



**WATFORD  
BOROUGH  
COUNCIL**

# **COUNCIL MEETING**

**19 July 2021**

**7.30 pm**

**Watford Colosseum, Watford**

## **Contact**

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**Publication date: 9 July 2021**

9 July 2021

Councillor

You are hereby summoned to attend a meeting of the Council of the Borough of Watford to be held on Monday, 19 July 2021 starting at 7.30 pm at the Watford Colosseum, Watford to take into consideration and determine upon the following subjects, namely: -

**1. Apologies for Absence**

**2. Disclosure of Interests**

**3. Minutes**

The [minutes](#) of the meeting held on 25 May 2021 to be submitted and signed.

**4. Official Announcements**

**5. Mayor's Report (Pages 5 - 9)**

**6. Questions by Members of the Council under Council Procedure Rule 10.0**

**7. Questions by Members of the Public under Council Procedure Rule 11.0**

**8. Petitions presented under Council Procedure Rule 12.0**

**9. Business especially brought forward by the Chairman or the Head of Paid Service which in the opinion of the Chairman should be considered as a matter of urgency.**

**10. Local Development Scheme (Pages 10 - 32)**

Report from Cabinet incorporating the report of the Spatial Planning Manager

**11. Watford Local Plan: Submission Document (Pages 33 - 976)**

Report from Cabinet incorporating the report of the Spatial Planning Manager

**12. Review of Parliamentary Boundaries (Pages 977 - 979)**

Report of the Group Head of Democracy and Governance

**13. Neighbourhood Locality Fund Annual Report 2020/21 (Pages 980 - 984)**

Report of the Democratic Services Manager

**14. Scrutiny annual report 2020-21 (Pages 985 - 995)**

Report of the Senior Democratic Services Officer

**15. Motions submitted under Council Procedure Rule 13.0**

1. The following motion has been proposed by Councillor Bell and seconded by Councillor Smith –

“Watford Council condemns the proposals in the Government’s planning bill that will take away our local democratic oversight and scrutiny of planning applications.

Planning will be taken away from locally elected representatives and handed over to development boards appointed by Ministers in Whitehall.

The boards will zone areas for future development. Residents living in areas designated for growth or renewal will find that they no longer have the right to object to tower blocks at the end of the Road, to the concreting over of green space or to oversized developments that will overburden local infrastructure here in Watford such as roads, GP surgeries and public transport.

Watford Council believes that regeneration works best for all our residents if we have a strong local partnership between the Council, local community groups and developers.

The best developers understand this and its in their interests to work positively with the council and our communities in this collaborative way.

This Council resolves that the Mayor writes to the secretary of state for Housing, communities and Local Government expressing our strong objections to the new planning bill and we want to keep the right of communities to object to individual planning applications.”

2. The following motion was proposed by Councillor Turmaine and seconded by Councillor Watling –

**TITLE: INFORMING MEMBERS OF WARD ACTIVITY**

This council notes that all members work towards responding to residents needs and delivering the best service they can as an elected councillor for the area that they represent.

In order to effectively achieve this, members need to know about activity that the council is planning or undertakes in their ward ahead of it happening, so that they have the opportunity to be involved and can

represent their residents' interests.

Therefore, this council resolves to:

- Ensure that all relevant staff are aware of the requirement to keep local ward members informed and that the timing of such information allows members to contribute to those discussions.
- Local ward members should also be kept informed about matters affecting their wards during the formative stages of policy development. It is important in an effective democratic process that they know early on if they are to deal with their constituents' concerns or to exert influence on their behalf.
- If local ward members do not attend such a meeting for whatever reason, they should be advised by the convenor of the meeting (provided the meeting is convened by the Council or its officers) of any significant outcome.
- Whenever the Council undertakes any form of consultation exercise, the local ward members will be notified at the outset of the exercise.
- Local ward members will be advised of all planning applications relating to their wards (and be able to view them within the Council as the Planning Authority). Licensing applications are available for viewing on the website, which is routinely updated.
- Where any public meeting to be held in a member's ward is arranged by the Council the local ward members for the ward in which the public meeting takes place will be informed of the event and invited to attend by the Chief Executive or relevant Director.
- Local ward members will be invited to the opening of any Council buildings/projects or launches of services in their wards.
- A copy of the Mayoral Engagement List shall be sent by electronic means to all members in order that they are kept informed of the Mayor/Deputy Mayor's attendance at any occasion in their ward.
- Where a local liaison or local consultation group is established by the Council, local ward members should be invited to attend to observe if not appointed as a member of the group.
- Any publicity activity organised by officers in a member's ward whether of a local nature or borough wide nature will seek to involve the relevant local ward members.

A handwritten signature in dark ink, appearing to read 'Donna Nolan', with a horizontal line extending to the right.

**Donna Nolan, Managing Director**

## **Elected Mayor's Report – July 2021**

As I write this report, I note that we were in a similar position this time last year, coming out of lockdown, with businesses starting to open again. However, the difference this year is that a lot of our community has now been vaccinated and the government believes this is the final time we will be exiting lockdown. While it is a positive position to be in, we must remain cautious as we get back to 'normal' because Covid-19 has not gone away and even though restrictions are lifting there are still risks.

On 5<sup>th</sup> July, I was pleased to be able to celebrate the work of the NHS, Social Care and Frontline workers for an inaugural celebration and service of remembrance. Joined by people who have worked on the frontline in Watford throughout the pandemic, we were able to reflect on the events of the past 18 months and say thank you to all those who have worked so hard to keep our community going. I would like to once again thank all the doctors, nurses, teachers, carers, retail workers, waste operators, bereavement services, and many more who have carried on throughout the pandemic, as well as those who have had to close to protect the country.

### **Covid-19 Response**

#### **Community protection and support**

Our Town Hall Vaccination Clinic has now been open for 5 months and has been doing an amazing job helping to get our residents vaccinated with the support of pop-up clinics within the community such as at Watford Mosque, Wellspring Church, Stanborough Park Church, and various GP practices across the borough. We were also able to hold a mass vaccination clinic at Vicarage Road last month to escalate our vaccination effort. I would like to thank council officers, the NHS, Watford Football Club and the Chamber of Commerce for their support in organising the event in such a short time frame and for making the day such a success. In Watford, we have now delivered over 110,000 doses of Covid-19 vaccinations.

#### **Supporting local businesses**

The Council has been very supportive of all of the town's businesses throughout the pandemic and has made an effort to come up with a variety of ways to provide both financial and practical support to local companies. Most recently, we have launched a new scheme to provide expert advice and support to small businesses adversely affected by the COVID-19 pandemic; the Watford Business Growth Grant Scheme is delivered in partnership with Hertfordshire Growth Hub and has the potential of allocating grants of up to £5,000 to small businesses in Watford.

We have also continued to promote our 'shop local' campaign as restrictions have lifted and encouraged people to visit their local shops, cafés and restaurants.

Through the government's restart grants scheme we have supported various businesses in the town to reopen upon the easing of lockdown restrictions. We have so far paid out £792,029 to 197 non-essential retail businesses and £3,674,000 to 352 Hospitality, Leisure, Personal Care & Gyms.

### **Community engagement**

As restrictions have started to ease, I have made an effort to start getting out and seeing people once again face-to-face alongside continuing virtual communications and engagements such as my regular Facebook Live Q&A, virtual surgeries and sending my weekly newsletter to residents. One of the ways in which I have been able to engage with residents is through a new initiative we launched during Mental Health Awareness Week where I went for 'walk and talk' sessions in our parks. The Mental Health Walks were a great opportunity to reflect on some of the mental health implications of the pandemic and also to speak to residents about ideas, concerns and questions they had.

We have continued to distribute 'Unsung Hero' Awards to people within Watford who have been particularly inspirational over the last 18 months and have gone above and beyond to support their local communities. I would like to take this opportunity to thank everyone who has volunteered in Watford over this period and look forward to meeting more unsung heroes in the upcoming months.

### **Delivering my manifesto and working for the town**

#### **Sustainability in Watford**

We continue to promote sustainable transport methods in the town and have once again seen an uptick in use of our Beryl bike hire scheme and Arriva Click on-demand bus service as lockdown restrictions have started to ease. There have now been over 122,000 Beryl Bike journeys since it was launched just over a year ago.

It has also been great to see both Beryl and Arriva Click teaming up with the council to offer free rides for people getting vaccinations.

As part of our commitment to make Watford a more environmentally friendly place, the Council has been supporting residents to make their homes more energy efficient through grants to install energy saving measures including external wall, underfloor and roof insulation as well as smart heating controls. Not only will the work improve the sustainability of homes, but it will also help residents on lower incomes to reduce their energy bills.

### **Protecting Watford's heritage**

To further highlight the heritage of the town and the importance of Watford FC within the community, new commemorative artwork featuring the club's players from the 1919-1920 season has been installed at the entrance to King George V Playing Fields. The memorial created in partnership with the football club and Watford Museum features most of the Watford FC players from that season, and was chosen as it was the team from the early years of George V's reign.

### **Protecting our local environment**

Work is now underway in parts of Cassiobury Park to promote further biodiversity in Watford. In May, we launched a new rewilding project to introduce wildflower meadows into the park next year. Working with Hertfordshire & Middlesex Butterfly Conservative Trust and Friends of Cassiobury Park we have planted seeds which will encourage more butterflies, bees and insects and plays a big part in our ambition to be carbon neutral by 2030.

The other area of Cassiobury Park that we have just started working on is the wetlands. We are working with the Friends of Cassiobury Park, Herts and Middlesex Wildlife Trust, and Community Connection Projects CIC to restore the nature reserve and transform the area into a wetlands habitat for wildlife. The restoration works will not only improve biodiversity in the area and help to reduce flood risks, but will also create learning opportunities for the public with new boardwalks introduced to make the site family friendly and accessible.

I have also had the pleasure of participating in some of Watford's activities for the Great British Spring Clean. Organised by local community groups, there have been a number of litter picks taking place throughout Watford, including those on Ebury Way and Boundary Way which I was able to take part in. Thank you to everyone who is helping to keep Watford clean and tidy by organising and participating in litter picks.

### **Investing in our town**

After working hard with West Herts Hospital Trust to find space for a new multi-storey car park at Watford General Hospital, works are now underway on this project which will hopefully be of great help to patients, visitors and staff at Watford General. This will not only support the hospital as it currently stands, but should be in place for years to come as the redevelopment of the hospital becomes a reality.

### **Supporting the most vulnerable**

The latest round of the Mayor's Small Grants Fund (MSGF) has been distributed to a variety of charities based in Watford. The MSGF is a great opportunity to work with some fantastic charities and organisations in Watford to ensure they can continue to support the most

vulnerable in our communities. This year we have been able to award over £40,000 to support Random Café, Watford Workshop, StrongMen, Watford & Three Rivers Refugee Partnership, Everett Rovers Football Club, Watford Jazz Junction, Disability Watford, West Herts Amateur Boxing Club, Dignify, Herts Inclusive Theatre, Ngorli CIC, Octagon Music Society, Watford Salvation Army, Small Acts of Kindness, Playskill and Mencap.

The Council has also been able to support Watford Mencap to find a new home so they can continue to provide vital services for the local community. The charity has completed the purchase of 92a Langley Road and will be completing refurbishment works to the property over the next few months. The new home marks the start of an exciting future for the charity, providing scope for more facilities and services and offering a hub for similar activities run by other groups and organisations.

The Council, along with partners Cathartic, Home Instead and West Herts College celebrated this year's Dementia Action Week with a number of events, fundraisers and training sessions throughout the town. A key part of Watford's goal to be a more dementia friendly town, Dementia Action Week was also seen as a fantastic opportunity to restart the town's programme of activities that were severely curtailed due to Covid-19. I'd like to thank everyone who worked so hard to make the week a success. We are always looking for more businesses and community organisations to support this project and I look forward to the programme continuing to expand over the coming months and years.

### **Improvements to leisure facilities**

One of my key manifesto commitments was to help bring a brand new family friendly facility to Woodside Playing Fields. The first phase of the development project was approved last year, and good progress has been made with planning and design work. The first phase focuses on creating the Woodside Community Sports Village, with a range of developments to improve the sports facilities on site, promoting an active lifestyle and encouraging greater use of the park by residents and visitors. I would like to thank officers who have been working hard to make this project happen and deliver yet more fantastic leisure facilities for our residents. Construction is scheduled to start in early 2022.

To further expand on our offering of free facilities available for residents, we have installed two new table tennis tables outside the library. This follows the success we have seen in similar facilities at Oxhey Activity Park and Cassiobury Park. I hope we will begin to see even more people enjoying the sport, getting fitter and making friends. Long-term, our hope is that we can encourage communities and local table tennis clubs to get involved and support the project by volunteering and providing group social sessions wherever possible.

### **Events in Watford**

It is fantastic to be able to see live events returning to Watford and people having the chance to enjoy different experiences once again. In May, the Council welcomed the



successful Magical Maze to the town centre for the first time, offering family friendly fun for free over half term. More recently we have also seen the return of our big events start with Big Dance, and other arts and cultural offerings in the town such as Imagine Watford, organised by Watford Palace Theatre. We are also looking forward to welcoming the Stage in the Park to Cassiobury Park which will be putting on a variety of live performances during the summer with many special guests. These fantastic events help bring Watford residents together, and after so long of being unable to see one another, it's important that we can come together in safe ways. Thank you to everyone in the council and our partners who is helping to make these exciting events happen.

### **Defending the interests of our residents**

The Government has made it clear that they intend to press ahead with making changes to the planning system, including increasing permitted development rights and removing the power of local authorities to have a say in the way their areas develop. When I was elected as Mayor of Watford, I made a commitment to our residents to stand up for their interests. Therefore, I have recently written to the Minister for Housing, Communities and Local Government to ask that the housing target for Watford be reduced as this is what is in the best interest of our residents. Current targets are unrealistic and don't take into account space that is available to build on, meaning that places such as Watford which are already relatively built up are forced to build taller buildings, something which I know our residents don't want to see more of.

# Agenda Item 10

## Report to Council – 19 July 2021

## Report of Cabinet – 5 July 2021

Present: Mayor Taylor (Chair)  
Councillor Dychton (Deputy Mayor and Portfolio Holder for Community)  
Councillor Johnson (Portfolio Holder for Commercial Property, Planning and Housing Services)  
Councillor Pattinson (Portfolio Holder for Wellbeing)  
Councillor Stotesbury (Portfolio Holder for Transport and Sustainability)  
Councillor Watkin (Portfolio Holder for Resources)

Also present: Councillor Bell, Labour Group Leader  
Councillor Turmaine, Chair of Finance Scrutiny Committee

Officers: Managing Director  
(Shared Services) Director of Finance  
Group Head of Democracy and Governance  
Head of Planning and Development  
Spatial Planning Manager  
Democratic Services Manager

There was the following recommendation to Council.

### 17. **Local Development Scheme**

Cabinet received a report of the Spatial Planning Manager which set out the subject, scope and timetable for the preparation of the Development Plan Documents, including the Watford Local Plan.

The Mayor invited Councillor Johnson, Portfolio Holder responsible for planning, to present the report.

Councillor Johnson informed members that the last update had been in October 2020. The revised scheme reflected an updated position prior to the submission of the Watford Local Plan to the Secretary of State.

The Head of Planning and Development added that it was essential to ensure the Local Development Scheme was up to date prior to the Watford Local Plan's examination. It is expected the examination will take place during December 2021 or January 2022 with a targeted adoption date of June 2022.

RESOLVED –

1. That Cabinet recommends to Council the Local Plan timetable, attached as Appendix A, be adopted.
2. Cabinet recommends to Council that, minor updates to the Local Development Scheme be delegated to the Head of Planning and Development in consultation with the Portfolio Holder for Commercial Property, Planning and Housing Services.

## Part A

**Report to:** Cabinet

**Date of meeting:** 5 July 2021

**Report author:** Spatial Planning Manager

**Title:** Local Development Scheme: Timetable for the New Watford Local Plan

### 1.0 Summary

1.1 The Local Development Scheme (LDS) sets out the subject, scope and timetable for the preparation of Development Plan Documents. The LDS includes the Local Plan which will set out the growth strategy, policies to guide planning decisions and identify sites for development.

1.2 The LDS, adopted in March 2019 and last revised on 13 October 2020, has been reviewed to update the timetable for the different stages of preparing the new Local Plan leading to its anticipated adoption in June 2022. The revised LDS will cover a period from 2018 to 2022 and supersedes the timetable set out in the current LDS.

1.3 The Local Development Scheme is a legal requirement. It provides certainty for the council, external stakeholders and the community about how the Local Plan will be prepared. The Cabinet is asked to support the document and recommend that it be taken to council for adoption.

### 2.0 Risks

#### 2.1

<b>Nature of risk</b>	<b>Consequence</b>	<b>Suggested Control Measures</b>	<b>Response</b> (treat, tolerate, terminate or transfer)	<b>Risk Rating</b> (combination of severity and likelihood)
Local Development Scheme not	Challenged by Planning Inspector at	Engagement with members and corporate officers	Treat	6

kept up to date	the Local Plan examination.  Local community not kept informed of progress on the Local Plan.	about progress on the Local Plan and compliance with the set timetable.		
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### 3.0 Recommendations

- 3.1 That Cabinet recommends to Council the Local Plan timetable, attached as Appendix A, be adopted.
- 3.2 Cabinet recommends to Council that, minor updates to the Local Development Scheme be delegated to the Head of Planning and Development in consultation with the Portfolio Holder for Commercial Property, Planning and Housing Services.

#### Further information contact:

Contact: Jack Green, Spatial Planning Manager

Email: [Jack.green@watford.gov.uk](mailto:Jack.green@watford.gov.uk)

Telephone extn: 8093

**Report approved by:** Ben Martin, Head of Planning and Development

### 4.0 Detailed proposal

- 4.1 The Local Development Scheme (LDS) sets out what the Local Plan will cover and the timetable for its preparation. It is a public document and one that is referred to in the examination process. The proposed LDS is set out as Appendix A to this report.
- 4.2 The proposed LDS presented is a revised version of that adopted in October 2020. This is to update the timetable reflecting discussions with the Planning Inspectorate and Planning Officers Society who have suggested the timetable for the Examination will take longer than set out in the current LDS given available resources. The primary change made to the document is to the timetable for adoption of the new Local Plan to June 2022 with the submission of the final draft Local Plan to the Secretary of State at the end of July 2021.

- 4.3 At examination, an independently appointed Planning Inspector will consider whether the Local Plan document being examined has been prepared in accordance with the latest LDS. This forms part of the assessment of soundness. It is therefore important that the scope and preparation timetable are both accurate and achievable, given available resources, and potential changes to those resources.
- 4.4 The proposed LDS sets out a timetable for completing the new Local Plan. This will replace the Local Plan Part 1 Core Strategy adopted in 2013 and any remaining “saved” policies from the Watford District Plan 2000 adopted in 2003.
- 4.5 Local Plans are required to be no older than five years to be considered up to date. The Watford Local Plan (Core Strategy) adopted in 2013 no longer meets this requirement. Additionally, local authorities are required to work constructively and collaboratively when preparing a new Local Plan. Work has already begun on the evidence to inform the Local Plan review including several jointly commissioned studies with other authorities in the South West Hertfordshire area. Additionally, Watford and the other South West Hertfordshire authorities have agreed to work collaboratively on a Joint Strategic Plan to address cross boundary issues related to future growth.
- 4.6 The LDS sets out a timetable for a review of the Local Plan to ensure it remains up to date. It is anticipated the new Local Plan will be June 2022.

## 5.0 **Implications**

### 5.1 **Financial**

- 5.1.1 There is an agreed annual budget of approximately £300,000 to support Local Plan preparation (including officer time). It is estimated that around £75,000 per year will be required for the evidence studies and sustainability appraisal, and engagement programme, of which much of this has already been committed. It is also anticipated that a further £150,000 will be required for examination costs (including legal support); any budget shortfall will be met from the Planning Fee Income.
- 5.1.2 The Shared Director of Finance comments that any financial implications will be met from existing budgets.

## 5.2 **Legal Issues** (Monitoring Officer)

5.2.1 The Group Head of Democracy and Governance comments that the LDS must be approved by Council and is a legal requirement as part of the Local Plan development process.

## 5.3 **Equalities, Human Rights and Data Protection**

5.3.1 Having had regard to the council's obligations under s149 of the Equality Act 2010, it is considered that No equalities impact has been identified in relation to the scope and preparation timetable of the Local Plan. The Local Plan documents will be subject to equalities impact assessment as they are prepared.

## 5.4 **Data Protection Impact Assessment**

5.4.1 Having had regard to the council's obligations under the General Data Protection Regulation (GDPR) 2018, it is considered that officers are not required to undertake a Data Processing Impact Assessment (DPIA) for this report.

## 5.5 **Staffing**

5.5.1 The team currently has the staff resources available to deliver the Local Plan to the time table set out in the Local Development Scheme.

## 5.6 **Sustainability**

5.6.1 Progressing the Local Plan will help the council to make decisions on planning applications to help achieve sustainable development. The Local Plan documents themselves will be subject to separate sustainability appraisals.

## 6.0 **Appendices**

- Appendix A: Local Development Scheme: Timetable for the New Watford Local Plan

## 7.0 **Background papers**

7.1 No papers were used in the preparation of this report.

Local Development Scheme  
Timetable for the New Watford Local Plan  
July 2021

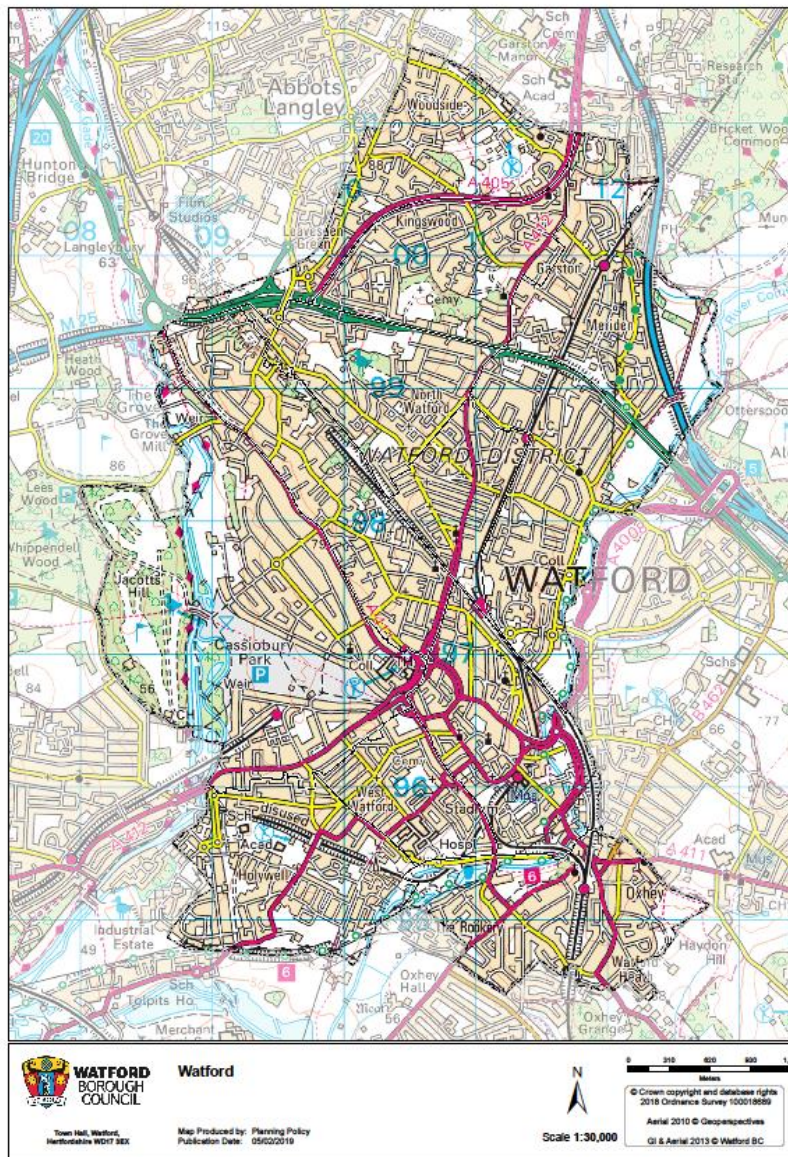


[watfordlocalplan.co.uk](http://watfordlocalplan.co.uk)





## Watford Local Plan Coverage



## Summary Timetable

Notification	December 2016
Issues and Options consultation	September – October 2018
First Draft Local Plan consultation (Preferred Options)	September – October 2019
Publication	January 2021
Submission	July 2021
Examination	September 2021 – April 2022
Adoption	June 2022

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## What is the Local Development Scheme?

Local authorities are required to prepare and maintain a Local Development Scheme (LDS). The LDS sets out the three year timetable for the new Local Plan. This document updates the timetable set out in the previous LDS which was adopted in October 2020 and will be reviewed on a regular basis.

The LDS includes a summary of the content and geographical area covered by each document, the timetable for their preparation and subsequent review. The requirement for an LDS is set out in the [Planning and Compulsory Purchase Act](#) (2004), as amended by the [Localism Act](#) (2011). It states that the scheme must specify the local development documents which are to be development plan documents and include:

- the subject matter and geographical area to which each development plan document is to relate
- which development plan documents (if any) are to be prepared jointly, with one or more other local planning authorities
- any matter or area in respect of which the authority have agreed (or propose to agree) to the constitution of a joint committee under section 29
- the timetable for the preparation and revision of development plan documents and
- such other matters as are prescribed.

Progress on the Local Plan will be monitored through the local authority's monitoring report and inform future versions of the document. These updates will be made available on the council's website.

## Current Development Plan

The preparation of a local plan is guided by the National Planning Policy Framework (Revised 2018). This national guidance includes a presumption in favour of sustainable development when preparing plans and making planning decisions.

The development plan includes all of the adopted planning documents that set out policies and proposals for the development and how land is to be used in the borough. This includes those prepared by Watford Borough Council, Hertfordshire County Council and neighbourhood plans prepared by neighbourhood groups.

The development plan guides planning decisions and ensures these are rational and consistent, having regard to material considerations. Development plans require updating to ensure decisions are made based on up to date planning policies and that future needs are appropriately planned for.

## Watford Local Plan Documents

The Watford Local Plan consists of several Development Plan Documents (Figure 1).

**Figure 1.** Watford Local Plan Documents



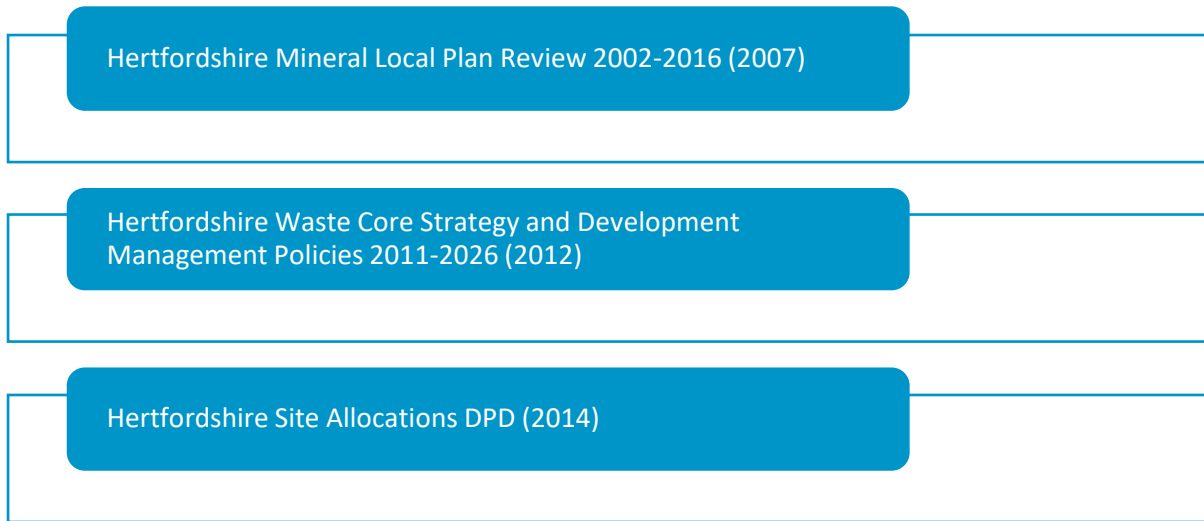
The revised National Planning Policy Framework (2018), and accompanying Planning Practice Guidance (PPG) are material considerations but do not form part of the Development plan.

Local Plan - Part 2 Site Allocations and Development Management Policies 2006-31 was intended to include more detailed policies and allocations to deliver the vision set out in the Core Strategy. However, the council resolved not to progress the Local Plan Part 2 but to instead switch to the preparation of a new Local Plan. A new Local Development Scheme and timetable have therefore been prepared to reflect this change.

## Other Development Plans Covering Watford Borough

In addition to documents that Watford has prepared and adopted, there are other Development plan documents prepared by Hertfordshire County Council that form part of the Watford Development Plan (Figure 2).

**Figure 2.** Hertfordshire County Council documents forming part of the Watford Local Plan



## Strategic Planning and the Duty to Cooperate

The ‘duty to cooperate’ was brought in through the Localism Act (2011). To make plans more effective, it requires local planning authorities and other relevant bodies and organisations to work collaboratively and constructively to discuss cross-boundary issues when development plan documents are being prepared.

### Joint Working

The Local Development Scheme sets out a commitment and timetable for the preparation of the Local Plan. In addition to Watford, neighbouring authorities are also preparing their respective local plans.

Watford shares a variety of cross boundary issues with neighbouring areas. Collaborative working to discuss shared issues and constructively consider how these can be addressed through coordinated development has improved, and continues to do so, over time. Watford has also been working collaboratively with other partners to support development including the Local Enterprise Partnership.

**Figure 3.** Area covered by the South West Hertfordshire Joint Strategic Plan



## South West Hertfordshire Joint Strategic Plan

The local authorities of Dacorum, Hertsmere, Three River, St Albans and Watford, with the additional involvement with Hertfordshire County Council, have come together and agreed to work on the South West Hertfordshire Joint Spatial Plan (JSP). This Plan will identify key strategic issues in the area and set out a growth strategy for the South West Hertfordshire area.

Preparation of the Joint Strategic Plan will take place alongside the Local Plans being undertaken by each respective council and will provide a platform to consider how the growth challenges in the wider South West Hertfordshire area can be addressed in the long-term.

## Future Development Plan

### Local Plan Review

Since the Watford Core Strategy was adopted in 2013. There have been many changes in the planning system.

The National Planning Policy Framework was revised in 2018 and requires local authorities to have an 'up to date' local plan. This is when the local plan is less than five years old and makes provision for the housing required during this time span. Local Plans are also expected to identify land for development to cover a period of 10 years.

In 2020, the Government amended national guidance on how to calculate housing need. This is a standard methodology that is to be used by all local authorities to set out the number of homes required over the next ten years and over the period covered by the Local Plan.

The Core Strategy set out a housing target of 260 dwellings per year to 2031. This was based on the East of England Plan requirements. In 2016, the South West Hertfordshire Strategic Housing Market Assessment identified a need for 577 dwellings per year.

The review will result in a new Local Plan which will include strategic planning policies, development management policies and site allocations. These will be set out in a single document and will be represented on the Policies Map.

### Neighbourhood Plans

Neighbourhood Plans were introduced through the Localism Act (2011) and subsequent regulations such as [The Neighbourhood Planning \(General\) Regulations 2012](#) and the [Neighbourhood Planning Act 2017](#). The area and issues covered by a neighbourhood plan are identified and set out by the neighbourhood planning group. Neighbourhood plans once adopted become part of the Development Plan. They are a material consideration when making planning decisions. As of June 2021, there were no neighbourhood plans in the borough.

## Statement of Community Involvement

The Statement of Community Involvement (SCI) was adopted by the council in November 2019. The document sets out how the council will involve and engage with the community during the preparation, monitoring and review of development plan documents and planning applications.

Following the circumstances related to the pandemic affecting the Local Planning Authority, the Statement of Community Involvement will be revised to set out how the Local Planning Authority will engage with the community where face to face meetings and events are not possible or advised.

## Other Documents to be Prepared

### Authority Monitoring Report

The council aims to publish a monitoring report (AMR) annually. It covers the year from the start of April of the preceding year to the end of March. The AMR compares the progress of Local Plan preparation to the timetable in the LDS. It also assesses the effectiveness of local plan policies, the significant effects, and reports that monitor data for the borough.

The AMR will therefore act to flag up both policy changes which may be required, and whether a review of the preparation timetable is necessary.

### Supplementary Planning Documents

Supplementary planning documents (SPDs) provide additional detail and guidance to support policies in the development plan. These documents are subject to public consultation and are a material consideration when making planning decisions. However, they cannot be used to set out new policies.

### Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a mechanism to gather financial contributions generated by new development to provide new infrastructure, both locally and strategically. The CIL Charging Schedule was adopted by Watford in 2015. It sets out the standard charge that particular types of new development are required to pay. The CIL will be kept under review to ensure it appropriately reflects development requirements and viability considerations critical to the Local Plan.

### Infrastructure Funding Statements

Infrastructure Funding Statements are prepared annually and set out the funds received by the Local Authority that have been generated by new development, through CIL or section

106 agreements. The statement sets out the projects, or types of infrastructure, that have been allocated or accrued funds to deliver infrastructure.



## Risk Assessment for the Emerging New Watford Local Plan

Risk	Likelihood	Impact	Mitigation
Changes in national policy and regulations which require a significant alteration to emerging plan content.	High	Medium	Highlight issues and concerns through responses to Government consultations. Access external support from agencies such as the Planning Advisory Service (PAS).
Preparation of Local Plan and/or the Joint Strategic Plan fails to meet key project milestones.	High	Medium	Achieving key milestones is integral for the continuity of a project and to progress work that is to follow. This can be mitigated through good project management, project coordination through shared resources and setting out clear objectives with regular dialogue between authorities. Can be supported by joint working on evidence bases.
Preparation of evidence base documents is delayed.	High	Medium	The evidence base is critical to underpin approaches and policies set out in the Local Plan. Delays can adversely affect progress on the Plan and compromise the overall timetable for completion. This can be mitigated by good project management of internal projects and external consultants and anticipating the potential ramifications of delays on other aspects of the Local Plan when being prepared.
Failure to agree critical cross boundary strategic planning issues with prescribed Duty to Co-operate bodies.	Medium	Medium	Strategic issues are important to consider so development can be brought forward effectively to benefit the local and wider area. This will require continued and regular engagement with key stakeholders and retaining an up to date evidence base.

Unexpected issues and quantity of consultation responses.	Medium	High	Consultations are important to gain views and ideas about the draft Local Plan as it is prepared. To reduce the potential for unexpected issues arising it will be important to have an up to date and robust evidence base and work with stakeholders and neighbouring authorities to address issues appropriately. Temporary staff could be employed, however, this will have budgetary issues.
Loss of staff, experience and continuity.	Medium	High	Staff resources and their continuity are important to progress the Local Plan which can take several years to complete. Loss of staff can be mitigated through the appointment of temporary staff and commissioning of consultants although this has budgetary issues. Undertaking exit interviews can help to clarify and understand issues. The Local Development Scheme timetable will be monitored and amendments can be considered.
Delays to decision making process	Medium	High	Decision making can accelerate and delay the preparation of the Local Plan. The potential for delays can be reduced by keeping key stakeholders and parties informed of progress. On-going officer and member training related to key planning issues will help with understanding of the Local Plan and clarifications through legal advice can be obtained when necessary. Good project management will be required and the arranging 'special' meetings for Cabinet and Council if required.

Emerging neighbourhood plans	Low	Low	Neighbourhood plans do not have a predictable nature for where they could arise in Watford or what their timetable may be. These will require staff resources and it will be important to have a clear and consistent approach to supporting neighbourhood planning groups. From the outset, dialogue with neighbourhood planning groups will need to highlight the importance of being consistent with the Development Plan.
Pressure on financial resources	Medium	High	Preparing a Local Plan will incur financial costs. Reducing funding pots and competing priorities are increasing the pressure on financial resources available to support the production of a local plan. This can be mitigated by being proactive to identifying costs early in the project, ensure a coordinated approach between council officers, teams and elected members to make effective use of resources available and deliver mutually inclusive corporate objectives. Commissioning evidence bases jointly with neighbouring authorities can improve efficiency and reduce cost. Access grant funding and other external financial sources of finance can supplement in-house funding.
Capacity of Planning Inspectorate (PINs) and other statutory consultees	Medium	Medium	The latter stages of the Local Plan require the involvement of the Planning Inspectorate as part of the examination process. Delays can be mitigated with on-going dialogue with the Planning Inspectorate and key stakeholders.

Local Plan found 'unsound'	Medium	High	An unsound Local Plan can result in significant delays. To minimise the potential for this taking place is preparation of a quality evidence base that is robust and up to date. To mitigate the potential for an unsound Plan will require working collaboratively with external stakeholders, statutory consultees, and neighbouring authorities as part of the Joint Strategic Plan. Additionally, obtain legal advice when required.
Legal challenge	Medium	High	Obtain legal advice when required and ensure documents supporting the Local Plan are robust.

## Preparing a Development Plan Document

The stages to prepare a development plan document are set out in the Figure 3. References to 'Regulations' relate to The Town and Country Planning (Local Planning) (England) Regulations 2012.

## Key Stages of Preparation

Starting Point	Consultation on the scope of the sustainability appraisal
Identification of the scope and information content of the sustainability appraisal followed by a consultation with statutory consultees.	
Regulation 18	Informing stakeholders about undertaking a new local plan
Notifying those bodies or persons specified in the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 that we intend to prepare a local plan; the subject of that document, and inviting representations on what such a document should contain. Responses will inform the local plan document.	
Regulation 18	Public participation in the preparation of the development plan document
Optional consultation on the early draft of the local plan to further inform content to be contained in the document.	
Regulations 19 and 20	Publication of the development plan document
The local plan, as intended for submission to the Secretary of State, will be published for formal consultation.	
Regulation 22	Submission of the development plan document to the Secretary of State
The local plan is submitted for independent examination by a planning inspector, along with all comments received at the publication stage, supporting evidence bases and the sustainability appraisal.	
Regulation 24	Independent examination
An independent inspector is appointed by the Planning Inspectorate to assess the soundness of the submitted plan. The inspector will take all comments received into account.	
Regulation 25	Inspectors examination report
The Planning Inspector will release a report setting out recommended changes and if the development plan document should be adopted.	
Regulation 26	Adoption
The council formally adopts the local plan as part of the development plan.	

## Preparation Schedule

<b>Title</b>	Watford Local Plan	
<b>Subject Matter</b>	The Local Plan will set out the overall spatial strategy, strategic development priorities and objectives, site allocations, criteria based policies and a monitoring framework to guide development in Watford to 2036.	
<b>Status</b>	Development Plan Document	
<b>Geographic coverage</b>	Watford Borough	
<b>Timetable</b>	Issues and Options consultation	September - October 2018
	First Local Draft Plan consultation (Preferred Options)	September - October 2019
	Publication of the Local Plan (Final Draft Local Plan)	January 2021
	Submission for examination	July 2021
	Examination	September 2021 – April 2022
	Inspectors report	May 2022
	Adoption	June 2022

## Timeline for the Review of the Local Plan

2018					2019							2020																				
A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D				
▲												●																				
2021												2022																				
J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D									
◆					■							■					+	★														

- ▲ Local Plan Issues and Options consultation (Regulation 18)
- First Draft Local Plan consultation (Regulation 18)
- ◆ Publication of Final Draft Local Plan consultation (Regulation 19)
- Submission of the Draft Local Plan to the Secretary of State
- Examination Hearings
- ✦ Inspectors Report
- ★ Adoption

## Evidence Base

Development plans and planning policies need to be based on a robust evidence base. During the preparation of the development plan the studies and surveys will need to be carried out. These will be undertaken by the council and through the commissioning of consultants.

## Sustainability Appraisal

Development plan documents are subject to a Sustainability Appraisal, which includes fulfilling the requirements for the Strategic Environmental Assessment (SEA) EU Directive. This Directive will continue to be adhered to by the UK Government post Brexit. The purpose of an SA is to assess the economic, environmental and social impacts of a strategy or proposal and provide additional information about the potential implications of alternative strategies as planning policies evolve. The process runs alongside the preparation of development plan documents.

## Soundness

Local authorities are required to prepare a plan that it considers to be 'sound'. This requirement is tested by an independent planning inspector as part of an Examination in Public. To satisfy the tests of soundness the National Planning Policy Framework (paragraph 35) requires a local plan to be:

### Positively prepared:

providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

### Justified:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

### Effective:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground and

### Consistent with national policy:

Enabling the delivery of sustainable development in accordance with the policies in this Framework.

## Resources

It is anticipated that sufficient in-house resources will be available for preparing the development plan documents.

The need for an external consultant to fulfil our Sustainability Appraisal and Strategic Environmental Assessment requirements is ongoing. When required, external consultants may be commissioned to prepare background evidence base studies to support the Local Plan.



## Report to Council – 19 July 2021

## Report of Cabinet – 5 July 2021

Present: Mayor Taylor (Chair)  
Councillor Dychton (Deputy Mayor and Portfolio Holder for Community)  
Councillor Johnson (Portfolio Holder for Commercial Property, Planning and Housing Services)  
Councillor Pattinson (Portfolio Holder for Wellbeing)  
Councillor Stotesbury (Portfolio Holder for Transport and Sustainability)  
Councillor Watkin (Portfolio Holder for Resources)

Also present: Councillor Bell, Labour Group Leader  
Councillor Turmaine, Chair of Finance Scrutiny Committee

Officers: Managing Director  
(Shared Services) Director of Finance  
Group Head of Democracy and Governance  
Head of Planning and Development  
Spatial Planning Manager  
Democratic Services Manager

There was the following recommendation to Council.

### 18. **Watford Local Plan Submission Document**

Cabinet received a report of the Spatial Planning Manager which included the draft Watford Local Plan and proposed modifications. Cabinet was asked to review the documents which would then be forwarded to Council for final approval.

The Mayor invited Councillor Johnson to introduce the report.

Councillor Johnson informed members that the draft Watford Local Plan had been developed over seven years and had involved many people. It was an important document for the council to have and it was not possible for the authority to move forward without it in place. The draft Local Plan addressed the housing targets. It set out the council's approach to delivering new development and the policies included as part of the draft Local Plan would be used to determine planning applications.

Councillor Johnson explained that the policies had been informed by a comprehensive evidence base, which was available on the council's website. A number of the background studies had been completed jointly with other

south west Hertfordshire authorities. This ensured that strategic issues were understood in a wider context across the council's boundaries. The document had been developed in several stages and comments had helped to shape the draft Local Plan. The draft Local Plan was accompanied by proposed modifications that would be put forward to the Planning Inspector for consideration as part of the Examination in Public.

The Mayor invited the Spatial Planning Manager to add further comments.

The Spatial Planning Manager added that the Planning Inspector would review the proposed modifications alongside the draft Local Plan. Some of the proposed modifications suggested were to amend the plan period from 2018-2036 to 2021-2037, including the Watford General Hospital as part of site allocation MU21 and the approach to fast food takeaways had been revised to require a Health Impact Assessment alongside a planning application rather than having a broad restriction on takeaway establishments located near education facilities which could be difficult to implement. The team was working with Historic England to undertake Heritage Impact Assessments on several sites to clarify potential impact of new development and identify appropriate mitigation measures that may be required. The team was working with a number of landowners on several site allocations objecting to the draft Local Plan on soundness grounds. Results of this work would also be submitted to the Inspector.

Councillor Bell stressed the importance of working with neighbouring authorities and the county council. He noted that some ex-John Lewis stores were being put forward for retail and residential development. He asked whether there were any similar plans for the Watford site.

It was noted that John Lewis no longer had any connections to the Watford site in Atria. The Spatial Planning Manager advised that a consultation response had been submitted to the council suggesting the south part of the former intu shopping centre could be redeveloped for housing as part of the draft Local Plan. However, this was not considered suitable and not put forward as a proposed modification. In response to Councillor Bell's first comment, the officer explained that the council had been working with its neighbouring authorities on strategic planning issues across the area for some time. Part of this work included the South West Hertfordshire Joint Strategic Plan that was being progressed.

RESOLVED –

That, Cabinet recommends to Council:

1. To agree the final draft Watford Local Plan, attached at Appendix A, and the Final Draft Watford Local Plan inclusive of proposed modifications (track changes), attached as Appendix B, be submitted to the Secretary of State Housing and Local Government for Examination in Public.
2. That, any minor updates to the Schedule of Proposed Main Modifications and Schedule of Proposed Minor Modifications can be made by the Head of Planning and Development in consultation with the Portfolio Holder for Commercial Property, Planning and Housing Services.
3. That, delegated authority be given to the Head of Planning and Development in consultation with the Portfolio Holder for Commercial Property, Planning and Housing Services, to undertake consultation on the Schedule of Main Modifications and Schedule of Minor Modifications, as recommended by the appointed Planning Inspector following the Examination in Public

## Part A

**Report to:** Cabinet

**Date of meeting:** 5 July 2021

**Report author:** Spatial Planning Manager

**Title:** Submission of the Final Draft Watford Local Plan

### 1.0 Summary

1.1 The proposed submission Watford Local Plan was published for consultation from 18 January to 18 March 2021. Following comments received, where appropriate proposed modifications for consideration during the examination have been drafted to address objections raised which are to be submitted alongside the final draft Local Plan. This report seeks Cabinet approval to take the final draft Local Plan and the proposed modifications to Council where it will be recommended for submission to the Secretary of State for an Examination in Public which is likely to be held in late 2021 / early 2022.

### 2.0 Risks

#### 2.1

<b>Nature of risk</b>	<b>Consequence</b>	<b>Suggested Control Measures</b>	<b>Response</b> (treat, tolerate, terminate or transfer)	<b>Risk Rating</b> (combination of severity and likelihood)
Plan not recommended for submission to the Secretary of State by Council	Timetable to examination extended. Changes to national guidance may need to be taken into account resulting in amendments and	Engagement with Members and corporate officers to explain key messages in the draft Local Plan.	Treat	6 (2x3)

	<p>additional consultation.</p> <p>Continue to rely on outdated planning policies reducing the Council's ability to manage development.</p>			
<p>Plan found unsound at examination</p>	<p>Adoption delayed.</p> <p>Planning decisions remain heavily weighted on an outdated Plan and national guidance.</p> <p>Reducing the potential to deliver high quality development and manage where it is located.</p>	<p>Engagement with stakeholders and progress Statements of Common Ground to resolve outstanding issues.</p> <p>Obtain legal advice as to Regulation 19 consultation is sufficient</p>		<p>8 (4x2)</p>

### 3.0 Recommendations

3.1 That, Cabinet recommends to Council:

- a. To agree the final draft Watford Local Plan, attached at Appendix A, and the Final Draft Watford Local Plan inclusive of proposed modifications (track changes), attached as Appendix B, be submitted to the Secretary of State Housing and Local Government for Examination in Public.
- b. That, any minor updates to the Schedule of Proposed Main Modifications and Schedule of Proposed Minor Modifications can be made by the Head of Planning

and Development in consultation with the Portfolio Holder for Commercial Property, Planning and Housing Services.

- c. That, delegated authority be given to the Head of Planning and Development in consultation with the Portfolio Holder for Commercial Property, Planning and Housing Services, to undertake consultation on the Schedule of Main Modifications and Schedule of Minor Modifications, as recommended by the appointed Planning Inspector following the Examination in Public.

**Further information contact:**

Contact: Jack Green, Spatial Planning Manager

Email: [Jack.green@watford.gov.uk](mailto:Jack.green@watford.gov.uk)

Telephone extn: 8093

**Report approved by:** Ben Martin, Head of Planning and Development

#### 4.0 Detailed proposal

- 4.1 The final draft Watford Local Plan (Appendix A) was consulted upon from 18 January to 18 March 2021. This consultation asked consultees if the document was compliant with the Tests of Soundness which includes four elements: is the Plan positively prepared, is the Plan justified, is the Plan effective and does the Plan comply with national policy. In addition to this, consultees were asked if the Plan was legally compliant and if the requirements of the Duty to Cooperate had been satisfied. The approach to consultation is set out in Appendix C and is consistent with Watford Borough Council's Statement of Community Involvement (2020).
- 4.2 82 organisations and individuals responded contributing 438 comments (Appendix D). This included 135 comments related to soundness (31%) and were a mix of support (72 comments), objection (63 comments), and general comments (303 comments). The representations related to a variety of issues and primarily focussed on: the growth strategy, housing, retail and the town centre, design, heritage, climate change, infrastructure, transport and site allocations.
- 4.3 Attached as Appendix B, is the final draft Local Plan document as consulted upon inclusive of Proposed Modifications. It is standard practice when referring a Local Plan for Examination in Public that the Proposed Modifications are contained in a separate document and not automatically incorporated into the Local Plan itself, even if the local planning authority accepts them. Ultimately it is for the planning inspector to decide whether to choose to accept the Proposed Modifications.
- 4.4 There are two types of Proposed Modifications; Main Modifications and Minor Modifications. Proposed Main Modifications are changes that directly relate to

decision-making and how the guidance and planning policies included in the Draft Local Plan are applied. The main issues raised that have resulted in proposed modifications, primarily to address issues of soundness, are set out in this report.

- 4.5 Proposed Minor Modifications do not materially affect the document, for example, grammatical amendments and clarifications on diagrams. A list of the Proposed Modifications can be found at the end of Appendix B (identified as Appendix Ba (Proposed Main Modifications and Appendix Bb (Proposed Minor Modifications)).

Growth Strategy:

- 4.6 Most comments suggested the time period covered by the draft Local Plan, 2018-2036, should be amended. It was suggested the plan period should start closer to the time of submission (2021) and be extended to at least 2037 to cover at least 15 years from the time the Plan is adopted, which is a requirement set out in the National Planning Policy Framework. The total housing requirement set out in the draft Plan should be amended to reflect changes to the plan period. It was also suggested that windfall development should not be counted until the fourth year of the draft Plan given the timescale of determining planning applications through to delivery.

- 4.7 In response, proposed modifications include amending the plan period from 2018-2036 to 2021-2037. The total number of housing units required would be reduced from 14,988 units (793 dwellings per year) to 13,171 units (784 dwellings per year). The housing trajectory set out in Appendix B of the draft Local Plan has been amended to reflect anticipated delivery of sites. The windfall figure has been revised so it is taken into account from 2024/25. The windfall allowance from 2024 to 2037 is an average of 156 dwellings per year and makes up approximately 15% of the total housing requirement in the draft Local Plan.

Housing:

- 4.8 The requirement for 35% affordable housing on sites was questioned. The requirement set out in the draft Local Plan is to be carried forward without modification as it has been supported by a viability study completed in January 2021. It was suggested that as part of a late-stage review requirement where a proposal has been granted planning permission without meeting the affordable housing requirement, developers should be able to provide either a financial contribution and/or be able to transfer units to a housing association (rather than just the latter). A proposed modification has been included to reflect these concerns as this would provide appropriate flexibility and support delivery.
- 4.9 The discounted market rent homes required as affordable housing on built to rent developments was challenged on the grounds that it was not compliant with national guidance as nomination rights should be left to the operator of the build to rent scheme. The draft Local Plan has been amended to clarify that nomination rights to discounted market properties is the responsibility of the operator but

should be agreed with the Local Planning Authority. This amendment reflects national guidance.

- 4.10 The requirement for nationally described internal space standards and higher accessibility standards were questioned in terms of their justification. No modifications are proposed in response to these comments based on the need to support health and wellbeing.
- 4.11 It was suggested that the provision of amenity space on large developments may not be feasible on some schemes and more flexibility was required. There are no modifications put forward to reduce the provision of on-site private amenity space. However, the text in the draft Regulation 19 consultation document is considered to be vague when referencing the provision of communal open space. To provide clarity, revisions to the supporting text have been added to clarify the standard carried forward from the Residential Design Guide (2016) of 50sqm if the site is not located within a five minute walk (400m) of an amenity green space that is of 0.1ha in size. This is set out in the supporting text rather than policy recognising that not all schemes may be able to achieve this standard but it should be expected where possible.

Employment:

- 4.12 It was suggested that retail should be permitted in designated employment areas based on job creation. No modifications have been put forward in response to this given that traditional employment uses such as offices, industry and storage are the focus of the designations. Small-scale retail uses that support existing uses are proposed to be permitted as part of the draft Local Plan. Clarification has been provided about the office impact test to be consistent with the retail impact test (threshold at which the impact of a proposal will have on other designations that accommodate this need in an area). This threshold has been amended from 250sqm to 2,500sqm.
- 4.13 The Colonial Way and Imperial Way industrial area is suggested to be amended to include the nearby concrete batching plant and rail aggregates facility. In the north of the borough, the operators of the Printworks Building located at the Dome roundabout have objected to being included in the designated industrial area. While they are currently being used for employment uses, they do not see their site as being well connected to the main body of the designation or contribute towards the overall objectives of the designation. They have requested the site either be removed from the designated employment area or be included as part of the mixed-use site allocation MU24 (Asda). In response, the draft Local Plan is not able to identify enough land for industrial uses to meet need to 2036, therefore, it is not proposed to remove this site from the designated employment area.



Retail and the Town Centre:

- 4.14 The approach to out-of-town retail uses was questioned in the context that these will not impact upon the types of retail provision in the town centre. There are no proposed modifications in response to this issue given the overall approach to mixed-use redevelopment within the Core Development Area and the intention to focus on the town centre as the key retail destination. Clarification has been added to clarify that when proposals have an area of 2,500sqm then an impact test will need to be carried out to establish if there will be an effect on the town centre.
- 4.15 The proposed policy in the final draft Local Plan that was consulted upon proposed an approach to restrict the location of fast food takeaways when located within 400m of a primary school. It was contested that this blanket restriction was not justified based on local evidence. Health is an important issue and has been sought to be addressed through the draft Local Plan where possible. There is evidence of a relationship between eating habits and obesity but this is limited with respect to being location specific. An amended approach has been set out to require a Health Impact Assessment for fast food takeaway proposals in general to provide better reflect local circumstances. .

Design:

- 4.16 There was a mix of support and objection to the proposed policy approach to building heights. In the Core Development Area and large sites outside of this designation it was stated that the base building height was too low and this underestimated site capacity (number of units per hectare). Outside of the Core Development Area there were concerns the base building height was too high. Proposed text modifications have been included to better explain that if taller buildings are proposed within the Core Development Area and may affect an existing area of lower building height that they should be designed to enable a transition between these two areas of different character. No further modifications are put forward as the building height policy acts as a trigger for further design considerations to be used to ensure development is appropriate and of very high design quality.
- 4.17 A proposed amendment has been put forward to clarify the requirement of no more than eight units off of a single core. This is to better reflect the individual characteristics of a development and ensure that the internal quality space is not compromised.

Heritage:

- 4.18 Several proposed modifications have been set out to make the section easier to read. Further work is being undertaken, at the request of Historic England, on seven sites and screening work on the three Strategic development Areas to better understand what potential impact there could be on nearby heritage assets. Recommendations from the work will be considered as part of the Examination

Historic England has agreed to work on a Statement of Common Ground if required to overcome the objection.

Climate change:

- 4.19 The higher building standards for new non-residential buildings were challenged on the grounds of viability. The viability assessment completed in 2021 indicated development to this standard should be viable, therefore, no modifications are proposed as it is considered an important part of addressing the climate change emergency. Clarifications are been put as to how groundwater protection will be accounted for in the draft Plan at the request of the Environment Agency.

Natural Environment:

- 4.20 Objections were raised on several areas of open space covered by planning policy. The green space located at Blackwell Drive is proposed to be amended to include all of the green space. An amended area covered by open space policy at the Kytes House estate in Garston has been proposed to include extensive tracts of green space but exclude the gardens that were identified on the Regulation 19 consultation Policies Map. It was suggested that Attenborough Fields be included as designated open space, however, no proposed modifications are put forward as the area is protected as Green Belt and it is an identified Priority Habitat so is protected by other policies in the draft Local Plan.

- 4.21 Text modifications are put forward in response to comments submitted by the Environment Agency and Hertfordshire County Council to place increased emphasis on improving green infrastructure and biodiversity as opportunities arise through new development.

Infrastructure:

- 4.22 Hertfordshire County Council requested that further references to primary school provision are set out in the draft Local Plan. Proposed modifications, particularly related to the Core Development Area have been put forward to accommodate this.
- 4.23 The Environment Agency required greater clarification as to how wastewater infrastructure was to be addressed by new development. Proposed modifications to policy and supporting text have been put forward to clarify what is required as part of a planning application. The amendments have been agreed through a Statement of Common Ground.
- 4.24 Hertfordshire County Council requested further references to cycling, walking, bus priority and the former Metropolitan Line Extension corridor to facilitate improvements to the town and mitigate the impact of new development on transport infrastructure. Highways England have sought further clarification about the impact of the proposed development in Watford on the Strategic Road Network. Further work modelling the strategic road network has been undertaken

by the Highways Authority and results are anticipated during the summer. This supplements traffic modelling work undertaken in central Watford and mitigation measures that have been identified and set out in the draft Infrastructure Delivery Plan completed in January 2021. Comments were received with concerns about parking standards and the impact new development could have on existing provision. No proposed modifications are put forward in response to this issue with the focus being on sustainability and addressing climate change.

- 4.25 Comments were received about how infrastructure will be funded. No proposed modifications have been put forward in response to these comments with details set out in the draft Infrastructure Delivery Plan.

Health:

- 4.26 There were no objections to the policies in the Health chapter, however, amendments have been put forward to strength health and wellbeing in the draft Plan following comments submitted by Hertfordshire County Council.

Site allocations:

- 4.27 Comments were submitted in relation to a number of site allocations. The main amendments put forward relate to site allocations located in the Watford Junction area including MU06 ((Land at Watford Junction), MU07 (Land and Building at Astral House) and EM05 (Land at Colonial/Clive Way). The latter has been revised to a mixed-use allocation from employment to be consistent with adjacent allocations. Proposed amendments seek to align the allocations in terms of what they are trying to achieve and how they will contribute towards the long-term vision for the area. The protection of the existing concrete batching plant and rail aggregates depot has also been clarified. Work is progressing on Statements of Common Ground.
- 4.28 The West Hertfordshire Hospitals Trust suggested the site of the Watford General Hospital redevelopment be included as part of the Riverwell site allocation (MU21). It is proposed the site boundary be amended to include the hospital and the development considerations amended to reflect its inclusion. This proposed amendment has also been reflected in the proposed modifications in Chapter 2: Core Development Area, more specifically the Colne Valley Strategic Development Area.
- 4.29 A proposed modification for site HS06 (Land at Russell Lane) seeks to clarify that given the segregation from the Green Belt improvements to improve green infrastructure in the vicinity will be required rather than having to improve connectivity to the remaining Green Belt.
- 4.30 There are two site allocations set out specifically for education provision. Site ED01 (Former Meriden School Site) is proposed to be modified to exclude land at the

north east corner of the site. This will have no impact on the functioning of the site as a school.

- 4.31 Representations requested that the following sites be included in the Local Plan, however, they are not proposed to be added prior to submission:
- Woodside Leisure Park (land owners had been contact earlier in the process but no response to put forward an appropriate use was received);
  - the south part of the former intu shopping centre (not considered appropriate); and
  - a garage site located on Radlett Road (only large enough for three dwellings, threshold for the Local Plan is five dwellings).
- 4.32 Having considered all of the comments and put forward proposed changes these will be considered by the Planning Inspector at the Examination in Public before determining whether changes are appropriate. It is therefore, recommended that the Council proceed with submission to the Secretary of State so that these issues and the evidence base can be fully explored. Should any significant changes arise from the Planning Inspector's input at the examination hearings, these will be advertised and any comments received will be considered by the Inspector before he/she prepares their final report.

The documents to be submitted for the examination is the [Final Draft Watford Local Plan](#) (as published January 2021). This will be supported but other documents including:

- Sustainability Appraisal Report and Habitats Regulations Assessment
- Statement of Consultation
- Comments received in response to the Final Draft Watford Local Plan Consultation (January – March 2021)
- Schedules of Proposed Modifications the Council wish to make in response to consultation for the Planning Inspector to consider
- The set of supporting evidence bases ([background studies](#))

## 5.0 Implications

### 5.1 Financial

- 5.1.1 The Shared Director of Finance comments that there is an annual budget to support Local Plan examination in Public. It is expected the cost of examination into the Watford Local Plan will be met from this budget.

### 5.2 Legal Issues (Monitoring Officer)

- 5.2.1 The Group Head of Democracy and Governance comments that the decision to submit the Draft Local Plan for Examination in Public is a council decision.

### 5.3 **Equalities, Human Rights and Data Protection**

5.3.1 Having had regard to the council's obligations under s149 of the Equality Act 2010, an Equalities Impact Assessment have been undertaken at the publication stage. This has been published as part of the consultation material.

### 5.4 **Data Protection Impact Assessment**

5.4.1 Having had regard to the council's obligations under the General Data Protection Regulation (GDPR) 2018, it is considered that officers are not required to undertake a Data Processing Impact Assessment (DPIA) for this report.

### 5.5 **Staffing**

5.5.1 The team currently has the staff resources available to prepare and participate in the Examination in Public.

5.5.2 The Planning Policy Team do not anticipate legal representation at the examination hearings at this stage, however, this will be kept under review as necessary.

5.5.3 A Programme Officer has been appointed to assist the Planning Inspector in the lead up to the Examination and for the duration of the Examination. This appointment is a necessary part of the examination process and cannot take place without the post being filled.

### 5.6 **Sustainability**

5.6.1 A Sustainability Appraisal has been undertaken at all stages of Plan preparation, and the reports have been published for consultation.

### 6.0 **Appendices**

- Appendix A: Final Draft Watford Local Plan 2018-2036 Submission Version
- Appendix B: Track changes version of the Final Draft Watford Local Plan 2018-2036, inclusive of Proposed Modifications
- Appendix C: Regulation 22(1)(c) Statement of Watford Borough Council in support of the Final Draft Watford Local Plan 2018-2036
- Appendix D: Final Draft Watford Local Plan Consultation Responses

### 7.0 **Background papers**

- [Statement of Community Involvement](#)
- Equality Impact Assessment












# A Sustainable Town

## Final Draft Watford Local Plan 2018-2036



**WATFORD**  
**BOROUGH**  
**COUNCIL**

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# Foreword

The Local Plan is a framework for how we grow our town so that it continues to be a great place to live, work and visit. With many challenges facing the community – including climate change, the shortage of homes, revitalising the town centre, delivery of new infrastructure, providing more jobs and protecting the environment and heritage of the town – we must be bold and ambitious. A new Local Plan is our opportunity to be exactly that, facing these issues head on to ensure Watford continues to flourish and grow in the best possible way.

Watford remains a popular town, and rightfully so, with beautiful award winning parks, excellent transport connections, a host of quality shops and restaurants, good schools and great leisure and cultural facilities. Plus, we are home to a thriving business community, ranging from TK Maxx European HQ to a cluster of pharmaceutical companies and a host of creative SMEs. These are all the reasons why we are proud to call Watford home.

It also means that our young people want to remain in Watford and others want to join our community. So we need to make sure we have the right homes in the right places and the much needed infrastructure to go with them.

The Local Plan sets out the best places to build homes and it protects and promotes the things that are important to people – like parks and green spaces, sustainable transport and community facilities.

Having a well thought through Local Plan in place means that we have our say on where development should be located. Otherwise, change will happen to our town in an unplanned way, with speculative development and little benefit to local community. A good Local Plan makes sure that decisions about the future of Watford are made here in the town and not by others.

**Peter Taylor**  
Elected Mayor of Watford





# How to use this document

The Local Plan covers a wide range of complex and interrelated issues that need to be considered when new development is proposed to ensure change can be managed to deliver benefits for the community. The Plan sets out planning policies to guide planning decisions, identifies strategic areas for growth. Strategic policies are indicated in the policy titles, any policies that are not specified as strategic are local policies.

## The Local Plan and the Spatial Strategy

Introduces the Local Plan and sets out the objectives to be achieved when development comes forward.



**Chapter 1:**  
**A Spatial Strategy for  
Watford**

Introduces the Local Plan and provides an overview of key planning themes through the document. Sets out the approach to growth and the principles behind the Core Development Area. Proposals for new development are to accord with the respective strategic development area policy and with the strategic and Local Planning Policies elsewhere in the Local Plan.



**Chapter 2:**  
**Core Development Area**

Sets out the principles for development in the Core Development Area and locally specific opportunities and constraints in the Strategic Development Areas.

## Planning policies to guide development

Proposals for new development are to accord with strategic and Local Planning Policies across different chapters in the Local Plan.

	<b>Chapter 3: Homes for a Growing Community</b>	Introduces the Local Plan and provides an overview of key planning themes through the document. Sets out the approach to growth and the principles behind the Core Development Area. Proposals for new development are to accord with the respective strategic development area policy and with the strategic and Local Planning Policies elsewhere in the Local Plan.
	<b>Chapter 4: A Strong Economy</b>	Provides a structure to support economic growth and enable an economy that can adapt to changing economic conditions.
	<b>Chapter 5: A Vibrant Town</b>	A framework to retain Watford town centre as the focus for retail, leisure, entertainment and cultural activities with flexibility to adapt to changing economic conditions. This will be supported by a network of sustainable local centres.
	<b>Chapter 6: An Attractive Town</b>	This section sets out the design standards new development will be expected to achieve in order gain planning permission.
	<b>Chapter 7: The Historic Environment</b>	This section sets out the design standards new development will be expected to achieve in order gain planning permission.
	<b>Chapter 8: A Climate Emergency</b>	Sets out requirements that new buildings need to achieve to reduce carbon emissions and contribute towards the borough becoming carbon neutral, while mitigating impacts associated with climate change, such as living environments, building quality and flood risk.
	<b>Chapter 9: Conserving and Enhancing the Environment</b>	Policies to manage and improve the outdoor environment for people and wildlife, enhance biodiversity and manage impacts on the environment when new development comes forward.
	<b>Chapter 10: Infrastructure</b>	Provides the framework for delivery of the infrastructure needed to support new development.
	<b>Chapter 11: A Sustainable Travel Town</b>	Sets out an approach to enable better mobility and access to services and facilities, a more balanced reliance on different modes of transport and to encourage a shift towards greater use of public transport, walking and cycling.
	<b>Chapter 12: A Healthy Community</b>	The role of promoting good health in the built environment is increasingly recognised and this chapter discusses the key threads that run through the Plan.

## Sites for development

Proposals for new development are to accord with strategic and Local Planning Policies across different chapters in the Local Plan.



**Chapter 13:**  
**Site Allocations and  
New Development**

Identifies land suitable for new development and the types of land uses that would be acceptable, along with site-specific issues that should be considered by applicants.

The information used to support the policies and site allocations is set out in the Council's evidence base which includes a diverse range of topic areas exploring local and strategic issues.



## Chapter 1

# A Spatial Strategy for Watford

## What is the Local Plan and what does it do?

1.1 The Local Plan lies within the national town and country planning system. It sets out the policy framework for how land is used and guides development so that it comes forward in a way that is co-ordinated and planned for.

**Table 1.1: Planning structure around the Watford Local Plan**

<b>National Planning Policy Framework</b>	<b>Sets out the national guidance to which Local Plans must conform.</b>
<b>South West Herts Joint Strategic Plan</b>	<b>Provides a framework to deliver strategic needs across five local authority areas.</b>
<b>Watford Local Plan</b>	<b>Sets out the growth strategy for the borough and policies to guide planning decisions and protect environmental and heritage assets.</b>
<b>Hertfordshire Minerals and Waste Local Plans</b>	<b>Sets out policies on minerals and waste for new development to comply with (forms part of the Watford Local Plan).</b>
<b>Neighbourhood Plans</b>	<b>Prepared by the members of the community to address locally specific planning issues (must be in conformity with Watford Local Plan).</b>
<b>Local Development Documents</b>	<b>These include documents which form part of the Development Plan such as Supplementary Planning Documents that support the Local Plan.</b>
<b>Background Studies</b>	<b>Provides a robust evidence base to inform the Local Plan and planning decisions.</b>

1.2 The Local Plan is a ‘statutory’ or legally required document that forms part of the Council’s strategy to deliver sustainable development, tackle climate change and to deliver new homes, jobs and infrastructure for current and future generations. It covers the period from 2018 to 2036 and will guide new development so that it goes ahead in a co-ordinated manner, making the best and most appropriate use of land to meet the needs of the community.

1.3 The Watford Local Plan sits within a wider structure of planning documents. This includes national guidance set out by the government, strategic plans, neighbourhood plans, supporting strategies and background studies. The hierarchical relationship between these policy documents is set out in Table 1.1.

1.4 Planning policies can be supported by additional guidance to explain how a policy is to be implemented in greater detail, these are referred to as Supplementary Planning Documents. Where required, the Council will prepare and update Supplementary Planning Documents to support the Local Plan.

## South West Hertfordshire Joint Strategic Plan

1.5 Watford is one of five authorities in South West Hertfordshire that share administrative boundaries and issues across the wider area, such as housing, employment and infrastructure. To plan strategically for growth in the area, Watford Borough Council, in conjunction with Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council and St. Albans City & District Council, is preparing the South West Hertfordshire Joint Strategic Plan.

1.6 The Plan will influence the end phase of the current Local Plans and the direction of travel for the next generation of Local Plans that will follow. It is not a statutory document, however, local authorities that share cross-boundary issues are encouraged by the government to prepare strategic plans as a way of maximising opportunities for growth and create greater benefits for communities.

## Preparation of the Local Plan and stakeholder engagement

1.7 When the Local Plan is being prepared, it goes through several stages from its inception, pulling together evidence to support decision making, through to the adoption of the Local Plan, at which point the policies can be applied to manage change in the town effectively (Table 1.2). The consultation has involved members of the public, the development industry, infrastructure organisations and other stakeholders that have an interest in the area.

**Table 1.2: Stages in the preparation of a Local Plan**



### Issues and options 2018

1.8 In September - October 2018 the Council consulted on what the community thought were the key planning issues and options affecting the borough and if they should be addressed as part of the new Local Plan. Key issues that were raised were:

- The impact of growth (including future infrastructure provision and parking);
- Climate change and pollution;
- Affordable housing;
- Taller buildings and achieving good design; and
- Improvements to sustainable travel options.

### First Draft Local Plan 2019

1.9 In October - November 2019 the Council consulted on the first draft Watford Local Plan. Key issues that were raised were:

- The impact of growth (including future infrastructure provision and parking);
- The potential impacts of proposed development sites;
- Taller buildings and high-density development; and
- Affordable housing.

### Final Draft Local Plan 2021

1.10 The final draft Local Plan is the version of the Plan the Council intends to submit to the Planning Inspectorate for examination by an independent Inspector to ensure the Plan is consistent with national guidance for it to be adopted by the local authority. Any proposed changes to the final draft Local Plan are submitted alongside the Plan for the Planning Inspector to decide which are appropriate.

## Stakeholder engagement

- 1.11 During the preparation of the Local Plan, stakeholders were involved in different aspects of the work. Early consultations seeking potential sites for development included members of the public, landowners and the development industry to identify those suitable for development. Public consultations provided further avenues to engage with stakeholders and comment on the different elements of the Plan they were interested in. This included online engagement, public events, working with elected members and local organisations to raise the profile of the Local Plan and the importance of having 'your say' to help shape future growth in Watford.
- 1.12 At each stage of the process a Sustainability Appraisal was carried out, to assess the social, environmental and economic effects of any plans, from the outset. In doing so it helped ensure that decisions were made which contribute to achieving sustainable development in Watford.
- 1.13 Background studies have been undertaken to create a robust evidence base. A number of these studies have been commissioned jointly with other South West Hertfordshire authorities in recognition of the cross-boundary issues shared across the area. These have involved engagement and the sharing of information with stakeholders who have a direct interest in the Local Plan such as organisations that provide or manage

infrastructure, and also engagement with people and organisations involved with the social and business community.

- 1.14 Working with the neighbouring authorities in South West Hertfordshire has been ongoing from early in the Plan preparation process, through the duty to cooperate. It has also been reflected in the undertaking of the Joint Strategic Plan. There has also been continued engagement with Hertfordshire County Council, the local Highways and Education Authorities, as well as a strategic approach with other organisations, such as the Hertfordshire Growth Board and the Local Enterprise Partnership.

## A brief portrait of Watford

- 1.15 In the middle of the nineteenth century Watford was a small market town in Hertfordshire with a population of around three thousand people. It saw growth from 1860 due to the introduction of the railways (various routes were developed in the years 1837 - 1925) and there was a rapid rise in the population from 1890 onwards. It was known for traditional industries including printing and brewing.
- 1.16 Today there are around 96,700 people (Office for National Statistics (ONS), 2019) living in approximately eight square miles. It is one of the smallest districts in England and the town has a high population density, averaging 45 people per hectare, compared to a 7 people

per hectare average in Hertfordshire (ONS, Census 2011). There are approximately 39,900 homes in the borough with an average household size of 2.4 persons per dwelling.

- 1.17 The town has a relatively young population and a high proportion of family-sized households compared to other areas in South West Hertfordshire (ONS, Census 2011). The town is ethnically diverse, with 62% of the existing population being White British, while 38% of people come from Black and Minority Ethnic backgrounds.
- 1.18 Watford is adjacent to north London and, as such, is facing similar growth pressures and related issues. Historical development has resulted in the built-up area extending up to its boundaries and consequently much of the development taking place in the borough is located on previously developed land. Approximately 19% of the land in Watford's administrative area is designated as Green Belt. Most of this performs a community function, being designated as public open space with other areas important for wildlife habitats and biodiversity.
- 1.19 There are four railway stations in the borough serving the mainline, London Overground and London Underground, connecting Watford to London, while the Abbey Line with two railway stations (in Watford) connects the town with St. Albans. The M25 is located just north of the town. Watford has long been a commuter town, yet one that maintains its independence and distinctive character.

## Sustainable development in England: The economic, environmental and social objectives

1.20 The National Planning Policy Framework states there are three overarching objectives to achieving sustainable development; these are economic, environmental and social. They are interdependent and need to be pursued in mutually supportive ways:



**An economic objective:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time, to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.



**A social objective:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.



**An environmental objective:** to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land; helping to improve biodiversity; using natural resources prudently; minimising waste and pollution; and mitigating and adapting to climate change, including moving to a low carbon economy.

## The key challenges and sustainable objectives for Watford: economy, society and environment

1.21 Watford will see a lot of change in the 18 years covered by the plan period, as it grows and makes a transition towards being a more sustainable town, actively tackling climate change, with the aim of becoming carbon neutral.

1.22 This will be achieved by promoting the three overarching objectives of the National Planning Policy Framework at a local level, thereby creating a different and better place in 2036. The Council will work with organisations including Hertfordshire County Council to help implement the objectives set out in local and strategic strategies including the Local Transport Plan, Watford Corporate Plan and the Sustainability Strategy.

1.23 The following highlights the key Economic, Social and Environmental characteristics of Watford now, and where the Council wants it to be in 2036.





## Watford's economy and the key challenges

- New employment floorspace is important to support economic growth, and based on past trends, the East of England Forecast Model indicates that the number of jobs in Watford will increase by 11.4%.
- There is limited land available in the borough to allocate new sites for industrial, storage and distribution uses with low plot ratios.
- 136,000sqm of office and industrial floorspace is needed in Watford. A variety of sites and floorspace of different quality is needed to support different sectors and employment skills.
- Business start-up rates are well above the national and regional average, indicating there is a demand for flexible and affordable workspace to foster new businesses.
- The town centre contains a mix of chain and independent retailers, creating a varied mix of retail, restaurant and leisure provision that make the area a retail and leisure hub for South West Hertfordshire.
- The town supports a variety of different sectors, 20% of jobs are in professional services and other large employers are in the retail and health care industries. Equally, there are also a number of people employed in industrial sectors, such as manufacturing, construction and wholesale.

- In Watford and across South West Hertfordshire, there is a shortfall of land available for employment. Since 2015, changes to permitted development right changes have coincided with a loss of employment floorspace.
- The resident workforce in Watford is generally highly skilled overall (Nomis, 2019), however, this is not met with the same level of growth in high-skilled jobs in the borough.
- Watford developed as part of the London commuting belt in the 1850s and has retained that role, with 47% of outward commuters travelling into the London area.
- Watford has good access to strategic transport rail routes and roads with the A41, M1 and M25 while Luton and Heathrow airports are within 20 miles.



## Watford's economy in 2036 - the sustainable objectives

- The Plan will have helped attract business investment to support jobs growth, strengthening its key role in the sub regional economy.
- The employment opportunities in the town will have increased with a highly skilled labour force and the provision of quality education facilities.
- Employment areas will have been intensified, making more effective use of land and higher employment densities, with appropriate areas supporting a mix of complementary uses.
- Watford town centre will have been enhanced as a place to socialise, as well as to shop, providing an enjoyable experience for people of all ages.
- The town and wider area will have an attractive range of activities available, reinforcing Watford's appeal as a destination for leisure and recreation.
- Redevelopment and delivery of high quality office floorspace in Clarendon Road will have brought in new investment, facilitating growth.

## Watford's society and the key challenges

- Watford is one of the most densely populated non-metropolitan districts in England.
- The town experiences some of the highest levels of in-migration in Hertfordshire, reflecting its attractiveness as a place to live.
- Watford has the lowest level of car ownership in Hertfordshire; a lot of its congestion is caused by through traffic.
- Rising house prices mean many people cannot afford a home of their own (the affordability ratio is 12.1 times the median average income (2019)).
- Life expectancy is marginally below the national average with males expected to live 79 years and women 83 years (NHS Health Profile), and is lower in more deprived areas.
- Overall, Watford is ranked the 194th least deprived of 391 local authority areas in England, with no areas identified as being in the 10% most deprived parts of the country.
- Despite areas of high prosperity, poverty is an issue with Tudor Ward being the fifth highest level of deprivation in Hertfordshire (ONS, Census 2011).
- There has been an increasing proportion of smaller one- and two-bed homes built in recent years compared to family-sized housing.
- There is limited space available for new social infrastructure such as new schools and healthcare facilities and to improve transport systems to encourage less car reliant travel.



### Watford's society in 2036 - the sustainable objectives

- New development will have met the needs of a population projected to increase to 97,080 people in 2036 (ONS, 2011 Census and 2018 based population projections).
- The town will be characterised by mixed and balanced communities and new development that will have made a positive contribution towards this.
- It will be a socially inclusive place for everyone, with a mix of homes for single occupancy, couples, families and older people including people with special needs.
- There will be a high quality, safe, clean and attractive public realm that encourages people to be more active through walking and cycling, encouraging social interaction and better health.
- Traffic congestion will be reduced and air quality improved, with priority given to public transport, shared car use, walking and cycling.

## Watford's environment and the key challenges

- The River Colne and River Gade, along with the Grand Union Canal, provide structure to much of the green infrastructure network in the borough, but in places it is poor in quality.
- Historical patterns of development have created constraints within the built-up area that limit the potential to deliver new open space of any significant size.
- Watford has the highest number of open spaces with Green Flag status in Hertfordshire, but some areas of the town have limited access to quality open space.
- The number of heritage assets protected in the town as nationally and locally listed buildings make an important contribution towards the character of the town.
- The built-up area is traversed by a number of strategic road corridors that results in a vehicle dominated environment with air, noise and light pollution.
- Traffic modelling shows that congestion and associated impacts on the environment will worsen without a modal shift in the town and also in the surrounding areas.



## Watford's environment in 2036 - the sustainable objectives

- The town will have a more sustainable pattern of urban development and transport, minimising the impact on the environment and reducing pollution.
- New development will be high quality, designed to minimise impact on the environment through greater energy and resource efficiency and adapted to climate change. These adaptations and renewable energy opportunities will have been incorporated into new and existing developments.
- The network of open spaces, parks and waterways, and the connections between them, will have been improved to support increased recreational activities.
- Important biodiversity and wildlife habitats will have been protected and connections within the green and blue infrastructure networks improved, increasing their value for wildlife.
- New development will also have made improvements to biodiversity and strengthened Watford's ecosystems, reversing the national trend of biodiversity decline.
- Important heritage assets, such as locally and nationally listed buildings, historic green spaces and conservation areas will have been protected and the historic environment enhanced.



## Helping to make Watford a better place for everyone

1.24 The housing targets set by the government have placed considerable development pressure to deliver new homes in the town, increasing targets threefold since 2013. In conjunction with this growth, the Local Plan needs to support economic development and make provision for infrastructure and community facilities to come forward alongside these developments. This change will need to be managed, which is one of the key roles of the Local Plan.

1.25 New development provides opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community. To maximise these opportunities, it is important for the Local Plan to set out the key sustainability objectives that will contribute towards achieving the vision for Watford, which will be delivered through a mix of corporate strategies and other approaches, with the Local Plan making the key contribution.

1.26 The Local Plan is a roadmap of where we want to be, and when looking ahead to 2036, whilst it is difficult to predict the future, the Plan is aspirational and it seeks to lay the building blocks for a vision that is both deliverable and achievable. It will help strengthen the town's pre-eminent role in the South West Hertfordshire sub-region, in terms of being a desirable place to live, a desirable place to invest and a desirable place to visit. The overall growth strategy and sustainability objectives will help Watford with taking steps forward to deliver growth and embrace change in a positive and sustainable way.



## Helping to create a better Watford in 2036: our Vision

At the edge of London, and also a part of the County of Hertfordshire, Watford will embrace its role as a major urban centre that acts as a focus for employment, homes, leisure, caring for its town centre and green spaces and making the most of its excellent connections to the capital and surrounding areas.

Watford will be an exemplar town in how it embraces the challenge of sustainability and climate change, with environmentally friendly construction and design, working towards being carbon neutral.

High quality design will be showcased as part of new development, with accessible and inclusive high-density, mixed-use development and enhanced open spaces.

Green and blue infrastructure will be conserved and enhanced, maximising their value for biodiversity and other important ecosystem services.

The Town Centre will retain its key role as a retail destination in the sub-region, home to a mix of uses including residential, commercial, cultural and leisure, creating a vibrant place for people to socialise, live and work.

The town will have a comprehensive network

of cycle and walking routes, encouraging a more active population. Public transport will also be enhanced, encouraging a move from car based travel for shorter journeys, reducing congestion and air pollution.

Watford's social, cultural, built environment and heritage assets will be protected, and where possible their settings enhanced.

Local economies will be supported by creating opportunities for local businesses to access new markets and providing a mix of employment spaces to support business growth.

The population will be healthier, with more opportunities to get active, through walking and cycling and access to high quality open spaces.

Growth will be supported by a range of high quality infrastructure delivered in a comprehensive, timely and co-ordinated manner, making the most efficient use of land.

In 2036, Watford will continue to be a welcoming and vibrant place and home to a wide range of communities, where people enjoy a high quality of life.



## Planning for growth

- 1.27 Many of the growth issues facing Watford are also being considered by other local authorities in South West Hertfordshire. All five authorities face different constraints making the delivery of development required over the respective plan periods challenging. In Watford, this challenge is primarily related to a shortfall of land available for development.
- 1.28 Watford has achieved 94% of its housing growth on brownfield land in the last ten years, reflecting the scarcity of greenfield land. Early in the stages of the Local Plan it was recognised that this trend of brownfield development would continue given the constrained nature of the borough.
- 1.29 The borough was assessed against a number of criteria including access to public transport, employment areas, schools and local shopping centres. This led to the identification of three sustainability zones across the borough with the centre of Watford being significantly more sustainable than the rest of the town (Figure 1.1). These areas formed the basis for calculating housing capacity of the borough as part of the Watford Housing and Economic Land Availability Assessment (2020).
- 1.30 As demonstrated by the Housing and Economic Land Availability Assessment, the majority of the land available for development is located in the area of highest sustainability. It is also the part of the borough that will see significant investment in the future and that will help facilitate infrastructure improvements integral to supporting the objectives of the Plan. Given its proximity to the town centre, business district and strategic transport hubs located at Watford Junction and Bushey this part of the borough has the greatest capacity to absorb new development in a way that will contribute towards achieving sustainable development.
- 1.31 The concentration of sites in the high sustainability zone led to the designation of three areas identified as being strategically important in the Local Plan; Watford Gateway, the Town Centre and the Colne Valley Strategic Development Areas. These are recognised as growth areas likely to experience transformative change. This area of growth encapsulating these designations is referred to as the Core Development Area, shown on the key diagram (Figure 1.2). In locations outside of these areas, while still likely to support development as areas of renewal, change will be more limited in scale and not transformative.

Figure 1.1: Sustainability zones in Watford

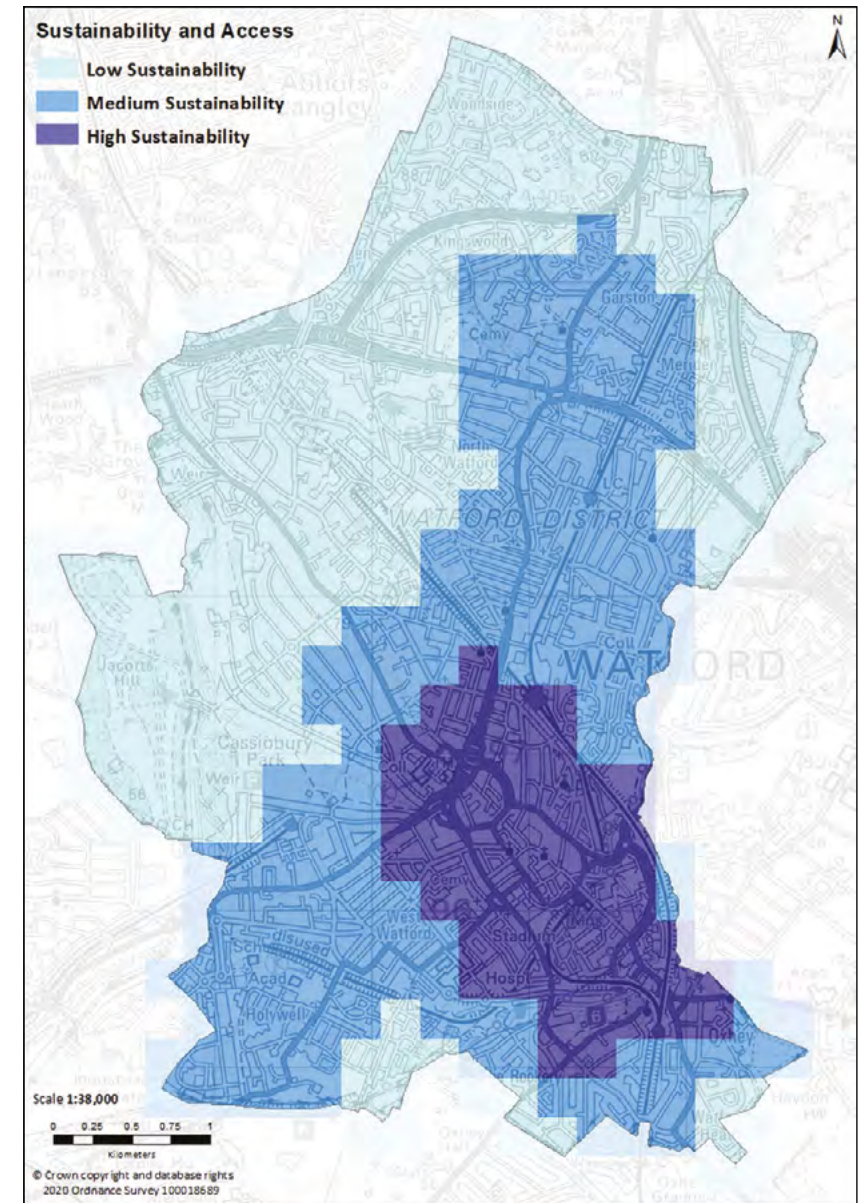
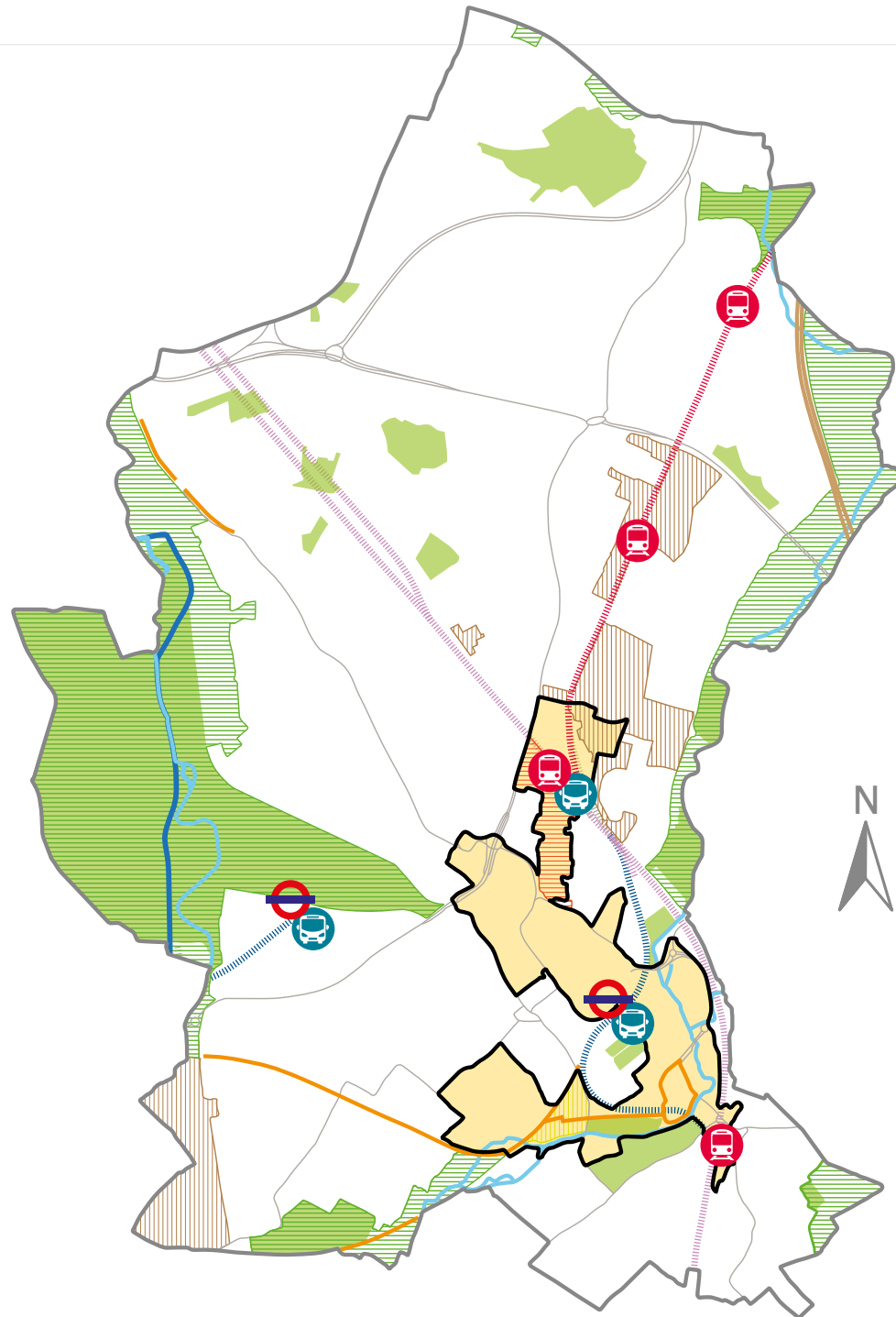
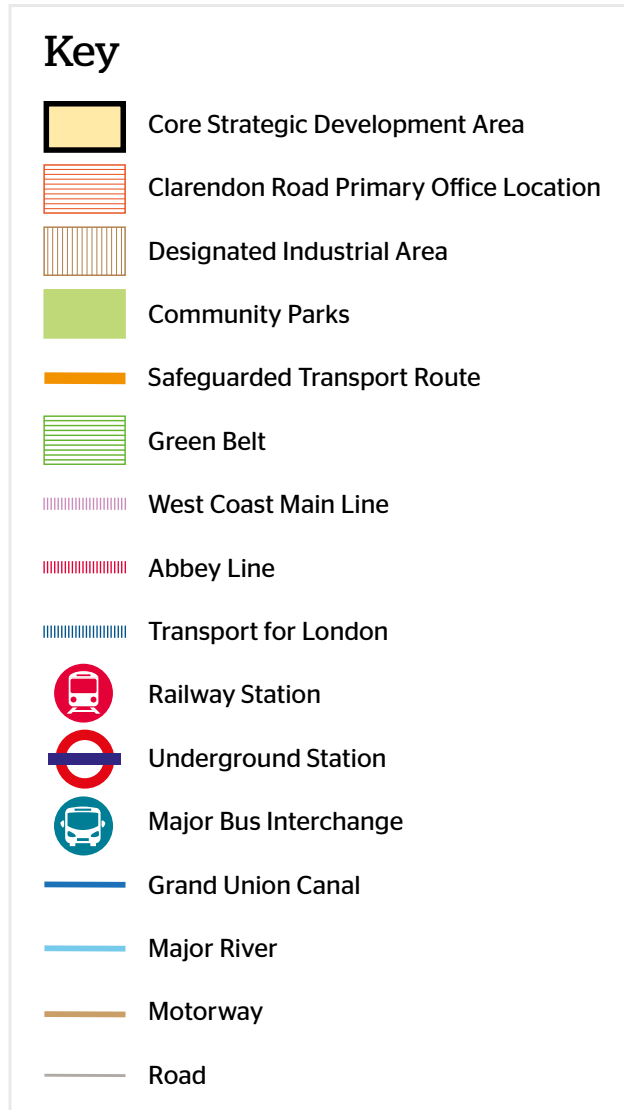


Figure 1.2: Key Diagram



## A sustainable development strategy for Watford

- 1.32 Sustainable development is integral to creating good places. To achieve it, proposals should seek to find a balance of economic, environmental and social considerations in order to ensure the town's success without compromising the potential growth and use of resources in the future. For a development to be successful, these fundamental elements need to work together to benefit the scheme and the community.
- 1.33 The Spatial Strategy sets out the approach for development to contribute towards the Council Plan and long-term vision for Watford as an inclusive place for everyone and the aim to be a town that has embraced sustainability. As a largely urban borough, and given the findings of the Housing and Economic Land Availability Assessment and the trend for developing brownfield land in the last ten years this will continue. There will be a general presumption against inappropriate development in the Green Belt, so the extent of the Green Belt will be largely maintained. Other policies in the Plan support delivery of this strategy and will collectively ensure development takes place in the most appropriate way.

- 1.34 To successfully achieve sustainable development, a wide variety of factors need to be balanced and delivered. One of the key aspects is climate change. This responds to the Climate Change Act (2008, as amended) when the government legislated that the United Kingdom will reduce greenhouse gas emissions by 100% by 2050. The Local Plan makes an important contribution towards achieving this target by guiding planning decisions to ensure they embrace and prioritise these principles.
- 1.35 In July 2019, Watford Borough Council declared a Climate Change Emergency. Key elements of the declaration included integrating climate change into planning policy and the Local Plan having a focus on greener homes and buildings, taking into account climate impacts within Council decision making processes with the overall objective to be carbon neutral by 2030.
- 1.36 Addressing climate change is intrinsically linked to public health and wellbeing. Public health, physical and mental, is an important part of achieving sustainable development. Closely linked to this is the quality of homes people live in and how people feel included as part of their community. The design of buildings and the spaces around them is integral to encouraging people to be more active, have a greater sense of belonging in their community through more social interaction, and increasing the perception of a place and in turn health and wellbeing.

- 1.37 The approach is to meet a significant proportion of Watford's future development needs in the Core Development Area. The residential character of the rest of the borough will largely see development that is more modest in scale.
- 1.38 This approach increases the number of people living in locations where there is good access to services and facilities, reducing the need to travel by car and making investment in public transport, walking and cycling infrastructure more viable and attractive by responding to demand. In turn, less reliance on private vehicles will help reduce traffic congestion, to benefit the economy and reduce air and noise pollution. This will create space to support walking, cycling and public transport and encourage people to be more active and have healthier lifestyles, while improving the quality of the built environment.



1.39 Creating sustainable neighbourhoods in this way has multiple benefits. New development can attract investment to the area as businesses cluster, creating local jobs and providing opportunities for new skills and training through apprenticeships. Employment opportunities bring workers into Watford, which, in turn, increases demand for ancillary goods and services supporting local businesses, particularly in the town centre. Delivering a mix of new homes to meet the needs of local people and those wanting to move here supports a more inclusive, equitable and balanced community. The inclusion of measures, such as improvements to the green infrastructure network, benefits people and biodiversity, while making better use of resources and helps to create high quality places and habitats.

### Collaborative working

1.40 Collaborative working is an integral part of preparing development schemes that will contribute towards delivering growth to help achieve sustainable development. Early engagement with the Local Planning Authority to discuss planning proposals is encouraged to ensure that schemes will comply with strategic and Local Planning Policies that seek to achieve economic, environmental and social objectives. Engagement is also encouraged to help ensure that development comes forward efficiently from the time of its design to when it is completed, whilst minimising the risk of unforeseen delays and costs that could adversely impact upon a proposed scheme.





## Monitoring the Local Plan

- 1.41 Monitoring of the Local Plan is important to determine the effectiveness of planning policies. It identifies if policies are impacting on Development Management decisions and whether they are contributing towards achieving the Council's objectives and targets. Policies in the Local Plan will be monitored to ensure they are being successfully implemented and the overall strategy is being achieved. These indicators are set out in Appendix A along with the source data to be collected to monitor the Plan. This findings will be presented in the Council's Authority Monitoring Reports.
- 1.42 Watford forms part of the South West Hertfordshire Housing Market Area and Economic Market Area. The Council will have an active role promoting and supporting high quality development that will benefit the community, support the economy, enhance the environment and are consistent with policies in the Local Plan. Development facilitated through the Local Plan will also contribute towards achieving strategic objectives set out in the future South West Hertfordshire Joint Strategic Plan.
- 1.43 Where monitoring, particularly the updated housing trajectory that will be published in the Authority Monitoring Reports, demonstrates that there will not be sufficient progress towards meeting housing need, the Council will consider the reasons for this and whether the extent of under-performance is sufficient to trigger a partial or full review of the Local Plan.





## Strategic Policy SS1.1: Spatial Strategy



The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs between 2018 and 2036, along with other supporting infrastructure. Proposals for new development will be supported, where they demonstrate that they will contribute towards the Local Plan's economic, social and environmental objectives, cumulatively achieving sustainable development.

Growth will be focused in the Core Development Area, which has excellent access to public transport and facilities, and where development can be accommodated sustainably, creating a high quality place to live, work and visit by 2036. Heritage assets and areas of greenspace will continue to be protected.

Development will make an effective and efficient use of land. This will need to support a mix of uses compatible with each other, with high quality design, and innovative technology to address climate change and reduce carbon emissions.

Proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian and cycle travel will be prioritised.

These high standards and a positive and integrated approach to development will be expected across the whole of the borough.

This will contribute towards creating attractive and inclusive neighbourhoods, supporting people to be more active, healthy and encourage greater social inclusion as part of a balanced community.

Across the borough, new infrastructure and improvements to existing infrastructure will be delivered to support development. Infrastructure proposals will be progressed collaboratively with relevant stakeholders and providers to maximise the benefits and success of any scheme.

All development will take place on brownfield, or previously developed land and only in exceptional circumstances will development on greenfield land be supported. Development in the Metropolitan Green Belt will not be supported unless it can be demonstrated that exceptional circumstances apply.

### The Core Development Area

The Core Development Area is expected to support 80% of allocated development in the borough and provides opportunities for further redevelopment. Proposals in this area will be supported where they optimise the use of land in this location through mixed-use high-density development, with excellent access to services, facilities and public transport. Development should deliver positive social and environmental gains, incorporating high quality design

and innovation to ensure high environmental standards are achieved.

The scale of change will be transformational in places. Collaboration between development partners and stakeholders on larger sites will be the key to unlocking the potential of the area. Ongoing and effective community engagement will also be required. Proposals should demonstrate a holistic approach to development, optimise opportunities for higher-density development, create linkages to adjacent areas and ensure proper infrastructure provision.

### Areas outside the Core Development Area

Outside the Core Development Area, proposals will be supported where they optimise densities to make efficient use of land and manage change with greater regard to the existing context and local character. Development should make the most of its location, such as access to public transport, cycling and walking and seek to provide off-site infrastructure to enhance them, and facilitate access to services and facilities.

High quality connections between people and destinations within the Core Development Area, wider town and locations outside of the borough will be sought.

WATFORD  
RIVERWELL



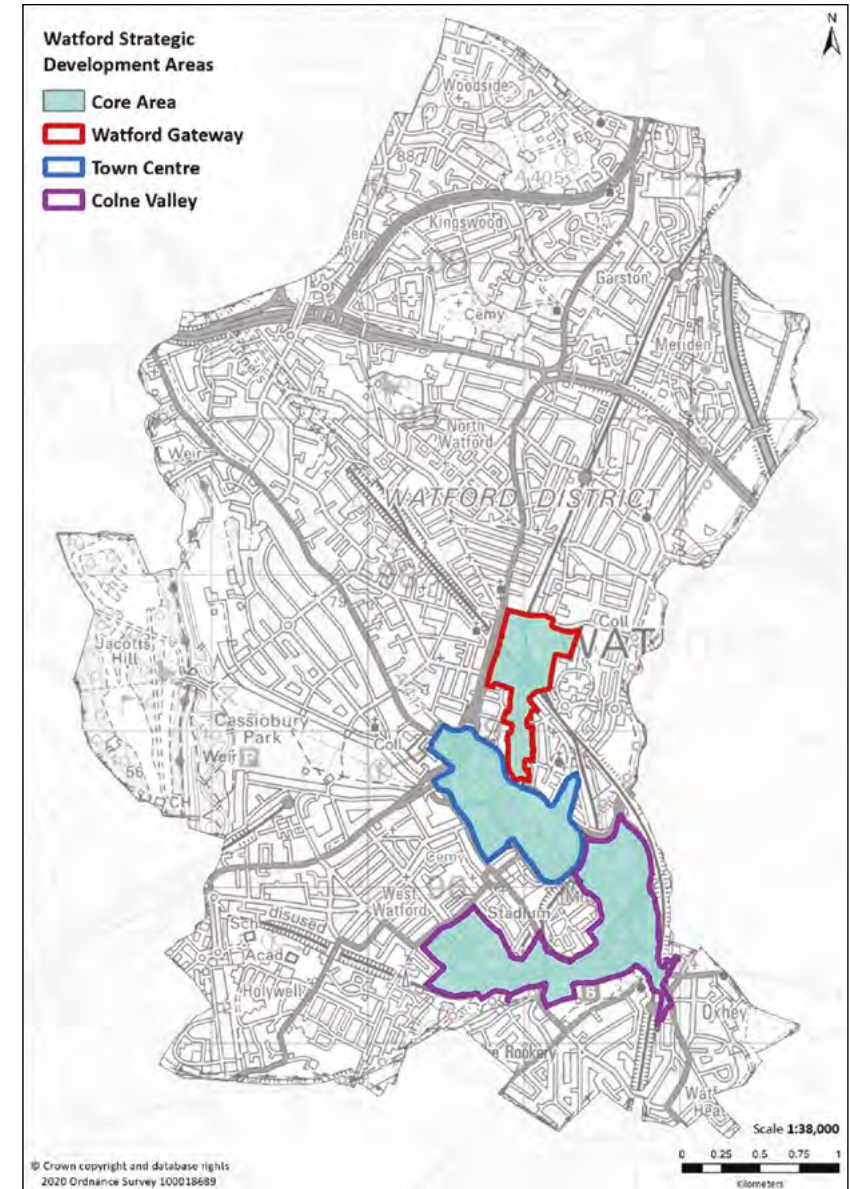
Chapter 2

# Core Development Area

## Core Development Area

- 2.1 The Core Development Area constitutes 8% of the built area of Watford (2,150 hectares), and is an area where significant revitalisation and transformative change are expected to bring new investment in the town (Figure 2.1).
- 2.2 The Core Development Area comprises three distinct locations, based on their character and the opportunities that each presents to contribute towards making Watford a place that people want to be and where businesses want to invest.
- 2.3 These areas are:
  - **Watford Gateway**, which is focused on the transport hub of Watford Junction and business district of Clarendon Road;
  - **The Town Centre**, where the majority of the retail and leisure offer of the borough is located; and
  - **The Colne Valley**, which encompasses the out-of-town retail area, hospital and stadium and adjoins the River Colne flowing through the area.
- 2.4 The scale of development envisaged in the Core Development Area during the plan period provides opportunities to deliver new homes and provide more employment space for businesses, infrastructure to support new development and community facilities to make the area a focal point for the borough. To help achieve the vision and deliver the objectives of the Local Plan, the policies and site allocations have been informed by the Watford Sustainability Strategy (2019). Applicants will need to embed sustainability principles, such as; appropriate land uses, active travel, energy and water efficiency, and good design resulting in high quality buildings and public realm into their proposals.
- 2.5 The requirements set out in the policy for each Strategic Development Area are to be considered alongside other planning policies in the Local Plan and applied collectively. Further information about site-specific allocation considerations and requirements are set out in Chapter 13 'Site Allocations and New Development'.

Figure 2.1: Core Development Area and the Strategic Development Areas



# Watford Gateway Strategic Development Area

## Context

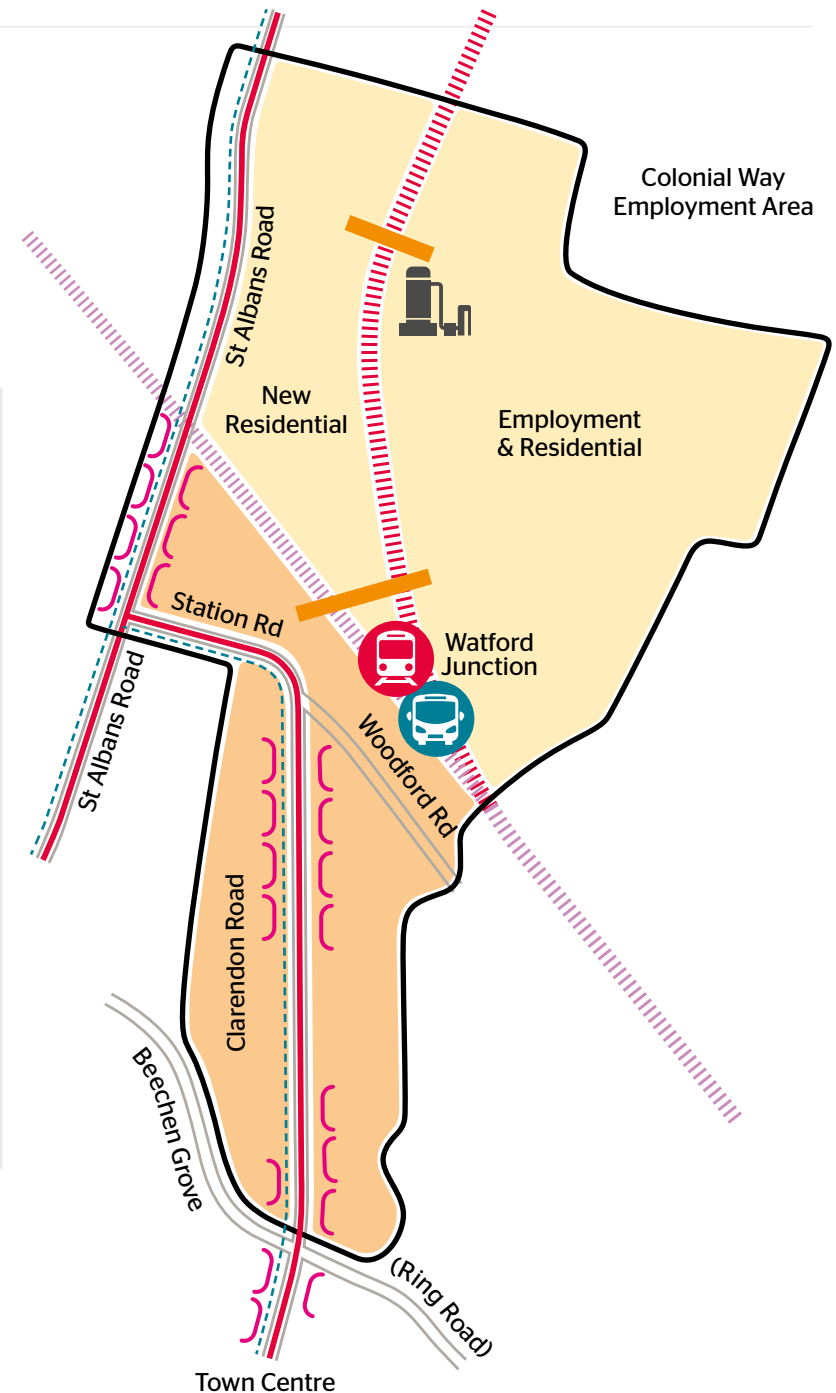
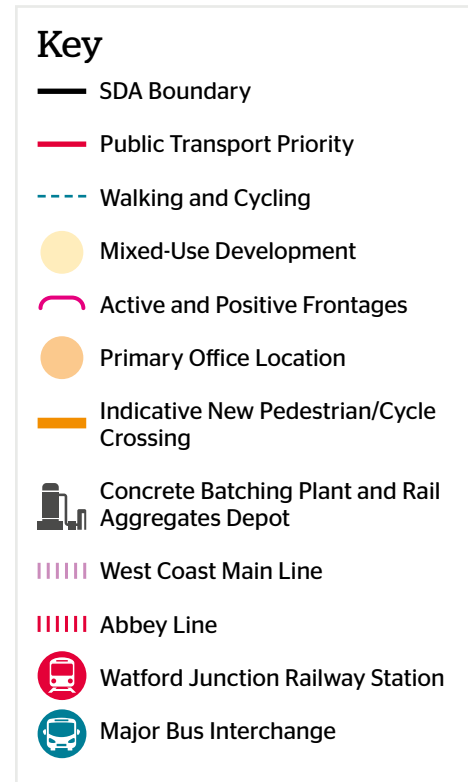
2.6 The Watford Gateway Strategic Development Area encompasses 31 hectares of land north of the town centre and comprises two key locations in the town; the Watford Junction railway and bus station, surrounding retail and employment land and Clarendon Road, which is the primary business district in the area (Figure 2.2).

2.7 Nearly all of this Strategic Development Area sits within the High Sustainability Area (Figure 1.1). This area is recognised by the Hertfordshire Growth Board as one of the key locations for redevelopment in the county.

## Watford Junction Station Area

2.8 The railway and bus station provide the main transport interchange for the town, in conjunction with five other railway stations in Watford. These provide excellent connections to London, Milton Keynes and further north to Birmingham and destinations beyond. With good access to local services, facilities, employment and leisure activities the Watford Gateway area provides a focal point for sustainable development.

**Figure 2.2: Watford Gateway Strategic Development Area**



- 2.9 The station, including the associated public realm, is to be improved, to increase capacity and make for better access to services and facilities to help people intuitively find where they are going using rail, bus, cycle, pedestrian and taxi facilities, as part of a modern transport hub.
- 2.10 The area north of the station along Station Road and Bridle Path is characterised as an area with inconsistent urban grain. New schemes should make use of design opportunities to reinstate a network of streets that improve the layout of the area. Schemes should be designed to improve connections with the residential area north of St Albans Road, including the pedestrian link from the station along the railway line to St Albans Road.

### Clarendon Road

- 2.11 Clarendon Road acts as a sub-regional business centre that provides offices to businesses that require good access to London, but which do not necessarily need to be located in the city. The objective of the area during the plan period is for Clarendon Road to continue to be a focal point for high value office uses and the primary link between Watford Junction station and the town centre.
- 2.12 Proposals should reflect the potential of Clarendon Road as an area of high-density development, while having regard to its underlying character. Where buildings of greater height than adjacent areas are proposed close to low lying residential areas, they will need designed so that they minimise their impact on the amenity of residents and demonstrate how they have embraced a

transition from higher-density development to areas of a different residential character. Where possible, taller parts of a building should be designed to have a frontage on the main road while the lower areas of a scheme should be located closer to areas characterised by lower building height.

- 2.13 To improve the quality of the environment along Clarendon Road, proposals should be designed to ensure there is a good relationship between new buildings, their frontages and street users. They should also create a positive route for people walking and cycling between the station and the town centre. Frontages along the side streets should also focus on making a positive contribution to the street scene.

### Land east of the railway line

- 2.14 Land east of Watford Junction Station and the railway lines consists primarily of industrial, storage and distribution uses including a concrete batching plant and rail aggregates depot. These premises generally support businesses that have low jobs per square metre. They make a contribution towards sustainable development by providing local jobs for industries where future land allocations is extremely limited in the borough. Consistent with Policy EM4.1 'Providing New Employment', appropriate intensification to make more effective use of the land will be supported in this part of the Strategic Development Area. However, the compatibility of new uses will need to be carefully considered, particularly where residential uses are proposed.

- 2.15 The concrete batching plant and rail aggregates depot is safeguarded by the Hertfordshire Minerals Local Plan. Its relocation will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria.
- 2.16 Reprovision of car parking, including access, will need to be considered at a strategic level across the area to avoid fragmentation and inefficient use of land. Large areas of scattered car parking throughout the Strategic Development Area should be avoided. Proposals for car parking that come forward independently of a car parking strategy for the area, or a future masterplan, will not be supported where they could compromise the road network or infrastructure for alternative forms of active travel, such as cycling and walking.
- 2.17 The area is presently severed by the railway lines and improved access is needed to mitigate the impact of this. The delivery of a new pedestrian and cycle bridge will connect Watford Junction station to the land east of the Abbey Line. This bridge will need to be accessible for commuters and local people to ensure that development is integrated into the existing built-up area. The location of the bridge landing points will be identified as part of discussions with landowners. The legal agreement for this will need to be in place before redevelopment can progress. A route for a second bridge that connects Penn Road with Watford Junction is to be protected so that new development does not compromise potential access to the area in the future.

## Community infrastructure

- 2.18 New development in the Watford Junction area is anticipated to include at least 2,718 new homes and some additional windfall development. This will generate additional need for school places and increase demands placed on existing health facilities.
- 2.19 A primary school has been identified as part of the scheme located in the north of the Strategic Development Area. Additional education facilities east of Watford Junction Station will be required. However, much of that area is sub-optimal given the constraints of the site including proximity to railway lines and the concrete batching plant and rail aggregates depot. A second primary school will be required east of the station and applicants are encouraged to work collaboratively to identify where it can be provided that provides good amenity for young children. If an alternative location for a new primary school is identified outside of the Strategic Development Area and will meet the needs of new residents this will be supported.
- 2.20 The Herts Valleys Clinical Commissioning Group has indicated that a new health facility, with a floorspace area of approximately 1,300sqm, is required in the Watford Gateway Strategic Development Area. Applicants should work collaboratively with other landowners and the Clinical Commissioning Group to identify how this facility can be delivered. Where provision is made on site, this will be considered in the context of other developer contributions. As part of the redevelopment of the area, a childcare facility should be reprovided within the Strategic Development Area. The location of this facility, and how it will be delivered, will need to be agreed with the Local Planning Authority prior to redevelopment of the existing premises.

## Building height

- 2.21 The Taller Buildings Study (2021) suggested that a suitable prevailing base building height in the Watford Junction and Clarendon Road area would be eight to ten storeys tall. Development will be required to comply with Policy QD6.5 'Building Height' where proposals are above this base height on a street frontage, or more than ten storeys to the rear. Other Local Plan policies and the relationship with existing low lying areas will also be considered in determining acceptable building heights.
- 2.22 Located adjacent to the east and west of the Strategic Development Area are the Estcourt and Nascot Conservation Areas. Developments will need to be considered with regard to how they may impact on these designations and their sensitivities, particularly where proposals are designed to exceed the base building height.





## Strategic Policy CDA2.1: Watford Gateway Strategic Development Area



The Strategic Development Area will see co-ordinated change around Watford Junction railway station / bus station and the Clarendon Road area, creating a mixed-use urban quarter of high quality design and place making, with excellent connectivity to support a mix of housing, employment and other subsidiary land uses and community orientated facilities. To achieve this, applicants will be required to demonstrate how proposals will make provision for and contribute towards the following criteria:

- a) The regeneration of land north of Watford Junction railway station and how they will help transform the area into new, high-density development providing homes, jobs and other uses;
- b) In locations where new development is of a scale and is notably different in character to adjacent existing residential uses, proposals will need to be designed so that they demonstrate a transition of taller urban form to lower lying character and mitigate any significant impact on neighbouring residential or community amenity;
- c) A new primary school site to meet the demands generated by the development;
- d) Provision of a circa 1,300sqm of healthcare floorspace;
- e) A high quality transport interchange hub located at Watford Junction connecting rail, bus, taxi, cycle and pedestrian facilities;
- f) New walking, cycling and public transport infrastructure will be required to contribute towards the Local Transport Plan and supporting strategies;
- g) On land east of the railway line, a pedestrian and cycle bridge for commuters and residents across the Abbey Line must be agreed before planning permission is granted;
- h) A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded;
- i) The land east of the West Coast Mainline will support a mix of uses including replacement car parking, new homes and employment uses;
- j) Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace and the proposed use will not undermine existing uses through the Agent of Change Principle. As part of the commercial floorspace a replacement childcare facility should be provided;
- k) Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line. Applicants will be required to demonstrate this has been achieved as part of any proposal;
- l) New development will not compromise vehicle access from Colonial Way and Clive Way into the site and access to the station;
- m) The concrete batching plant and rail aggregates depot will be safeguarded as significant mineral infrastructure.

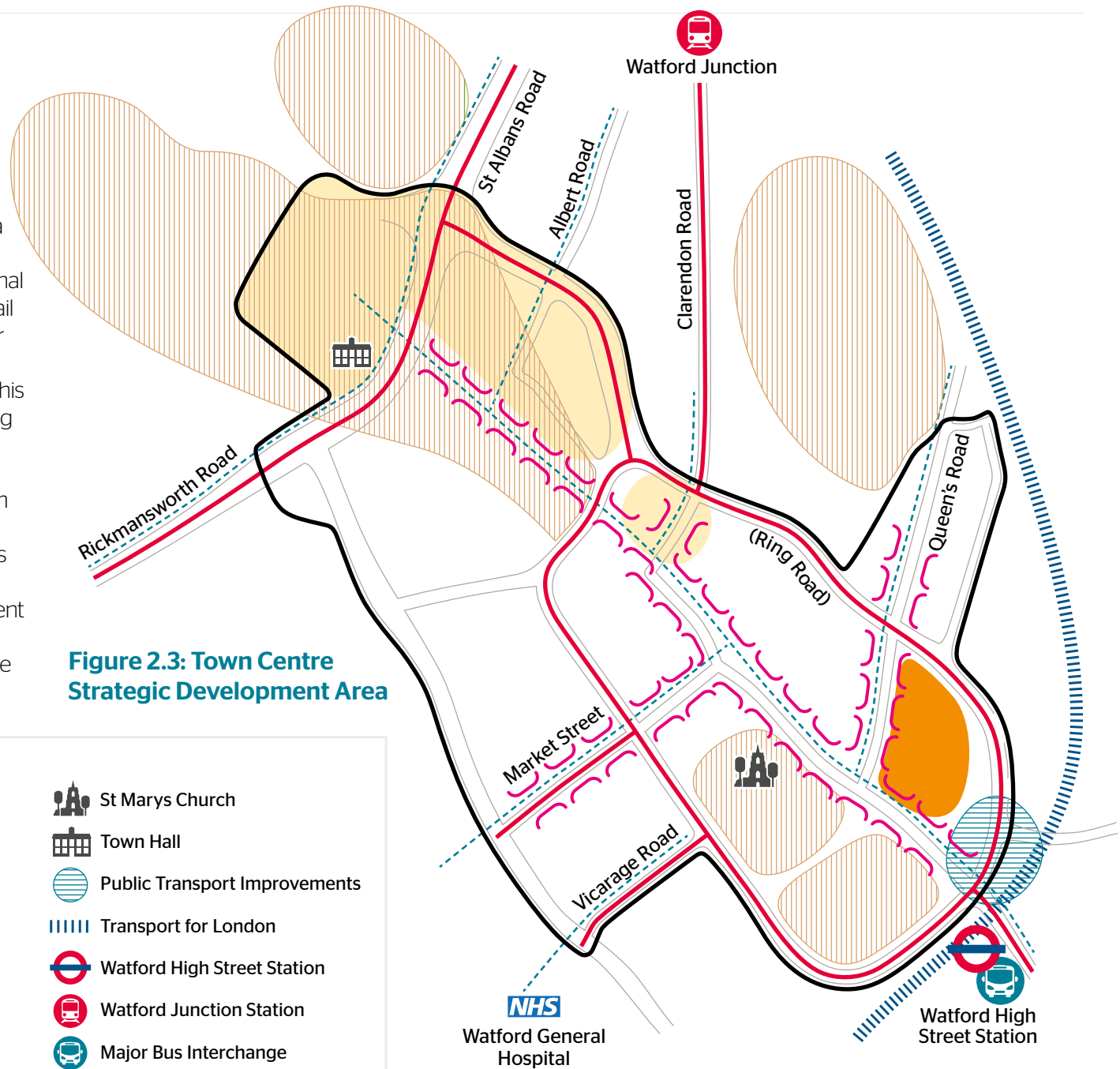


# Town Centre Strategic Development Area

## Context

2.23 The Town Centre Strategic Development Area encompasses 52 hectares of land at the heart of Watford (Figure 2.3). The area is a sub-regional destination for town centre uses including retail and leisure, and supports a significant number of jobs. Its historical importance is reflected in the high number of heritage assets present. This area of high sustainability is home to a growing residential community.

2.24 The Strategic Development Area extends from Watford High Street overground station in the south to West Herts College in the north. It has good access to rail and bus links and strong connections to the other Strategic Development Areas. The town centre does however suffer from an 'island effect' created by the severance caused by the surrounding ring road.



**Figure 2.3: Town Centre Strategic Development Area**

Key			
	SDA Boundary		St Marys Church
	Public Transport Priority		Town Hall
	Walking and Cycling		Public Transport Improvements
	Conservation Areas		Transport for London
	Mixed-Use Development		Watford High Street Station
	Active Frontages		Watford Junction Station
	Indoor Shopping Centre		Major Bus Interchange

## A thriving Town Centre

- 2.25 The Town Centre has existing residential areas alongside a wide range of facilities with large amounts of comparison retail alongside a variety of leisure, cultural and entertainment facilities. The evening economy is strong and draws visitors from a wide area to the restaurants, bars and in particular the Watford Colosseum and Watford Palace Theatre.
- 2.26 To continue to thrive, Watford Town Centre will need to evolve and diversify in response to current and future retail and social trends, be adaptable to changes in technology, consumer behaviours and the shift from 9am-5pm towards longer, flexible, active hours. This need for adaptation and diversification, together with access to good public transport, makes the Town Centre also appropriate for residential-led or mixed-use high density development.
- 2.27 The Strategic Development Area contains three distinct character areas: the North High Street from the Exchange Road flyover north to Rickmansworth Road; the central part of the High Street from the flyover, south to King Street; and the south part of the High Street, which extends south of King Street to the Colne Valley Strategic Development Area.

## Development in the Town Centre

- 2.28 The Town Centre provides opportunities for residential development as part of a wider mix of uses. This additional footfall will contribute towards the vitality in the Town Centre through the day and into the evening, particularly to support convenience and retail leisure uses. More people living in the area also encourages a sense of ownership.
- 2.29 Achieving an appropriate mix of residential types, sizes and tenures, including family-sized units, across the area, will be of great importance to meet Watford's housing need, as will providing essential services to ensure the area is an attractive place to live. The growth in the number of people living in the area will mean a need for additional community facilities to support the new residents of the town as well as providing community uses for the whole borough.
- 2.30 The importance of the retail offer in the Town Centre is reflected in the South West Hertfordshire Retail and Leisure Study (2018). Retaining active and positive ground floor shop frontages will be the key to maintaining this position. Further discussion is provided in Chapter 5 'A Vibrant Town' and Chapter 6 'An Attractive Town'.

- 2.31 New development, particularly new homes, will need to be sensitive to potential environmental issues, noise and light pollution that occur with some town centre uses. Applicants will need to design building servicing and waste management facilities into schemes to avoid adverse impacts on amenity and the public realm.
- 2.32 It is important that development proposals consider how they are integrated with other projects in the Town Centre and nearby. In this context, proposals will be expected to contribute towards the vision for Watford to 2036, which has been informed by Watford's Cultural Strategy and reinforces the importance of the town centre as a destination with an improved visitor experience.



## North High Street area

- 2.33 This area from the Exchange Road flyover to Rickmansworth Road is currently the focal point for the evening economy in Watford. The north part of the High Street itself is a wide boulevard with listed buildings at the north end but much of the area's character has been compromised by low quality development and public realm. The area lies outside of the Core Shopping Area, and a mix of uses that provides positive and active frontages, quality public realm and contributes towards the vibrancy of the town centre will be supported. Proposals to make better use of the public space along the High Street in the area north of Albert Road South will be supported, where they meet the requirements of licensing and do not create conflict with other uses in the vicinity.
- 2.34 At the north end of the High Street is the area known as The Parade, where several listed buildings are located. Proposals will need to be designed to minimise impact on the listed buildings and use heights that are sympathetic to the surrounding character.
- 2.35 The Civic Core Conservation Area encompasses several listed buildings, including the Town Hall and Watford library. A number of cultural facilities are also nearby including the Colosseum, leisure centre and West Herts College. Development in this area will be guided by the North Hub Masterplan, which seeks to deliver a variety of facilities reflecting the cultural and heritage value

of the area. Proposals will need to consider heritage-related Supplementary Planning Documents. They must also improve the function and setting of the buildings, reduce the dominance of the road system around the Avenue Car Park, and make more efficient use of land. A short distance to the west is Cassiobury Park, the largest park in the borough. Proposals for the wider area should seek to improve connectivity to this area given the limited recreation space available in the Town Centre.

- 2.36 East and west of the north part of the High Street are areas that have a low quality urban grain that does not relate well to the main retail area. Proposals in these areas should consider the potential for high-density development that will reinstate a street pattern that improves connectivity through a high quality public realm, and uses building design to create a balanced approach to openness, enclosure and natural surveillance.
- 2.37 Allocations around Albert Road South provide an opportunity for comprehensive redevelopment of this area to create a distinct identity with improved public realm. Proposals in this area will be supported to provide pedestrian and cycle connections across Beechen Grove.

## Central High Street area

- 2.38 The central High Street area lies within the core shopping area and is a focus for retail and leisure uses, to encourage a variety of

activities for all ages and a positive visitor experience. Development proposals should reinforce these uses and make a positive contribution towards the town centre as a destination.

- 2.39 The east side of the High Street is dominated by the indoor shopping centre, formerly intuWatford, where the extension into Charter Place, which opened in 2018, has also created a significant leisure draw. Flexibility for retail and leisure uses will be required to help ensure that the complex continues to make a positive contribution towards the town centre, while complementing the more traditional High Street retail offer.
- 2.40 Towards the south end of the area is the St Mary's Conservation Area, which includes St Mary's Church, the oldest building in Watford, and several other listed buildings. Proposals in this area will need to be designed to reflect the sensitivity of the historic environment and the setting of the listed buildings.
- 2.41 Located at the north end of this area is Watford Market. The market has two elements, with a covered 'box park' facility of retail and eateries and outdoor stalls on the open High Street. There are aspirations to improve the market and make it a more attractive destination for local people. Proposals to relocate the market will be supported where they align with the ambition to improve the quality of the town centre as a vibrant retail destination and visitor experience.



2.42 Adjacent to the High Street are the distinctive street areas of Market Street (to the west) and Queens Road (to the east). These are local retail areas that complement the High Street offer and have pedestrian and cycle links to other parts of Watford. Both reflect the residential character around them, being characterised by low-level built form and shops operated as private enterprises, rather than national operators. Development in these areas should enhance the retail offer and community orientated facilities. Projects that will improve the public realm and the pedestrian experience through urban greening and street works will be supported. The Council encourages engagement with local stakeholders in a co-ordinated approach to enhancing Market Street and Queens Road.

2.43 The Local Plan encourages increasing accessibility for people using public transport, walking and cycling, however, private vehicles will still be the choice for some. Should the redevelopment of large-scale parking facilities be considered in the future, proposals must be supported with evidence setting out the potential impacts and benefits for the town centre as a thriving retail destination and a place people want to visit. This will need to consider good access to retail, recreational and leisure facilities and the relationship to other strategies associated with walking, cycling, taxis and public transport.

### South High Street area

2.44 The south High Street area is more reflective of a traditional High Street, characterised by smaller independent units and specialised retail that create a continuous active frontage. The existing built form consists of buildings with a small footprint and is generally two storeys in height.

2.45 Much of the south part of the High Street lies within the High Street / King Street Conservation Area and includes several listed buildings. Proposals will need to consider their potential impact on these heritage assets, and be designed using high quality and innovative approaches to improve the built environment and contribute towards the distinctiveness of Watford.

2.46 At the base of the south High Street area is the junction with Beechen Grove and Exchange Road, creating severance between the Town Centre and Lower High Street and is a poor quality and vehicle dominated environment. Highways improvements to the junction will be supported, particularly where they prioritise walking and cycling. This area acts as a gateway to the Town Centre from the Watford High Street Overground Station and opportunities to improve local transport with connections to a future Mass Rapid Transport System will be supported. Where necessary the Council may use land assembly powers to secure proposals that are of high quality.

### Improving connectivity

2.47 The Local Plan reflects objectives set out in the Local Transport Plan and will be further informed by the Local Cycling and Walking Infrastructure Plan and Sustainable Transport Strategy. One of the overarching objectives of the Local Plan is to improve the environment for people to move through and make it an attractive place to live, work and visit.

2.48 The Town Centre is bound by the ring road, creating significant severance for people not using private vehicles to get around. Of particular importance are improvements to key junctions that should prioritise non-vehicle users, including the junctions at the High Street / Rickmansworth Road, Albert Road South / Beechen Grove, Clarendon Road / Beechen Grove, south part of the High Street / Beechen Grove and Market Street / Exchange Road.

### Community infrastructure

2.49 New development in the Town Centre Strategic Development Area is anticipated to include at least 546 new homes. This will generate additional need for school places and increase demands placed on existing health facilities.

2.50 Applicants are encouraged to work collaboratively to identify where a new primary school can be provided that provides good amenity for young children. If an alternative location for a new primary school is identified outside of the Strategic

Development Area and will meet the needs of new residents this will be supported.

2.51 Applicants will need to demonstrate collaborative working with other landowners and the Clinical Commissioning Group to identify how additional health facilities can be delivered. Where provision is made on site, this will be considered in the context of other developer contributions.

### Building heights

2.52 Developments within the Town Centre will need to consider how they relate to their surroundings, including heritage assets, and the impact they may have on the character and function of the area. Schemes will need to comply with policies set out in Chapter 6 'An Attractive Town' and consider how they relate to the existing built form. Informed by the Building Heights Study the future base height in the Town Centre is considered to be five storeys. Proposed buildings taller than this will need to satisfy the requirements set out in Policy QD6.5 'Building Height'.





## Strategic Policy CDA2.2: Town Centre Strategic Development Area

Proposals in the Town Centre Strategic Development Area will be supported where good design contributes positively towards creating a vibrant town centre, focused on people, healthy lifestyles and quality of life. To achieve this, applicants will be required to demonstrate how proposals will make provision for, and contribute positively towards, the following criteria:

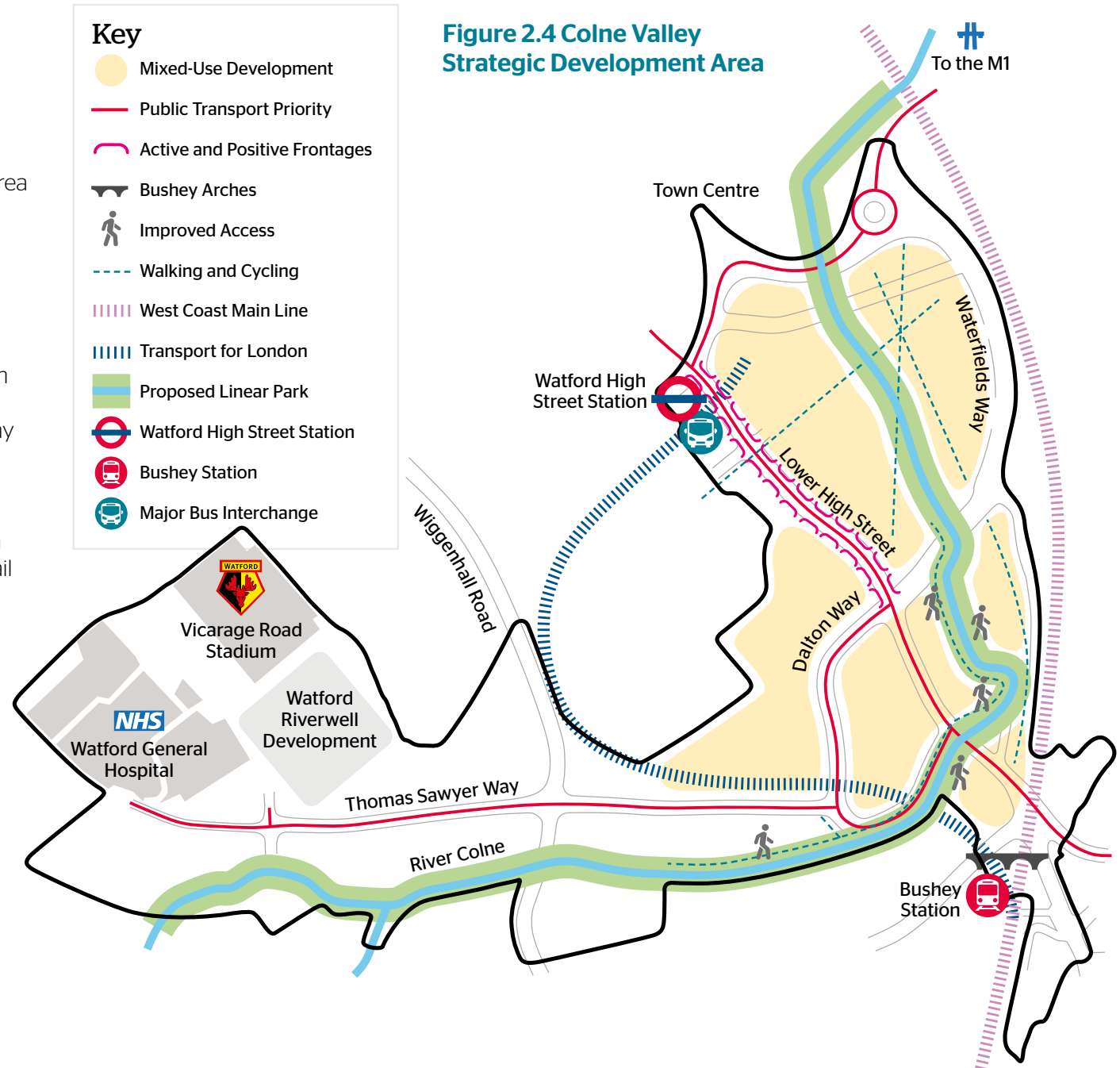
- a) New development will make effective use of land to intensify town centre uses and increase the amount of people living in the Town Centre, intensifying footfall and adding vitality to the town throughout the day and evening;
- b) New uses should make a positive addition to the vitality and functionality of the Town Centre. Residential uses should be sensitively designed and located to avoid negatively impacting on existing town centre uses. Leisure uses that contribute towards the vibrancy and functionality of the Town Centre will be supported;
- c) Development along the High Street, Market Street and the north part of the High Street should retain and enhance active frontages on the ground floor. Uses, such as flexible workspace, where activity occurs throughout the day, will be supported in these areas;
- d) Public realm should be improved to create distinct places throughout the Town Centre to increase dwell time. Proposals should support the delivery of green infrastructure, and in particular, tree planting, to enhance the visitor experience;
- e) Proposals should contribute to clear and co-ordinated wayfinding across the Town Centre and permeability into surrounding areas, including the rail and bus stations, Clarendon Road office hub, the football stadium and hospital. Priority will be for pedestrians and cyclists;
- f) Opportunities should be taken to reduce the vehicle dominance of the ring road, proposals that provide active frontages to the ring road will be supported, transforming the environment into a street that is a positive experience to use for pedestrians and cyclists, as well as vehicle users, will be a priority;
- g) Linkages to open spaces, particularly Cassiobury Park and the proposed Colne Valley Linear Park, should be improved, contributing to the creation of a well connected, accessible and integrated network of open spaces;
- h) Heritage assets, in particular St Mary's Church and the surrounding conservation areas, are key to the character of the Strategic Development Area and proposals should be sensitive to these heritage assets, enhancing their character and setting;
- i) Proposals should demonstrate the provision of innovative waste management and recycling storage and collection systems, to reduce the need for service vehicles along the High Street.

# Colne Valley Strategic Development Area

## Context

2.53 The Colne Valley Strategic Development Area encompasses 83 hectares in the southern part of the Core Development Area with the defining feature being the River Colne. It includes destinations such as Vicarage Road Football Stadium; Watford General Hospital; Trade City employment area and a distribution of retail parks that perform an out-of-town shopping role in the borough and Bushey and Watford High Street railway stations (Figure 2.4).

2.54 The overarching vision for the Strategic Development Area is to transform it from a car-dominated environment with large retail and commercial sheds, into a new mixed use urban quarter with a quality public realm and an enhanced and accessible river environment for all to enjoy. The Strategic Development Area comprises three areas of different character and objectives; Lower High Street, River Colne and Watford Riverwell.



2.55 Located in an area of high sustainability, new development provides opportunities for people to have excellent access to public transport, services and facilities including the town centre. New development is envisaged to transform this part of the town and create a built and natural environment that is increasingly focussed on people and high quality place making. New development should be designed to reinstate an urban grain that creates a legible network of streets and public spaces and a quality public realm. This should improve connectivity for all users and more widely makes a contribution towards creating a high quality neighbourhood where people want to live.

2.56 Proposals should maximise the opportunities and be designed to make effective use of land. They should ensure design measures are implemented to mitigate any adverse impact of the scheme on existing residential areas. Within the Strategic Development Area, proposals should not increase the amount of retail floorspace on site unless small-scale provision is needed to support the local community. Existing retail floorspace can be reprovided, where appropriate, however a reduction of retail provision will be supported to contribute towards the objective of transforming this area into a residential and mixed-use quarter.

2.57 Watford Museum (Grade II listed building), the Pump House Theatre and Frogmore

House are important heritage assets located along the Lower High Street. Where there is a potential adverse impact on a heritage asset a Heritage Impact Assessment may be required. Design measures to minimise impacts on these assets should be set out as part of any proposals.

2.58 The area is dominated by a network of busy roads that include the Lower High Street, Dalton Way and Waterfields Way (which links to the M1). The high volumes of traffic have resulted in the designation of an Air Quality Management Area Bushey Arches and another at Pinner Road just outside the Strategic Development Area boundary. The road network has also resulted in fragmented pedestrian and cycle provision and significant severance between people and local destinations. Informed by the Local Transport Plan and the forthcoming Local Cycling and Walking Infrastructure Plan, proposals will contribute towards reducing the influence of the motorised vehicle in this area and prioritising active travel and public transport. Projects such as junction improvements and giving priority to non-private-vehicular traffic along the Lower High Street will be supported.

2.59 Major development proposals should use a masterplan led approach that demonstrates how they have maximised local opportunities for development of appropriate densities, to improve the public realm and increase access to services and facilities.

## River Colne area

2.60 Development in this area will primarily be residential. Located at the lowest point of the valley between the town centre and Bushey Arches, proposals will need to be designed to reflect their location near the River Colne while intensifying existing land uses given the close proximity to Bushey Station.

2.61 New development fronting the river should be designed to minimise disturbance to semi-natural areas. Proposals should do this by including measures that will enhance the setting of the river, the avian, riparian and aquatic habitats it supports and improve pedestrian and cycle routes. To do this, proposals should by consider the location of other green spaces and community facilities in the wider area that the community will use.

2.62 The area has been subject to a Strategic Flood Risk Assessment and this should be used to inform how proposals are designed in order to mitigate flood risk. Sites affected may require a site-specific flood risk assessment and this should consider other flood risk mitigation measures that may be forthcoming in the Core Development Area. Applicants are encouraged to engage with the Environment Agency as an early part of scheme preparation. Further discussion is set out in the 'Flood risk and ground water management' section of Chapter 9 'Natural Environment'. On sites where the River Colne has been culverted, measures need to be taken to re-naturalise the waterway.



2.63 The impacts of new development will need to be managed given the sensitivities of the environment, particularly those located in Flood Zones 2 and 3 or with potential to affect biodiversity. Building design measures that reduce noise and light spill should be integrated into all development proposals. Building heights in this area will need to be appropriate and reflect the context and constraints of this part of the Strategic Development Area.

2.64 The River Colne is an important asset in the area as part of the network of green and blue infrastructure, and a connection from the Ebury Way and Oxhey Park to Waterfields Recreation Ground and further north along the valley. The area lies to the north of the Colne River Regional Park and shares many of the same characteristics as part of the green and blue infrastructure network. The Colne Valley provides an opportunity to improve the natural environment and increase the recreational value for local people.

2.65 A key objective of the Strategic Development Area, informed by the Watford Green Infrastructure Strategy (2011), is to create a linear park along the river basin. Proposals along the River Colne should be designed to help create this park and make provision for a publically accessible shared use path along the site. This will contribute towards open space requirements set out in Policy NE9.7 'Providing New Open Space'. As part of the linear park, proposals should be designed to facilitate continuous access to adjacent

greenspaces, play areas, allotments and playing fields, this may require measures to address road crossings in the vicinity.

### Watford Riverwell, Vicarage Road Football Stadium and Watford General Hospital area

2.66 The western part of the Strategic Development Area incorporates Watford Riverwell, an area of residential development and supporting community facilities; the Vicarage Road Football Stadium and Watford General Hospital, an important sub-regional health facility. The area has an overarching residential character and development schemes will need to be designed to reflect and integrate with this character.

2.67 The stadium and hospital are next to each other and important local landmarks in the Vicarage area. Improvements to the hospital will be supported, and planning consent has been granted for a new multi-level car park. Any future development proposals in this area should positively contribute towards the existing residential character and enhance community facilities.

2.68 Part of the site includes the former Metropolitan Line Extension, a route safeguarded by Policy ST11.2 'Protecting and Enhancing Future Public Transport routes and Watford Junction Station Area as a Transport Hub'. This route will form part of a Mass Rapid Transport system linking Watford High Street and Ascot Road to the west (on the boundary with Three Rivers District). Development

proposals adjacent to the safeguarded route should be designed to enable pedestrian and cycle connections into the route and to any future infrastructure. More generally, proposals are expected to enhance the local walking and cycle network and enable good access to public transport along Vicarage Road and Thomas Sawyer Way.

### Community infrastructure

2.69 New development in the Colne Valley Strategic Development Area, is anticipated to include 4,361 new homes. Of these, 1,383 form part of the Watford Riverwell scheme which already has planning permission. These will generate additional need for school places and increase demands placed on existing health facilities.



2.70 The Watford Riverwell scheme will provide one new primary school with one other provided within the Colne Valley SDA and there is some projected capacity at existing schools in the wider area. Proposals will be required to make provision for primary school facilities. For sites larger than 1,000 dwellings, this will be required on site. For sites that are located in close proximity to each other and will have a cumulative impact that will generate demand for a new school, applicants are encouraged to work collaboratively with other landowners and the education authority to best meet this need. There is a need to identify where a new primary school can be provided that provides good amenity for young children. If an alternative location for a new primary school is identified outside of the Strategic Development Area and will meet the needs of new residents this will be supported.

2.71 Applicants should work collaboratively with other landowners and the Clinical Commissioning Group to identify how additional health facilities can be delivered. Where provision is made on site, this will be considered in the context of other developer contributions.

### Building height

2.72 Informed by the Taller Buildings Study', the base future building height in the area is five storeys. New development should be designed to reflect this character and where proposals exceed this height, they will need to comply with the requirements set out in Policy QD6.5 'Building height'. To make a positive contribution to the Watford Skyline, proposals should use appropriate densities, site layouts, building heights and reflect the topography which is lowest around the River Colne and highest near the town centre. Important views across the borough, such as from the rail viaduct and Oxhey Park, should not be compromised.





## Strategic Policy CDA2.3: Colne Valley Strategic Development Area



The Colne Valley Strategic Development Area is designated to facilitate transformative and co-ordinated change around the River Colne and Lower High Street area, producing a sustainable and mixed-use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses.

Development will be supported where it contributes towards the objectives for the area and is consistent with other policies in the Local Plan. Applicants will be required to set out how their proposals contribute positively towards the following:

- a) The redevelopment of retail and commercial land will be intensified with mixed-used development. Where retail use is reprovided, this should not exceed the existing net retail floorspace on site;
- b) In locations adjacent to existing residential areas, new development should be designed to minimise the potential impact on these areas by providing a transition in built form between existing homes and higher-density development;
- c) Proposals located in areas of flood risk will need to consider the cumulative impact of development and ensure that mitigation measures do not conflict with other measures that may have been agreed on other sites in the Core Development Area;
- d) New development will contribute towards the creation of, and connections to a linear park along the River Colne, from Water Lane to Oxhey Park, enabling public access for pedestrians and cyclists and the enhancement of wildlife habitats;
- e) Proposals adjacent to the River Colne are to be designed to enhance its setting, facilitate public access, and to include measures to minimise the impact of development on the river-based habitats including the re-naturalisation of the River Colne between Water Lane and Waterfields Way;
- f) New primary school sites to meet the demands generated by the development;
- g) A new pedestrian and cycle crossing or underpass at Waterfields Way should be provided as part of the linear park along the River Colne;
- h) The Lower High Street should be prioritised for improved public transport and the creation of a shared surface route;
- i) Priority systems at junctions and crossings to improve access and permeability in the wider area for public transport, pedestrians and cyclists.





Chapter 3

# Homes for a Growing Community



## Homes for a Growing Community

- 3.1 The Spatial Strategy to 2036 seeks to deliver at least 14,988 new homes. This figure includes the amount of housing required to meet local need as determined using the government’s standard method (14,274 homes) and an additional 5% allowance (714 homes) to reduce the risk of sites identified in the plan not coming forward as anticipated. The figures that make up this housing target are set out in Figure 3.1.
- 3.2 The Housing and Economic Land Availability Assessment (2020) identified 56 sites suitable for residential and mixed-use development that includes new homes. The location of these sites are shown in Figure 3.2. This assessment sets out the number of homes that will come forward. This includes identified sites and also how many homes will come forward on sites that are either: not identified as a site allocation, or come forward with a housing density that is different from the indicative capacities calculated in the Housing and Economic Land Availability Assessment.

Figure 3.1 Housing figures in the Local Plan

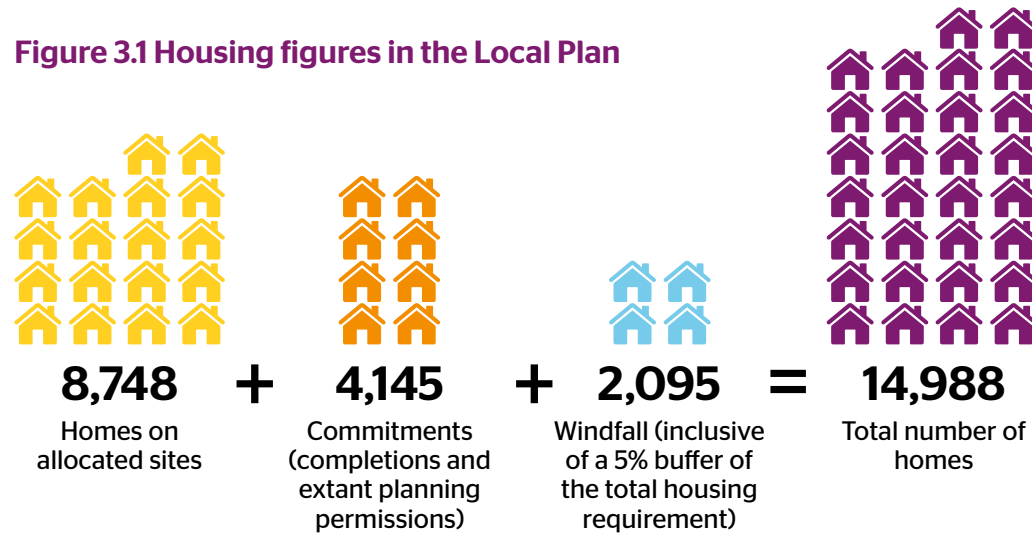
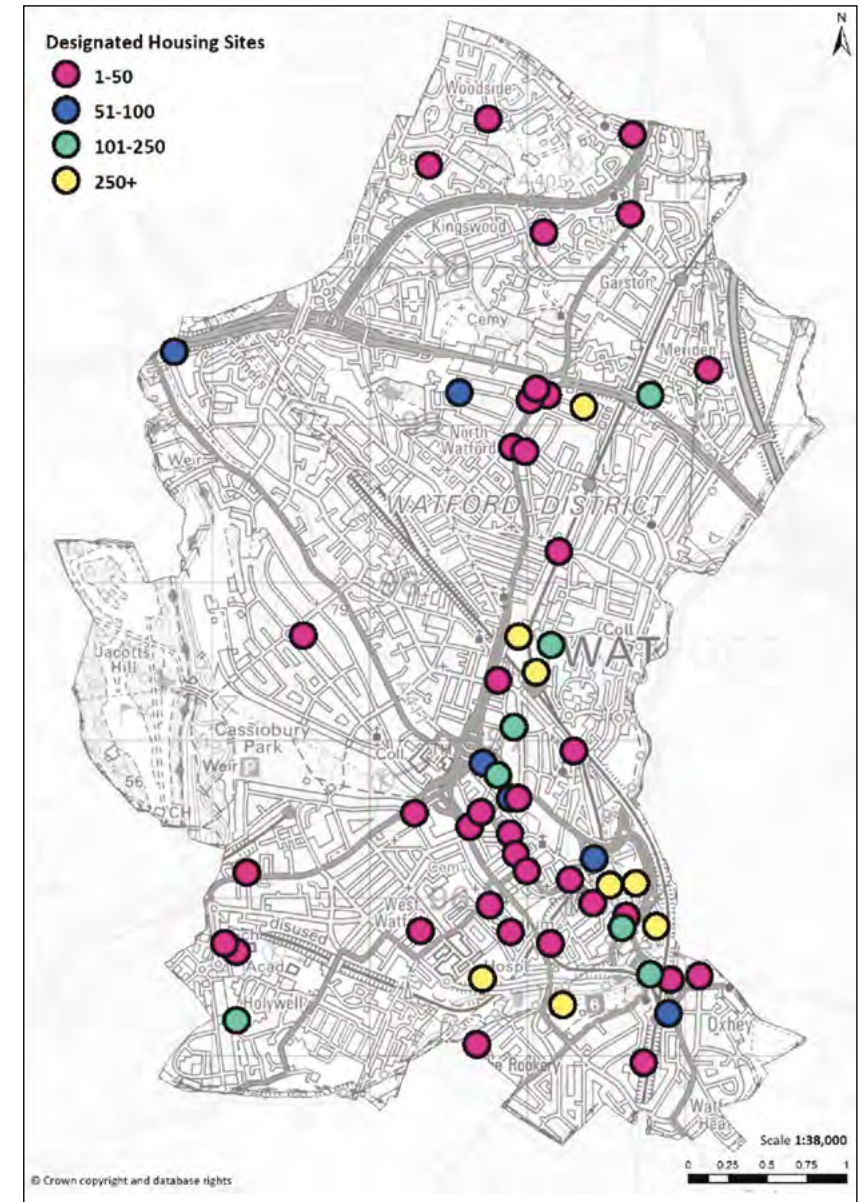


Figure 3.2: Housing sites in the Local Plan



- 3.3 As part of the housing to be provided to 2036, a windfall allowance of 2,132 units is included. This is based on a combination of three factors including the historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall development will contribute, on average, 116 new homes per year.
- 3.4 The South West Hertfordshire Local Housing Needs Assessment (2020) identified the local authorities of Dacorum Borough Council, Hertsmere Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council as forming the South West Hertfordshire Housing Market Area. It demonstrates a relationship between housing need and movement between the five authority areas. The Council's all face challenges to meet their housing need, however they have agreed to continue to work together to deliver the housing required across the wider area.

- 3.5 The delivery of new homes over the plan period is set out in the housing trajectory (Appendix B). This forecasts the anticipated delivery of new homes each year to 2036 and provides a mechanism to evaluate the performance of the Plan. It also highlights when the provision of supporting facilities and infrastructure are required. The housing trajectory will be kept up-to-date and monitored as part of the Council's Authority Monitoring Report.
- 3.6 To provide more certainty about when schemes will be coming forward and assist with projecting when other types of supporting development may be required, such as infrastructure, as part of their proposals, applicants are expected to provide a year by year housing trajectory setting out when new homes will be completed.



## Strategic Policy HO3.1: Housing Provision



Provision will be made for 14,988 new homes, inclusive of a 5% buffer of 714 homes, in Watford Borough for the period 2018 to 2036. Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development.

Residential developments should demonstrate how they will make an optimal use of land and provide a mix of homes including size, tenure and specialist adaptations to support people with different needs to ensure good quality homes are provided for all, both now and in the future.



## Housing mix, density and optimising use of land

### Design-led schemes and housing density

- 3.7 The Spatial Strategy sets out an approach to maximise the land available for redevelopment, reduce its impact on the environment through carbon reductions and deliver sustainable development. Housing density provides an indication of how effectively a site is used and its contribution towards meeting housing need. However, it does not provide wider context about efficient use of land, which is more closely related to site-specific opportunities, constraints and sensitivities. Design-led schemes should make efficient and effective use of land by responding to character, existing or intended as appropriate, the opportunities, constraints and sustainability of a particular site and its surroundings.
- 3.8 Within the Core Development Area higher-density development of at least 95 dwellings per hectare is expected. Higher-density development will be particularly supported in areas where there is good access to Mass Rapid Transport, such as at Watford Junction. Outside of the Core Development Area, proposals should start with a minimum of 45 dwellings per hectare and be revised up or down, based on the character and attributes of the area. This lower figure reflects the lower sustainability of these areas which have fewer services and facilities compared to the Core Development Area.

### Housing mix

- 3.9 The variety of housing types enable people to live and move within the town at different times in their lives as their needs change. The types of new homes coming forward during the plan period should reflect the needs of local people, present and future, and account for market trends.
- 3.10 A balance between housing demand and housing need should relate to what is deliverable. This can vary on a site-by-site basis. During the plan period Watford is likely to provide a higher proportion of smaller one-and two-bed properties than other local authorities in the South West Hertfordshire housing market area. This is reflective of Watford's character, which is more intensively built-up, has a higher population density and better access to public transport, which makes it a more sustainable location compared to its neighbours. Over the plan period the mix of housing types may need to be rebalanced across the housing market area to ensure an appropriate amount of family housing is provided.

- 3.11 The Local Housing Needs Assessment suggests that a high proportion of demand for new homes will be generated by households with one and two dependent children. Providing a mix of homes of different sizes is therefore important to support a balanced community and ensure that housing demand and housing need are both met through new development. Therefore, proposals for residential development will be expected to provide a housing mix that includes a proportion of family-sized homes with three or more bedrooms.
- 3.12 Proposals with a residential element are to provide a Housing Schedule. This should set out the total number of units; type and tenure of units; the number of habitable rooms and floorspace for the different elements of the market; and affordable and specialist housing, provided as appropriate. In conjunction with this, a housing trajectory setting out the anticipated annual completions should be provided as part of a planning application.





## Policy HO3.2: Housing Mix, Density and Optimising Use of Land

### Housing mix



Proposals for new residential development will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms).

### Housing density and optimising land



Residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher-density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings per hectare. Outside of the Core Development Area, new residential developments are expected to achieve at least 45 dwellings per hectare, but the optimal density for individual sites should be established through careful consideration of local character, context and access to amenities and public transport.

### Protecting existing housing stock



If a net loss of residential accommodation is proposed, applicants will be required to demonstrate how the benefit of the scheme outweighs this loss.

## Affordable housing

### The need for affordable housing

3.13 Affordable housing can refer to rented or sales properties and is defined by the National Planning Framework. Definitions of affordable housing are set out in Annex 2 of the National Planning Policy Framework. To best reflect affordable housing as a proportion of the total number of homes completed on a site, the requirement will be based on habitable rooms, with supporting information to be provided by an applicant including the number of units, floorspace and bed spaces as part of the housing schedule. Applicants are encouraged to partake in pre-application discussions to determine the affordable housing mix early in the planning process.

### Type and size of affordable housing

3.14 The National Planning Policy Framework requires new development to provide different types of affordable housing, including shared-ownership products on qualifying sites in conjunction with other affordable housing products, such as social and affordable rent. The level of provision required has been determined through a viability assessment of the Local Plan to ensure sites are deliverable.

3.15 Social rented housing provides homes for those who need it most and cannot access the property market. To prioritise this need, at least 60% of affordable housing provided on qualifying needs should be social rent,

with the remaining made up of other tenures, such as affordable rent and discounted home ownership products. Social rented units are in greatest demand, but are the costliest to deliver. In some circumstances it may be preferable for a proposal to include a greater number of social rented properties, which would reduce the total number of affordable units. Where this is agreed with the Local Planning Authority, the applicant will be required to demonstrate how the provision is of equivalent value to meeting the affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.

3.16 The type and quality of an affordable home to meet the needs of local people is often reflected in the size of the units provided. New homes can have bedrooms designed for one-bed space (single bed) or two-bed spaces (double bed or twin beds). Unit sizes are commonly expressed in terms of the number of beds and persons. The Council's preference generally being for larger bedrooms which are more reflective of local need. The types of units in terms of bedroom and bed spaces should reflect the needs set out in the Council's Housing Strategy.

### Deliverability

3.17 Where delivery of 35% affordable housing on site is not possible and a reduced requirement is agreed with the Local Planning Authority at the time of planning consent, permissions will be subject to a late-stage review to determine if the scheme could deliver affordable housing more akin to the full policy requirement of 35%.





## Policy HO3.3: Affordable Housing



Residential developments, including residential institutions of ten homes or more will be supported where they provide at least 35% affordable housing (by habitable room).

Proposals will be required to provide a mix of affordable housing tenures, including a minimum of 60% of new affordable homes as homes for social rent. The homes for social rent should seek to prioritise family-sized (three+ bedrooms) accommodation and reflect the most up-to-date housing strategy.

Affordable housing should be provided on site. The Council will not support provision in lieu through commuted sums, other than in exceptional circumstances where it can be clearly demonstrated that it is not feasible to provide affordable housing on site.

Affordable housing is to be fully integrated in the development and to be designed and built to the same standard as market housing.

In exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a late-stage review mechanism, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority) will be required. Where it is demonstrated the number of affordable units achievable on site is higher than agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development.

## Build to Rent

### Build to Rent proposals

3.18 The National Planning Policy Framework defines Build to Rent as 'purpose-built housing that is typically 100% rented out.' Additionally, the South West Hertfordshire Local Housing Needs Assessment states that 'it can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and / or contiguous with the main development. Schemes are usually of a large-scale in terms of the number of residential units and offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control'.

### Discounted market rent and affordable housing

3.19 Build to Rent schemes will be required to provide affordable housing based on the criteria set out in Policy HO3.3 'Affordable Housing'. Where a developer is proposing a Build to Rent scheme that requires affordable housing to be provided, the affordable housing offer may be entirely Discounted Market Rent, if agreed with the Local Planning Authority. Discounted Market Rent units should be fully integrated into the development, with no differences between these units and the market units, tenure blind.

3.20 The discount on the market rent should be provided in line with the findings of the Local Housing Needs Assessment. It identified that for a person or family to afford a home in Watford, a discount of between 26-34% would need to be applied to market rents, with the variation reflecting different sizes of homes. This level of discount reflects a local approach to meeting the needs of local residents who cannot afford market rents.



3.21 As part of a planning application, applicants should provide the following information to demonstrate how the scheme will be operated and provide well managed, high quality rented homes:

- a) There is unified ownership and unified management of the development;
- b) Longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months;
- c) The scheme offers rent certainty for the period of tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases, which should always be formula linked;
- d) There is on-site management, this does not necessarily mean full-time, dedicated staff, however, all schemes need to have systems for prompt resolution of issues and some daily on-site presence;
- e) Providers have a complaints procedure in place and are a member of a recognised ombudsman scheme;
- f) Providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits in advance.

3.22 Discounted Market Rent units that are provided as affordable housing will be allocated to eligible households on Watford

Borough Council housing register. The allocation of the Discounted Market Rent properties that are not offered as affordable housing should be allocated to people in a manner agreed with the Local Authority.

### Clawback agreements

3.23 Private affordable rented properties will be subject to a 15-year covenant or a clawback agreement, agreed through planning conditions. For units provided as affordable housing, these will be provided in perpetuity.

3.24 Affordable housing, whether it be publicly or privately operated, provides a long-term community benefit. This benefit is likely to increase over the plan period if past trends continue, with property values increasing significantly faster than household incomes. Therefore it would be reasonable to expect an operator who wishes to sell any discounted market rent properties to:

- Clearly set out how the property(s) will be reprovided, by identifying a specific development to provide certainty to the local authority that there will be no net loss of affordable housing provision and the community will not be adversely affected;
- Reprovide with a unit(s) of the same size as the unit(s) being withdrawn for sale;
- Locate the replacement units where they will meet the needs of people on the discounted market rent housing register.

3.25 This requirement should be set out through the use of planning conditions.





## Policy HO3.4: Build to Rent



Proposals for Build to Rent homes will be supported in locations appropriate for residential development. Affordable housing should be provided in accordance with Policy HO3.3 'Affordable Housing', although Discounted Market Rent, at a genuinely affordable rent, will be accepted in place of other affordable housing tenures. Genuinely affordable rents should be established against the most up-to-date Local Housing Market Needs Assessment and should be capped at a level equivalent to the Local Housing Allowance.

To qualify as a Build to Rent scheme, proposals should meet the following criteria:

- a) The development, block or phase within the development has at least 50 units;
- b) The homes are retained as Build to Rent under a covenant for at least 15 years;
- c) A clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken;
- d) All the units are self-contained and let separately.

On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, this policy will only be applicable to the Build to Rent component. The scheme should be assessed as a whole, with affordable housing calculated as a proportion of the total habitable rooms across the scheme.

## Accommodation for vulnerable people

3.26 With an ageing population comes changing housing needs. These include differing design principles and the types of support required to enable people to live independently for longer, with care services and facilities available. Specialist housing for elderly people can include:

- Age-restricted general market housing;
- Retirement living or sheltered housing;
- Extra care housing or housing with care;
- Residential care homes and nursing homes.

3.27 People may have disabilities such as ambulatory difficulties, blindness, learning difficulties, autism and mental health needs, which may generate a range of housing requirements that change over time. These should be considered when new homes are built and if any special requirements should be incorporated into the design of a new building.





## Policy HO3.5: Specialist Housing and Care Homes



Existing specialist and supported housing will be protected where it is up to the standards set out in Hertfordshire County Council guidance.

The redevelopment of any site that includes housing for vulnerable people will only be acceptable where it meets the standards set out in Hertfordshire County Council guidance and when it meets the following criteria:

- a) There is no longer an identified need for the existing facility;
- b) The needs will be met elsewhere in the Borough, preferably close to the existing building or in a preferential location for specialist housing;
- c) Reprovision would result in improved quality of specialist housing.

Proposals for new specialist housing should be located within 400m of a district or local centre and public transport, be designed to include pick-up and drop-off facilities close to the principle entrance that are able to accommodate specialist transport vehicles. To aid mobility, development should provide space for the storage of mobility scooters.

New specialist housing and care homes that are provided at market value will be required to comply with the affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.

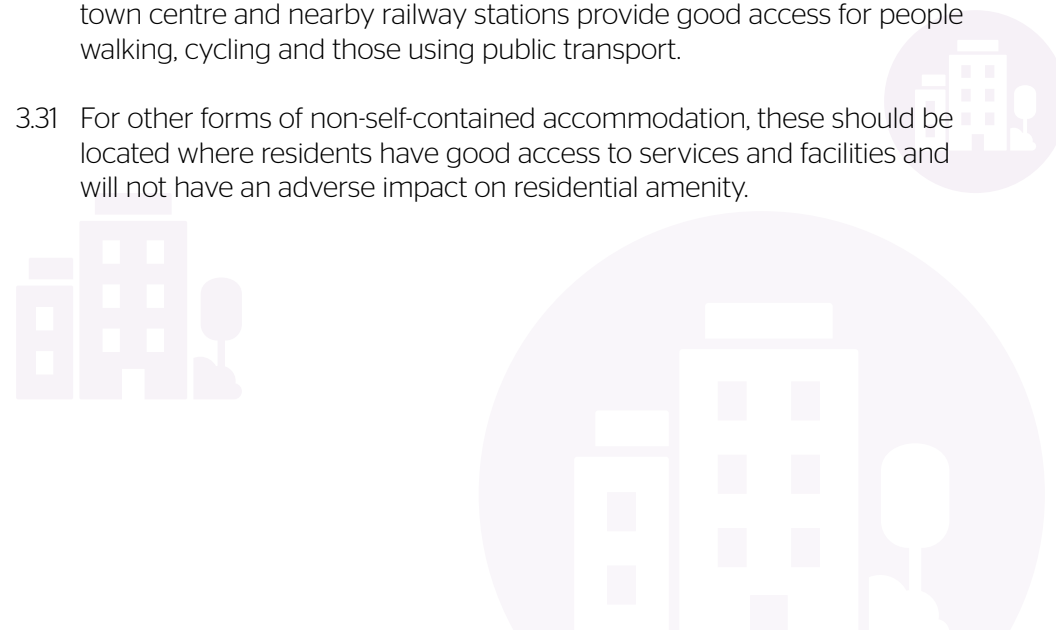
## Student, co-living and non-self-contained accommodation

3.28 Watford has a thriving town centre with a diverse range of services and facilities in the borough. The population is relatively young compared to neighbouring districts, with population projections indicating this demographic will continue.

3.29 West Herts College is the largest education institution providing tertiary education opportunities up to diploma and apprenticeship levels. The University of Westminster branch in Harrow, Middlesex University in Hendon, as well as a number of technical colleges in the area, offer wider education opportunities, attracting people from other areas or abroad who will seek accommodation. Increasingly Watford is seen as a possible location for a more affordable lifestyle.

3.30 Student and co-living accommodation is a type of housing primarily focused on younger people, where they can share communal facilities while having their own accommodation. These types of developments have a high ratio of people per square metre and are best suited to areas where there is good access to services and facilities. In Watford, the town centre and nearby railway stations provide good access for people walking, cycling and those using public transport.

3.31 For other forms of non-self-contained accommodation, these should be located where residents have good access to services and facilities and will not have an adverse impact on residential amenity.





## Policy HO3.6: Student, Co-living and Non-Self-Contained Accommodation



New student and co-living and non-self-contained accommodation will be supported where it is located within the Core Development Area, or within 800 metres of a railway station located in the Core Development Area.

Proposals for student accommodation will be supported where they provide evidence of support and need from an educational institution or a registered provider of student accommodation.

A covenant protecting the premises for student use only will be secured through planning conditions.

Co-living and non-self-contained accommodation will be supported where it incorporates a high quality of design and generous communal shared space and amenities for all occupants.

To differentiate co-living and non-self-contained accommodation from other types of residential accommodation, proposals will be required to have a minimum provision of 50 units. Proposals will need to be supported with a management plan submitted as part of a planning application.

Proposals will be required to make a financial contribution to comply with affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.



## Self-build and custom housebuilding

3.32 Self-build and custom housebuilding is an approach to delivering new homes that are designed and built by people to meet their needs and aspirations. The limited amount of land available for new development, as identified by the Housing and Economic Land Availability Assessment, makes it inappropriate to allocate land specifically for self-build homes and custom homebuilding. However, self-build and custom housebuilding will be supported on windfall sites where proposals are for 50 new houses or more.

3.33 If the scale of development is large enough to support one or more self-build plots, applicants are encouraged to consider how these self-build plots can be integrated into the overall scheme. Marketing of the site should be demonstrated to have been undertaken proactively to gauge potential interest in a self-build plot by those registered on the Council's Self-build Register.



## Policy HO3.7: Self-build and Custom Housebuilding



Residential proposals for 50 houses or more (excluding houses to be provided as affordable homes) will be supported where they provide one self-build plot for every ten houses, in agreement with the Local Planning Authority. This will be secured through legal agreement.

The average size of a self-build plot should be comparable to the average size of the market sized plots provided on site.

If the plot has been offered to people registered on the Council's Self-build Register and has not been sold within 12 months of completion of the overall scheme, the property will return to the developer to be built out.



## Gypsies and Travellers

3.34 Gypsies and Travellers are part of our community and have housing needs that are to be addressed as part of the Local Plan. Presently, there is one permanent Gypsy and Traveller site in Watford at Tolpits Lane, with ten authorised pitches. There are no private long-term sites or sites for temporary stays in the borough.

3.35 The Watford Gypsy and Traveller Accommodation Assessment (2018) was undertaken to identify the local needs of Gypsies and Travellers up to 2036. The study identified a need for two additional pitches for Gypsy and Traveller households.

3.36 The assessment found there is a need for seven additional pitches for households that do not meet the planning definition of Gypsies or Travellers. This need will be addressed as part of the general housing need.

3.37 One site with two pitches located adjacent to the existing site at Tolpits Lane is allocated for Gypsies and Travellers to meet projected need during the plan period. There is no further requirement to allocate land to meet future need. However, should that change in the future, proposals for new Gypsy and Traveller accommodation will be assessed using Development Management policies.



## Policy HO3.8: Gypsies and Travellers



Existing designated sites used by Gypsies and Travellers will be protected, unless it is demonstrated they are no longer required.

Proposals for new sites will be supported when there is no further capacity at existing or allocated sites for Gypsies and Travellers and the Gypsy and Traveller Accommodation Assessment is considered out of date.

Proposals for new sites for Gypsies and Travellers should:

- a) Have good access to the highway network;
- b) Have good access to health and education facilities by walking and cycling;
- c) Not have a significant adverse impact on the physical or visual character of the area;
- d) Contribute towards biodiversity net gain and not adversely impact upon habitats or trees;
- e) Not be located in an area of significant flood risk; and
- f) Not have an adverse impact on the amenity of existing or future residents.

## Residential conversions

### Residential conversions

3.38 Properties converted into smaller units contribute towards new homes required in an area through the sub-dividing of existing properties. This can make effective use of existing dwellings, particularly where there is high-density housing in an area of high sustainability. However, they can reduce the number of family-sized homes available in the area and impact upon local amenity if not properly managed. A mix of dwelling sizes (number of bedrooms) is important to maintain balanced communities and enable people to move and live in areas where they share social connections and are affordable.

### Houses in Multiple Occupation

3.39 Houses in Multiple Occupation perform an important role in the availability of housing, particularly for people only able to afford lower rents, and are supported in the borough. However, Houses in Multiple Occupation, in conjunction with other residential conversions, can create issues where there is a high concentration in a particular area. This can be visible through inappropriate numbers of parked vehicles and declining maintenance, affecting the property and amenity in the immediate area.

3.40 Proposals for changes of use to a House in Multiple Occupation will only be acceptable where residential amenity is not significantly affected, family housing is reprovided and the dwelling has good access to services and facilities (Figure 11). To enable good management and support, and ensure that they are available in the right locations without having an adverse impact on the surrounding area, only ten percent of the total number of dwellings along a residential frontage (or for a long street, defined as a residential frontage between two main roads or junctions) will be permitted.



### Policy HO3.9: Residential Conversions



Proposals to sub-divide existing residential accommodation in to self-contained flats or large-scale Houses in Multiple Occupation will be supported where:

- a) In the case of conversion to self-contained flats, proposals resulting in the loss of purpose-built, family-sized accommodation with three or more bedrooms include a family-sized unit (three+ bedrooms) with direct access to garden space at ground floor on site as part of the development;
- b) In the case of conversion to self-contained flats, all residential units on site meet the nationally described space standard;
- c) In the case of conversion to a House in Multiple Occupation, the property has an original, unextended, floor area of at least 150sqm and is located in an area with good access to public transport and other amenities;
- d) Appropriate amenity space and facilities for refuse and recycling storage are provided; and
- e) The proposal is car-free or parking provision is provided on site, or in nearby off-street parking facilities.



## Building standards for healthy, accessible and adaptable Homes

3.41 To achieve sustainable development and improve health and wellbeing, new homes need to be of a quality to enable people to live comfortably in circumstances that meet their needs. This applies to all members of our community who may be at different stages of their lives and have different family circumstances. Physical and mental health are often affected by household circumstances such as cramped accommodation and poor soundproofing and in part, can be related to the quality of how a home has been built.

### Internal space standards

3.42 New housing is an opportunity to improve new housing for local people. This is particularly pertinent with an increasing number of homes being delivered through permitted development rights, where Internal Space Standards are not regulated, and an increasing awareness of the importance of healthy homes to support physical, mental health and wellbeing. To ensure the delivery of high quality housing, proposals will be required to meet the Internal Space Standards set out in the national Building Regulations.

### Adaptability and accessibility

3.43 People should have the opportunity to stay in their own homes as they grow older; enjoy a good quality of life, and continue to live in the community where they have lived their lives; feel more connected to their communities; and help reduce costs to the social care and health systems. To do this, homes need to be adaptable. Most existing homes have not been designed in this way and are increasingly unlikely to meet the needs of a changing demographic. Alterations useful to support people as they get older, or those with disabilities, include wider doors and ramps for wheelchair access, and walls fitted with grab rails. More generally, it is important that the internal layout of a home is designed to enable it to support people with mobility issues and disabilities.

3.44 The demographic in Watford is one of an ageing population, with the number of elderly people expected to increase (ONS, 2011 Census). The Local Housing Needs Assessment highlights the projected increase in the number of people with a range of disabilities from existing levels, including those with mobility issues, autistic spectrum disorders, learning disabilities and challenging behaviour.

3.45 The Local Housing Needs Assessment states there is an existing shortfall of adaptable homes in the borough. It suggests there is a significant need for new housing that is designed to address the needs of the changing demographic. More specifically, the study suggests that a higher proportion of people using wheelchairs are likely to be living in social housing.





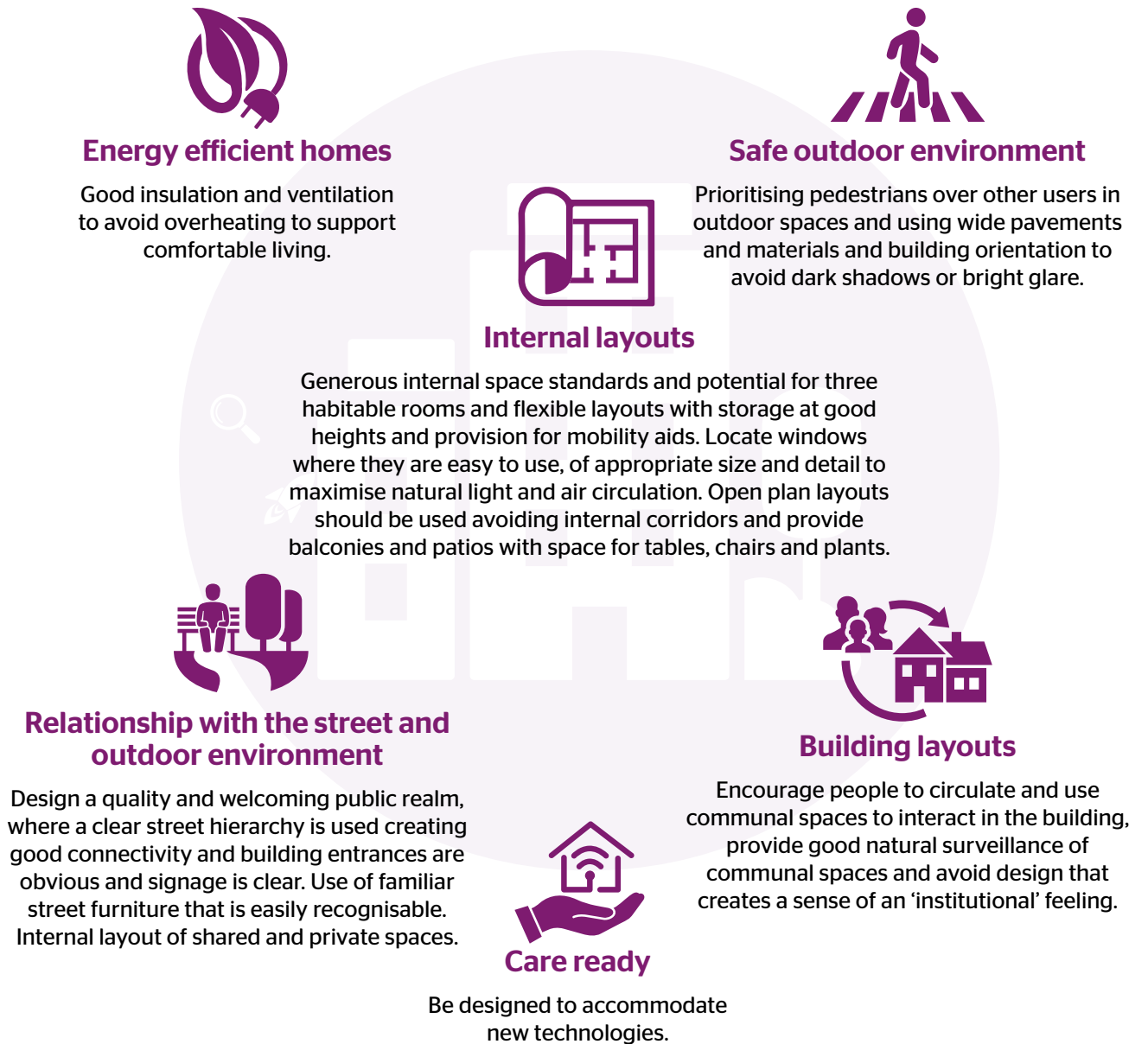
### Dementia Friendly homes

3.46 It is estimated that nationally the number of people living with Alzheimer's will more than double by 2040 and directly affect one in three people aged over 65 (Alzheimer's Society). In Watford this translates to about 2% of people who could be living with Alzheimer's by 2036. This is recognised locally by Watford Borough Council, having declared their intention to be a 'Dementia Friendly Town' in 2019.

3.47 Good quality housing and sensitively planned environments, whether a family home, extra-care housing, residential care or nursing care, can have a substantial impact on the quality of life of someone living with dementia. Small changes can often be enough to help someone living with dementia to be more independent, by providing an environment that is clearly defined, easy to navigate, and feels safe. Design considerations to support people with dementia are set out in Figure 3.3.



Figure 3.3: Dementia Friendly design principles





## Policy HO3.10: Building Standards for New Homes



All new homes will meet or exceed the nationally described internal space standard.

All new housing will be designed and built to comply with M4(2) of the Building Regulations unless they are built to comply with M4(3) of the Building Regulations.

For developments of 10 or more homes, at least 10% of the dwellings will be built to be wheelchair adaptable and comply with M4(3) of the Building Regulations.

For developments of 50 homes or more, 2% of dwellings should be designed to support someone living with dementia.



## Private and communal open space

### Private open space

3.48 In addition to internal space standards that contribute towards quality homes, access to private outdoor space is just as important for health and wellbeing. Most of the residential development to come forward in Watford during the plan period will be apartments. To provide healthy home environments, access to private outdoor space is essential.

3.49 Proposals should consider how private outdoor space can add quality to a scheme and how it will improve the relationship between the building and its surroundings. This includes the provision of a high quality built environment, and should increase natural surveillance early in the design process. All dwellings should have level access to one or more of the following forms of private open space: garden, terrace, roof garden, courtyard garden or balcony.

3.50 Private open space should be practical in terms of its shape and utility, offering good amenity so it can comfortably accommodate a table and at least four chairs. The space should also be suitably screened, to protect the area from high noise levels and provide privacy.

### Communal amenity space

3.51 Where communal amenity space is provided this should be of a minimum size of 50sqm for two units, plus 15sqm per additional two units. The use of roof areas, including podiums and courtyards for additional private or shared amenity or garden space is encouraged. While the standard is set out, this will need to be considered in the wider context of the scheme, in terms of the opportunities and constraints of a site.

3.52 Family housing on upper floors should have access to shared amenity space, informal play space and equipped play space (if no facilities are located nearby) and / or a balcony or terrace, subject to acceptable amenity and design considerations. This should be considered in conjunction with Policy NE9.7 'Providing New Open Space'. Where communal amenity space is provided, it should be designed to provide places to sit, play and the exercise. It should be adaptable to accommodate the changing needs of residents and be easy to maintain, whilst not compromising its contribution towards creating a quality public realm. Importantly, communal open space should be designed into the scheme so as not to be overshadowed or suffer low levels of daylight.





## Policy HO3.11: Private and Communal Outdoor Amenity Space



A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and at least one additional square metre should be provided for each additional occupant. The minimum depth and width for all balconies and other private external spaces should be 1.5m. This does not contribute towards the minimum internal space standards.

Provision of private amenity space is to meet the following standards:

Size of dwelling	Apartment*	House/Duplex/Maisonette
1-bed	5sqm	12sqm
2-bed	7sqm	24sqm
3-bed	8sqm	25-40sqm
4+bed	9sqm	25-40sqm

The provision of communal outdoor amenity space, including roof and terrace space, will be supported. Communal outdoor amenity space will need to be designed to be usable by all residents.





## Chapter 4

# A Strong Economy

## A Strong Economy

- 4.1 Watford is a sub-regional economic centre, home to the UK headquarters of some well-known companies as well as many smaller local businesses. A short commute to central London means that Watford is strategically placed for business, although it remains a distinct and competitive economic centre in its own right.
- 4.2 Watford has a diverse economy, with a mix of office and Industrial-led employment that reflects the multi-skilled community living in the borough. Information and communications technology based industries (ICT) are key employers in Watford, with professional services and knowledge based industries being its largest sector. Equally there is a strong industrial base in the borough, with five distinct industrial areas operating across a variety of different industries (Figure 4.1). This includes businesses related to storage, distribution and manufacturing.
- 4.3 Watford is also part of the South West Hertfordshire Functional Economic Market Area (FEMA) along with Dacorum, Hertsmere, St Albans and Three Rivers. Watford shares a strong relationship with its neighbouring areas, as demonstrated by the interlinked commuting flows.
- 4.4 The planning system can help to support the growth of Watford's economy by ensuring that the right type of land is available in the right places. The South West Herts Economic Study Update (2019) has identified a need across the sub-region for 188,000sqm of additional office floorspace and 481,500sqm of additional industrial floorspace. To contribute towards this requirement, Watford has planned for 111,175sqm of office floorspace and 40,759sqm of industrial floorspace. This means that there is an underprovision of industrial floorspace due to land availability, which is compensated for through an overprovision of office floorspace.
- 4.5 Providing more office floorspace than required for Watford can support our neighbouring authorities in meeting their need, provide high quality office floorspace to replace aging stock and reinforce Watford's role across the sub-region as an office hub. It also allows for new offices to be provided at the most sustainable locations, as Clarendon Road allows for the benefits of its proximity to Watford Junction to be maximised.

**Figure 4.1: Areas designated for office and industrial uses**

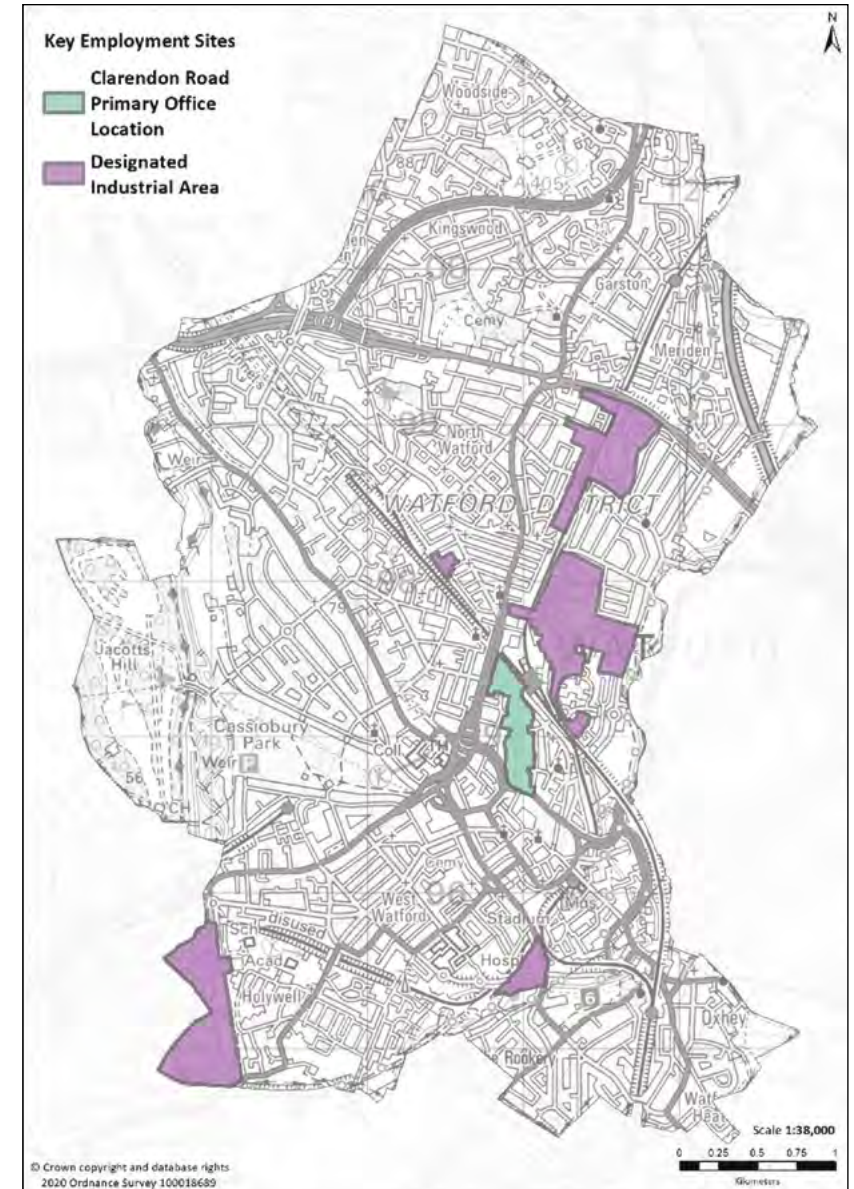
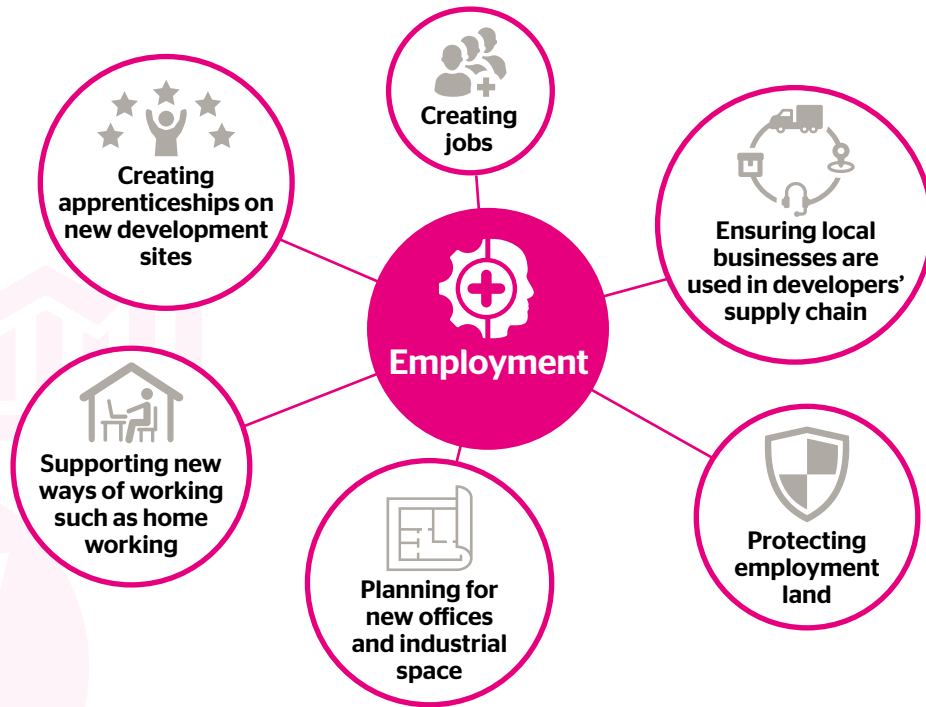


Figure 4.2: Role of employment policies



4.6 The policies in this chapter seek to encourage further economic growth by supporting increased provision and intensification of employment floorspace, including industrial.

4.7 COVID-19 has greatly impacted the economy to date, with the full, long-term effects upon employment remaining relatively unknown. The policies have been designed to continue to support business investment and development in Watford, whilst also being sufficiently flexible to allow for any potential transformative impacts. This may include increased flexible and home working. There is also the potential for an economic recession which could lead to a period of high unemployment and vacancy before any long-term recovery.



## Strategic Policy EM4.1: Providing New Employment



Proposals for new employment floorspace will be supported where they contribute towards meeting the identified employment need in the borough and Functional Economic Market Area.

To meet these challenging targets, the Local Plan will seek to prevent the net loss of both office and industrial floorspace across the Borough. New office growth will be prioritised at the Clarendon Road Primary Office Location, while new industrial growth will be prioritised in the five Designated Industrial Areas. Over the plan period, the Council will seek to plan for the creation of 11,500 new jobs.

The Council will continue to work with neighbouring authorities in the South West Hertfordshire Functional Economic Market Area to deliver the shortfall of industrial floorspace that cannot be provided in Watford over the plan period.

The Council will seek to support sustainable economic growth in the borough and the wider Functional Economic Market Area where possible by:

- a) Protecting existing employment land from inappropriate development;
- b) Encouraging the growth of new businesses and industries;
- c) Supporting new models and ways of working, including more flexible working practices;
- d) Ensuring employment land is intensified to make the most effective use of land; and
- e) Attracting new inward investment.

## Designated industrial areas

4.8 Watford contains five industrial areas, which host a wide variety of businesses, from large warehouses for storage and distribution, to smaller workshops. These industrial areas are vibrant during the day time and vacancy rates are low. Yet as the demand for housing grows, so too will the number of jobs required in Watford. A key issue facing the borough is that the identified need for new industrial land is met with a limit in land supply. The South West Herts Economic Study Update has shown there to be a large demand for industrial floorspace within the plan period, although the borough's Housing and Economic Land Availability Assessment (HELAA) (2021) has identified a shortfall of land for industrial uses up to 2036.

4.9 This shortage has been exacerbated by large-scale losses of floorspace over recent years. In Watford, industrial floorspace has seen a net loss of 24,657sqm between 2007 and 2018. Evidence shows that these losses have often been to residential uses, which enjoy higher land values and have been subject to conversions through Permitted Development Rights. There have also been losses to other non-employment uses that generate few jobs, such as bulky retail units and community spaces that are better suited to other locations. These losses, combined with high future demand for industrial land, mean that protecting and intensifying designated

industrial areas will play an important role in meeting future industrial growth requirements. Sites within designated industrial areas that have scope to be intensified have been identified as part of the Housing and Economic Land Availability Assessment.

4.10 While any new industrial floorspace could be dispersed across the borough, the colocation of industrial uses in a designated area can have benefits. Although evidence shows productivity is higher when industry is clustered, there are some more practical advantages of consolidating designated industrial areas. The noise, vibration and odour often caused by industrial processes can make it more sensible to locate these industrial uses together, as opposed to dispersing them directly amongst residential and office uses.

4.11 Uses that would be considered inappropriate in designated industrial areas are destination uses that do not complement the existing industrial uses in the area. These destination uses generate specific trips to the industrial areas that are not related to the employment offer on site. For example, some retail uses such as showrooms may attract customers to the industrial area, but cannot be used by the employees on site on a daily basis. These types of uses can undermine the effectiveness and value of the employment area to Watford's economy and are better suited to other locations.

4.12 Some non-industrial uses can support the function of the designated sites, making a valuable contribution to the area. These uses can be referred to as supporting uses, or 'walk to' uses, reflecting their strong relationship with neighbouring businesses. Providing small facilities under 100sqm in size such as fitness gyms, nurseries, some retail units and cafés can complement existing uses by providing facilities that can frequently be used by staff working in the employment areas while also creating jobs. Offices may also support the industrial function of some businesses in the site, although larger premises will be subject to Policy EM4.3 'Office Development'. Existing office in the Designated Industrial Areas can retain the same use, but will be encouraged to intensify where possible.

4.13 Development should also have regard to the Waste Local Plan and the identified Employment Land Areas of Search (ELAS) which overlaps with some of the sites in the Local Plan.

**Table 4.1: Future industrial supply**

Industrial potential supply 2018-2036	Floorspace (sqm)
Site allocations	17,035
Sites with planning permission	23,724
<b>Total</b>	<b>40,759</b>



## Policy EM4.2: Designated Industrial Areas



Designated industrial areas are identified on the Policies Map.

Proposals for new industrial employment uses will be supported where they contribute to the identified need for industrial land set out in the South West Herts Economic Study Update. To achieve this, proposals will be supported that incur no net loss of industrial floorspace unless:

- a) An up-to-date evidence base demonstrates that the site is no longer required for industrial use; or
- b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for industrial use in the medium term.

Proposals for supporting uses under 100sqm will be supported where their job generating potential can clearly be demonstrated. This should be assessed on a case by case basis. Proposals for supporting uses must show that the development proposed would not compromise any industrial or other employment activities in the designated site in terms of their continued efficient function, access, service arrangements and operating times.

## Office development

- 4.14 The professional service industry is the largest sector of employment in Watford and accounts for 14% of employment, with these types of businesses often being office based.
- 4.15 The majority of Watford's offices are clustered around Clarendon Road, which functions as Watford's central office district. The draw that Clarendon Road has across the sub-region is reflected in the South West Herts Economic Study Update, which emphasises the strategic role that the area plays in the Functional Economic Market Area. The provision of office floorspace in the Local Plan is set out in Table 4.2.

**Table 4.2: Future office floorspace supply**

Office potential supply 2018-2036	Floorspace (sqm)
Site allocations	38,672
Sites with planning permission	72,503
<b>Total</b>	<b>111,175</b>

- 4.16 The Housing and Economic Land Availability Assessment has shown that the vast majority of new office growth in the plan period can be met at Clarendon Road. There are many economic and environmental benefits of concentrating Watford's office growth at this established office location. Developing an intensified office cluster will help sustain Clarendon Road as an eminent and distinctive office location, with an increased focus on sustainability and high quality design. Ensuring that Watford's offices are grouped at Clarendon Road would also help retain its vibrancy, whilst enjoying the benefits of agglomeration.
- 4.17 The area sits within the Watford Gateway section of the Core Development Area, which is set to be an area that will experience some transformative change during the plan period. Potential exists to redevelop sites within the Clarendon Road office area and intensify land use to ensure that office growth requirements are met. This includes high-density development and taller buildings.
- 4.18 Similar to designated industrial areas, some smaller, supporting or walk-to uses of under 100sqm may also be considered appropriate, where they support the office function of the area. This may include cafés or convenience stores for employees to purchase lunch, hot drinks or other everyday items. Residential uses will also be supported in the area, to create a vibrant, mixed-use quarter. However, any mixed-use development should be office led to ensure that the quarter retains its key office function.





4.19 To preserve the strong sub-regional role that Clarendon Road plays in supporting growth in the office sector, the area will be the preferred location for future office growth. It is important to protect existing office use at this location, in line with the findings of the South West Herts Economic Study Update. For proposals for new office floorspace, the office development hierarchy should be followed (Figure 4.3). The approach aims to direct new office development to the Clarendon Road Primary Office Location. If it is not possible for the new office to be located within the Clarendon Road Primary Office Location, the sequential test should be used to direct the office use to the wider Core Development Area, in line with the office hierarchy. This ensures that new office use outside of Clarendon Road contributes to small clusters first, to minimise any potential negative impacts on residential or industrial areas elsewhere.

**Figure 4.3: Office development hierarchy**



### Policy EM4.3: Office Development



The Clarendon Road Primary Office Location is located on the Policies Map.

Proposals for new office development that result in no net loss of office floorspace in the Clarendon Road Primary Office Location will be supported. Proposals that would incur a net loss of office floorspace will be resisted unless:

- a) An up-to-date evidence base demonstrates that the site is no longer required for office use; or
- b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for office use in the medium term.

Mixed-use development, including residential, will be supported where there is no net loss of office floorspace and a predominantly commercial frontage is maintained on to Clarendon Road.

Proposals for development of new office uses outside the Clarendon Road Primary Office Location must support the Office Development Hierarchy. Where these are 250sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no significant adverse impact on the office function of Clarendon Road, and that good accessibility by walking, cycling and public transport is provided or available.

Proposals for supporting uses under 100sqm will be supported where their job-generating potential can clearly be demonstrated. This should be assessed on a case-by-case basis.

## Economic development outside of designated employment areas

4.20 The Watford Employment Land Review (2019) has shown that losses of B (employment) class floorspace have been most prevalent in non-designated employment locations. This has largely been through changes to residential uses through permitted development and other means. These losses remain in conflict with the need to increase floorspace to support Watford's economic growth to meet the identified need set out in the South West Herts Economic Study Update. Whilst the majority of employment growth is expected to come through the redevelopment and intensification of designated sites, the designated industrial areas and the Clarendon Road Primary Office Location, smaller non-designated sites also have the potential to assist in supporting Watford's economy.

4.21 In the first instance, new offices should be directed to the Clarendon Road Primary Office Location and industrial uses to the Designated Industrial Locations. However, the loss of existing offices and industrial sites should be avoided to ensure that viable employment sites are not lost to other uses. The policy seeks to protect the employment offer outside of designated employment areas to address recent losses of B (employment) class floorspace.

4.22 Changes in the market may mean that some sites are no longer viable for employment use and either lie vacant, or are better suited for another use. In these circumstances, changes of use should be enabled to ensure that the most effective use of land is being pursued.



### Policy EM4.4: Economic Development Outside Designated Employment Locations



**The net loss of existing employment floorspace outside designated industrial areas or the Clarendon Road Primary Office Location will only be permitted where:**

- a) **An up-to-date evidence base demonstrates that the site is no longer required for employment use; or**
- b) **The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for employment use in the medium term; or**
- c) **The job generating potential of the alternative proposed use can clearly be demonstrated; or**
- d) **The proposal achieves clear sustainability objectives, such as the provision of residential development in close proximity to key public transport nodes.**

## Different ways of working

4.23 One of the impacts of COVID-19 to date has been the move towards more flexible working practices. This includes a rise in home working for those who are able to do so. This change in working culture may spell an increase in demand for different types of premises.

4.24 Small and medium-sized enterprises (SMEs) dominate the working base in South West Hertfordshire and account for 99.6% of all businesses and 50% of employment. This means that there may be a greater demand in Watford for smaller, non-traditional workspaces. This issue was also raised during the preparation of the Local Plan, where public consultation identified the need for the provision of more flexible workspace, as well as more start-up and incubator units for small businesses. The demand for more communal office facilities to be provided as part of new development was also highlighted as part of the public consultation.

4.25 Creative industries are a fast-growing sector in South West Hertfordshire and providing the right types of spaces could support their growth. The Cultural Strategy (2019) highlights the need to improve the range of facilities for creative industries, which could strengthen Watford's cultural offer. This could include the provision of exhibition or studio space on the ground floor of new developments or in stand-alone spaces.



## Policy EM4.5: Different Ways of Working



Development proposals for new forms of workspace including flexible workspace, start-ups, micro businesses and space for social and cultural enterprises will be supported across the borough where there is demonstrated to be no significant harm to the amenity of neighbouring land uses.

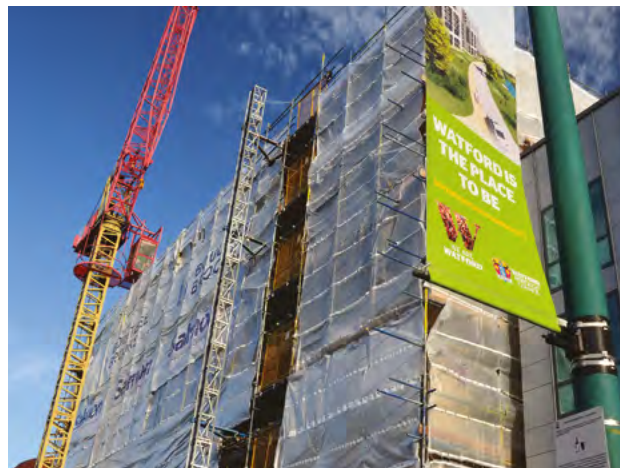
## Training, skills and professional development

4.26 It is important that when new development comes forward, this benefits local people. Development contributions are sought to ensure that new development provides the required infrastructure to support the current and future needs of the community. These contributions, such as Section 106 contributions, can be used to fund social infrastructure, such as opportunities for training and professional development. Although the labour force in Watford is considered to be highly skilled, there exist opportunities to help address social inequalities by offering opportunities to those seeking apprenticeships or further training. This could be during the construction phase of new development or in the completed development itself.

4.27 There are high levels of deprivation in parts of the borough, including the fifth most deprived area (LSOA) in Hertfordshire. This is often linked to income deprivation, which can be exacerbated by unemployment and lower levels of education. Supporting apprenticeships or training schemes would seek to capture the social value of new development.

4.28 New development can also support local businesses in Watford by ensuring that fair tender opportunities are given to local small and medium-sized enterprises and social enterprises, and that local businesses are used in the developer's supply chain.

4.29 The process for providing these employment and training initiatives will be set out in a Supplementary Planning Document. Applicants will be required to provide a training, skills and employment strategy to demonstrate their contribution.



## Policy EM4.6: Training, Skills and Professional Development



The Council will work with its partners and use development obligations to require major developments to provide appropriate employment and training initiatives for local people.

To achieve this, major development proposals will be required to submit a training, skills and employment strategy, in agreement with the Council, which demonstrates:

- a) Training programmes and apprenticeships provided on new development sites and / or as part of new development;
- b) Fair tender opportunities offered to local small and medium-sized enterprises and social enterprises; and
- c) Opportunities offered to local businesses in their supply chains. (Figure 4.2)



## Chapter 5

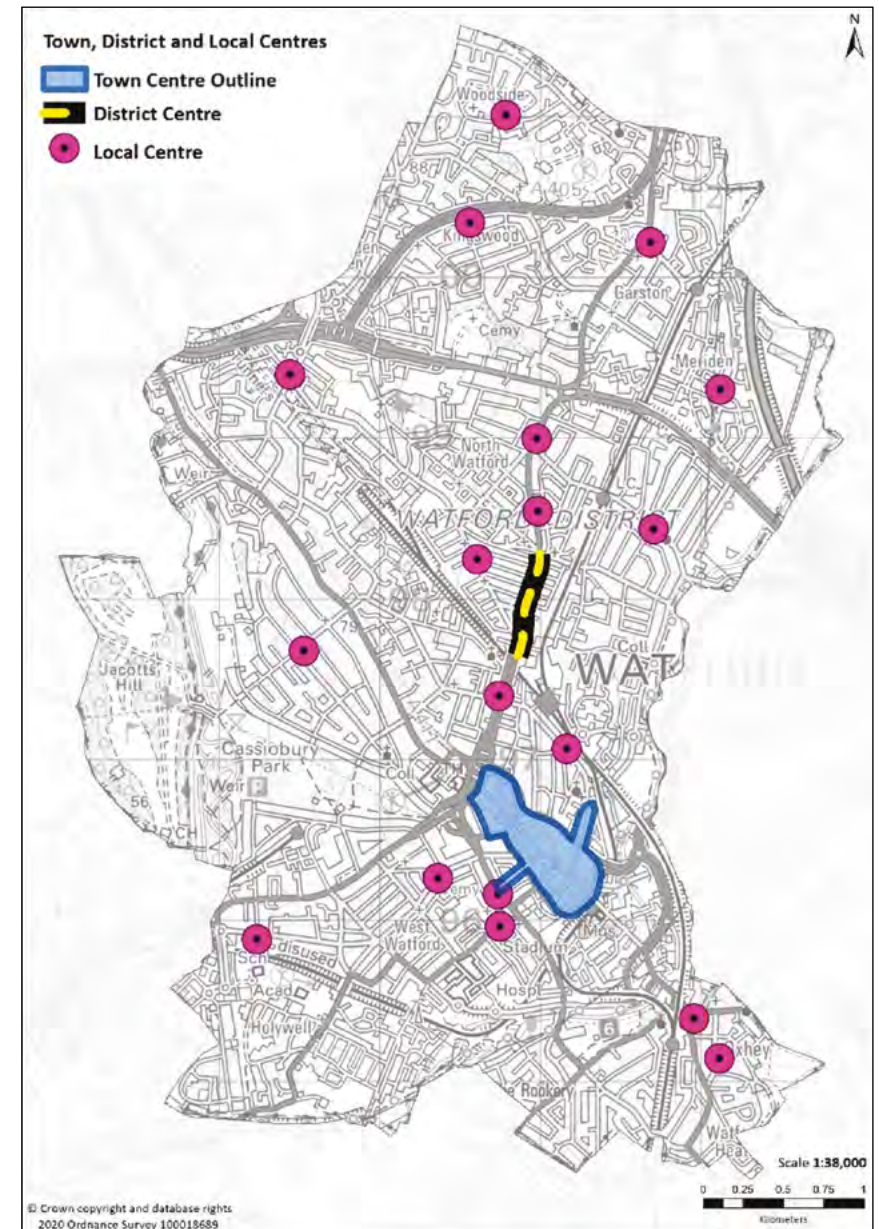
# A Vibrant Town



## A Vibrant Town

- 5.1 Watford has a strongly performing Town Centre, with St Albans Road District Centre supporting by also offering a wide range of services and facilities. In addition, there is a network of Local Centres that provide for much of their communities' day-to-day needs. The approach for the Plan is to build on these strengths and focus growth in these centres, providing retail, leisure and entertainment for all ages and groups of people. Protecting smaller centres will help ensure built-up areas in the borough have good access to services and facilities and contribute towards achieving sustainable development.
- 5.2 The opportunity to participate in activities, whether for recreation, community events or learning, is important for people living in and visiting Watford. The availability of a variety of facilities and shops attracts people to the Town and Local Centres (Figure 5.1) and helps them remain dynamic and vibrant.
- 5.3 Watford, as a sub-regional centre, serves residents of the town and beyond, drawing people from throughout South West Hertfordshire. The vibrancy and vitality of the Town Centre will be maintained and enhanced through the plan period, providing the opportunity to access a wide range of 'town centre uses' (as identified in the National Planning Policy Framework) including retail, leisure, entertainment, office, arts and culture. These functions are vital to long-term sustainability and underpinning Watford as an attractive place to live, work and invest.
- 5.4 Continued vitality in these areas can reduce the need to travel, by providing goods and services in easily accessible locations and allowing combined trips. This encourages sustainability and creates opportunities for focal points within residential areas, particularly those with the potential to support higher housing densities.

Figure 5.1: Watford Town, District and Local Centres



## The changing nature of retail in Watford

- 5.5 Watford has a successful town centre but the Local Plan also recognises that the retail environment is changing with traditional retail declining and service sectors, such as food and drink, health and fitness, and hotels increasing. This highlights the importance of retaining flexibility in retail policy to encourage footfall with popular uses, such as leisure and food and drink.
- 5.6 The nature of our Town Centre and, to a lesser extent, Local Centres is continuing to evolve. Increasingly they are becoming hubs for leisure, social and community activities, not just for shopping. Retaining flexibility in retail policy to encourages footfall, ensuring centres remain vibrant while continuing to meet the needs of people that use them. The Council is seeking to enhance the offer for families in the town and create a balanced centre that meets the needs of all residents and users at different times of the day and night. New proposals for cultural and social uses will be encouraged as appropriate town centre uses that can add vibrancy and activity. It is anticipated that a building may be in a number of different uses concurrently or at different times of the day.

- 5.7 The Town, District and Local Centres play a critical role in place making. To support this, developers will be expected to maximise the proportion of ground floors in town centre uses, fronting on to streets or public spaces that are active, by taking steps to reduce the amount of blank frontage and space given over to building servicing and management, such as bin stores and plant. Proposals must ensure that units are accessible and designed to the highest quality, considering how proportions, materials and detailing relate to, and complement, their surroundings.
- 5.8 Where opportunities arise to develop new centres or to enhance existing local shops to perform as Local Centres, some limited additional retail development may be acceptable, subject to the Sequential and Impact Tests.



## Sequential Test

National policy sets out a 'town centre first' approach through the Sequential Test adopted for the delivery of new retail and other town centre uses. This means that such uses should be located in central locations first to ensure the continued vitality and viability of those town centre locations. Town centre uses should be delivered in the following order of preference:

- a) Locations within the Town Centre;
- b) Edge of centre locations, with preference given to those sites which are or will be well connected to the town centre;
- c) Local Centres.

Where appropriate the Local Planning Authority will support applicants in undertaking a proportionate and appropriate Sequential Test. This should consider whether there is scope for flexibility in the format and /or scale of the proposal and assess the contribution more central sites are able to make individually to accommodate the proposal.



5.9 There are a number of out-of-centre retail parks in Watford. These generally provide for shops selling large value items, less suitable for Town Centre locations. They are generators of car travel and are poorly integrated into their surroundings. Redevelopment of these sites, such as Waterfields and Lower High Street, should make a better use of land by providing new residential development alongside appropriate retail that is easily accessible and well integrated with the surrounding area. Redevelopment of these sites could also provide an opportunity to reassess the transport network in the vicinity, securing improvements to public transport, cycling and walking. Consolidation of retail floor space in such locations may be appropriate to support additional economic spend or investment in the Town Centre, Watford's primary retail destination.

5.10 This chapter should be read in conjunction with the Town Centre Strategic Development Policy CDA2.2 'Town Centre Strategic Development Area'.



## Strategic Policy VT5.1: Supporting Vibrant Retail Centres



Planning permission will be granted for the development of town centre uses (retail, leisure, entertainment, office, arts and culture) within the defined Town, District and Local Centre boundaries, providing the use is appropriate for the scale and function of each centre. Development within these boundaries should contribute towards the enhancement of the public realm.



### Town Centre

Alongside new homes, Watford Town Centre will remain the focus for; comparison shopping, leisure, entertainment, civic and cultural activities. Development proposals within the Town Centre that are 'family friendly' will be encouraged.

To ensure the long-term vitality and viability of the Town Centre, the Council will apply a 'Town Centre first' approach to proposals for retail, leisure, cultural facilities and other town centre uses.

Proposals that optimise the use of land and floorspace within the Town Centre, through mixed-use development, including new or re-used space above shops and commercial premises, will be supported, providing they have regard to the role and function of the centre, impact on vitality and viability and the compatibility of proposed and existing surrounding uses.



### Outside the Town Centre

Where appropriate, a limited amount of retail development will be supported on strategic sites to provide for the new community, subject to: compliance with the Sequential Test; proposals being of an appropriate scale; provision of good accessibility by walking, cycling or public transport; and there being no significant adverse impact on the vitality and viability of the Town Centre or Local Centres in the vicinity.



### District and Local Centres

The vitality and viability of the District and Local Centres will be enhanced to provide local goods and services for local communities. Proposals that optimise the use of land and floorspace within the District and Local Centres, through mixed-use development, including new or re-used space above shops and commercial premises, will be supported, providing they have regard to the role and function of the centre, impact on vitality and viability, including that of existing business, and the compatibility of proposed and existing surrounding uses.



Figure 5.2: Components of a vibrant town





## Retail hierarchy

5.11 The retail hierarchy focuses town centre uses that, generate high footfall in accessible locations for those working, living and visiting Watford (Table 5.1). It is important that new retail development takes place in the right locations and at an appropriate scale. Watford’s retail hierarchy will be used to direct town centre uses to the most appropriate location, with regard to their scale, function and character. The Town Centre will be the preferred location for these uses.

5.12 It is acknowledged that ‘walk-to’ Local Centres can help provide premises for small-scale manufacturing or shared working premises, where businesses may wish to sell their produce. These uses can help to serve the needs of the local community and improve the function by increasing footfall in the area. Proposals for these uses will be supported, but will be considered against the policy criteria.



Table 5.1: Watford Retail Hierarchy

Retail hierarchy		Description
<b>Town Centre</b>	Watford Town Centre	Watford Town Centre performs a role as a regional centre, with its catchment extending beyond the borough boundary. The centre offers a full range of town centre uses, including: retail, leisure, business, community and cultural facilities.
<b>District Centre</b>	St Albans Road	St Albans Road District Centre contains a good range of town centre uses, including a large public library. The District Centre has a smaller catchment than the Town Centre, but a wider draw and a larger number and range of units than the Local Centres.
<b>Local Centres</b>	Buckingham Road Bushey Arches Garston Park Parade Goodwood Parade Langley Road Langley Way Leavesden Road Longspring Merton Road North Approach St Johns Road The Brow The Gossamers Tudor Avenue Vicarage Road Villiers Road Whippendell Road East Whippendell Road / Ascot Road	Local Centres include a range of small shops, meeting the day-to-day needs of a small catchment area. It is expected that Local Centres will also contain facilities, such as GPs, dentists, dry cleaners and community facilities, to support the retail offer. Typically, Local Centres are categorised as being over seven units, with a range of at least three different uses.



## Watford Town Centre

5.13 Given the scale of development envisaged within Watford over the plan period, the rapidly changing economic market and the way people are increasingly using town centres to socialise, it will be important for proposals to be designed to be sufficiently flexible to allow for changing conditions and needs. Proposals that allow for varying size requirements, for example, by providing for expansion through the future creation of mezzanines, or the subdivision / amalgamation of units, will be supported. Consideration should also be given to future-proofed design that allows for units to readily change uses. This flexibility should be demonstrated as part of a planning application submission.

5.14 It is acknowledged that there may be instances where some loss of floorspace contributes towards achieving wider objectives, such as the redevelopment of the site, or improving access to upper levels. In such cases, ground floor units should remain of a size and scale that is viable to current or future occupants and the access to upper levels be designed so as not to undermine the activity and function of the frontage.



5.15 The South West Herts Retail and Leisure Study (2018) recognises the prominent position of Watford Town Centre, whilst also acknowledging the need to broaden the offer to include a wider range of leisure and cultural activities. No specific allocations are required to meet any leisure capacity identified within Watford, however, such facilities should be promoted, providing that such uses would not adversely impact the operation or function of existing retail provision and the vitality and viability of the town centre.

5.16 Other uses, such as employment and residential, would be appropriate on upper floors, however, access must be designed to promote street level activity and not undermine the viability of ground floor units or interrupt the active frontages.

### Learning and non-residential institutions

5.17 These uses (class F1) are acceptable in the Town Centre, however, it is important that they do not negatively impact on the function. It is acknowledged that large numbers of people travel to large-scale attractor uses at a specific time; applications will need to demonstrate that such uses would have no negative impact on the transport network. In addition, uses that remain closed for large portions of the day or week are not appropriate. Windows and doors should face on to the street, creating interest and activity for significant portions of the day, with lively internal uses visible from the outside, or spilling on to the street in appropriate locations.

### Outdoor uses

5.18 Uses that help to keep the public realm active will play an important role in placemaking and are, in principle, encouraged. However, the impacts on the amenity of residents and workers would need to be carefully considered. Any proposals for street markets would need to be accompanied by a management plan that identifies its hours of operation and storage arrangements when not in use, types of traders, advertising, servicing and pedestrian and transport impacts. Event spaces will also require a management plan regarding types of events, frequency of use, noise levels, advertising, servicing and pedestrian and transport impacts.

### Convenience food takeaways

5.19 There has been a growing concern in recent years about the proliferation and over-concentration of hot food takeaways and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on childhood obesity. In 2020 government reclassified hot food takeaways into a separate use class. The type of food on sale nearest to schools can influence the diet of schoolchildren and the availability of 'unhealthy' foodstuffs can make healthier choices less likely. While it is acknowledged that takeaway uses can be beneficial to the function of the Town Centre and reduce vacancies, an over-concentration of these uses would be detrimental to the character and function, or vitality and viability, of the Town Centre, and, as such, proposals that would result in potential clustering will be resisted.



## Policy VT5.2: Watford Town Centre



**Within Watford Town Centre, as shown on the Policies Map, applications for town centre uses will be supported where they:**

- a) Maximise the proportion of the ground floor fronting a street as a positive and / or active frontage; and**
- b) Support flexibility and adaptability to future-proof for changing uses (subject to appropriate permissions).**

**Applications for learning and non-residential institutions will be supported where they:**

- c) Retain active frontages throughout the day;**
- d) Demonstrate no negative impact on the road network;**
- e) Serve the local community.**

**Applications providing outdoor uses, such as eating and drinking uses with outdoor seating, event space or street markets are encouraged and will be supported where they:**

- f) Do not detract from residential amenity;**
- g) Demonstrate no negative impact on connectivity and the ease of getting around for pedestrians and cyclists.**

**Applications for new hot food takeaway will be supported where they:**

- h) Retain a separation of at least four units between each hot food takeaway unit;**
- i) Protect the amenity of surrounding properties.**

## Local Centres

- 5.20 Retail and service provision outside the Town Centre is an important element towards achieving sustainable development and healthy communities. The network of Local Centres across the borough allows easy access to multiple services and contributes positively towards the identity of neighbourhoods. Local shops, alongside other services, are a key component of Local Centres and their protection will help shape how services are provided in the future.
- 5.21 Proposals will need to provide flexibility for Local Centres to address the challenges of new forms of retailing, while realising their potential for higher-density, mixed-use residential developments and environmental improvements. Redevelopment will be supported where it can make centres more viable and functional, but existing floorspace will be protected, to provide more facilities and amenities in local communities and reduce the need for travel. Proposals should demonstrate that the continued operation of existing facilities is not compromised by redevelopment.
- 5.22 The focus is on the consolidation of a viable range of functions and uses that make Local Centres a recognisable destination in the local area, particularly convenience retailing, leisure, local employment and workspaces. The design, accessibility and layout of Local Centres will have an important impact upon their success, and, in turn, the health and wellbeing of local people. Proposals should promote a range of unit sizes and retain a variety of uses, to meet the needs of the local community.
- 5.23 Smaller Neighbourhood Centres should focus on a limited but variety of uses and provide convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.



## Policy VT5.3: District and Local Centres



New development must contribute positively to the function, vitality and viability of the District and Local Centres. This will include sufficient provision of local shops and services to meet the day-to-day needs of local communities.

Proposals for commercial, business and service uses, or appropriate community uses, will be supported. Development proposals should:

- a) Maximise the proportion of the ground floor fronting a street as a positive and / or active frontage;
- b) Demonstrably relate to the character, scale and role of the existing centre;
- c) Ensure centres are accessible, active, attractive and safe during the day and night;
- d) Provide convenient and attractive access by walking and cycling; and
- e) Support temporary and community uses where they help to activate and revitalise units.

Applications for new hot food takeaway will be supported where they:

- f) Are located more than 400m walking distance from the entrance of an existing or permitted primary school;
- g) Retain a separation of at least four units between each hot food takeaway unit; and
- h) Protect the amenity of surrounding properties.





Chapter 6

# An Attractive Town

## An Attractive Town

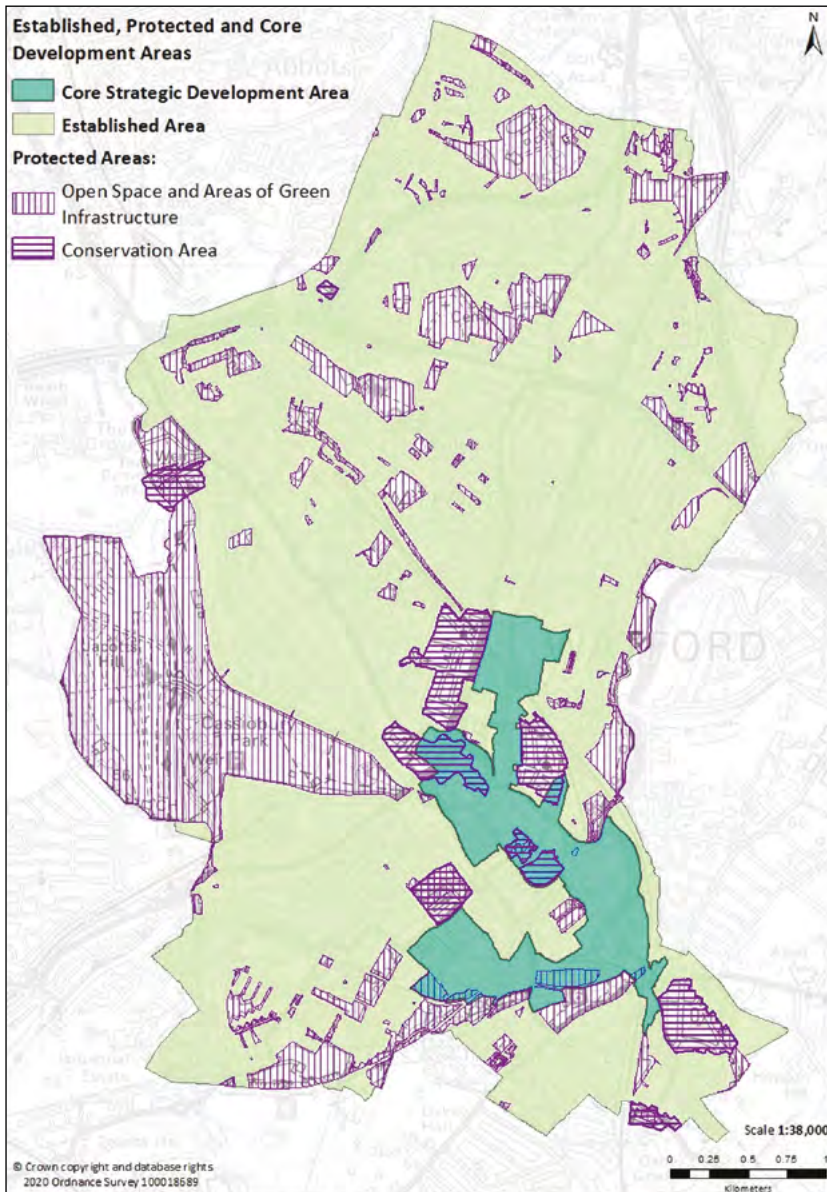
- 6.1 The Spatial Strategy identifies areas of the town where transformational change is appropriate, areas where the scale of change is lower and some areas where very little change is expected. Within Watford's urban fabric there are existing areas of distinctive and high quality character, which should be retained and reinforced, and other areas where the character has been eroded through past developments that present opportunities for creating new, distinctive, high quality places.
- 6.2 New development provides an opportunity to make a positive contribution through high quality design. To help deliver the objectives of the Local Plan, applicants will need to demonstrate how they have integrated high quality design in a fashion that reflects the character of the area. The National Planning Policy Framework requires new development to take opportunities to improve the character and quality of an area and the way it functions. The National Design Guide sets out detailed practice guidance which new development should follow. Development proposals should take account of guidance provided in the Council's supporting planning documents and guidance.



Figure 6.1: Principles of good design



**Figure 6.2: Established, Protected and Core Development Areas**



6.3 To ensure that the growth proposed can be delivered in a way which will retain and reinforce the character and identity of Watford three types of area within the town have been identified.

- a) The core development area, where most of the growth for the town will take place and the scale of change is expected to be transformational;
- b) protected areas where the scale of growth will be very limited and very respectful of the local context; and
- c) established areas (parts of the town not in the Core Development Area or Protected Areas) where the scale of change is more limited than the Core Development Area but where some intensification is expected.

6.4 Protected areas include all parks and open spaces (detailed map at Figure 9.1) and all conservation areas (detailed map at Figure 7.2).





## Strategic Policy QD6.1: Design for an Attractive Town

New Development in Watford is required to deliver high quality design. Buildings will be designed to minimise environmental impact including mitigating climate change impacts, deliver attractive and functional spaces and reinforce and develop a distinctive local character with durable, lasting materials. Proposals will be required to demonstrate that they have responded positively to sensitive areas. New public realm will be attractive, accessible and reflective of the needs of the community.

There are three areas in Watford, each of which requires a separate approach when considering the design of new development.

### Core Development Area

The approach to design will encourage a new positive character, enhance areas of poor quality and build on existing aspects of positive design. High-density development will be supported, with the highest densities to be located in the most sustainable locations. Proposals for taller buildings will be of an appropriate height that reflects its location, role in the built-up area, contributes to wayfinding as a key marker in the townscape and which makes a positive contribution towards an attractive skyline.

Proposals for major developments will be required to achieve high quality design, with taller buildings required to demonstrate exceptional design and innovation that are well connected through a quality public realm that is interesting and people can easily interpret and use. Together, these will contribute towards achieving a compact and walkable town.

Proposals will demonstrate how they maximise the relationship between new buildings, environmental features and people, maximise site-specific opportunities and contribute towards their integration with the surrounding area.

In locations where the Core Development Area is adjacent to existing areas of established residential character, proposals will need to be designed to reflect this sensitivity and demonstrate how they enable an appropriate transition between these areas.



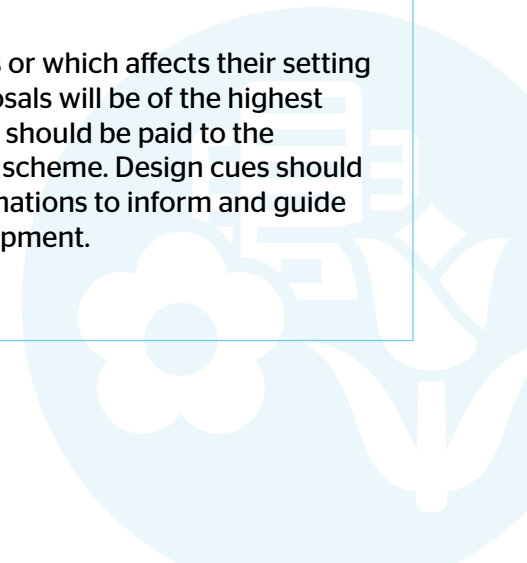
### Established Areas

This includes all areas that lie outside the Core Development Area and the Protected Areas. The degree of change will be more limited than in the Core Development Area but is expected to result in a gentle uplift in the density of the area. Development proposals in these areas should be led by the existing characteristics of the local area and will reinforce and where appropriate enhance the character of the local area.



### Protected Areas

The degree of change within these areas or which affects their setting will be more limited. Development proposals will be of the highest design standard and particular attention should be paid to the detailing and materials proposed for the scheme. Design cues should be taken from heritage assets and designations to inform and guide the character and identity of new development.





## Design principles

- 6.5 The quality and distinctiveness of a place is the result of decisions made about how the buildings relate to one another and to the spaces between them. This affects the way the place looks, feels and is used. It is important that new developments in the town make a positive contribution to the identity and character of the local area and support and enhance the local movement network whilst providing opportunities for businesses to thrive, spaces for people to enjoy and leisure activities.
- 6.6 The ground floor of new buildings should provide animated and active frontages. This can be achieved through the provision of direct access to ground floor uses and the positioning of ground floor uses so that the active uses animate the adjoining public space. This will help streets and spaces to be lively areas and contribute to social wellbeing and strong communities.
- 6.7 New development inclusive of individual buildings and the public spaces between them should be designed for all users, link well into the existing network and provide safe and attractive areas for cyclists and pedestrians. Street layouts should follow a logical structure and hierarchy to aid navigation including: incorporating local landmarks; other distinctive features that help wayfinding and be designed to provide a logical sequence of key points.
- 6.8 Local and town wide views are important to residents and those arriving in the town, and are an important aid to finding key locations. Key views are identified in supporting planning documents.





## Policy QD6.2: Design Principles

Proposals for new development will be required to show how they will make a positive contribution to high quality design and place making. To achieve this, proposals for new development will need to show how they have responded to the following design principles.



### Character and identity

New buildings and streets are to be attractive and distinctive. This includes consideration to the way an area looks, feels, sounds, smells and how it functions, both presently and in the future. Street scenes are to be of high quality, welcoming and take design cues from existing buildings, where they make a positive contribution to the character of the area ensuring it is identifiable and relatable to residents.



### Built form

The scale and massing of proposed buildings will need to relate to the local context and the role of the area. Building footprints are to be of an appropriate scale, enhance the relationship between buildings individually, collectively and the spaces between them to create environments that are relatable to people, easy to understand, have good light, minimise wind effects and improve connections with the surrounding area. New buildings should make use of local topography, to reinforce Watford's distinctiveness.



### Active and positive frontages

On main streets and in public spaces, new buildings should include active frontages and / or positive frontages and ensure an active visual and physical relationship between the street, or space, and the building. Uses on the ground floor should incorporate active uses to animate the interface between buildings and the public realm.



### Movement and connectivity

Streets are to be designed so they are efficient, convenient, legible and permeable, to support all users and prioritise non-vehicular travel. Routes need to be designed for their anticipated level of use and be clearly defined, to make it easy for different users to interpret using appropriate wayfinding measures, including sightlines.



### Views

New development will need to make a positive contribution towards important views in the borough. This includes views from high vantage points, ground level and long distance views. New development should enhance the setting of local landmarks where appropriate. New developments that have an impact on the local skyline will need to be designed to an exceptional standard that will improve the distinctiveness of Watford in a positive way.



## Public realm

6.9 High quality and functional public realm is crucial to creating places in which communities and businesses can thrive. Streets and spaces should be designed to promote social interaction and inclusion, where people of all ages and abilities can mix, feel safe and be comfortable. In areas of higher-density development, it is crucial that the streets and spaces accommodate a wide range of uses to meet the needs of the communities around them such as areas for play, fitness, quiet spaces and more generally to contribute towards improving health and wellbeing.

6.10 The spaces created between buildings should be convenient for a wide range of users, adaptable and flexible so they can accommodate the changing needs and lifestyles of users and changing uses over time. Building lines and active frontages should be used to define the public realm and building height used to create a sense of enclosure that results in a comfortable and usable space or street.

6.11 Complementary elements, such as materials, finishes, furniture, planting, signage, lighting and public art should be used to ensure that the spaces and streets created in new developments are at a human scale. Design details should consider the health and wellbeing of the people using them, for example, the provision of shade and shelter, places to rest as well spaces for more active uses. The creation of 'gated communities' which do not contribute to well connected, accessible and a permeable public realm should be avoided.

6.12 The delivery of high quality public realm within new schemes and within the Strategic Development Areas will be secured through the use of conditions or S106 Agreements.

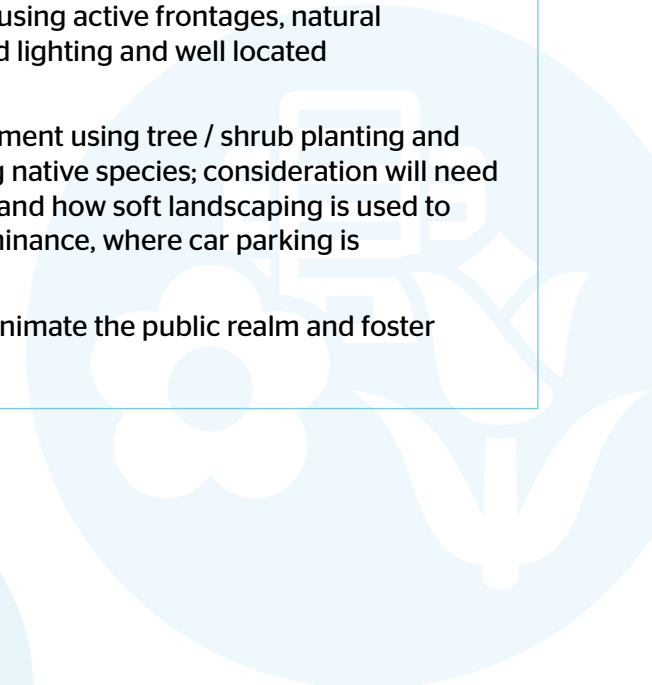


### Policy QD6.3: Public Realm



**All areas of public realm need to be designed so they are safe, accessible, inclusive and attractive. Public spaces in new development will be supported where it is demonstrated they meet the following criteria:**

- a) Create spaces that positively reinforce local identity;
- b) Routes and spaces are designed to accommodate social interaction, activity and green infrastructure for everyone to use;
- c) Use appropriate street furniture to enable informal play, areas for rest, encourage social interaction, wayfinding measures and linkages between local destinations taking care to avoid unnecessary street clutter, and consider how spaces will be used during the day, evening and night;
- d) Provide safe environments, using active frontages, natural surveillance, sightlines, good lighting and well located building entrances;
- e) Create an attractive environment using tree / shrub planting and soft landscaping, prioritising native species; consideration will need to be given to maintenance and how soft landscaping is used to reduce the sense of car dominance, where car parking is provided; and
- f) Use public art where it will animate the public realm and foster a sense of identity.



## Building design

6.13 High quality building design is important to creating successful places, in terms of the impact that the external appearance has on the spaces and streets around it and the internal living environment which occupiers experience. Good building design will contribute to high quality living environments and will have a beneficial impact on the health and wellbeing of users and occupiers.

### Relationship between buildings and streets

6.14 New buildings should be designed so that the external appearance enhances the positive aspects and features of existing local character and identity. There are some parts of the urban area where the positive character has been eroded through inappropriate past development and proposals to redevelop in such locations should take the opportunity to enhance and upgrade the character and identity of the area, drawing on the positive aspects of the wider area.

6.15 The detailed design of the building facades should have a positive relationship with the street and, in particular, should be at a scale that people walking in the street can relate to and feel comfortable with. Façades facing the street and other public spaces should have entrances and windows at regular intervals allowing access to the building and the sense that the space is over looked from the surrounding buildings. The details and materials should reflect those found in the

local area but may be interpreted in a more contemporary and innovative way. Materials should be of high quality and designed to age well, retaining their quality and finish; care should be taken when introducing new materials alongside traditional ones, so that they work well together and also reinforce local character, whilst creating a distinctive new identity.

### Flexibility in design

6.16 The design of new buildings should consider how the building and the spaces in the area will be used now and in the future, and ensure that they can be adapted to accommodate the needs of future users. In particular, consideration should be given to how new residential buildings can facilitate changing working patterns, where more people may be working at home more of the time. This may be achieved by providing additional space within residential units or in appropriate locations, providing a shared workspace on the ground floor of a new building. Applications for residential development should demonstrate how this has been considered.

### Designing for comfortable environments

6.17 The effects of climate change mean that buildings should be adequately heated and cooled to deal with more extreme hot and cold spells. Where possible, new residential units should be able to be cooled using natural cross ventilation, which will result in a more energy efficient building. This can be achieved using dual aspect units in residential schemes which

will also improve the daylight levels. Internal design measures, such as higher ceilings, can be used to aid cooling and ventilation.

6.18 Proposals for new buildings should consider this at an early stage of the design process and use building layouts that maximise the number of dual aspect units delivered. The size of glazed areas should be adjusted to avoid overheating, particularly on south and west-facing elevations, which receive more sunlight during the hottest part of the day. Other measures to shield the impacts of afternoon sun should be an integral part of the building design.



### Safe and attractive environments

6.19 To assist with delivering active frontages and improving social interaction within larger residential developments, buildings should be designed to have multiple cores that access directly onto the street at the front of the building. Reducing the number of units served by a core area will provide better opportunities for residents to meet and get to know their neighbours and to develop stronger local communities. Shared internal areas should be light and airy and provide sufficient circulation space for residents to pass each other easily and for informal social interaction.

6.20 It is important that residents have somewhere safe and convenient for package and parcel delivery. Where possible, this should be located within the buildings on the ground floor of each core. Other large item and cycle storage should be conveniently located, easily accessible and safe, so that residents feel comfortable using it. The best location is within the building and on the ground floor of the core area. If this cannot be achieved, then storage should be located close to the buildings, visible from the buildings and secure. External refuse and recycling and cycle storage should be located to minimise visual and physical obstruction, whilst being easily accessible for residents and operatives.

6.21 To provide attractive environments and buildings it is important to consider the location of services, utilities, down pipes and gutters carefully and early in the design process so that they are an integral part of the design. Where possible, service and utility boxes and pipes should be located inside buildings with access to boxes from communal areas on the ground floor. On taller buildings the removal of excess rainwater from the roof of buildings to the drainage network should be integrated into the building and external gutters and downpipes avoided. On a more domestic scale, buildings external downpipes and gutters should be carefully positioned to avoid a cluttered appearance.

6.22 Internal space standards and amenity space standards are set out in Policy HO3.10 Building Standards for New Homes and Policy HO3.11 Private and Communal Outdoor Amenity Space. Policies relating to sustainable construction are located in Chapter 8 'A Climate Emergency'.





## Policy QD6.4: Building Design

Well designed buildings that are visually attractive, functional, accessible, sustainable, mitigate climate change, and which reflect the character and wider objectives for the area will be supported.



### Enhancing character and identity

New buildings are to positively contribute towards the local area using the following design principles:

- a) In areas where the local character and identity has been eroded, the design of new buildings should enhance the positive and improve the negative qualities of the area;
- b) The proportions of new buildings need to be appropriate to the existing or emerging character of the area;
- c) Façades and their detailing are to have a positive relationship with the street, be of a human scale, reflect its role and function and enhance the character of the area;
- d) Materials should be of high quality, robust, durable, age well, reflect their function and sit comfortably with buildings in the area, adding to local distinctiveness.



### Safe, healthy and attractive internal and external environments

New residential buildings should be designed to provide internal and external spaces that support the health and wellbeing of all those who use and experience them. New building design should adhere to the following:

- e) All ground floor units to be designed so that the primary access for each individual unit is directly on to the street;

- f) Include a high proportion of dual aspect units to create quality internal spaces, able to receive good light and air ventilation and, where possible, avoid using a single aspect form;
- g) Internal layouts should provide for working at home, implementing the technical internal space standards; this could be the inclusion of space within individual dwellings for a home office, or a shared workspace within the building;
- h) Internal cores are to serve no more than eight units.



### Getting the details right: storage, waste, servicing and utilities

All new developments will be designed so they are effective and attractive by meeting the following criteria:

- i) Access to service and utility boxes should be inside the building and avoid unnecessary clutter; where this is not possible they should be an integral part of the design;
- j) Refuse and recycling should be located within the building envelope; where this cannot be achieved, bin stores which are carefully positioned, easy to use and attractive should be provided;
- k) Secure provision for parcel receipt and storage should be provided on site;
- l) The location of drainpipes and gutters and pipes for services and utilities should be integrated into the wider design, to avoid a cluttered appearance.

## Building height and taller development

- 6.23 To meet the borough's need for new homes and jobs the Local Plan anticipates development coming forward at higher densities than currently exist across the borough. This means Watford is more likely to see new buildings that are taller than the existing prevailing height within an area.
- 6.24 The Taller Buildings Study (2021) examines the prevailing height of existing buildings across a series of defined character areas and the likely base building heights that will need to be achieved in order to meet the need for homes and jobs across the borough. The findings have been drawn from an assessment of relevant factors, including: an area's sensitivity to taller buildings and suitability for them; consideration of strategic growth designations; and potential visual impacts of tall buildings when seen within the townscape including important views). The report provides an evidence-driven approach, which establishes appropriate thresholds for base building heights in each character area for future development.
- 6.25 Base building heights are not intended to act as an absolute 'cap' on the height of new buildings but instead set a presumption in favour of developments where the predominant height falls within the threshold set for that character area. Four distinctive character areas have been identified including:

- **Watford Gateway:** Potential development sites within Watford Gateway are generally less constrained by their urban context, particularly in the area around Watford Junction Station. They are well connected to the local and strategic transport network, and higher-density and mixed-use development is generally appropriate here. The Watford Junction area is relatively low lying, while Clarendon Road is characterised by buildings taller than the surrounding area. The station area is a key node with limited sensitivity and excellent access to public transport; strengthening the role of Clarendon Road as a gateway into the town centre through good design and use of buildings with added height can make a contribution towards this. Sites in this area will be expected to make a significant contribution to streetscape and connectivity improvements, particularly the transformation of the ring road. Proposals that adjoin existing residential areas will need to demonstrate a transition between the two areas.
- **Town Centre:** The Town Centre contains a diverse range of uses, buildings and public spaces. The area is suitable for higher-density development in the right locations, however, this needs to be appropriate to the site and its surroundings and to clearly justify why a site is suitable for a taller building. Proposals will need to be explicit as to why a taller building is appropriate for the location. This includes demonstrating which landmark, node or location the building is marking;

how it relates to and enhances the existing built form, including scale and massing; how the frontage will positively contribute towards the public realm and placemaking; in locations near the High Street, how it relates to the shopping area and provides a quality living environment; and how the proposal has responded to heritage assets that may be affected by the proposal.

- **Colne Valley:** The Colne Valley area has a greater sensitivity to building height and proposals will need to consider the local topography and views across the area. Proposals should embed placemaking aspirations to open up the river, protect and enhance existing or future views and mitigate sensitivities associated with biodiversity. On larger sites, through a masterplan approach, well designed schemes may identify opportunities that maximise changes in topography to achieve additional height.



• **Areas outside the Core Development Area:**

These areas have an established character and the prevailing height is lower. Proposals will need to clearly demonstrate how they relate to the existing character and make a positive contribution towards the area. In very limited cases, specific locations might be suitable for taller elements above the proposed base building heights. However, in the absence of significant improvements to public transport accessibility, building heights and density are likely to be more modest. Locations outside the Core Development Area where taller elements may be appropriate include:

- Ascot Road, where a character for taller buildings has been established; and
- On large sites close to the Dome Roundabout, which is a key entry point to the town.

6.26 Where a proposed building would exceed the base building height for the area, this will need to be clearly justified and will be subject to detailed consideration under the criteria set out within the Building Height Policy. To demonstrate why a proposal for a taller building should be supported the starting point should be to demonstrate that the location is appropriate, based on an evaluation and assessment of suitability and sensitivity, as set out in the Taller Buildings Study:

• **Suitability:** Proposals should demonstrate the suitability of the proposals in relation to excellent public transport and cycling accessibility, proximity to town centres or local facilities, access to green spaces and designations for strategic development.

• **Sensitivity:** Proposals must consider potential impact on designated and undesignated heritage assets, views, ecological assets and greenspaces.

6.27 Proposals that involve higher densities should be based on careful consideration of local character, context and access to amenities and public transport. Relevant plan policies include: housing and amenity space (Chapter 3 'Homes for a Growing Community'); design (Chapter 6 'An Attractive Town'); and heritage (Chapter 7 'The Historic Environment'); sustainability and climate change (Chapter 8 'A Climate Emergency'); open space (Chapter 9 'The Environment') and sustainable transport (Chapter 11 'Sustainable Transport Town'). The approach to building heights should also be considered alongside the Spatial Strategy and Local Plan objectives (Chapter 1 'Spatial Strategy for Watford') and aspirations for the Strategic Development Areas (Chapter 2 'Core Development Area').

**Exceptional design, high quality living environments and community benefits**

6.28 Where consideration of the suitability and sensitivity of a site suggests that a taller building, or built element, may be justified proposals will need to demonstrate how they will deliver exceptional design quality, high quality living environments and public benefits for the town and community.

6.29 Taller buildings can have a significant impact on townscapes and views and therefore, in relation to their prominence, it is important that taller buildings are of the highest design quality. To ensure taller buildings are of exceptional design, applicants should make appropriate use of tools and processes for assessing and improving the design of their proposals, including making use of design review. More specifically, when taller buildings are designed, they should demonstrate that consideration has been given to the three main elements: base, mansard and pop-up. Guidance should refer to the specific massing rules that apply to each of these elements, as set out in the Taller Buildings Study.





6.30 Buildings that would be taller than the base building height for their area will also be required to demonstrate their positive contribution in terms of public benefits to the town and the community. These benefits should clearly exceed the benefits that could be achieved for a building that would be lower than the base height for the appropriate area. These benefits should include, but may not be limited to:

- a) Provision of affordable housing and a good mix of dwelling sizes;
- b) Provision of infrastructure, including public transport, cycling and walking infrastructure and social infrastructure to support communities' health and wellbeing, including public open space and access to services and facilities;
- c) Building to high environmental standards, with comfortable internal living environments that provide good air ventilation, daylight and minimise overheating;
- d) Maximising opportunities to generate energy, using low carbon and renewable sources and taking advantage of the scale of development;
- e) Make a positive contribution towards placemaking, including measures to reflect local character and signify a recognisable landmark; and

- f) How the building will contribute towards Watford as a place, in terms of distinctiveness, design quality and how this relates to the urban form.

### Definition of prevailing building height and taller building thresholds

6.31 The Taller Buildings Study' has identified future prevailing building heights in all parts of the borough. This has been used to inform an approach where higher-density development up to a certain height will not be defined as a taller building. This is referred to as the 'base building height' and is set out as the number of storeys. This base building height for each respective area reflects the balance between existing character, constraints and opportunities (Fig 6.2). Buildings at this height or lower will not be assessed against Policy QD6.5 'Building Height', but will need to comply with other policies in the Local Plan. Where a building is proposed that exceeds the appropriate base building height, it will be defined as a 'taller building' and will trigger the implementation of Policy QD6.5 'Building Height' alongside other Local Plan policies.

Figure 6.3: Base building heights

Area of the borough	Base building height
Watford Gateway	Up to 8 storeys on a street frontage, stepping up to 10 storeys to the rear.
Town Centre Strategic Development Area	Up to 5 storeys on the High Street, stepping up to 8 storeys to the rear.
Colne Valley Strategic Development Area	Up to 6 storeys.
Outside of the Core Development Area	Up to 4 storeys.





## Policy QD6.5: Building Height

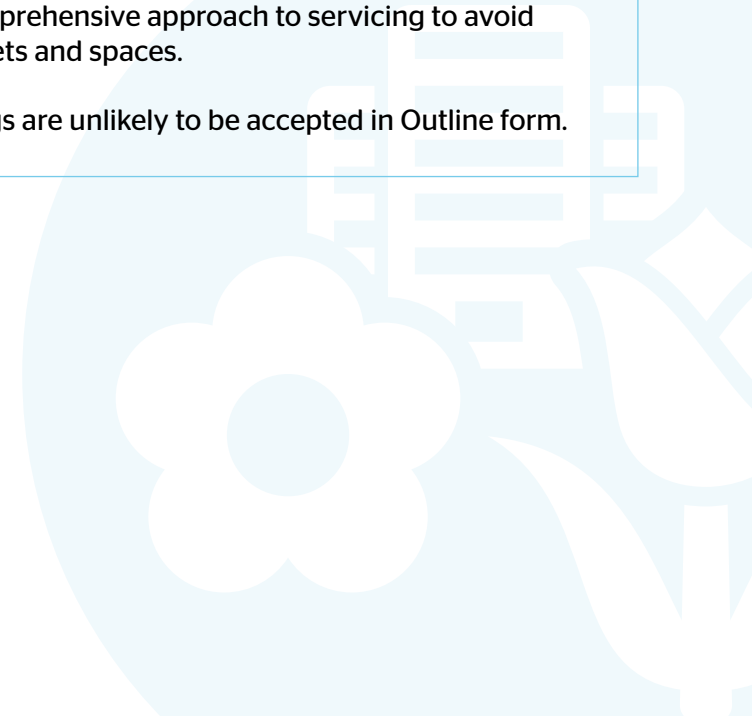


Proposals for buildings that exceed the base building height set out in Table 6.1 will be classified as a taller building.

Proposals for taller buildings should clearly demonstrate:

- a) Exceptional design quality, including height, massing, proportion, materials, detailing, site layout and its relationship with the surrounding area, which set it apart in terms of quality and distinctiveness, and which positively contribute towards the context and character of the area;
- b) Significant public benefits that the development will provide, clearly setting out why these would not be achievable as part of a development restricted to the base building height;
- c) Significant sustainability benefits including the building design, construction, operation and connections to the surrounding area;
- d) A clear townscape rationale for the specific siting of taller buildings, marking key locations or nodes, and responding to public transport accessibility and activity;
- e) A positive relationship with relevant heritage assets and their setting and the historic character that contributes to the town's distinctiveness;
- f) A desire to achieve a specific skyline shape or cluster;
- g) That proposals have been designed to avoid harmful impacts on daylight, sunlight, wind conditions, overheating and microclimate, including the provision of appropriate mitigation where required;
- h) That appropriate amenity and play spaces are incorporated to a high standard for all residents;
- i) That the setting of the development will not be dominated by car parking as a result of the higher-density. In this context, a car-lite approach should be taken where this would be an appropriate response to higher local public transport accessibility;
- j) A balanced and comprehensive approach to servicing to avoid impact on local streets and spaces.

Proposals for tall buildings are unlikely to be accepted in Outline form.





## Chapter 7

# The Historic Environment



## The Historic Environment

7.1 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their setting.

7.2 Watford has a diverse and rich range of heritage assets including listed buildings, historic parks and gardens, conservation areas and assets of archaeological significance which make an important contribution towards the character and distinctiveness of the town (Figure 7.2). Some key elements of the town's heritage include:

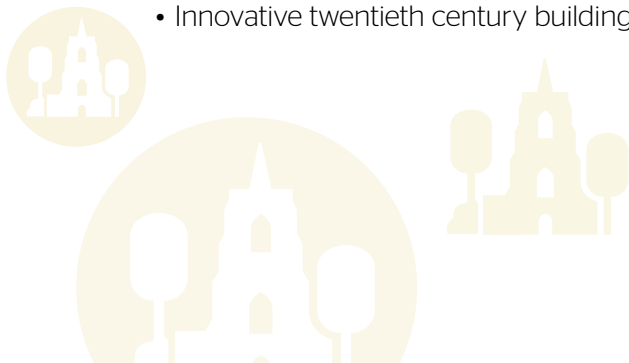
- Surviving buildings from the medieval core of the town (St Mary's Church, Almshouses, Fuller Free School);
- 18th Century town houses (Frogmore House , 97 High Street, Little Cassiobury and Watford Museum);
- Industrial heritage;
- Parks, gardens and cemeteries;
- Residential streets and buildings of the Victorian period; and
- Innovative twentieth century buildings and housing developments.

Figure 7.1: Heritage benefits



7.3 All heritage assets (designated and undesignated) will be appropriately protected reflecting the importance of the designation and where appropriate enhanced.

7.4 New development can make a positive contribution to, or better reveal the significance of heritage assets and the Council will encourage this where appropriate. Well designed proposals which protect and enhance the significance, character and setting of heritage assets which may be affected by the development will be supported.



7.5 The Council has a proactive approach to managing heritage assets and in addition to the Local Plan Policies the Council protects the historic environment through the following guidance which should be considered as part of planning proposals where they apply:

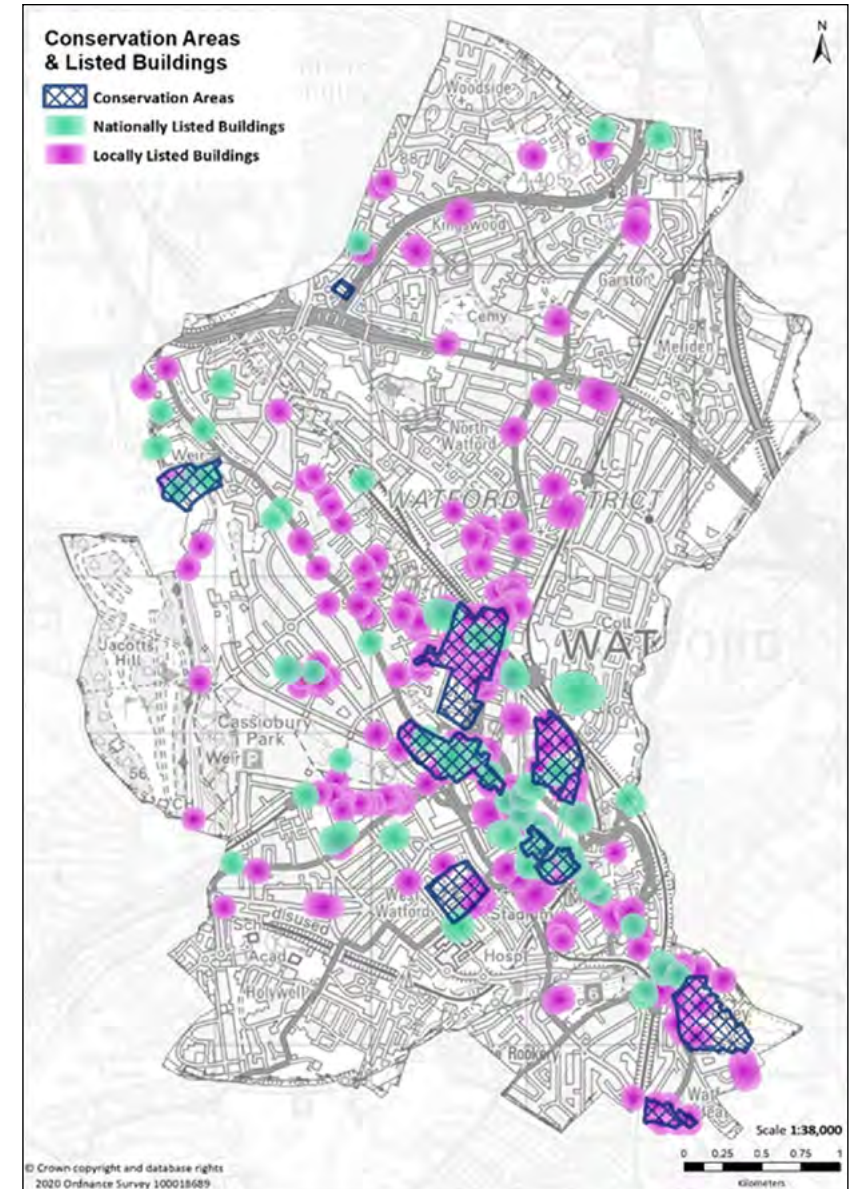
- Conservation Areas Management Plan;
- Conservation Area Appraisal documents;
- Local list of undesignated assets of local interest;
- Register of buildings and structures at risk;
- Supplementary planning documents to provide more detailed guidance on specific issues;
- Article 4 Directions to protect designated and undesignated assets from small-scale changes which are allowed under permitted development rights and which would erode the significance of those assets.

7.6 Proposals for new development which involve heritage assets or their setting should be accompanied by supporting material which shows that the development has understood the significance of the asset. This should be a combination of desktop and on-site investigation making use of the Historic Environment Records (HERs) database and relevant supplementary planning documents.

7.7 Detailed plans to an appropriate level will need to be submitted with applications, alongside design and access or heritage statements, to demonstrate how the heritage asset and its setting will be affected and to ensure that its significance is protected or enhanced.

7.8 Where a new heritage asset is revealed during the early phases of new development, the developer will be expected to work with the Council to seek a solution, as far as is practicable, which protects the significance of the new asset. Depending on the importance of the revealed assets proportionate changes to the scheme being proposed may be necessary.

**Figure 7.2: Conservation areas, listed buildings and locally listed buildings in Watford**





## Strategic Policy HE7.1: Enhancement and Protection of the Historic Environment



Development proposals should embrace opportunities to use the historic environment to support good design and enhance the setting and understanding of the historic environment and improve Watford's historic character.

All development proposals involving heritage assets (designated and undesignated) should avoid causing harm to the significance of those assets, including their setting. Where this cannot be avoided measures to minimise or mitigate the harm caused will be considered and balanced against the heritage and public benefits arising from the development according to the importance of the asset and the extent of the impact to its significance.

Where loss, wholly or partly, is unavoidable developers are required to record and enhance the understanding of the significance of any heritage asset and to make this record publicly available.

Proposals will need to consider the potential adverse impacts on a heritage asset or its setting associated with cumulative development. Where there are potential cumulative effects, applicants should include design measures to mitigate this impact.

All development proposals involving heritage assets (designated and undesignated) or affecting the setting of assets should be supported by a Heritage Impact Assessment, proportional to the scheme proposed and significance of the heritage asset, prepared by a suitable qualified person.





## Designated heritage assets

- 7.9 Designated assets within the borough include statutorily listed buildings, registered parks and gardens and conservation areas. It is important to ensure the significance of these assets is protected and where possible, better understood through any changes which have to be made to the assets. Proposals involving listed buildings and registered parks will need to clearly justify the positive contribution it will make and show that the proposal has been designed to avoid, and where possible, minimise the impact on the significance of the asset through appropriate enhancement and conservation measures.
- 7.10 Designated assets and in particular listed buildings and structures make an important and valued contribution to the distinctive character and appearance of the town and provide attractions for people visiting the town and cherished local landmarks.

### Listed buildings

- 7.11 New development proposals involving listed buildings should avoid total or substantial demolition including those which propose the rebuilding behind the façade. Proposals should avoid causing harm to the setting of listed buildings and structures and where appropriate should seek to enhance and better reveal the significance of that setting.
- 7.12 Many minor alterations and some repairs to listed buildings, including those to the interior, which may affect the special interest of the building will require listed building consent. Proposals for changes to listed buildings may present opportunities to improve disabled access to those buildings. Solutions to improved accessibility will require a balancing of the need for access with the conservation and preservation of the asset. Design approaches for this should be supported by an audit of conservation constraints and access needs and should have considered all available options.



7.13 Proposals which seek to reduce energy consumption in listed buildings will be welcomed provided they do not cause harm to the significance of the building. Energy use can be reduced without harming the fabric or appearance of the building such as roof insulation, draught proofing, secondary glazing, more energy efficient boilers, heating and lighting and the use of green energy sources.

### Conservation areas

7.14 Changes within conservation areas will be managed in a way which retains the distinctive character and appearance of that area and new development should make a positive contribution to this. Design and access statements or heritage statements should include an assessment of the character and context and show how the development proposed has been informed by this and how it contributes positively to it.

7.15 When considering applications for demolition in conservation areas account will be taken of group value, context and setting of buildings as well as their quality as individual structure and any contribution made to the setting of listed buildings. Applications for total / substantial demolition will be expected to:

- a) Demonstrate to the Council's satisfaction that effective measures will be taken during demolition and building works to ensure structural stability of retained parts and adjoining structures;
- b) Be justified in terms of the optimisation of resources and energy use in comparison with the existing building;
- c) Include plans which clearly show which parts of buildings are to be demolished;
- d) Provide detailed plans for redevelopment which are to be approved prior to permission for demolition being granted.



## Policy HE7.2: Designated Heritage Assets



Proposals will be supported where they will not result in the loss of, or substantial harm to an asset unless this will provide substantial public benefits that outweigh the harm or loss caused; where any harm caused to the significance of an asset is deemed to be less than substantial the public benefits from the scheme should convincingly outweigh the harm caused.



### Designated buildings, structures and parks

Development involving a statutory listed building, scheduled ancient monument, its setting or a registered park or garden will be determined in accordance with their significance and value. To ensure the conservation of the listed buildings in Watford proposals should:

- a) Avoid total or substantial demolition of a listed building;
- b) Avoid changes of use, alterations, and extensions that would cause harm to special architectural and historic interest of the building; and
- c) Not cause harm to the significance of the listed building or its setting.



### Conservation areas

Development in conservation areas will be supported where they preserve and, where possible, enhance the character, appearance and significance of the designation and clearly demonstrate they:

- d) Use building design that is of an appropriate scale and materiality;
- e) Enhance existing features and structures which contribute to the significance of the Conservation Area;
- f) Do not significantly harm important views into, out of, or within the conservation area; and
- g) Preserve trees and other significant built and landscape features which contribute to the character and appearance of a conservation area or which provides a setting for local architectural heritage.





## Non-designated heritage assets

7.16 Watford has many attractive and locally significant buildings and features which contribute to the distinctiveness of the town but which are not formally designated as heritage assets. The NPPF identifies these as non-designated assets. These can either be identified as part of the planning process or be on Watford's Local List. Watford's local list identifies historic buildings and features which are valued by the local community. When planning permission is required for any proposal which directly or indirectly affects the significance of a non-designated asset then the Council will treat the significance of that asset as a material consideration when determining the application. Proposals for development must have regard to Watford's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent.

7.17 Proposals should be of a design and scale which preserves or enhances the features which contribute to its significance and should use building materials, features and finishes for features such as gates, walls, railings and hard surfacing which are appropriate to the setting of the asset and the local context. Where possible proposals should take the opportunity to remove unsympathetic alterations and restore or reinstate missing features.



### Policy HE7.3: Non-designated heritage assets



**To preserve and enhance the character, appearance and setting of Locally Listed Buildings all planning applications that affect Locally Listed Buildings will be determined in accordance with the following:**

- a) **Where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building; and**
- b) **All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building.**

## Archaeology

7.18 Archaeological remains can provide great insight into the social and economic lives of people living many years ago and it is important to ensure that such remains, whether known or unknown are protected.

7.19 Where an application site includes, is considered to, or is found to have the potential to include, heritage assets with archaeological interest, it must be accompanied by an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation.

7.20 Where the loss of the whole, or a material part of, the significance of a heritage asset of archaeological interest is justified, planning conditions will be included in any permission to ensure that an adequate record is made of the significance of the heritage asset before it is lost. This will be secured through an archaeological Written Scheme of Investigation which must include provision for appropriate publication of the evidence. The potential for local public engagement and dissemination should also be considered and included in the Written Scheme of Investigation where this is deemed to be appropriate.



### Policy HE7.4: Archaeology



**New developments should protect remains of archaeological importance. Where a development may affect archaeological remains applicants will be required to submit an archaeological assessment as part of a planning application.**

**To protect the significance of archaeological assets, measures will need to be taken that are proportional to their importance to ensure the physical preservation of the assets and their setting. These measures should be prepared in collaboration with the county archaeologist and secured through planning conditions.**



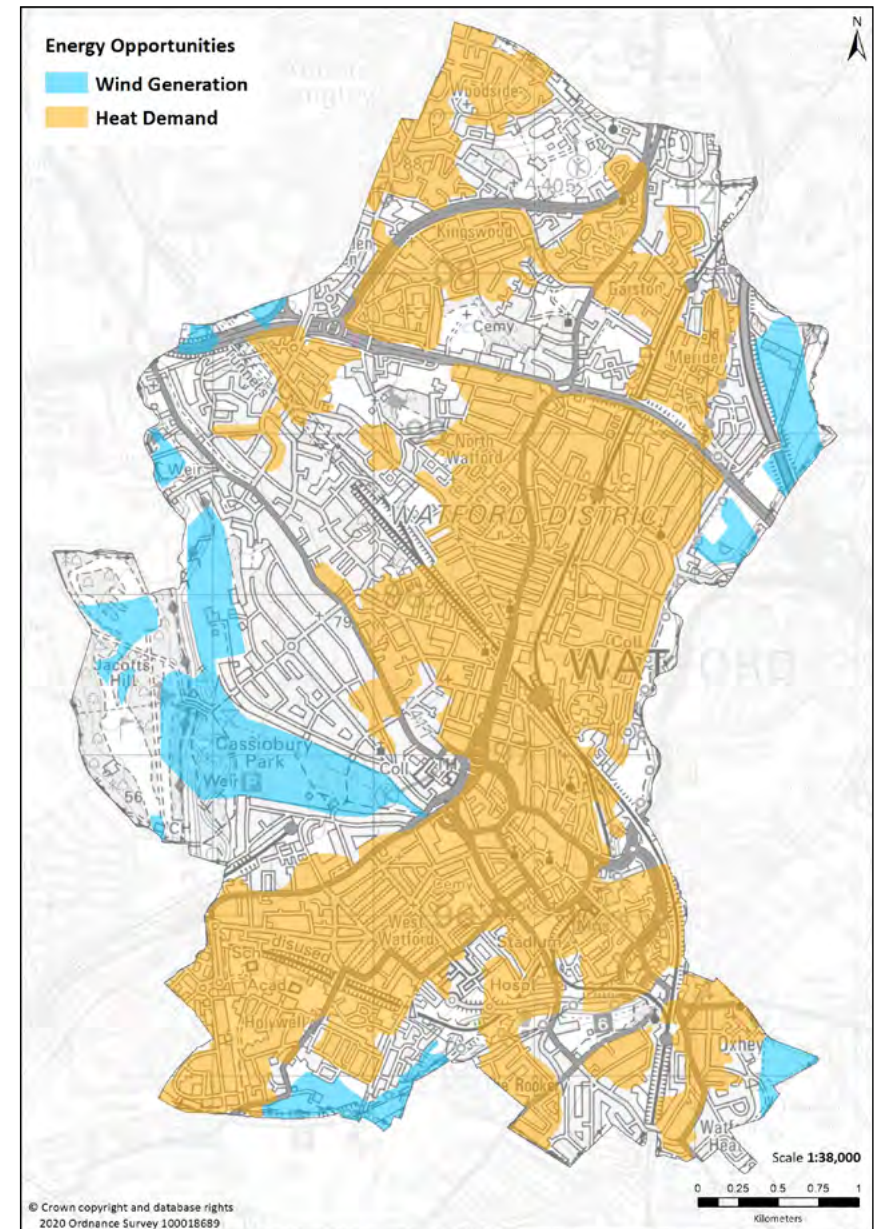
## Chapter 8

# A Climate Emergency

## Sustainable construction and resource management

- 8.1 The Climate Emergency Declaration by the Council in July 2019 led to the ambitious objective of becoming carbon neutral by 2030. Planning has an important role to play in creating carbon neutral developments to meet this objective and work in conjunction with the wider Council initiatives to combat climate change as set out in the Watford Sustainability Strategy (2020)<sup>1</sup>.
- 8.2 New development will be expected to use design and a mix of passive and active low carbon and renewable energy technologies to reduce emissions and support greener industries. Sustainable building construction and operations will be encouraged.
- 8.3 Major developments in the Core Development Area should consider how they can reduce carbon emissions through the use of large-scale renewable energy schemes, such as community energy networks. Areas with potential for community energy schemes are identified on the Watford Energy opportunities map (Figure 8.1).
- 8.4 To be most effective, minimise costs and avoid time delays, applicants should consider sustainable principles from the start of the design process. A Sustainability Statement should be used to set out how proposals will mitigate the impact of climate change and contribute towards sustainable development.

Figure 8.1: Energy opportunities map



<sup>1</sup> [https://www.watford.gov.uk/downloads/file/3229/sustainability\\_strategy\\_part\\_1\\_-\\_2020\\_to\\_2023](https://www.watford.gov.uk/downloads/file/3229/sustainability_strategy_part_1_-_2020_to_2023)



## Strategic Policy CC8.1: Mitigating Climate Change and Reducing Carbon Emissions

The Council will support proposals that help combat climate change and ensure the borough becomes more resilient, sustainable and adaptable to climate change. Developments should provide a sustainability statement with their application. New development will need to demonstrate how it is contributing positively towards:



### A Carbon Neutral Watford

Developments are expected to contribute towards the borough becoming carbon neutral and reducing the overall environmental impact.



### Sustainable construction

Proposals need to consider how they will affect the environment from start to finish including the construction process and how occupants will use the building and surrounding area.



### New buildings

New buildings will need to be high quality, use resources efficiently, reduce pollution, be safe to live in and encourage healthy lifestyles.



### Cumulative development

New development should consider opportunities associated with cumulative development. This includes materials used in construction, the layout of the scheme and measures that will create a comfortable microclimate such as light, shading and landscaping.



### Low carbon and renewable energy

On-site low carbon and renewable energy technologies will be encouraged, particularly where the scale of growth can support community energy networks.

8.6 As indicated in Chapter 4: 'A Strong Economy', Watford will see significant employment and other non-residential development coming forward. This provides an opportunity to reduce their impact on the environment through the use of high quality construction methods. The Building Research Establishment Environmental Assessment Method (BREEAM) is intended improve the design quality of new non-residential schemes. Therefore, major non-residential developments are to meet the BREEAM 'excellent' standard, or equivalent. While more limited in scope, smaller schemes also have opportunities to reduce their environmental impact, Minor non-residential proposals are encouraged to achieve BREEAM 'very good' standard or individual requirements that form part of the overall assessment to improve their environmental quality.

8.7 To be effective and reduce costs of retrofitting buildings, applicants are to provide a pre-assessment certificate to the Local Planning Authority which will set out how sustainability measures can be achieved as part of the development early in the process. Submission of a certificate by an accredited assessor will be required upon completion.

## Sustainable construction standards

8.5 The scale of development in Watford presents significant opportunities to improve the quality and sustainability of new residential and non-residential buildings and how they

can contribute towards a wider goal of achieving sustainable development. All new development should strive for sustainable consumption of resources, including energy, water and materials, with the latter reflecting guidance set out in the Hertfordshire Waste Local Plan<sup>2</sup>.

<sup>2</sup> <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/waste-planning/waste-planning.aspx>



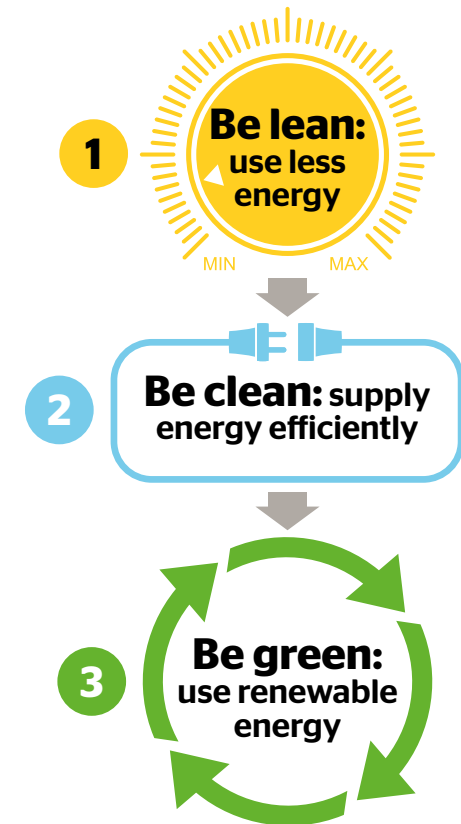


## Policy CC8.2: Sustainable Construction Standards for Non-residential Development

Proposals should be designed to reduce their impact on the environment and create high quality internal and external space for people to use. Proposals will be supported where it is demonstrated that resources will be used efficiently as part of the construction and operation of a building. This includes appropriate use of technologies, building design and layout, while taking into consideration the effects of climate change. To achieve this, non-residential major developments should achieve BREEAM excellent standard.

Applicants should provide a BREEAM pre-assessment completed by a suitably qualified assessor as part of an application. The submission of a Compliance Certificate to the Local Planning Authority upon completion will be secured through planning conditions.

Figure 8.2: Energy hierarchy



8.12 The Council will be more ambitious with energy performance standards as technologies improve, become more accessible and cheaper, and therefore the impact on development viability is reduced. Developments are to either achieve the applicable percentage of improvement required over the Target Emission Rate (TER) set out in Building Regulations or updated government standards that exceed this requirement, whichever is greater.

## Resource management

### Energy efficiency

8.8 Energy use should be prioritised in line with the energy hierarchy (Figure 8.2). The first priority is to be lean. This is to ensure less overall energy use with good building design and high energy efficiency using passive design measures, such as building orientation, internal and external building layout, tree planting (prioritising endemic and deciduous species) and the size and location of windows.

8.9 The second priority is to be clean; to use energy that is supplied efficiently. Developments should consider connecting to decentralised energy networks (energy generated off the energy grid). This can include technologies such as solar energy and water, heat pumps, biomass-fuelled energy

generation and larger-scale schemes, such as Combined Heat and Power (CHP) systems.

8.10 The final priority is to be green and use renewable low or zero carbon energy sources. To reduce the impact on the environment and contribute towards the borough becoming carbon neutral, energy generation using sustainable sources is strongly encouraged.

8.11 In June 2019, parliament passed legislation to legally bind the UK government to reduce greenhouse gas emissions by 100% from 1990 levels, by 2050. The design of new buildings will make an important contribution towards this goal. To plan, design and save unnecessary retrofitting of buildings, new homes should be designed to be adaptable to zero carbon in the future.

### Carbon off-setting

8.13 If developments demonstrate exceptional circumstances, resulting in an inability to meet the required standard of efficiency, they are to contribute to Watford’s Carbon Offset Fund. Contributions will be used within Watford for carbon reduction projects, such as retrofitting. The amount to be paid will be agreed in advance using the equation:  $Cost = (T - O) * X * Y$ . Where T = Total carbon emissions; O = Amount already offset on site; X = Cost per tonne of carbon emitted and Y = Number of years found applicable.

### Overheating

8.14 Building energy efficient homes is important to reduce carbon emissions, however, it is also important to build new homes that are healthy to live in and support a person’s wellbeing. Overheating can be uncomfortable and dangerous, making it an important health issue. Smart design, such as dual aspect windows, passive ventilation and the incorporation of cooling measures like trees and shrubs, to increase light or provide shading, reflecting the seasons, are important to prevent overheating and avoid health risks. Further detail is set out in Chapter 6 ‘An Attractive Town’. Developers will be expected to integrate good design to support health and wellbeing and reduce overheating as part of their schemes. Use of traditional, energy dependent, cooling systems is not appropriate.

8.15 Where apartments are single aspect, which reduces airflow, and need to be supported by mechanical ventilation in addition to passive cooling measures developers should demonstrate how this is addressed using low carbon technologies.

### Water efficiency

8.16 The borough is within an area classified as under serious water stress by the Environment Agency. Water security can be put at risk, especially during droughts and with an increasing population, if not carefully managed.

8.17 To secure a sustainable water supply, new standards and technologies should be incorporated as part of new development schemes to reduce water use. Residential developments are to meet the technical standard for water efficiency set at a maximum consumption level of 110 litres per person per day. All developments should utilise opportunities to install internal water efficient fixings and incorporate rainwater use and harvest greywater where possible.

### Materials and waste management

8.18 Generating large amounts of waste can be detrimental to the health of the public, the environment and wildlife. To be more resource efficient, new developments should actively plan to reduce waste by minimising residual waste and by using recycled and recyclable materials as much as possible.

8.19 Proposals are to be in accordance with the Hertfordshire Waste Local Plan, including aligning construction practices and building operations with the Hertfordshire Waste Hierarchy (Figure 8.3). Practices to manage materials and waste through mechanisms such as Site Waste Management Plans and circular economy statements, as appropriate, are supported:

8.20 Site waste management plans outline the types and amounts of waste expected from a construction site, including how each will be reused, recycled or disposed of.

8.21 Circular economy statements consider how materials are used and keep their main use for as long as possible, before planning on reusing or recycling the material.

**Figure 8.3: Hertfordshire Waste Hierarchy**





## Policy CC8.3: Sustainable Construction and Resource Management

### Energy efficiency

To minimise the impact of new homes on the environment and achieve Net Zero Carbon, a phased approach to improve the energy efficiency of new homes is set out. To achieve this residential developments should:

- a) Be designed so they can be adapted to be Net Zero Carbon;
- b) Avoid overheating and use passive ventilation when possible;
- c) Achieve the minimum applicable percentage, as set out below, of improvement for carbon emissions over the target emission rate (TER) as outlined in National Building Regulations Part L (2013)<sup>3</sup>, or any updated government standards, whichever results in a higher target.

2018 - 2025	19%
2025 - onwards	35%

Proposals that do not meet these energy efficiency targets will only be supported if it is unfeasible due to exceptional circumstances and a financial contribution is made towards the Carbon Offset Fund to provide equivalent carbon savings off site.

### Water efficiency

All residential developments should meet the technical standard for water efficiency of 110 litres per person, per day.

In new, non-residential developments, water conservation measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM 'very good' for the appropriate building typology.

### Materials and waste management

Development proposals should reduce construction waste through the re-use and recycling of materials. Practices undertaken should reflect the Hertfordshire Waste Hierarchy. As part of an application, applicants should set out how waste management of the site is in accordance with the Hertfordshire Waste Local Plan.

### Sustainability Statements

A Sustainability Statement will be submitted to the Local Planning Authority to demonstrate compliance with this policy for new-build residential developments (other than householder applications). The Sustainability Statement will include details as to how energy, water and waste requirements will be complied with and monitored.



<sup>3</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/226965/Part\\_L\\_2013\\_IA.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/226965/Part_L_2013_IA.pdf)

## Managing air quality

8.22 A polluted environment can result in a severe cost to public health, the natural environment and the economy. The links between poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk. Mitigating the impact of development on air quality and minimising exposure to poor air quality across Watford is important. This can help to safeguard residents from the impacts of a polluted environment.

8.23 There are currently two Air Quality Management Areas (AQMAs) in Watford, where national objectives for ambient air quality have been exceeded. The predominant pollutants in Watford are those commonly associated with road traffic.

8.24 The exposure of vulnerable residents, such as children, the elderly, and those with respiratory issues to poor air quality, is a particular concern. Air pollution can affect anyone's health; nevertheless, some individuals can be more susceptible than others. These include:

- children;
- the elderly;
- individuals with existing cardiovascular or respiratory diseases;
- pregnant women;
- communities in areas of higher pollution, such as close to busy roads; and
- low income communities.

8.25 Sensitive development may include, but is not limited to, schools, residential care homes and health facilities. Air pollution also has potential to have increased impacts on the wider global environment and society with a changing climate.

8.26 Air quality is often managed through soft measures, such as active modes of travel, urban greening and the use of sustainable construction methods. The ways new developments are designed can also assist in mitigating against the negative impacts of poor air quality. For instance, strategically planting trees and hedges between major roads and residential development can create a barrier to shield residents from poor air quality caused by traffic. Measures such as these will be supported as part of the Plan. However, to ensure that national and international objectives for ambient air quality are met, additional steps must be taken to guide new development.

8.27 Development should seek to achieve overall improvements to air quality and minimise the potential adverse impacts. The policy intends to ensure that the potential impacts of new development upon air quality is an issue considered early in the design process and when planning applications are determined. Regard should be given to the location of development where users may be more sensitive to poor air quality.

8.28 Development will be expected to support the aspirations of the Air Quality Action Plan, as well as Public Health England's 2019 'net health gain' principles and the Public Health Outcomes Framework. Regard should also be given to the Ambient Air Quality Directive (2008) and the European Union Limit Values to determine compliance with national and international air quality standards.







## Policy CC8.4: Managing Air Quality



Development will be supported where it does not contribute towards a worsening of existing air quality and, where possible, seeks to improve existing air quality. Appropriate mitigation measures will be required to address any potential impact on air quality.

An Air Quality Assessment will be required for all major developments and other forms of development that are considered to be at risk of impacts from significant emissions or pollutants. This includes, but is not limited to, development where the occupiers/ users may be sensitive to poor air quality and development in close proximity to an Air Quality Management Area. Assessments will be required to consider the cumulative impacts in conjunction with other developments in the vicinity and include mitigation measures where necessary.

Where the Air Quality Assessment indicates that a development would cause harm to air quality, planning permission will not be granted unless appropriate mitigation measures are proposed, which demonstrate that:

Public exposure to the pollution source has been minimised;

- a) Sensitive development has been located an appropriate distance away from the source of exposure; and
- b) The development would not lead to the creation of a new street canyon or a building configuration that inhibits effective pollution dispersion.

## Managing the environmental impacts of development

- 8.29 There are other types of pollution in addition to air quality that can have a negative impact on the environment and residential amenity, including light, noise, contamination, odour and vibration. Pollution can be brought about by new development and can have a severe impact on the amenity and function of existing properties and businesses, and the quality of life in an area.
- 8.30 The Council places responsibility on the applicant, or the party responsible for the development, to provide mitigation for any significant adverse impacts that may be generated by the proposed development. This is set out in national policy as the 'Agent of Change Principle' and ensures that new development does not cause existing uses in the vicinity to curtail their activities. Applicants will need to demonstrate how mitigation has been provided for any potential issues related to noise and light pollution, odour, contamination and other negative impacts. The Council will seek to ensure that quality of life, health, wellbeing and the environment are not adversely affected by harmful pollutants and other negative impacts that could be associated with new development.
- 8.31 The relevant national policy and guidance, including Building Regulations, should be referred to for information regarding ambient levels for each individual pollutant. There are also various key stakeholders who are able to give advice on minimising the risk of pollution and effective mitigation. These bodies should be engaged early in the process for good practice. For instance, where overhead powerlines traverse the site, early engagement with the operator should be undertaken and where development may have an impact on groundwater, the Environment Agency should be consulted.



## Policy CC8.5: Managing the Impacts of Development



Development should be designed to protect the amenity of adjacent land uses and their occupants and local amenity, and to enhance the public realm. In accordance with the 'Agent of Change Principle', new development will be required to assess its potential impacts on neighbouring land uses, including the cumulative effects, and set out mitigation measures where appropriate. To achieve this, development must have regard to the risk related to:



### Light pollution

Developments must be designed to minimise any significant detrimental impact of external lighting on local amenity and safety, biodiversity, heritage assets, roads and watercourses.



### Noise pollution and vibration

Where development is noise-generating, or the surrounding area is sensitive to noise and vibration, applicants must undertake a

noise assessment to identify potential issues and the required attenuation measures to achieve acceptable noise levels, as defined in national guidance. Noise assessments should also consider the risk of noise reflection, particularly on new developments near to railway lines and major roads.



### Contamination, including contamination of groundwater

Applicants are required to carry out a comprehensive ground investigation report and take appropriate remediation measures for development on or near a site that is potentially contaminated.

Development that could adversely affect the groundwater quality, flow or volume will not be granted permission.



### Odour

Development must address the adverse impact of odour through the incorporation

of appropriate mitigation measures where the development is considered to generate or development is sensitive to odours.



### Unstable land

Applicants will be required to remediate unstable land and further issues related to subsidence, before development can commence. Appropriate measures must ensure that the proposed development will not lead to land instability during works or following completion. A Land Stability Risk Assessment report may be required in line with national guidance if unstable land is considered to be a potential risk.



### Power lines

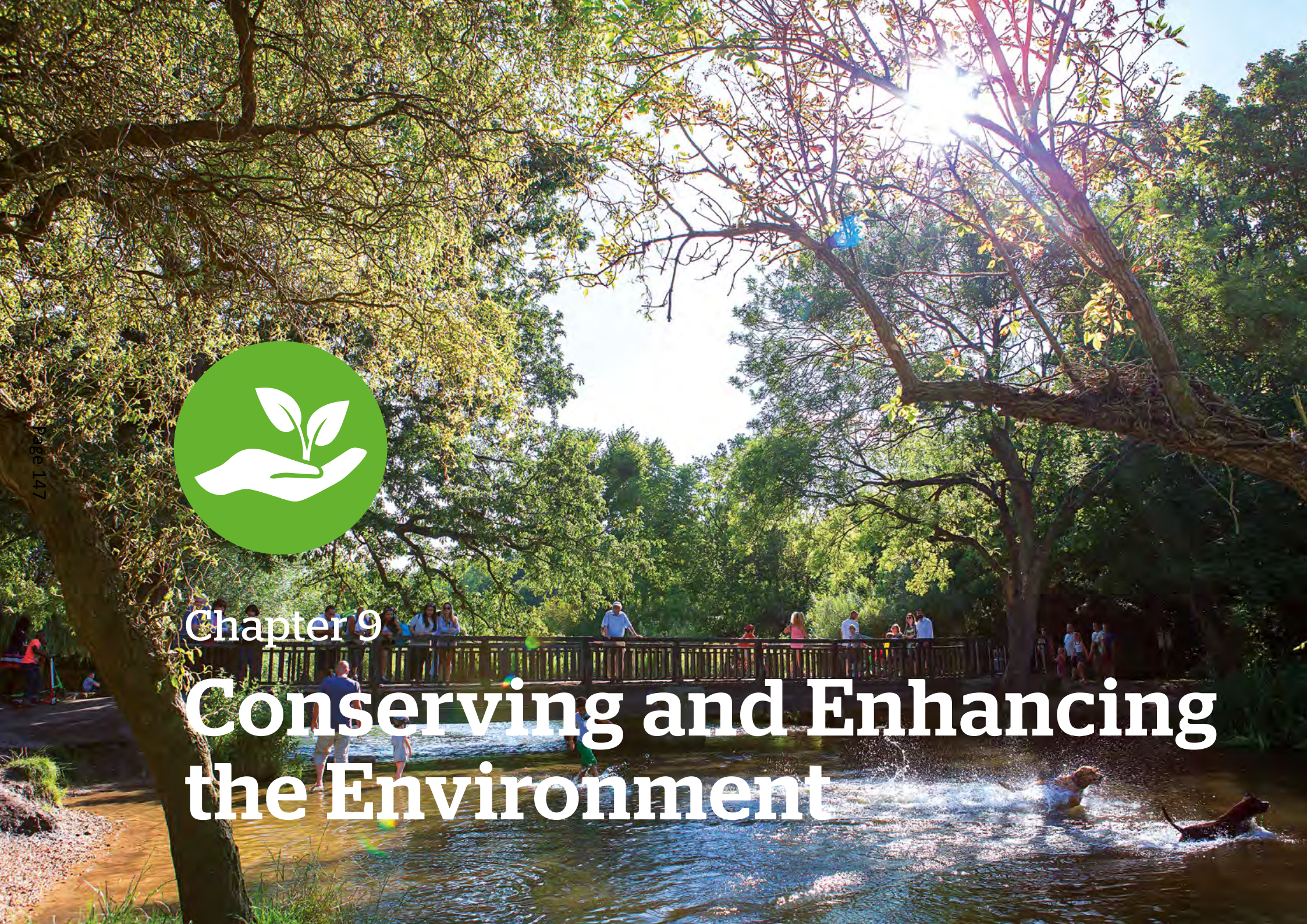
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.





## Chapter 9

# Conserving and Enhancing the Environment

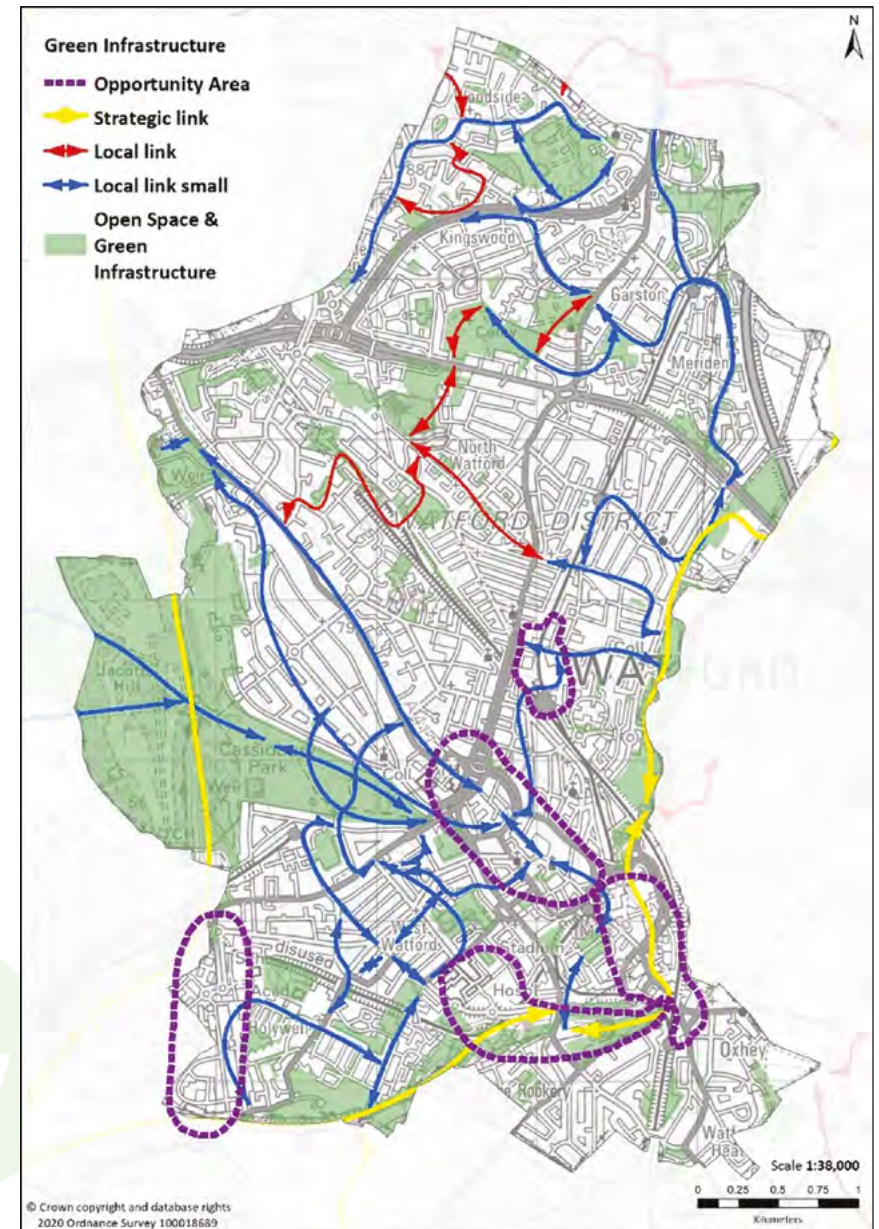


## Conserving and Enhancing the Environment

9.1 Although Watford is a densely populated urban borough, the natural environment is relatively rich. There are many high quality and high value open spaces, including 12 Green Flag parks, ancient woodland and sites of national and regional significance. Two rivers run through the borough, as well as the Grand Union Canal, which stretches from London to Birmingham. Watford supports wider green and blue links to other natural areas of significance in the region, including Colne Valley Regional Park and the Chilterns Area of Natural Beauty. Urban planning can be an important instrument for the natural environment, for it seeks to balance the need for new development while also striving to conserve and enhance the natural environment.

9.2 Designated green infrastructure and open spaces in Watford are shown on Figure 9.1. Ecological resources and opportunities have been identified and mapped as part of data held by the Hertfordshire Ecological Records Centre. This data includes species and site records and maps, as well as the Local Nature Partnership's Network Mapping.

Figure 9.1: Green infrastructure in Watford



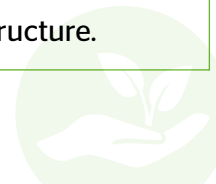
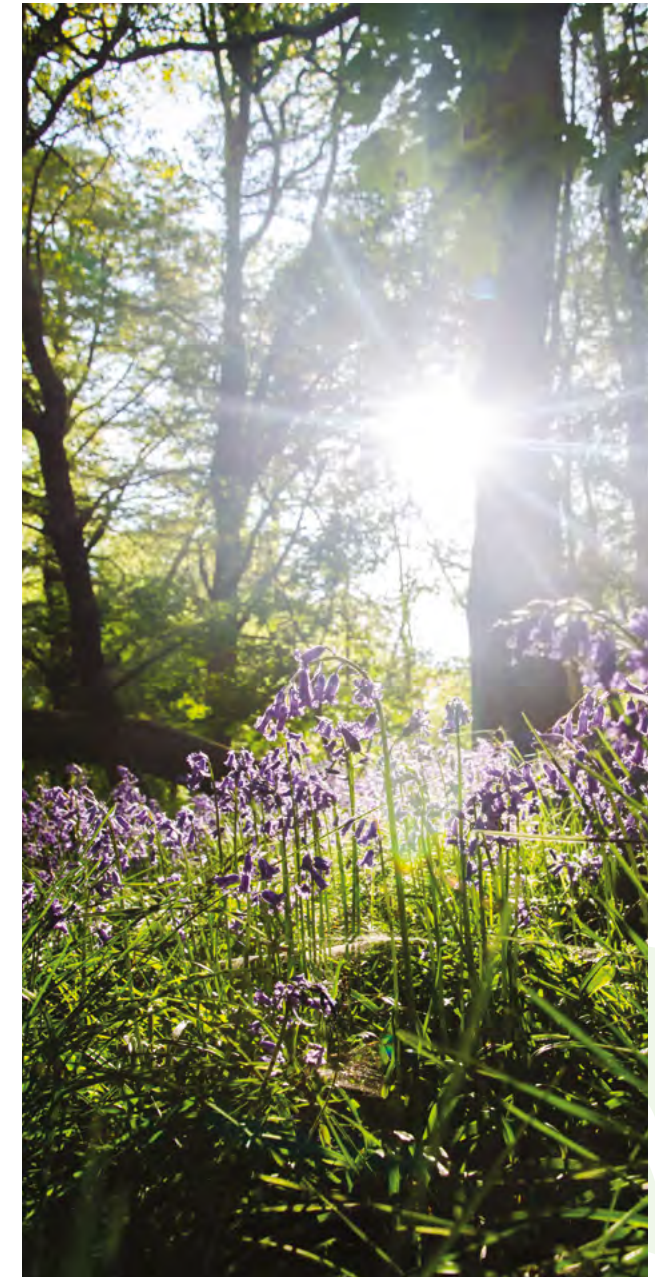


## Strategic Policy NE9.1: The Natural Environment



The Local Plan will support the conservation and enhancement of the natural and local environment. Development proposals will be required to demonstrate a positive impact on Watford's natural environment by:

- a) Protecting and enhancing Watford's natural and environmental assets and seeking to create new environmental features where possible;
- b) Conserving and enhancing the extent and quality of green infrastructure and ecological networks by seeking to create, expand and restore links within the network, and support the wider benefits from natural capital and ecosystem services at a landscape scale where appropriate;
- c) Ensuring all new development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, locally, where possible;
- d) Following the 'mitigation hierarchy' of avoidance, mitigation or compensation as appropriate;
- e) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value;
- f) Minimising the risk of flooding, including surface water flood risk;
- g) Bettering access to open space across the borough where there is an identified need and delivering new green spaces as part of new development;
- h) Delivering non-traditional forms of urban greening as part of high-density development, as well as traditional open space, including green roofs and walls;
- i) Improving the quality of Watford's existing open spaces through development contributions;
- j) Where necessary, ensuring that protected species and their habitats are a material consideration when determining planning applications;
- k) Protecting trees and encouraging native planting on new development; and
- l) Considering the cumulative impacts of development on green and blue infrastructure.

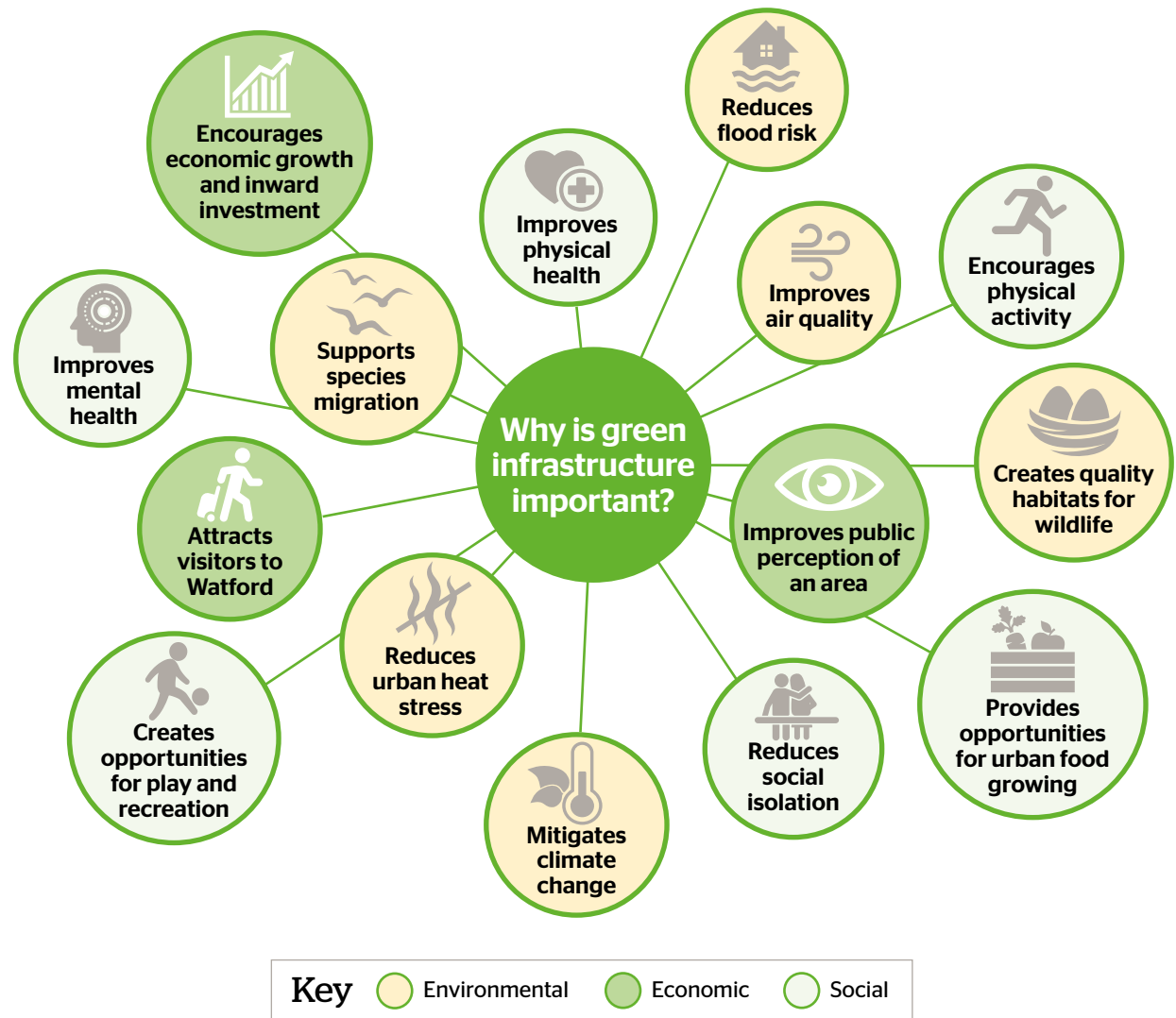


## The green infrastructure network

9.3 Green infrastructure is defined as multi-functional networks of open spaces, green corridors and natural green space. Together, these networks perform a variety of functions for the environment and the people who live here. The importance of green infrastructure is highlighted in Figure 9.2. Watford's green infrastructure network contains critical links across the borough, but also across wider Hertfordshire and beyond.

9.4 To conserve and enhance the green infrastructure network, new proposals adjacent or in close proximity to open space and green corridors should consider the impact of development on existing networks and prevent fragmentation. New development can help deliver enhancements to the green infrastructure network and improve connectivity between green spaces if opportunities are proactively identified in the early stages, as proposals are being drafted. The potential impact of landscaping, access, excessive lighting, overshadowing and noise should also be considered and appropriate mitigation provided to protect the intrinsic quality of the network.

Figure 9.2: Benefits of green infrastructure



9.5 Opportunities to improve the green infrastructure network have been set out in the Green Infrastructure Plan and have been illustrated on Figure 9.1. The projects identified are:

- Cassiobury Park enhancement;
- Whippendell Woods enhancement;
- Grand Union Canal enhancement;
- Colne Valley Wetland enhancement;
- Urban greening and legibility for Watford.

9.6 Trees also make an important contribution to biodiversity and should be protected where possible to support the government's England Tree Strategy (2020)<sup>4</sup>. Opportunities should also be taken to increase native planting to support biosecurity.



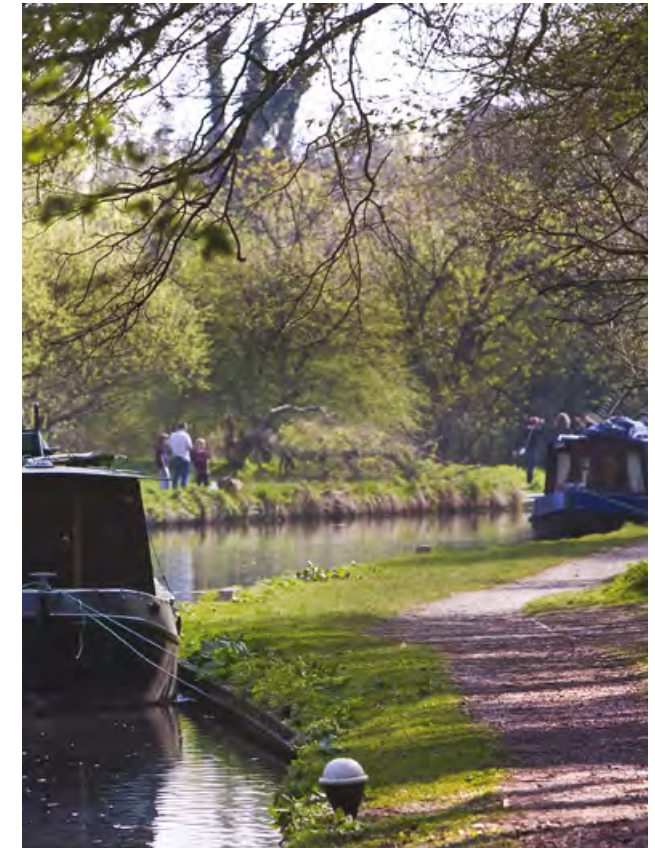
## Policy NE9.2: Green Infrastructure Network



Proposals must demonstrate how they will appropriately conserve, restore, expand or enhance the green infrastructure network, including how the site connects with the wider network. Development should protect the function and amenity of green routes, including public rights of way.

A proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. Native planting should be prioritised.

Priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan.



<sup>4</sup> [https://consult.defra.gov.uk/forestry/england-tree-strategy/supporting\\_documents/englandtreestrategyconsultationdocument%20%20correctedv1.pdf](https://consult.defra.gov.uk/forestry/england-tree-strategy/supporting_documents/englandtreestrategyconsultationdocument%20%20correctedv1.pdf)

## The blue infrastructure network

- 9.7 The Grand Union Canal, River Gade and the River Colne all flow through Watford and form the borough's blue infrastructure network. Rivers Colne and Gade are designated as main watercourses by the Environment Agency, whereas the Grand Union Canal is designated as an ordinary watercourse for the length it runs through Watford. Protecting and enhancing these watercourses is important for many reasons, such as to effectively manage flood risk, to conserve and enhance river habitats and to maximise opportunities for active travel and leisure. The Water Framework Directive (WFD)<sup>5</sup> also sets an objective to improve these watercourses to 'good' status by 2027.
- 9.8 During the plan period, there is expected to be new development occurring near to Watford's watercourses and their corridors. High quality development presents an opportunity to enhance the role of watercourses and make them a central feature of new development. This would maximise the contribution that blue infrastructure can make to creating successful places.

- 9.9 New development also presents an opportunity to enhance the quality of watercourses, to support them achieving Water Framework Directive 'good' status within the established timeframe. The potential impact of landscaping, access, lighting, overshadowing and noise should be considered and appropriate mitigation provided to protect the intrinsic quality of the water environment. This is particularly pertinent for taller buildings, which can overshadow rivers and result in the loss of habitats.
- 9.10 Development that occurs too close to the banks of watercourses can increase the risk of pollution and limit capacity to manage run off. The South West Hertfordshire Strategic Flood Risk Assessment Stage 1 (2018) identifies the need for 8m undeveloped buffer zones between the top of the bank of any main watercourse and the built environment (including formal landscaping, sport fields, footpaths, lighting and fencing). The buffer zone must be free of hard standing, paths or lighting and must not be used for storage of materials. Planning conditions will require the developer to provide details of an appropriate management scheme to ensure that the buffer is well maintained.

- 9.11 Many of Watford's watercourses have been culverted, to support historic development and infrastructure projects. However, the culverting of watercourses can be harmful for the ecology, as it creates barriers to the movement of fish and causes the loss of bankside habitats.<sup>6</sup> Culverts also contribute to an increased risk of blockage, which in turn, increases flood risk. As new development comes forward, it is important that deculverting and the re-naturalisation of the watercourse occurs as much as possible to improve the water environment. Culverting, among other issues, has meant that routes for cyclists and pedestrians along canals are also relatively fragmented. New development can help deliver enhancements to watercourses and their corridors by providing new connections and routes for active travel and leisure uses and by enhancing interconnectivity with the green infrastructure network.
- 9.12 This policy should be read in conjunction with Policy NE9.4 'Flood Risk and Mitigation', which provides more detailed guidance on mitigating flood risk.



<sup>5</sup> [https://ec.europa.eu/environment/water/water-framework/info/intro\\_en.htm](https://ec.europa.eu/environment/water/water-framework/info/intro_en.htm)

<sup>6</sup> Environment Agency, Fluvial Design guide: <http://evidence.environment-agency.gov.uk/FCERM/en/FluvialDesignGuide/Chapter8.aspx?pagenum=6>





## Policy NE9.3: Blue Infrastructure Network



Development proposals in close proximity to watercourses must support the strategic importance of Watford's blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits. Development proposals in close proximity to, or that include a watercourse must:

- a) Maintain an undeveloped and unobstructed buffer strip of eight metres from the top of the bank of all watercourses. Where this enables public access, proposals should be accompanied by a management plan;
- b) Conserve and enhance the biodiversity value of the watercourse and its corridor through the inclusion of in-channel enhancements, the creation of priority wetland habitats, prioritising native planting schemes and by addressing misconnections;
- c) Enhance the role of the watercourse as an accessible active travel and leisure route for pedestrians, cyclists and boaters, and increase connectivity along the length of the watercourse. This includes connectivity and access, where appropriate, to the green infrastructure network;
- d) Integrate the watercourse into the scheme as a vital part of the public realm; and
- e) Open and re-naturalise modified watercourses, including culverted and piped waterways.

The provision of crossings and bridges will be supported where they improve connectivity for pedestrians and cyclists, are in keeping with the setting of the area, and are designed to avoid obstructing flood flows.

## Flood risk and groundwater management

9.13 The National Planning Policy Framework supports a risk-based, sequential approach to manage flood risk and ensure development is located in areas of lowest risk. Along with the Flood and Water Management Act (2010), there is a requirement for new development to minimise vulnerability and improve resilience to the impacts of climate change including flooding.

### Flood risk

9.14 Flood zone classifications reflect the local risk to people and property and indicate types of development that may be suitable in that zone due to risk level. In Watford, zones of fluvial and surface water flood risk and groundwater protection are identified in the Level 1 (2018) and Level 2 (2020) Strategic Flood Risk Assessments. These areas are largely, but not exclusively, associated to the water basins of the Rivers Colne and Gade.

- Sites located within Flood Zone 1 are subject to lower levels of flood risk, however, they may still require a Flood Risk Assessment where new development could affect the floodplain and increase risk on site or on other sites nearby. A sequential test may be required for development where there is a previously identified flood risk issue.
- Development located in Flood Zones 2 and 3 is at high risk of flooding. Site-specific Flood Risk Assessments are required for all developments within these zones. Development should be prioritised outside of these areas, however, where this is not possible, sites will need to comply with Sequential and Exception Test requirements, as appropriate, before planning permission can be granted.



9.15 Flood risk should be discussed when development proposals are prepared. Applicants are expected to consider how their proposals affect, or could potentially impact other sites in the vicinity and the cumulative impact on flood risk. In some circumstances this may require further modelling to determine the overall impact and potential mitigation measures that may be needed. Developments should seek betterment of existing flood risks, both within the site and in the surrounding area. External organisations such as the Environment Agency and the Lead Local Flood Risk Authority (Hertfordshire County Council) should be consulted to provide guidance when required.

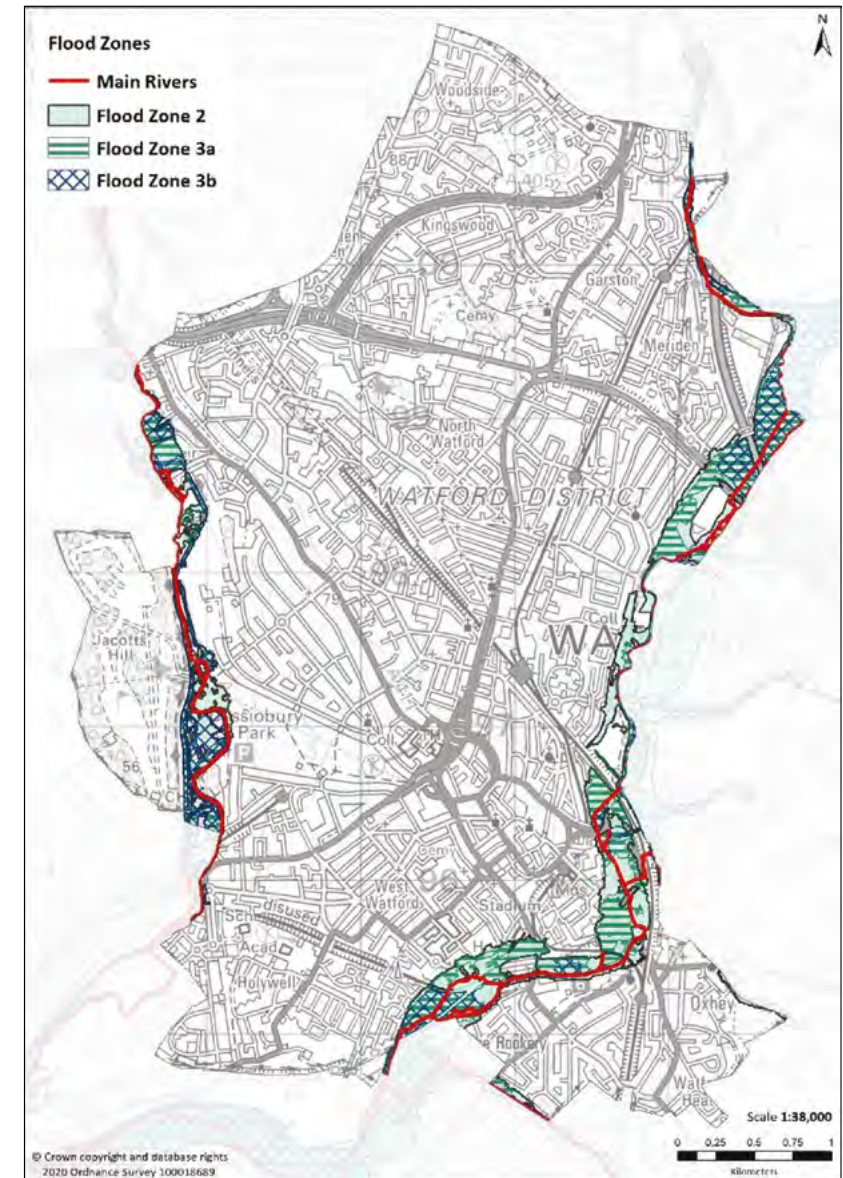
### Groundwater protection

9.16 The River Colne basin is designated as Groundwater Source Protection Zone 1, most sensitive with an area buffering the waterway covering much of east Watford identified as Groundwater Source Protection Zone 2 and sensitive to contamination. This means several land uses including industrial, petrol stations and waste management may not be suitable in certain areas of Watford due to the high risk of contamination to the aquifer and drinking water. Developers are expected to implement measures to minimise these potential negative impacts on the ground source. Where these are required these should be prepared in collaboration with the Environment Agency and the Lead Local Flood Authority.

### Flood risk mitigation

9.17 There are different causes that can trigger fluvial, surface and ground source flooding, and appropriate mitigation measures are required to reflect this. Proposals located in different parts of the borough that are subject to any type of flood risk will need to consider suitable measures to minimise the potential impacts. This should include measures to address safe access and egress, particularly for changes of use to a 'more vulnerable' classification (e.g. commercial to residential). These should satisfy the requirements set out in the Hertfordshire Local Flood Risk Management Strategy (2019) and should be prepared in collaboration with the Environment Agency.

**Figure 9.3: Flood Zones with climate change allowances in Watford**



9.18 Developments located in Flood Zones 2 or 3 are encouraged to have early and ongoing discussions with the Environment Agency (EA) and Lead Local Flood Authority to ensure proposals comply with their requirements. New residential developments should be designed to withstand a 1-in-100 year flood, plus a 35% climate change allowance while considering the impacts of plus 70% climate change during the process, to ensure longevity and safety of the development over time.

### Sequential and Exception Tests

9.19 Sites designated for development in this Plan have already been put through the Sequential and Exception Tests. However, the Exception Test may need to be reapplied if relevant aspects of a proposal were not considered initially. Windfall sites located within Flood Zones 2 or 3, or sites within Flood Zone 1 where there is an identified flood risk, which have not been subjected to Sequential and Exception Tests, will be required to do so.

9.20 In some instances, following the application of the Sequential Test, it may be necessary for a developer to make a contribution to the improvement of flood management provision that would benefit the proposed new development and the existing community. Where a proposed development is deemed to have a harmful impact on flood risk, a contribution towards flood mitigation may be required through planning conditions.



## Policy NE9.4: Flood Risk and Mitigation

### Fluvial flooding



**When located within areas identified as being at risk of flooding, applicants are required to demonstrate how appropriate and effective mitigation measures have been integrated into the scheme, including management of residual flood risk.**

Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. To demonstrate compliance with the Exception Test, a flood resilient design and emergency planning considerations will need to be accounted for, over the lifetime of the development including:

- a) The development to remain safe and operational under flood events;
- b) Safe evacuation and/or safely remaining in the building under flood conditions;
- c) Key services must continue to be provided under flood conditions; and
- d) Buildings are to be designed for quick recovery following a flood.

**Any development within Flood Zones 2 and 3, and those over one hectare in Flood Zone 1, should use a Flood Risk Assessment to show how they have considered flood risk beyond the site boundaries, including cumulative impacts arising from other developments. Proposals should demonstrate that suitable flood compensation storage is available to avoid any net loss in floodplain.**

**Proposals located in areas where waterways have been culverted or altered should seek to re-naturalise the river and surroundings, improve water storage and enhance riparian habitats, in line with requirements to meet Water Framework Directive objectives and the Thames River Basin Management Plan. Flood defences within the site boundary must be maintained, repaired or replaced by the developer for the lifetime of the development.**

### Groundwater protection

**Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), deep infiltration soakaways should be the last resort. Certain discharges into the ground may require an Environmental Permit.**

## Surface Water Management

9.21 A well-considered drainage strategy plays a vital role in the management of surface water flood risk. Sustainable Drainage Systems (SuDS) are water management measures that use natural methods designed to manage surface water as close to the source as possible. To be effective, a Sustainable Drainage System can be designed to use a combination of approaches including rainwater collection, grey water recycling, infiltration, soakaways, bio-swales and discharge to a watercourse as appropriate. Design requirements for effective drainage systems can be found in the CIRIA (Construction Industry Research and Information Association) Sustainable Drainage Systems Manual (2015) and Hertfordshire Local Flood Risk Management Strategy (2019).

9.22 Sustainable Drainage Systems should be multifunctional in their approach and be designed to maximise their benefits in other areas such as biodiversity and useable space for periods when they are not actively managing water for flood risk. Sustainable Drainage Systems can also aid in pollution mitigation when implemented correctly, but it is important that they are designed carefully to avoid contamination. For example, soakaways should not be implemented on contaminated land and infiltration should only be incorporated when using uncontaminated

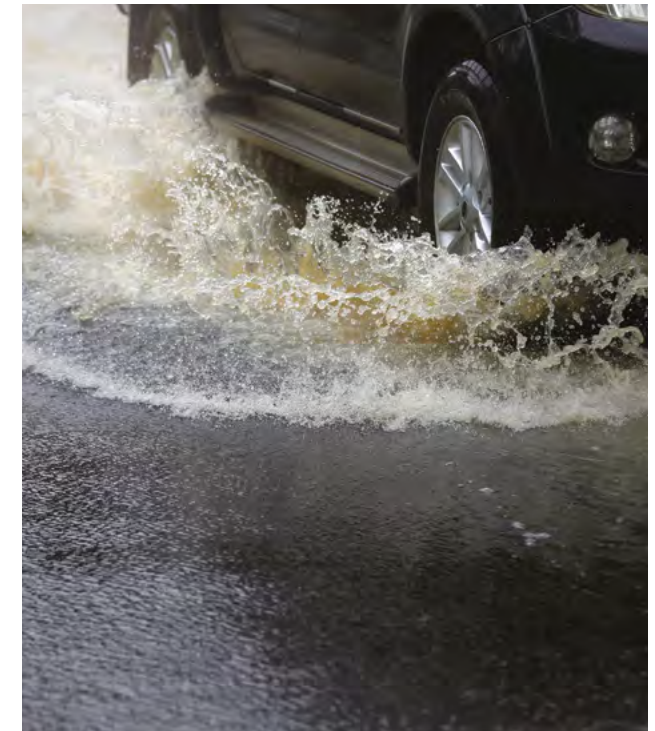
water. A surface water management plan is necessary to ensure Sustainable Drainage Systems are effectively designed, maintained and monitored.

9.23 The quality and effectiveness Sustainable Drainage Systems can vary. The hierarchy below sets out an approach that should be considered where a scheme could use single or multiple measures. From preferable, to least preferable:

- a) storage rainwater for later use;
- b) use of infiltration measures, such as porous surfaces in non-clay areas;
- c) attenuate rainwater in ponds or open water features for gradual release;
- d) attenuate rainwater by storing in tanks or sealed water features for gradual release;
- e) discharge rainwater direct to a watercourse;
- f) discharge rainwater to a surface water sewer/drain; and
- g) discharge rainwater to a combined sewer.<sup>7</sup>

9.24 Where management and maintenance of Sustainable Drainage Systems are required, the applicant should set out how this will be approached. This will need to be discussed with the appropriate stakeholders and required through the use of planning conditions.

9.25 Site-specific and Strategic Flood Risk Assessments for surface water management should consider both central and upper-end climate change allowances as stated in the National Planning Policy Framework. Details on the locations and necessary allowances are provided in the most recent Strategic Flood Risk Assessment. Predicted climate change allowances are increasing with time, and developments must consider this increase based on the expected duration of the structure.



<sup>7</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-five-londons-response/pol12>



## Policy NE9.5: Surface Water Management



Proposals that incorporate well designed Sustainable Drainage Systems that are appropriately integrated into the scheme, aim to achieve greenfield run-off rates manage surface water and improve resilience will be supported.

Sustainable Drainage Systems should make effective use of land by being multifunctional, to maximise ecological benefits such as biodiversity, provide open space or incorporate tree planting and landscaping. Developments will need to ensure the implementation of Sustainable Drainage Systems does not worsen contamination effects, and soakaways should not be located within land affected by land contamination. Details of the Sustainable Drainage System should be submitted to the Council as part of the Sustainability Statement.

Developments should seek betterment of existing surface water flood risk, both within the site and surrounding area, as an opportunity to have a positive impact on cumulative risk, using appropriate drainage measures. Allowances for changes and increases in flood risk due to climate change need to be considered. Sustainable Drainage Systems must be designed to respond to risk for the lifetime of a development, including the appropriate climate change impacts.

Sustainable Drainage Systems should be designed and integrated into the proposal to effectively manage the existing surface water flow paths on the site and help to mitigate other flood risks. Measures should be agreed with the lead flood risk authority and be consistent with the Hertfordshire Local Flood Risk Management Strategy. As part of an application, an applicant should provide a management plan that clarifies how any measures will be managed and maintained and agreed with the lead Local Flood Risk Authority.

## Protecting open space

9.26 Watford's open spaces are a great source of pride for our communities. Our award winning parks are not the only types of green spaces that Watford's residents can enjoy, as the borough contains a wide variety of types of open space. From allotments to playing pitches, these different open spaces can provide for a variety of different uses, functions and activities. Open space can make an important contribution to the green infrastructure network and offer valuable space for recreational and amenity use. Open spaces can also contribute towards flood risk management schemes and sustainable drainage systems.

9.27 Everyone living, working in and visiting Watford should have access to high quality open space and sports and recreation facilities. The types of open spaces provided and protected through new development should reflect a locally identified need. This can help to avoid deficiencies in different types of open space, and to ensure that open spaces are being effectively used. Watford's open spaces are not evenly distributed across the borough. Some communities are deficient in open space and require improved access to these recreational areas, whereas in some neighbourhoods there may be opportunities where alternative open space and ancillary uses could be considered if there is a demonstrated need.





## Policy NE9.6: Protecting Open Space



**Open space and ancillary facilities used for leisure and recreation will be protected, unless an up-to-date assessment demonstrates the space is surplus to need. For an open space or an ancillary facility to be considered surplus to requirements, the following must be demonstrated:**

- a) An assessment has been undertaken that has clearly shown the open space, buildings or land to be surplus to requirements, having regard to the Council's most recent evidence base; and
- b) The open space is not needed for alternative open space uses; or
- c) An equivalent or better facility in terms of quality and quantity is to be provided in a more suitable location that meets the needs of the local community.

**Development proposals for alternative open space uses will be supported where an up-to-date assessment clearly shows the benefits outweigh the loss.**

**The absence of identification of an open space on the Policies Map does not imply that development is appropriate.**

## Providing new open space

9.28 As new development comes forward, there will be opportunities to create new communal open space on site. While some level of private amenity space will be expected (Policy HO3.11 Private and Communal Outdoor Amenity Space), larger developments can also help to provide communal sports and recreational facilities, such as:

- Parks, public gardens and recreational grounds;
- Amenity green spaces;
- Equipped play space;
- Natural and semi-natural green spaces;
- Outdoor sports facilities;
- Churchyards and cemeteries; and
- Allotments.

9.29 The different types of open space have been defined in the Green Spaces Strategy. The strategy sets out where these different facilities are located in the borough and appropriate catchment distances for each type of open space. Where a development does not lie within the catchment distance of a type of open space, it will be imperative that this is provided on site to reverse the deficiency.

9.30 In circumstances where on site open space provision is not practical, feasible or would not benefit the scheme, a financial contribution may be acceptable with the agreement of the Local Planning Authority. This contribution will be secured through planning conditions. In these cases, some level of communal open space and landscaping should be provided on site.

9.31 For outdoor sports facilities, it is not expected that provision will generally be possible on site. For areas deficient in outdoor sports facilities, contributions will be sought through the Playing Pitch Calculator, in line with the Playing Pitch Strategy (2020). Therefore, new residential developments will be required to provide open space, such as amenity and equipped play space on site, or where practical, other forms of open space such as allotments or semi-natural areas, where opportunities exist to enhance the green infrastructure network and support local residents.

9.32 The design of new play areas and other formal open spaces should take account of good practice provided in Sport England's 'Active Design' guidance and any subsequent replacements.





## Policy NE9.7: Providing New Open Space

New developments proposals will be supported where they contribute to the provision, enhancement and maintenance of open space, either by means of on-site provision or through developer contributions.

Where there is an identified deficiency, as set out in an up-to-date open space needs assessment, development proposals of ten dwellings or more will be required to provide publicly accessible open space on site. Provision should reflect the type of open space required in the area through accessibility, quality and value.

Proposals that include new open space should be accompanied by a site management plan, in agreement with the Council, which sets out a proactive approach to the long-term maintenance of the site.

## Biodiversity

9.33 Despite being a largely urban borough, Watford is rich in biodiversity. Watford contains a number of Local Nature Reserves and Local Wildlife Sites and is home to European Protected Species such as great crested newts and pipistrelle bats. Other locally important but non-designated wildlife sites also make a significant contribution towards biodiversity in the area.

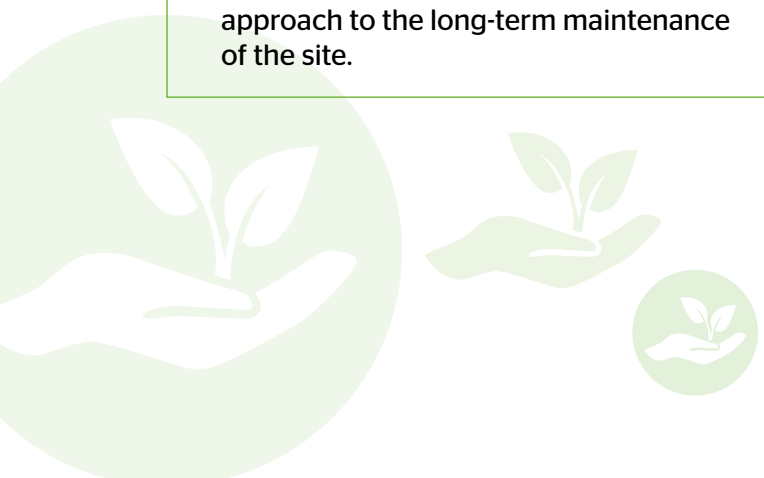
9.34 The sustained loss of green infrastructure and the breaking up of its networks can have a damaging effect on ecosystems in Watford. Inappropriate development could threaten the future of different species through habitat fragmentation and the loss of habitats. Given development pressures, it will important to ensure that Watford's biodiversity is protected and enhanced. Development proposals should contribute positively to ecosystems in Watford through the delivery of net gains in biodiversity.

9.35 New development should support the creation of new wildlife habitats, which can be integrated into the layout and design of sites, as well as offsite where this cannot otherwise be achieved. Traditionally, this would include habitats incorporated as part of open space, such as water courses, vegetation and

planting. However, some contemporary schemes have evolved to include green/brown roofs, living walls and roof and rain gardens, which support biodiversity, amongst other benefits. Where appropriate, smaller alterations can include providing integrated bat or bird boxes within the fabric of new buildings, or hedgehog highways to make gardens more permeable.

9.36 The Council will take a hierarchical approach to assessing proposals, as set out in national guidance. Compensatory measures will only be considered when no other measures are demonstrated to be feasible as set out in the mitigation hierarchy (Figure 9.4). In such an instance, Biodiversity Offset Agreements must be secured through Section 106 Agreements. The process for this will be set out in a Supplementary Planning Document.

Figure 9.4: Biodiversity mitigation hierarchy





## Policy NE9.8: Biodiversity

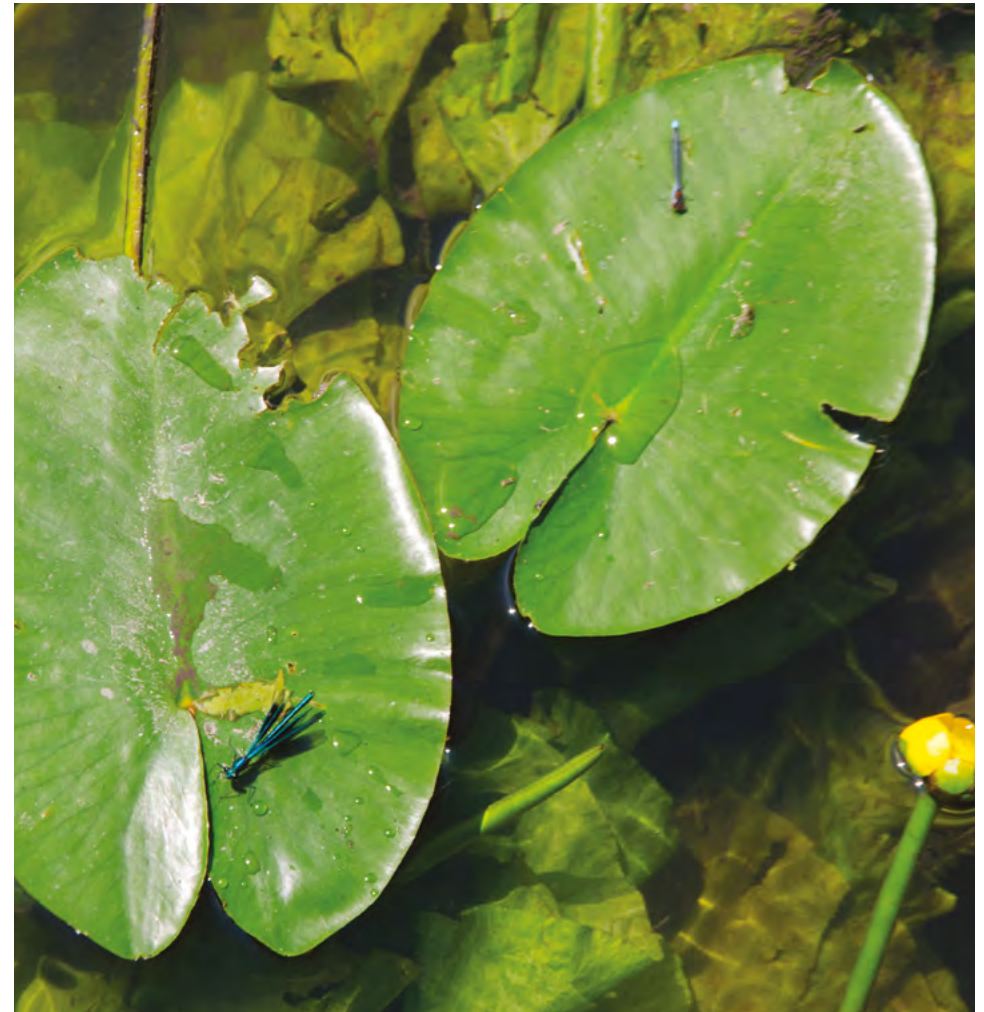


Development proposals should apply the mitigation hierarchy to avoid or mitigate harmful effects on biodiversity. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.

New development should seek to achieve an overall net gain in biodiversity. This must be measured through the use of the latest Natural England biodiversity metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.

Development should apply the mitigation hierarchy to avoid or mitigate harmful effects on biodiversity. Mitigation and compensation measures must offset any losses to achieve a measurable net gain for biodiversity. Where it is not possible to avoid or mitigate all impacts on site, an offsite Biodiversity Offset Agreement should be submitted.

Where there is a reasonable likelihood of the presence of a protected species or its habitat, applications must be supported by an ecological survey. If present, the proposal must mitigate or compensate appropriately in accordance with the legislation that protects them.







## Chapter 10

# Infrastructure



## Infrastructure

10.1 The provision of sufficient and appropriate infrastructure is required to support the growth and change set out in the Local Plan, in line with the sustainable development objectives in the National Planning Policy Framework.

10.2 Infrastructure is provided by public and private bodies and includes:

- Social infrastructure: schools, healthcare, community facilities, leisure and cultural centres, places of worship and emergency services.
- Physical infrastructure: roads, footpaths, cycleways, water provision and treatment, sewerage, flood prevention and drainage, waste disposal, electricity, gas and electronic communications networks.
- Green Infrastructure: open spaces, recreation facilities, trees, green corridors, wildlife corridors and landscape features.

10.3 Details of these requirements are set out in Watford's Infrastructure Delivery Plan (IDP). The Infrastructure Delivery Plan considers the infrastructure improvements that are needed to support the planned increase in new homes, businesses and other facilities arising from the population and job growth in the borough. It identifies essential infrastructure and prioritises projects according to their importance in delivering the growth strategy.

10.4 The Watford Infrastructure Delivery Plan considers the infrastructure improvements that are needed to support the planned increase in new homes, businesses and other facilities arising from the population and job growth in the borough. The Council will seek to protect existing community facilities in line with Policy HC12.3 'Built and Community Facilities'.

10.5 Developers will be expected to engage early with the Council and appropriate infrastructure service providers to discuss relevant requirements. Some will be specific to a particular site, whilst some will relate to the wider area. It is important that each development provides a fair contribution towards both site-specific and area-wide infrastructure. Alongside this, the cumulative impacts arising from the development across the area will need to be co-ordinated and adequately mitigated. Where necessary, the use of compulsory purchase powers to assist in the timely delivery of infrastructure will be considered.

10.6 Significant infrastructure items such as, but not limited to, schools, community centres, public realm, or, public transport provision, and will often require different landowners or stakeholders to work together to secure timely and efficient delivery. Infrastructure should be delivered in a way and at a time that does not compromise development coming forward on connected sites.





## Strategic Policy IN10.1: Integrated Infrastructure Delivery



Proposals should demonstrate a comprehensive integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and:

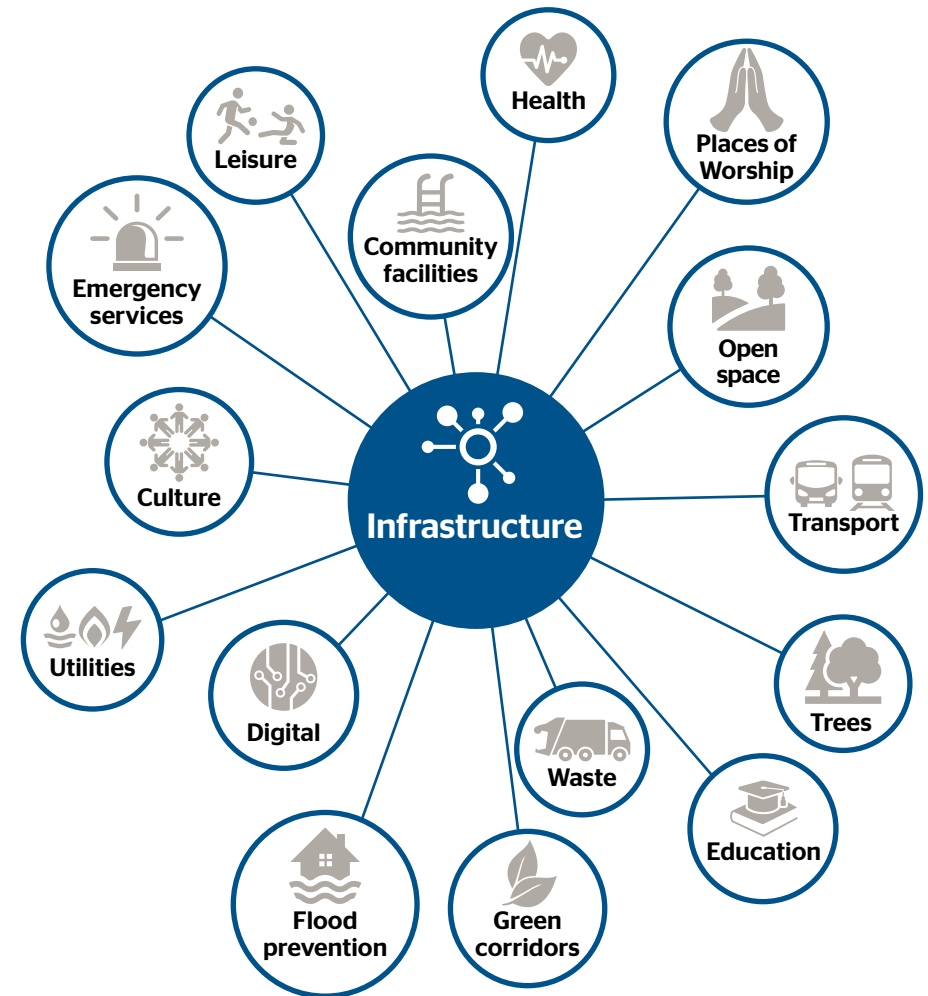
- a) Contributes appropriately and proportionately towards required infrastructure identified in Watford's Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan;
- b) Where applicable, connects to area-wide infrastructure and enables future connections;
- c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the Watford's Infrastructure Delivery Plan, Site Allocations and / or other policies in the Local Plan;
- d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; this will be delivered on site;
- e) Is appropriately designed so that it complements and does not unduly restrict development on adjacent or connected sites.

Developers will be expected to engage early with the Council and infrastructure service providers to discuss their requirements.

Developer contributions will be sought where needs arise, in line with the policy requirements of this plan; where provision is made on site, this will be considered in the context of other developer contributions.

## Providing infrastructure to support new development

Figure 10.1: Types of infrastructure



10.7 Infrastructure should be well integrated alongside new development with the phasing agreed, alongside providers, as part of a planning application. Wherever possible, especially on larger developments, infrastructure should be provided on-site creating sustainable neighbourhoods.

10.8 The Infrastructure Delivery Plan highlights the need for new schools, healthcare and sustainable transport to support Watford's population growth over the plan period. As infrastructure is provided by various agencies, the onus is on developers to ensure there is capacity to meet requirements arising from a proposed development.

**Health facilities**

10.9 Applicants will need to demonstrate collaborative working with other landowners and the Clinical Commissioning Group to identify how additional health facilities can be delivered. The scale and range of service provision will need to be appropriate to the level of demand generated by developments. Contributions towards new or enhanced healthcare facilities will be sought to ensure the health care requirements arising from new development are met.

**Education**

10.10 As the Borough's population grows, demand for school places will continue to increase, placing pressure on existing facilities. It is

therefore vital that where housing growth results in increased demand, investment is made across each education tier, as necessary, to ensure there are enough places to serve the Borough's pupils within their community.

10.11 For sites larger than 1,000 dwellings, education provision will be required on site. For sites that are located in close proximity to each other and will have a cumulative impact that will generate demand for a new school, applicants are encouraged to work collaboratively with other landowners and Hertfordshire County Council to best meet this need, identifying where a new primary school can be provided that provides good amenity for young children. Education opportunities should be maximised on any site given the high demand and limited suitable sites for school provision.

**Sustainable Transport**

10.12 Applicants will need to demonstrate collaborative working with other landowners, Watford Borough Council and Hertfordshire County Council, as well as other providers to deliver transport infrastructure improvements to support development, in line with Chapter 11 'A Sustainable Transport Town'. This will include delivery of onsite infrastructure as well as contributing towards projects identified in the Infrastructure Delivery Plan, Local Cycling and Walking Infrastructure Plan and Watford's Sustainable Transport Strategy.

**Metropolitan Line Extension**

10.13 The Metropolitan Line Extension, commonly known as MLX, was a proposal to extend the existing line to Watford Junction, creating two new stations including one in Vicarage Road. It was a project costing more than £300 million, with funding secured from the government, Hertfordshire County Council, Watford Borough Council, and Transport for London (TfL). However, the financial contributions from Transport for London were withdrawn in 2018.

10.14 Watford Borough Council continues to support the Metropolitan Line Extension, or a comparable alternative, and considers that the route along the disused former Croxley Rail Line provides a potential future route for Mass Rapid Transit, as well as an opportunity for a walking and cycling link. As such, the route and access to it should be safeguarded to maintain the possibility of its use by these modes; details of the land to be preserved are set out within the Watford Mass Rapid Transport Safeguarding Technical Report and reflected on the Policies Map.





### Quality communications

- 10.15 Communication technology is an integral part of modern society. It is important to work with developers and providers to ensure that schemes are well designed and have sufficient capacity to meet the anticipated demand and embrace technological change to continue to be socially connected and economically competitive.
- 10.16 For a scheme to be successful and be able to adapt to future technological changes, developers are expected to engage with utility providers early in design process. This enables all stakeholders to understand as early as possible if, and where, there may be a need for additional capacity in the network. It provides opportunities for development to be designed in such a way as to support the provision of utilities.
- 10.17 Future-proofed, high quality digital infrastructure is considered vital to support well-functioning employment areas. The National Planning Policy Framework requires planning policies to set out how high quality digital infrastructure is expected to be delivered.



## Policy IN10.2: Providing Infrastructure to Support New Development



Planning permission, except for householders, will be granted where it is demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from proposed development. Infrastructure provision will reflect the Infrastructure Delivery Plan and its successor documents to; meet the needs arising from development, and mitigate adverse social, economic or environmental impacts arising from development.

Developers must demonstrate they have explored existing infrastructure capacity, and how this could be future-proofed, with appropriate providers and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the borough, opportunities should be taken to maximise infrastructure provision on suitable sites.

Proposals for employment uses should demonstrate that provision is made for high quality digital facilities as part of the application.

## Development contributions

- 10.18 The Local Plan will deliver new homes and jobs to meet Watford's identified need. To support this, significant supporting infrastructure will be required to be delivered at the right time to meet the Council's aspirations for sustainability, affordable housing delivery, health and wellbeing and placemaking. To ensure that the burden of providing the additional infrastructure needed does not fall on existing communities, planning authorities are able to seek appropriate funding for this infrastructure from developers.
- 10.19 Housing and employment density, site constraints, affordable housing, ambitious sustainability standards, infrastructure delivery and other planning obligations all have associated costs. There will be a need to consider the ability of each site to contribute its fair share towards infrastructure, affordable housing and sustainability standards, whilst ensuring new development is viable and that the market is appropriately incentivised to deliver. Site constraints may include exceptional or abnormal costs relating to contamination or poor ground conditions for example. The presence of such issues will be expected to impact on land values, rather than through a reduction in planning obligations or sustainability standards. In taking a balanced approach, development will need to deliver on the principles of sustainable development

as set out in the National Planning Policy Framework.

- 10.20 Watford's Infrastructure Delivery Plan identifies and prioritises the key infrastructure required to support the growth outlined in this plan. It is an important supporting document that is regularly updated to react to the infrastructure delivery requirements and challenges associated with delivering the Local Plan.
- 10.21 A substantial amount of the infrastructure required to deliver sustainable development, including (but not limited to) enabling works, public realm and open space improvements, and street greening, will be sought on site and it is expected that developers will directly fund these.
- 10.22 The Council will primarily use Section 106 Agreements and Community Infrastructure Levy payments to secure appropriate contributions from developments for affordable housing and items of infrastructure, or financial contributions towards their delivery, such as new schools and transport network improvements. Non-financial contributions may include employment and training opportunities.
- 10.23 The Council's Infrastructure Funding Statement provides a summary of all financial and non-financial Section 106 and Community Infrastructure Levy planning obligation receipts and projects.





## Policy IN10.3: Development Contributions



There will be a need to balance the priorities for infrastructure delivery with those for affordable housing, other non-infrastructure related planning obligations and sustainability standards.

The Council will secure the infrastructure necessary to support the growth outlined in this plan, ensure sustainable development, meet the needs of development and, where necessary, mitigate the impacts of development by:

- a) Securing appropriate on-site enabling and development works;
- b) Charging the Community Infrastructure Levy on developments as required by any charging schedules in operation for the area within which the development is located;
- c) Securing Section 106 Agreements to provide affordable housing and make provision to mitigate the impacts of the development where necessary, or appropriate, having regard to any relevant supplementary planning documents or guidance;
- d) Securing off-site highway works where necessary;
- e) Working with relevant service providers to identify and secure infrastructure funding or financing mechanisms.





## Chapter 11

# A Sustainable Travel Town





## A Sustainable Transport Town

11.1 The approach to managing transport in Watford is a key challenge, given its significant impact on major factors, such as economic productivity, air quality, public health and carbon emissions. With respect to the Climate Emergency, transport remains the largest emitting sector of greenhouse gases in the UK<sup>8</sup>, whilst the town also has the highest levels of deaths attributed to air pollution in Hertfordshire. Working collaboratively with transport providers including Hertfordshire County Council as the Local Highway Authority, Highways England, and both bus and rail operators, the importance of a strategic direction to the development of transport options for Watford is reflected in the development of a Sustainable Transport Strategy, which should be considered alongside the Local Plan. Without significant change, the transport network will increasingly be a limiting factor on the borough's aspirations for economic productivity, environmental sustainability, community vitality and public health, amongst others.

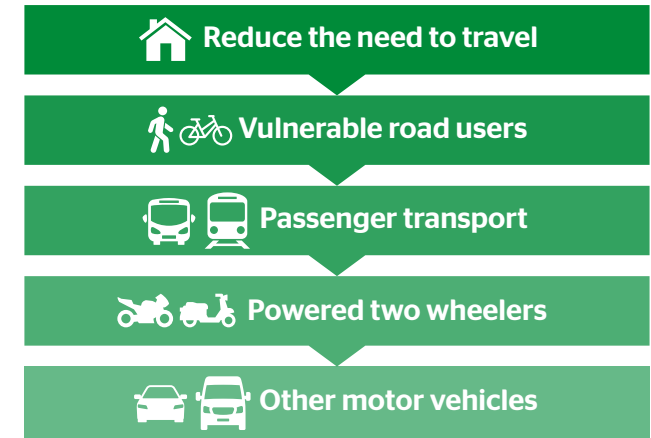
11.2 Watford's compact urban form has significant potential to encourage people to walk and cycle more to local destinations, services and facilities, reflected by the fact that of trips made by Watford residents, 19% are less than one mile, with a further 36% being between one and three miles. This highlights the

opportunity for more active travel if people have access to routes that get them to where they want to be in a way that is safe, efficient and enjoyable.

11.3 The combination of the Climate Emergency, the dominance of the car in the current modal share, and the potential for active travel based upon the volume of short-distance trips, means that new developments will need to be designed to encourage a modal shift in the town that reduces local people's dependency on cars in favour of increased walking, cycling and public transport use. This will contribute towards reducing congestion, addressing climate change and air quality issues, as well as bringing health and economic benefits.

11.4 Hertfordshire County Council has adopted the Hertfordshire Local Transport Plan (2018). The South West Herts Growth and Transport Plan (2019) is the key supporting document to the Local Transport Plan, with an emphasis on improving health and generating modal shift away from car use. The Local Plan supports the Local Transport Plan and will facilitate delivery where possible. Additional county-wide transport strategies, to which development should align, include the Intalink Bus Strategy (2019), draft Rail Strategy (2020), and forthcoming Highways Network Management Strategy. To encourage more sustainable forms of travel, applicants should design schemes to reflect the Transport User Hierarchy priorities in the sequential order shown in Figure 11.1.

**Figure 11.1: Transport User Hierarchy**



11.5 Measures that encourage the uptake of sustainable modes, including new, high quality cycle networks, walking infrastructure and bus prioritisation will be supported. In addition, measures that reduce through traffic flows and speeds, including low traffic neighbourhoods and 20mph speed limits, will be encouraged. The enhancement of public transport provision will be prioritised through the safeguarding of land required for major interventions, such as new interchange spaces, mass rapid transit and upgrades to existing hubs, as well as supporting the County Council in delivering the public transport actions set out in its transport strategies.



<sup>8</sup> 2018 UK Greenhouse Gas Emissions, Final Figures, ONS, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/862887/2018\\_Final\\_greenhouse\\_gas\\_emissions\\_statistical\\_release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/862887/2018_Final_greenhouse_gas_emissions_statistical_release.pdf)

11.6 Watford Borough Council aims for Watford to become a Sustainable Travel Town (Figure 11.2), as advocated by the Local Transport Plan, where the perception to all highway users is that pedestrians, cyclists and public transport users will have a greater priority than they do at present. It will be expected that major new development will be located in areas of high sustainability where there is existing, or the potential for, high public transport accessibility, and that key services will be accessible by walking or cycling, with developments contributing to significant improvements to sustainable transport routes. Where this is the case it is expected that the provision of car parking will be highly limited, effectively removing in-built car dependence.

11.7 Land use decisions made through the Local Plan development process can shape and facilitate change in transport provision and travel choices. However, to successfully achieve a meaningful and sustained shift in travel behaviour, attractive alternatives to the private car are required. This is the start of a long-term process of change that will continue beyond the Local Plan end date of 2036, and will work within the framework of the South West Herts Joint Strategic Plan and the multi-modal study that goes up to 2050.

Figure 11.2: Elements of a sustainable travel town





## Strategic Policy ST11.1: Sustainable Travel Town



New development will be supported in principle where it contributes towards sustainable and active travel behaviour, respecting the Transport User Hierarchy (Figure 11.1) set out in the County Council's Local Transport Plan and Watford's ambition to be a sustainable travel town. It should create an urban environment where people choose to walk and cycle, whilst reducing the impact of cars on the transport network, and promoting the use of public transport. Proposals will need to demonstrate how they contribute positively towards the Council's Climate Emergency declaration and are expected to bring public health, air quality and economic productivity benefits.

Development proposals should align with the principles set out below that aim to achieve better integration of land use planning and transport planning and develop a Sustainable Travel Town with a more active population. They should support the objectives of Hertfordshire County Council's Local Transport Plan, and supporting strategies, plus contribute to the Growth and Transport Plan packages in the Local Transport Plan and subsequent updates, as well as aligning with Watford's forthcoming Sustainable Transport Strategy and Local Cycling and Walking Implementation Plan.

To promote active travel the following initiatives should be embedded in development plans:

- a) Developing Watford as a Walking and Cycle Infrastructure Improvement Town, supporting the growth of shared mobility offerings that include bike share schemes;
- b) Creating neighbourhoods that encourage people to walk or cycle, through the provision or contribution to high quality walking and cycle routes that enhance connectivity and reduce severance; and

c) Measures that reduce traffic speed and flow.

Developments will be supported where they improve public transport connectivity through:

- d) Contributing to the development of comprehensive priority measures for buses with supporting high quality, accessible bus stops and service improvements where required, to enhance existing services and demand responsive transport throughout the town;
- e) Supporting the development of mass rapid transit in Watford;
- f) Preserving and improving Watford Junction as a strategic transport hub for both rail and bus users, with excellent access routes, interchanges and other facilities enabling sustainable 'first and last mile' travel; and
- g) Supporting a Sustainable Transport Hub within the town centre that serves as a focal point for multiple modes.

To reduce car dependency and the impact of private motor vehicles developments should:

- h) Contribute to traffic-demand management measures introduced that promote mode shift away from private cars;
- i) Provide provision for car clubs and electric vehicles, as set out in Policy ST11.5 'Car Parking, Car Clubs and Electric Vehicles'; and
- j) Produce Travel Assessments and Travel Plans where required by, and in line with, Hertfordshire County Council's relevant guidance.

## Protecting and enhancing future public transport routes and Watford Junction station area as a transport hub

- 11.8 Watford benefits from being home to a number of key transport interchanges and routes, and is an established transport hub for the South West Hertfordshire area. This transport infrastructure should be retained and enhanced where necessary to meet the needs of those who live, work and visit. There is an expectation that an uplift in densities will also aid the provision and maintenance of public transport on a borough-wide basis.
- 11.9 A variety of measures will need to be pursued and supported, including those identified in the South West Herts Growth and Transport Plan. The Council will support all of these where it can, including safeguarding routes for future active or public transport provision. The disused former Croxley Rail Line provides a potential future route for mass rapid transit, as well as an opportunity for a walking and cycling link. As such, the route and access to it should be safeguarded to maintain the possibility of its use by these modes; details of the land to be preserved are set out within the Watford Mass Rapid Transit Safeguarding Technical Report.
- 11.10 The Ebury Way cycle path provides a direct, traffic-free cycle and walking route between Watford and Rickmansworth, providing a

valuable commuting and leisure route. It should therefore be preserved, including access to it, with opportunities sought to enhance its quality, particularly in making it an all-weather route.

- 11.11 The Abbey Line is an important public transport link between Watford and St Albans, enhancing regional connectivity. The status of this route, as being used for public transport, should be safeguarded.
- 11.12 Plans for an enhanced walking and cycling network are set out within the Local Cycle and Walking Infrastructure Plan. This network will be critical to Watford being a town where active travel is the natural first choice for short journeys. Thus, development should not prevent the ability of these networks to be delivered.
- 11.13 Hertfordshire County Council is developing plans for a new, mass rapid transit system to significantly increase connectivity across the county. This will bring significant benefits to Watford, and it is expected therefore that proposed routes for this system will not be prevented by new development.
- 11.14 Watford Junction is the busiest railway station in Hertfordshire. The adjacent bus station, along with taxi rank provision, cycle and walking links and car parking mean that it serves as a multi-modal transport hub for both the town and the wider region. Growth around the station is unlikely to be possible without alterations to the built

environment to unlock sites and improve accessibility to sustainable travel. The ability to deliver key transport infrastructure must therefore be preserved. This should include the provision of two new pedestrian / cycle bridges to overcome severance caused by the rail lines. One of which should cross both the West Coast Main Line and Abbey Line, preferably as part of, or within the vicinity of, Watford Junction Station, and the second being between Penn Road and Colonial Way. Links to these should accommodate both pedestrians and cyclists, and be accessible to non-station users 24 hours a day, to maximise the permeability of the area.

- 11.15 A key requirement in developing Watford Junction as a transport hub is ensuring the existing bus station is well integrated with Watford Junction Station, as well as making travelling by bus as attractive as possible. Opportunities for improved infrastructure and facilities for passengers and bus operator staff should be preserved, and the bus and rail station should not be separated. A further element to the re-development of the area is a new multi-mobility hub, containing a multi-storey car park as well as facilities for a range of other modes, to be located immediately east of the station, space for which should be preserved. Improvements to the road network through an extension of Imperial Way, to provide a connection with the new proposed mobility hub and the rerouting of vehicle access to the concrete batching plant via Imperial Way, should also be facilitated.



## Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub



To prevent development that would compromise future mass transit, bus prioritisation, walking, and cycling infrastructure, set out in either the South West Hertfordshire Growth and Transport Plan, the Local Cycling and Walking Infrastructure Plan or Watford's Sustainable Transport Strategy, the following routes will be protected from development whose designs would compromise their ability to prioritise public transport and active travel routes:

- a) The disused, former Croxley Rail Line, including access points, as set out in the Watford MRT Safeguarding Technical Report;
- b) The current Ebury Way cycle path and access to it;
- c) The Abbey Line;
- d) Current and planned cycle routes identified in the Local Cycling and Walking Infrastructure Plan;
- e) Planned mass rapid transit routes identified by Hertfordshire County Council.

All routes are represented in Figure 11.3.

The role of Watford Junction as a multi-modal hub should be preserved, meaning that development must not hinder the provision of the following on-site and cross-boundary infrastructure;

- f) New pedestrian / cycle bridges over the West Coast Main Line and Abbey Line and connecting Penn Road with Colonial Way, plus access to these;
- g) Bus and rail access that also provides for cycles, electric vehicles, drop-off movements, taxis, coaches and future mass rapid transit access;
- h) Extension of Imperial Way to provide a connection to the station and the rerouting of vehicle access to the concrete batching plant via Imperial Way;
- i) Upgrading of the bus station and bus priority improvements to roads in the vicinity of the station.



## Providing sustainable transport infrastructure for major development

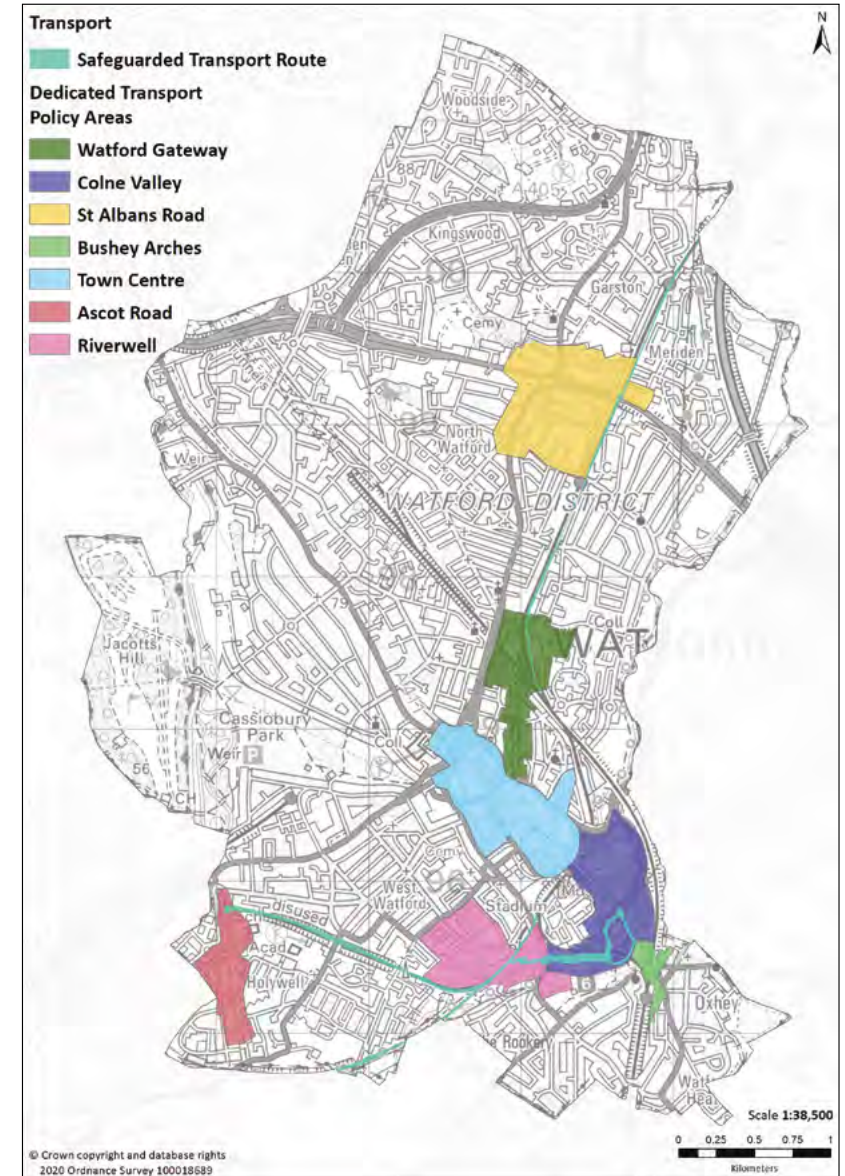
11.16 A number of areas within the town are anticipated to experience significant levels of development within the Local Plan timescales or are located around major transport infrastructure. These areas are shown in Figure 11.3. Without appropriate mitigations, new development will likely affect the functioning of the local transport network. A key mitigation will be the reduced provision of car parking (Policy ST11.5, 'Car Parking, Car Clubs and Electric Vehicles') that, in turn, will require the provision of alternative transport options. The sustainable transport requirements for these areas are set out within this policy. In particular, attention should be paid to providing internal permeability to walking and cycling, as well as complete, high quality routes to key destinations, overcoming severance where encountered.

### Colne Valley

11.17 Modelling forecasts that, without mitigation, potential development will have an impact on all major links into Watford, with particularly high impacts on Lower High Street, Beechen Grove Gyratory, and Waterfields Way. Therefore, where development sits within the Core Development Area it is expected that sites will be car-lite, with car-free being encouraged for those in closest proximity to Watford High Street Station.

11.18 Given its central location, and proximity to existing public transport networks, there is significant potential for the area to be supported by sustainable transport. Development should support the creation of a sustainable, multi-modal transport hub at the High Street / Water Lane junction. The location of the site between the town centre, Bushey Arches, Watford General Hospital, and Watford Riverwell means that development will be supported where permeability for people walking and cycling is enhanced from current levels through the provision of direct, high quality routes and an internal road network that ensures traffic volumes and speeds are low. Provision should also be made for active travel links to the termination of the former Croxley Green Line on Wiggshall Road.

**Figure 11.3: Areas for transport improvements in Watford, and routes to be safeguarded**



11.19 Lower High Street should be seen as a corridor primarily for sustainable transport, preserving the current high frequency bus service, as well as accommodating mass rapid transit, plus being a key walking and cycling route for the site. To enhance bus services, introducing bus priority measures on the ring road should also be supported. Ensuring access to the site for people walking and cycling should also be considered as part of development in the area, including upgrading the public realm and reducing severance at the Lower High Street / Exchange Road junction, plus providing high quality cycle routes on Lower High Street and Wiggshall Road. As a noted accident hotspot, contribution should also be made to a revised junction layout at the intersection of Waterfields Way and Lower High Street.

### Bushey Arches

11.20 Whilst the scale of expected development is relatively limited, Bushey Arches is a known congestion hotspot, and an Air Quality Management Area has previously been declared for Pinner Road and Chalk Hill, so the traffic impacts of any development will need to be carefully considered. Without additional intervention, modelling suggests increasing stress on Lower High Street, south of Waterfields Way, and the Buses Arches Gyratory, as well as a number of further links, including Pinner Road being over capacity. It is therefore expected that development around Bushey Arches will support a package of sustainable transport interventions that

is coherent with those to the north, around Lower High Street. Developments should make sure that best use is made of existing public transport in the area, in particular by contributing to high quality walking and cycling links to Bushey Station and upgrading those around the Bushey Arches Gyratory. Bus priority measures around the gyratory and connecting to a Lower High Street sustainable transport corridor should also be supported.

### Watford Riverwell

11.21 Development beyond that already granted permission is not anticipated to be significant. However, new trips from development in the Riverwell area are likely to increase congestion and delays on the town centre road network and links such as the A4178, Vicarage Road and Harwood Road in the immediate vicinity. It is therefore expected that new development must contribute to sustainable transport infrastructure that makes the most of the area being within walking distance of the town centre and local transport hubs. Contributions could be expected to bus prioritisation measures on Vicarage Road, whilst permeability for cycling and walking should be substantially improved. In particular, active travel routes should link Watford General Hospital, Stripling Way, Thomas Sawyer Way and Ebury Way through the area, and additional infrastructure should be provided on routes around the site, such as Vicarage Road and Wiggshall Road.

### Ascot Road

11.22 Whilst the highway network of the Ascot Road Area currently operates without congestion at most times, several locations are expected to see large increases in traffic levels during the Local Plan period, particularly around the Ascot Road / Hatters Lane / Blackmoor Lane / Greenhill Crescent Roundabout.





11.23 To ensure bus services become a primary travel option for residents and employees in this area, development should support Ascot Road becoming a sustainable transport corridor, with significantly improved cycle infrastructure and bus priority measures. Existing pedestrian and cycle links between Croxley View and Greenhill Crescent improve local connectivity, and the Council will support new development that ensures this access is protected and enhanced, to maximise the permeability of the area. The road network within the area features few high quality cycle lanes. New developments will therefore be required to provide significantly upgraded cycle lanes on key routes to sites, and site layouts should integrate connections to these routes where possible, to deliver a cohesive cycling environment. The Council will support proposals to improve cycle links in the Holywell area including resurfacing the Ebury Way (and new connections to it) to maximise use, alongside enhanced east-west cycle facilities along Harwoods Road / Chester Road / Queens Avenue to Whippendale Road and along Vicarage Road. New development in the Ascot Road Area should preserve the opportunity for providing mass rapid transit and walking and cycling on the disused Croxley Railway line, including safeguarding land for a potential terminus.

### St Albans Road

11.24 Several congestion hotspots exist within this area, with St Albans Road, the A41 and the Dome Roundabout particularly under stress. It should also be noted that an Air Quality Management Area was required on St Albans

Road (revoked in 2019) and journey times for bus travel are long. These issues will be exacerbated if new development does not support sustainable transport.

11.25 St Albans Road is a key strategic route serving the Dome Roundabout area for both car and public transport users, due to its connections with the town centre to the south and strategic roads to the M1. A shift to non-car-based modes of travel should be targeted for this corridor via improved highway infrastructure for bus priority. The corridor also has the potential to become a key cycle route, providing direct links to destinations and transport interchanges. Developments will therefore be supported that contribute to significantly enhanced, continuous walking and cycling infrastructure along the corridor, including overcoming severance and bus journey time delays caused by the Dome Roundabout.

### Town Centre

11.26 Development sites within Watford Town Centre have high accessibility to public transport options, as well as services, amenities and employment opportunities within convenient walking and cycling distances. Many of the arterial roads leading towards the town centre are congested at peak times currently, and high traffic levels on the central ring road affect bus journey times and reliability as well as it causing significant severance. It will therefore be expected that parking provision will be minimised at all new developments with car-free development encouraged, and contribution made to the development of enhanced public transport and active travel infrastructure in the town centre.

11.27 This would include bus priority interventions along and in the vicinity of the ring road, as well as preserving its ability to become part of a mass rapid transit route. The potential to develop a sustainable transport hub and interchange point at the High Street / Water Lane junction should also be supported. High quality and convenient cycle routes, especially those that facilitate north-south and east-west movement are required to encourage people to choose cycling as a primary mode of travel for short-to-medium-distance trips, notably along Hempstead Road, Rickmansworth Road and St Albans Road. All developments should support significantly enhanced cycle and walking infrastructure provision, through being highly permeable and contributing to complete routes that overcome the severance of the ring road, particularly at the Derby Road, Water Lane, Lower High Street, Vicarage Rd and Market Street junctions.

### Watford Gateway

11.28 Being focused on a strategic, multi-modal transport hub, public transport accessibility in Watford Gateway is high and thus it is expected that developments will be car-lite, with car free encouraged. In addition to the internal requirements set out in Policy ST11.2, 'Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub', contribution should be made to high quality cycle and walking infrastructure to access the area from all directions. This should include a link north via Bradshaw Road to Balmoral Road as well as infrastructure along, and to cross, St Albans Road.





## Policy ST11.3: Providing Sustainable Transport Infrastructure for Major Development



Major developments should maximise opportunities for sustainable transport, protecting and supporting current and future active and public transport routes.

Cycling and walking infrastructure should be high quality and provide complete routes to key destinations, such as the town centre, transport hubs, employment centres, educational or community facilities. In addition, for each of the following areas, as indicated in Figure 11.3, the principles set out below should be observed and the infrastructure requirements set out in Appendix C be positively supported by major developments, in addition to the safeguarding requirements set out in Policy ST11.2 'Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub'.

### Colne Valley Strategic Development Area

Developments should expect that their transport needs here are met primarily by sustainable transport objectives, and as such should be car-lite. Lower High Street should serve primarily as a sustainable travel corridor, with high quality direct pedestrian access from sites. The provision of an internal travel network that is highly permeable to those who wish to walk or cycle, with direct, high quality links and low-traffic streets between the town centre, Oxhey, Vicarage

Road, Watford General Hospital and Riverwell should be ensured. Bus prioritisation measures should be provided on key access links.

### Bushey Arches

Developments should support the ambitions for sustainable transport options around Lower High Street, and also make best use of existing public transport infrastructure, by supporting the delivery of new and significantly improved high quality walking and cycle links to Bushey Station and Arches; overcoming the severance caused by the current highway layout.

### St Albans Road

Developments will be expected to support significant improvements to walking and cycling infrastructure along St Albans Road and at the Dome Roundabout, alongside implementation of bus priority measures, mitigating potential junction delays for buses on main thoroughfares and junctions.

### Watford Riverwell

Permeability for active travel should be substantially improved, linking to bus stops, Watford General Hospital, Vicarage Road, Stripling Way, Thomas Sawyer Way and Ebury Way. Developments should contribute to bus priority or cycle infrastructure on Vicarage Road and Wiggenhall Road.

### Ascot Road

Development should contribute positively towards Ascot Road becoming a sustainable transport corridor through new and significantly enhanced bus priority measures and pedestrian / cycle infrastructure. Improvement to active travel permeability and routes should include significant enhancement to links between Croxley View and Greenhill Crescent, to Tolpits Lane, to the Ebury Way and further east-west routes to the town centre.

### Town Centre Strategic Development Area

Development should at a minimum be car-lite, and car-free should also be considered. Bus priority interventions along, and in the vicinity of, the ring road should be supported. Development should support the delivery of high quality cycle and walking routes across and to the Town Centre, linking to key destinations. Development should contribute to reducing the severance caused by the ring road.

### Watford Gateway Strategic Development Area

All major developments will be expected to significantly enhance pedestrian and cycle routes through the Watford Gateway area by providing high quality internal infrastructure and links to the Town Centre, North Watford and towards Bushey. The development of the station as a multi-modal hub should also be supported, including the access requirements for this across all modes.

## A walking and cycling infrastructure improvement town

11.29 Consideration of how best to facilitate walking and cycling trips must be integral to all design. A key principle of the Local Transport Plan is 'modal shift and encouraging active travel', noting that 'the potential public health benefits of increased levels of active travel indicate this should be a high priority, and a key feature of the future transport system we are planning for'. This contributes towards the wider objective within the Local Transport Plan promoting Watford as a Walking and Cycling Infrastructure Improvement Town.

### Local Cycling and Walking Infrastructure Implementation Plan

11.30 The forthcoming Watford and Three Rivers Local Cycling and Walking Implementation Plan will identify routes and improvements that comprise, but are not limited to, the provision of pedestrian crossings, segregated cycle routes, and enhanced junctions, to facilitate a more comprehensive and safe cycling and walking network that connects to local destinations and encourages less reliance on private vehicle travel.

11.31 Developments should ensure that their design encourages walking and cycling and respects the Local Transport Plan Transport

User Hierarchy that prioritises active travel, through being permeable to people both walking and cycling, with high quality footpaths, and design that reduces vehicle dominance and encourages cycling by all. This should be supported by signage that aligns with Watford's existing wayfinding approach.

### Cycle parking

11.32 Consideration of the needs for cycling parking play a key part in ensuring that design encourages cycling. The absence of high quality cycle parking, with its resulting inconvenience and fear of theft, is a key barrier to people choosing to cycle. Without an easily accessible and secure place for people to store their cycle, both at home and at their destination, they are unlikely to choose to cycle their journey.

11.33 In designing cycling parking, attention should be paid to the difference in requirements for long-stay parking, required where people will leave their cycle for an extended period, for example, at home, work, place of education or a station, and thus place a premium on security, compared to short-stay parking, for example, outside a retail location, where convenience is the key factor. Cycle parking standards are set out in Appendix D and parking should be laid out in accordance to the Watford Cycle Parking Supplementary Planning Document.

### Cycle parking in residential developments

11.34 The manner in which residential cycle parking is provided will depend on characteristics of the development:

- a) In large apartment complexes, single, large, communal storage does not provide sufficient security. Multiple cycle storage areas or individual storage compartments located outside the apartment, within the blueprint of the building, that are capable of taking cycles, prams and other large items, should be provided;
- b) For smaller developments or converted buildings, a secure, accessible communal area should be provided that includes space for non-standard cycles, such as cargo bikes, adapted cycles or tandems;
- c) For houses, cycle storage should be at the rear, the side or within the building, as storage at the front can be unsightly, and tends to advertise to thieves that cycles are there. Where adequate cycle parking cannot be provided within residential developments, alternative cycle parking arrangements for residents should be provided, such as the provision of a provision of a cycle hangar on the highway in a location agreed with the Council.





### Cycle parking in non-residential developments

- 11.35 Secure cycle storage for staff and visitors should be provided as part of new non-residential developments. These should be part of a wider approach to encourage cycling that includes the provision of changing facilities and showers, encouraging a long-term modal shift away from single-occupancy vehicle use.
- 11.36 To support commuting to employment and education destinations, security is particularly important. Provision for employees or students should have employee only access storage areas that are covered and include space for non-standard cycles, along with showering and changing facilities within the building. At primary and nursery schools, an appropriate proportion of long-stay cycle parking for students may be met through scooter parking.

### Location of cycle parking

- 11.37 All major non-residential developments and residential developments should provide short-stay cycle parking for visitors who will not be able to access parking provided for employees or residents. This should be convenient and readily accessible, preferably in the form of Sheffield Stands within 15m of the main entrance where possible, so that the ease of cycling is not undermined by a lengthy search for suitable parking.

For primary schools and nurseries, short-stay cycle parking should be located and designed to accommodate at least two parental cargo bikes or cycles with trailers.

### Bicycle hire and share schemes

- 11.38 Not all residents or visitors to Watford will own or have access to a cycle within the town. The town's bike-share scheme provides access to bikes for those without access to a personal cycle. These bikes are stored at bays across the town and can easily be hired for use via a mobile phone app. Users collect and deposit the bikes at a bay at the start and completion of their trip, thus it is important that sufficient bays are available near to all potential destinations to support the scheme. The provision of bike share bays where it would support the wider bike share network, in agreement with the Local Authority, will be encouraged and could replace some on-site visitor parking provision.
- 11.39 In the largest of developments it is encouraged that this is in the form of a bike share parklet that combines standard cycle parking with bike share bays. The requirements for bike share bays is specified in the cycle parking standards in Appendix D. To preserve the ability to enhance the bike share infrastructure, any land set aside to support the installation of a bike share bay will be safeguarded should installation not take place immediately.



## Policy ST11.4: A Walking and Cycling Infrastructure Improvement Town



New development will be supported where it will contribute towards achieving a modal shift and make walking and cycling a convenient and efficient way to access local destinations. To be integrated into the adjacent and strategic walking and cycling network, proposals should demonstrate how they have prioritised walking and cycling through the provision of on-site infrastructure including cycle parking facilities, wayfinding measures and good design for safety and security. Major developments should contribute towards the delivery of significantly improved walking and cycling routes to key destinations, prior to first occupancy, where viable.



### Walking

Developments should be permeable and safe to walk through, including high quality footways and pedestrian crossings, adequate lighting and signposting. They should facilitate or deliver the links required to connect to existing and proposed walking routes as well as local amenities and public transport. Developments adjacent to the borough's walking routes, as identified in the Local Cycling and Walking Infrastructure Plan, will be expected to accommodate them through allocating space and supporting off-site contributions.



### Cycling

Developments will encourage people to cycle by providing an urban environment that is accessible and safe for all cycle trips. This requires high quality cycle routes that are segregated, unless both traffic flows and speeds are low. These routes should connect to local amenities, transport interchanges and the existing and proposed cycle network, as set out in the Local Cycling and Walking Infrastructure Plan. Developments adjacent to existing and new cycle routes will be expected to facilitate and deliver these links through allocating space and contributing to infrastructure improvements.



### Cycle parking

All development proposals will be required to provide on-site cycle parking facilities in line with the cycle parking standards detailed in Appendix D. Secure cycle parking facilities should be designed at the outset of the scheme. Should the standards for visitor cycle parking mean a requirement in excess of ten spaces, part of this provision can be replaced with a contribution to publicly accessible bike share bays in a suitable location nearby, further detail on this is provided in Appendix D.



## Car parking, car clubs and electric vehicles

- 11.40 Controlling car parking and providing alternatives to personal vehicle ownership have been found to be some of the most effective methods for managing demand and thus addressing issues such as the perception of a car-dominated environment, congestion, unreliable journey times, diminished air quality and higher carbon emissions amongst others. Advancing transport technology has the potential to drastically change how travel is managed and undertaken and opportunities are to be taken through new development to help future-proof the borough to support electric vehicle charging and shared mobility solutions, such as car clubs.
  
- 11.41 There is limited space available to support new development, and new schemes will be expected to make the most efficient use of the land available for redevelopment. Continuing to provide excessive car-related infrastructure, particularly overgenerous parking, will exacerbate existing issues associated with the transport network and the environment. These requirements will also support Watford becoming a Sustainable Travel Town (Policy ST11.1 'Sustainable Travel Town') by encouraging mode shift away from private car trips and thus reducing the impact of transport on the environment.

## Car parking standards

- 11.42 New development in all areas of the borough is to provide car parking that is reflective of the needs of its location and encourages greater proportions of people to use alternative transport modes to the private vehicle in the long-term.
  
- 11.43 Car parking standards (Appendix E) have been set in consideration to the Core Strategic Development Area, the availability of public transport modes and the type of development, in accordance with the National Planning Policy Framework. The car parking standards provided are maximums, to support Local Plan objectives by helping reduce overall car use and pressure on highway networks and infrastructure. Provision should take into consideration alternative forms of mobility, such as car club vehicles and seek to minimise the risk of off-site parking impacts.
  
- 11.44 Developments that are likely to result in material impacts to highway safety as a result of insufficient parking will be refused. Development in the Core Development Area will be severely restricted (i.e. 'car-lite'), and this will be enforced via Section 106 agreements. This is to minimise congestion in this area by discouraging vehicles where there are excellent public transport options available.

## Allocated and unallocated parking spaces

- 11.45 For all new residential developments, the standards set out a requirement for a proportion of parking spaces to be unallocated to any particular user. This is intended to accommodate vehicles that visit the site irregularly (such as visitors) who may otherwise struggle to find a parking space on site, and car club vehicles. Where parking spaces are allocated, they should be leased rather than sold. This will ensure that parking areas are used efficiently and reduces the risk of spaces being left vacant for any period of time. This policy requirement also supports development land being adaptable for the needs of subsequent users.



### Car parking and controlled parking zones

11.46 There is a recognition that for low levels of on-site car parking to work most effectively, it needs to be combined with on-street parking restrictions, one of the most effective modes of traffic demand management. This is particularly important for the areas located in the Core Development Area. Controlled Parking Zones are well established in the borough and will be kept under review as part of the Council's approach to traffic management. New development should not increase parking demand in Controlled Parking Zones and users will therefore be exempt, or subject to restriction, from obtaining permits to existing Controlled Parking Zones.

### Parking for disabled persons

11.47 Though parking may be restricted across the borough, the need to provide parking for people with reduced mobility remains an important requirement as part of Watford's ambitions to become a more accessible, inclusive borough. Disabled persons' parking should form a proportion of the overall parking provision, rather than being treated as additional. Demand for accessible parking spaces may change over time, and so developers are required to future-proof residential car parks by identifying additional parking spaces that could be converted to disabled persons' parking spaces if needed.

11.48 Disabled persons' parking spaces should not be allocated to specific dwellings, unless they are provided within the curtilage of the dwelling, and all disabled persons' parking spaces should follow relevant design guidance. Recommended parking provisions for non-residential land uses are also provided. Where it is not possible to provide disabled persons' parking at developments due to site constraints or highway safety concerns, the applicant will be required to demonstrate where a disabled person can park to access the development conveniently.

### Parking for powered two wheel vehicles

11.49 Powered two wheeled vehicles, such as motorcycles, scooters and mopeds, contribute to reducing congestion and emissions and also provide more efficient use of space than car parking. Providing space to park powered two wheeled vehicles will increase the attractiveness of powered two wheeled vehicles as an alternative to car ownership, and reduce instances of illegal parking which often obstructs footways. Guidance on designing for powered two wheeled vehicles is available from the Institute of Highway Engineers and motorcycle industry groups.

### Electric vehicles

11.50 Electric vehicles, that is any road vehicle with a battery that is intended to be charged from mains supply, will be encouraged for use where people are unable to use public transport, walk, or cycle to destinations. Whilst not reducing congestion, a move towards electric vehicles will reduce air pollution in the borough and contribute to local and national carbon reduction targets.

11.51 The number of electric vehicles is expected to increase further with the ban on the sale of petrol and diesel vehicles from 2030, and as electric vehicle technology becomes cheaper. It is therefore necessary to ensure that new developments are future-proofed to facilitate this progression. Sufficient electrical capacity in new developments for current and future demand for charging points will therefore be required.



11.52 The parking standards require consideration for the provision for electric vehicles, including one of two types of charging infrastructure:

- a) 'Active provision' requires fully wired and connected charging points at parking spaces;
- b) 'Passive provision' requires the necessary underlying infrastructure (e.g. capacity in the connection to the local electricity distribution network and electricity distribution board, and cabling to parking spaces) to enable simple installation and activation of a charge point at a future date.

11.53 As electric vehicles become more commonplace around Watford, locations for new electric vehicle charging infrastructure will naturally be focused on trip origins and destinations, where longer charges can take place (such as homes and workplaces). Where charging points are provided at commercial developments, the infrastructure must be able to support a rapid charging service (i.e. a 43kW connection, taking less than one hour for a full charge).

### Car clubs

11.54 Car clubs are a form of shared mobility that allows individuals and businesses to have access to a locally parked vehicle for a short-term rental period. Various models are possible including 'back-to-base' and more flexible one-way trip options, and dedicated parking bays are sometimes provided. Coinciding with changing population demographics, there is a recognition that the desire to own a car is reducing, and access to a vehicle for occasional use is becoming increasingly favourable. To support this change, people need to have a choice of easy and convenient transport options on a daily basis to best meet their circumstances. Having car club vehicles located at key journey origins and destinations will mean people can rely on this method of travel being possible when needed, and new developments must therefore support the growth of car clubs in the borough.

11.55 For residential schemes above ten units, developers are required to identify, and

safeguard, one unallocated parking space for every 50 units which would become a car club space if needed. Car-free residential developments will be expected to provide such spaces alongside disabled spaces, or contribute to the equivalent volume of on-street car club spaces within short walking distance, if required by the Council. This will help to facilitate and support effective travel planning measures being taken throughout the lifespan of the development.

11.56 Car club spaces should be situated where they are easily accessed and are visible to occupiers of the development and the surrounding neighbourhood. Where parking is inaccessible to the public, the Council may secure contributions to fund on-street car club spaces in the local area or require alterations to parking layouts to allow for accessible parking. Should a car club network become active in the borough, the Council will expect contributions to secure car clubs at new developments and incentivise membership as deemed necessary.





## Policy ST11.5: Electric Vehicles, Car Parking and Car Clubs



### Electric vehicle charging

For all schemes, 20% of parking spaces should have active charging infrastructure for electric vehicles provided, all other spaces should have passive provision. Proposals to increase the availability of publicly accessible electric vehicle charging infrastructure within the borough will also be supported and encouraged.



### Car parking

Development proposals should only provide car parking where it complies with the car parking standards set out in Appendix E. All new development proposals within the Core Development Area should be car-lite. Where these standards and requirements are met, the parking element of the proposal will be supported.

For residential schemes of ten units or more, 20% of all parking spaces should be unallocated.



### Disabled parking

For residential schemes of ten units or more, disabled persons parking should be provided for at least 5% of units, with a minimum of one space; potential disabled persons' parking spaces for a further 5% of units should be identified on a plan to facilitate conversion as required; wheelchair accessible or adaptable accommodation should provide one unallocated disabled persons' parking space per unit.

For non-residential schemes, provision for disabled persons' parking

will be determined on a case-by-case basis through pre-application discussions and an accurate estimate of potential demand provided in the Transport Statement/Assessment.

All disabled parking spaces should be located within 50m of the entrance to the building that it serves, via level access.



### Car club parking

The Council will support the development of car club networks within the borough, particularly those using low-emission vehicles.

For residential schemes of ten units or more, developers should identify one parking space per 50 units that would be designated for car club use only, if supported by a car-club operator (minimum of one space). Where parking is inaccessible to the public, the Council may secure contributions to fund on-street car club spaces. If no car-club spaces are proposed, this should be supported by evidence that there is a no demand from car-club operators for a space within the development. Developers may also be required to provide a financial contribution towards car club memberships for new residents.



### Powered two wheeler parking

For all schemes where parking is provided, one powered two wheeler parking space should be provided per 30 car parking spaces (minimum of two per site). All other schemes should provide sufficient powered two wheeler parking for the potential demand for their sites, as assessed in the Transport Statement / Assessment.





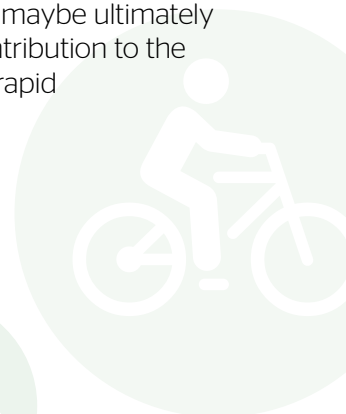
## Managing the transport impacts of development

### Transport Statements and Transport Assessments

- 11.57 Transport Statements and Transport Assessments seek to assess and reduce the transport impact of a development, and allow the Council to evaluate the scheme's compliance with relevant policies and objectives. They identify the need for mitigation and describe interventions to reduce traffic generation, highway safety risk and environmental impacts, and maximise accessibility.
- 11.58 A Travel Plan is a long-term management strategy for the site that seeks to deliver sustainable transport objectives. This is regularly reviewed and monitored. It should identify a package of measures for the development to improve accessibility and encourage the use of sustainable modes of travel.
- 11.59 All Transport Assessments, Statements and Travel Plans should follow the Transport User Hierarchy, as outlined in the Hertfordshire Local Transport Plan.
- 11.60 Planning applications for developments that will generate significant impact on

the transport network must be supported by a Transport Assessment. A Transport Statement may be sufficient instead of a full Transport Assessment, where the development will have relatively low transport implications. Applicants should determine whether a Transport Assessment or Transport Statement is required, based on the thresholds provided in Roads In Hertfordshire: A Design Guide<sup>9</sup>.

- 11.61 Where negative impacts are identified within the Transport Assessment or Statement on the safety or operation of the transport network, mitigation measures should be developed to eliminate or significantly reduce these. Appropriate levels of financial contribution for mitigation measures will be sought from developers towards any interventions required to offset transport impacts via Section 106 planning obligations or planning conditions. Should Hertfordshire County Council's plans for a mass rapid transit system progress, it could be expected that the total value of contributions is agreed via the Transport Assessment process based upon interventions directly related to the site, but that some or all of this maybe ultimately delivered as a financial contribution to the development of the mass rapid transit system.



<sup>9</sup> <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

## Travel Plans

11.62 A Travel Plan is required in all cases where a Transport Assessment is needed, as well as other circumstances where local factors make one necessary as determined by the Council. For smaller developments, a Travel Plan Statement, with a reduced quantity of detail, may be sufficient to accompany the planning application. Travel Plans should be produced with regard to Hertfordshire County Council's Travel Plan guidance<sup>10</sup>. Where the travel behaviour of the end user is unknown at the time of the planning application submission, applications will be expected to prepare draft Travel Plans with indicative modal shift targets for the planning application, before agreeing to update the Travel Plan with site-specific data upon occupation.

11.63 The Travel Plan should demonstrate how site users are being encouraged to travel in a sustainable manner, with a package of measures to support this. They should set targets or objectives, with accompanying monitoring, management and enforcement approaches. Monitoring of the Travel Plan's progress should take place on an annual basis for a minimum of five years following full occupation for residential developments,

or first occupation for workplace or commercial developments. Travel Plans for educational establishments should be monitored for a minimum of seven years following first occupation. A Travel Plan Review document, covering results, implementation updates and recommended revisions, should be shared with HCC within 30 days of data collection, and this will be assessed and recorded in Hertfordshire's Travel Plan monitoring system. The Council will secure a fee as part of the financial obligations of the planning permission to cover Travel Plan monitoring. Potential Travel Plan measures and objectives are provided within Hertfordshire County Council's guidance, measures that would support take up of the Council's sustainable transport schemes – bike share and on demand bus service – will be encouraged.

11.64 Alongside discussions with Watford Borough Council, applicants are encouraged to engage with the Highway Authority (Hertfordshire County Council) via the transport pre-application advice service to discuss and agree the appropriate level of assessment and the need for other supporting documents to be provided, such as Construction Management Plans and Delivery and Servicing Plans.



<sup>10</sup> <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>



## Policy ST11.6: Managing the Transport Impacts of Development

A Transport Statement or Transport Assessment is required to support planning applications for all developments that will impact upon the transport network, in accordance with Hertfordshire County Council thresholds. They should set out:

- a) How the development has been designed in line with the Transport User Hierarchy;
- b) How the development will facilitate greater use of sustainable modes of transport;
- c) The impact of all development users on the transport network during and after construction; and
- d) Proposed mitigations for any adverse impacts identified.

A Travel Plan that encourages sustainable travel behaviour should be developed for all developments, meeting the requirements set out by Hertfordshire County Council and should be structured according to their guidance. This should have a clear set of objectives, measures to achieve these and an approach to monitoring and enforcement. Where required, a Construction Management Plan and / or a Delivery and Servicing Plan must also be provided.

Significant negative impacts on the transport network as a result of new development must be satisfactorily mitigated. Developers will be required to contribute to and deliver appropriate transport infrastructure or other mitigation measures, with financial contributions required through planning conditions. This could include an agreement with the Council during the planning process instead for a financial contribution to the proposed mass rapid transit system equivalent to part of all of that required for local mitigations.



Chapter 12

# A Healthy Community



## A Healthy Community

12.1 Good masterplanning and the high quality design of buildings, outdoor spaces and the relationship between them make an important contribution towards health and wellbeing. It can lift the spirits or have a negative impact on people. Internal living spaces, personal and shared, and access to open space are known to help people relax and counter the stress of modern urban life.

12.2 Considering health and wellbeing as an opportunity can help to improve the quality of a scheme for both its marketability for people occupying a building. Figure 12.1 shows factors that contribute towards health and wellbeing while the Health and Wellbeing Planning Guidance (Hertfordshire County Council, 2017) sets out seven themes that should be considered and incorporated into the planning of new developments to ensure they are promoting health and sustainability. These include; air quality, movement and access, open spaces, design, employment and education, and healthy food choices. The Coronavirus pandemic has further highlighted how important both public open space and quality internal living spaces within a home are to people.

Figure 12.1: Factors contributing towards health and wellbeing





12.3 The health of an individual and the wider community is often dependent of a variety of issues, and the way people go about their everyday living. While not limited to the following, the Local Plan can help to positively influence the following contributors to health and wellbeing in Watford:

- **An active population:** taking steps to manage increasing child obesity and the location of unhealthy food outlets and providing better access to open spaces and community facilities.
- **Community severance:** physical and mental barriers such as busy roads affect the perception of safety, and restrict individuals' mobility and social interaction. This can be improved through a more community orientated public realm that prioritises people and provides better access to services and facilities through improved infrastructure and public transport.
- **Poverty and deprivation:** historical economic, environmental and social patterns affect the quality of living but can be improved through better access to education, quality jobs, improving support for people with disabilities and providing high quality places to live.
- **Environmental quality:** poor air quality and other disturbances such as noise, light, odour and vibration are commonly associated with vehicle traffic and industrial emissions. These can be improved through higher better use of technology, prioritising non-vehicular travel such as walking and cycling and also locating new development where people will not be adversely affected by pollution. Ensuring that uses are located where they are compatible will benefit physical and mental health and reduce conflict.
- **Mental health:** high population densities have higher rates of mental health issues compared to rural areas, including almost 40% higher risk of depression (RTPI Planning for 'wellbeings' 2020). Well designed internal and external spaces within new buildings and outdoor public spaces provide an opportunity to create healthy places to live and improve the neighbourhood.
- **An ageing population:** the changing age demographic will place increasing demand for new homes and facilities. Providing adaptable and specialist homes, improving access to community facilities and providing well designed spaces that enable people to interact and continue to feel part of their community are integral to sustainable development.





## Strategic Policy HC12.1: Healthy Communities



Creating a high quality environment encourages physical activity through easier movement for pedestrians and cyclists, and helps improve people’s mental health by creating spaces (urban and green) that are welcoming, pleasant and encourage activity and social interaction between people of all ages.

New development will be supported where it will contribute towards an inclusive and healthier community through delivering these objectives:

### An active population

Tackling obesity in children by creating opportunities for active play in new development. Encouraging adults to become more active with a more pedestrian and cycle-friendly urban environment that is focused on quality safe spaces for people, not dominated by the car or suffering from community severance. Major developments should support the provision of accessible open space that offers appropriate opportunities for outdoor physical activity to meet local needs. This should be supplemented by new and enhanced greenspaces to support health and wellbeing. Major developments are expected to promote active design by adhering to the 10 Principles of Active Design set out by Sport England.

### Healthy eating

Supporting healthy eating through the protection of community assets, such as allotments, community orchards and planting of fruit trees on open spaces. Opportunities for food growing should be maximised within new developments.

### Pollution

Improving air quality, noise and light pollution by locating compatible uses in the vicinity of each other, reducing the impact of vehicles through a modal shift and slowing average vehicle speeds.

### Poverty

Supporting initiatives to tackle poverty, such as back-to-work schemes, training and education and access to jobs using good public transport.

### A healthy older population

Providing homes and facilities to meet the needs of an ageing population such as adaptable and specialist homes and access to health facilities.

### Community facilities

It is important to ensure community facilities are of good quality and are located where they can be accessed by walking, cycling and public transport. Consideration should also be given to sensory gardens to provide a diversity of colour, patterns, smell, touch, taste and sounds to benefit physical and mental relaxation or in particular to benefit disabled members of the community.



## Health Impact Assessments

12.4 A Health Impact Assessment seeks to inform and influence decision-making, ensuring that health impacts, and the distribution of those impacts, are considered as part of the planning policy process. They provide a mechanism to understand more broadly how a wider range of economic, environmental and social factors can combine to affect a development.

12.5 The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:

- Rapid Assessment for simpler proposals;
- In-depth Health Impact Assessment for more complicated or larger proposals.

12.6 Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth Health Impact Assessments will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment, as a minimum, to support their planning application.



### Policy HC12.2: Health Impact Assessments



Health Impacts Assessments are required for proposals that may have an adverse impact on the immediate area and affect people living in the development and close by. More specifically, Health Impacts Assessments should be provided as part of a planning application submitted for the following types of applications:

- Major residential proposals of 100 units or more;
- Major transport infrastructure improvements, including major new roads or major new junctions, existing rail networks, rail stations and transport interchange areas and the proposed Mass Transit System along the former Croxley Rail link; and
- Any other locally or nationally significant infrastructure project.

Where a Health Impact Assessment has identified an issue that may have a significant adverse impact, the applicant should set out how this has been addressed and mitigated as part of the proposal.





## Cultural and community facilities

- 12.7 Facilities that provide opportunities for leisure, recreation, sport and tourism are vital to our physical and mental health, and can be a key element of the overall quality of life. Such facilities need to be close to where people live to reduce the need to travel, and be in the heart of the community, a social role often filled by uses such as public houses.
- 12.8 Built cultural or community facilities can include education and health facilities, public houses, local places of worship, community centres, public halls, leisure and sports centres, or arts buildings. Other types of buildings might also function as community facilities where they meet the social, leisure, cultural and religious needs of Watford's diverse communities. Such facilities can be listed as 'assets of community value' where they are of particular significance to the local community and this will form a key consideration in determining an application.
- 12.9 This policy provides protection for existing community facilities that play an important role in delivering a place where people want to live. Where major new development is proposed, or where facilities are lost as part of redevelopment proposals, the Council will seek the provision of new or replacement facilities where there is an identified demand. New community uses will generally be supported where the use has a clear benefit to the local community. Where possible, these are encouraged, in or near to, Local Centres, in order to reduce trips.
- 12.10 Proposals that result in the loss of a community facility must demonstrate that the facility is no longer needed and that no other community uses could make use of the site or facility. This should include evidence of consultation with the local community and community infrastructure providers, marketing and an analysis of local provision.



### Policy HC12.3: Built Cultural and Community Facilities



**Proposals for new, extended or improved cultural and community uses that address a demonstrated demand from the local community will be supported. Such uses should be located within sustainable, accessible locations close to the identified need and as a complementary use within, or close to, an identified Local Centre. Facilities that are proposed in isolated locations or that conflict with existing uses nearby will not be permitted.**

**The loss of existing community and cultural venues will only be permitted where it can be demonstrated that:**

- a) The facility is no longer needed and there is no need for an alternative community or cultural use on that site; or**
- b) The community or cultural uses can be reprovided of a higher quality in an alternative location or manner that is equally accessible to the community.**

**Development within the curtilage of existing community facilities should demonstrate that the continued operation of these facilities is not compromised.**





Chapter 13

# Site Allocations and New Development



## Site allocations and new development

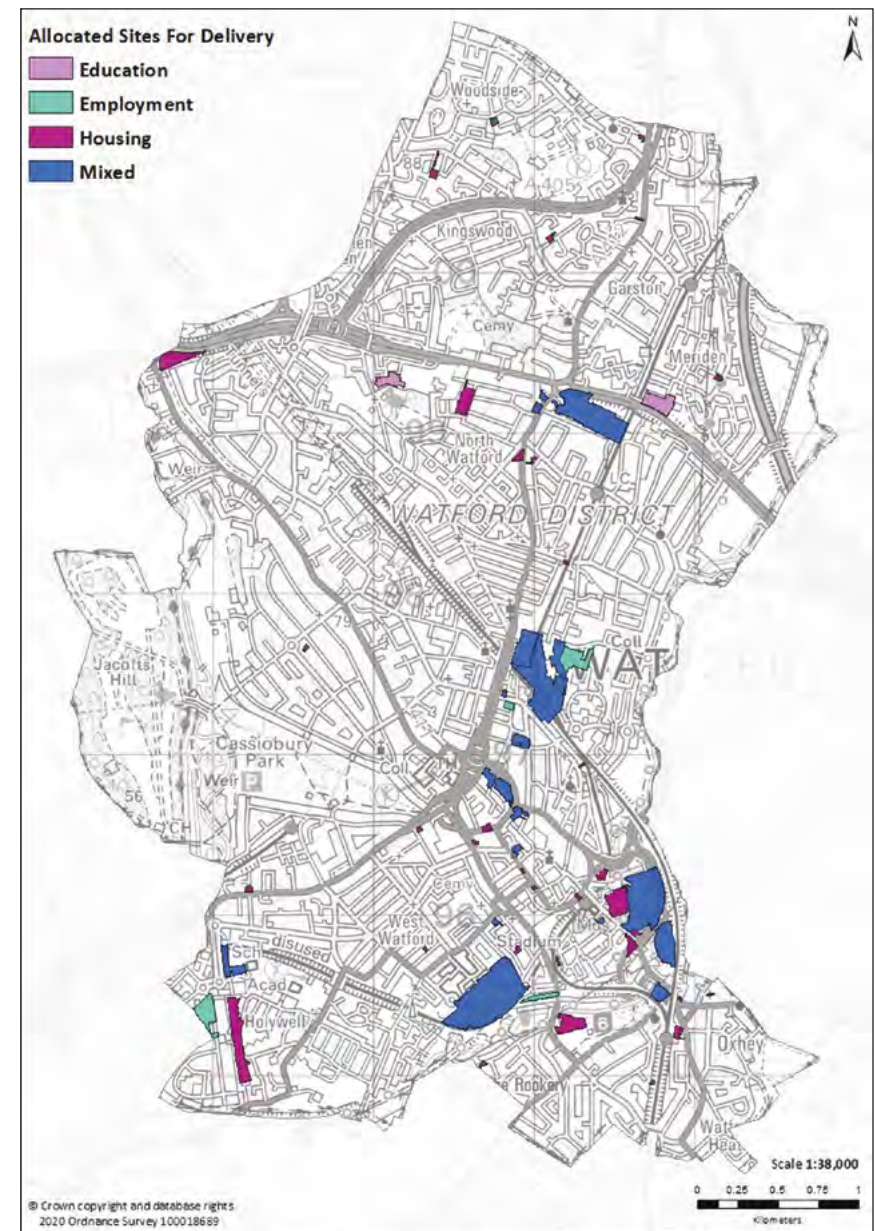
13.1 Demographic pressures, a national housing shortage and unbalanced regional development on a national level creates significant demand for housing in Watford and the South East more generally. The borough's proximity to London (with high housing costs in the city pushing people out into the surrounding areas) has resulted in challenging housing targets over the plan period.

13.2 There is need to plan for these homes. The Watford Housing and Economic Land Availability Assessment (HELAA) (2021) involved an exhaustive search of the borough for land available for development and sought to assess the capacity of the urban area. The administrative area of Watford has a capacity for providing 14,988 units over the plan period, with current estimates indicating a 793 units per annum requirement.

13.3 These sites are identified on the Policies Map. The policy is applicable to those sites identified in Tables 13.1, 13.2, 13.3 and 13.4 which include the following information:

- Site Name and Map
- The land use allocated for
- Site Size
- Whether the site is part of the Core Development Area
- Timescales
- Key development requirements and considerations
- Indicative yield (including net additional employment floorspace)

Figure 13.1: Allocated sites for delivery



13.4 The process for calculating the indicative yields of the site has been set out in the HELAA, as has the wider process for site selection.

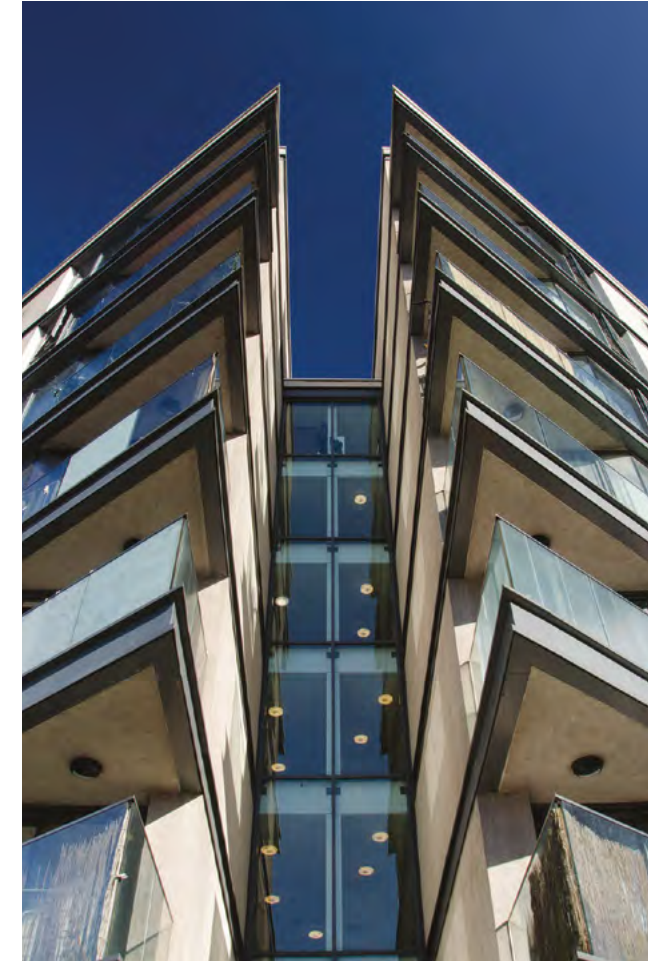
13.5 The development requirements and considerations detailed in Tables 13.1, 13.2, 13.3 and 13.4 are not exhaustive. They consist of a mix of requirements for on-site provision and considerations to aid scheme design by identifying key constraints and bespoke to specific sites. All allocated sites have a presumption in favour of development in principle. However, all proposals need to comply with the full suite of policies in the Local Plan. Absence of reference to a study or mitigation measure does not mean that it would not be required if a planning application was submitted.



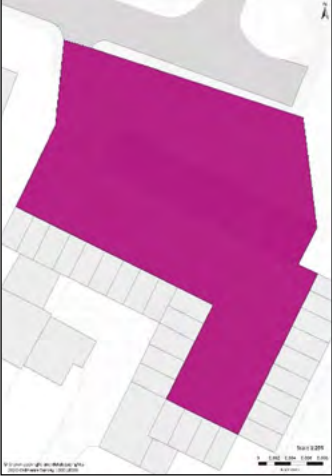

### Strategic Policy SA13.1: Allocated sites for delivery

The sites listed in Tables 13.1, 13.2, 13.3 and 13.4 as shown on the Policies Map, are allocated for residential (Use Class C3), mixed-use development (Sui Generis), employment uses (Use Classes B and E), education use (Use Class F1(a)) and any other uses specified. Planning permission will be granted for proposals that:

- a) Accord with the policies in the Local Plan;
- b) Accord with any Supplementary Planning Document, master plan or development brief that affects the site;
- c) Address the key development considerations for each site; and
- d) Provide appropriate mitigation measures for issues identified where the development considerations set out the need for an assessment.

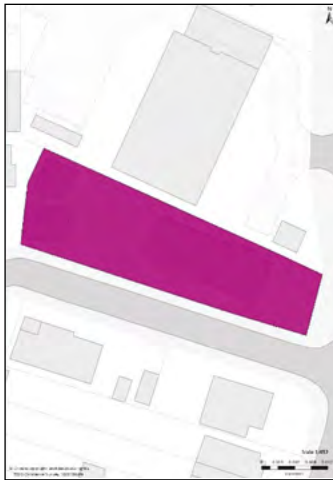


**Table 13.1: Allocated sites for delivery**

Site: HS01 Land and garages at Lych Gate			
Size (ha): 0.1	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 5 units
	<p><b>Development requirements and considerations</b></p> <p>The site is allocated for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Retain access to the garages not allocated in the Plan;</li> <li>• Take account of the potential risk of contamination on site; and</li> <li>• Be accompanied by a parking survey to avoid any adverse impacts on parking in the area.</li> </ul>		
Site: HS02 Land and buildings at 275 Sheepcot Lane			
Size (ha): 0.35	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 21 units
	<p><b>Development requirements and considerations</b></p> <p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Have regard to the waste management facility currently included in the allocation. The County Council, as the Waste Planning Authority, should be consulted on any applications which come forward on this site and the adopted Waste Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</li> <li>• Demonstrate that safe access has been provided to the site;</li> <li>• Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site;</li> <li>• Take account of the potential risk of contamination on site; and</li> <li>• Be accompanied by a Preliminary Roost Assessment.</li> </ul>		

**Site: HS03 Land and garages adjacent to 1 Lavinia Avenue**

<b>Size (ha): 0.08</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 6-15 years</b>	<b>Indicative yield = 5 units</b>
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**Development requirements and considerations**

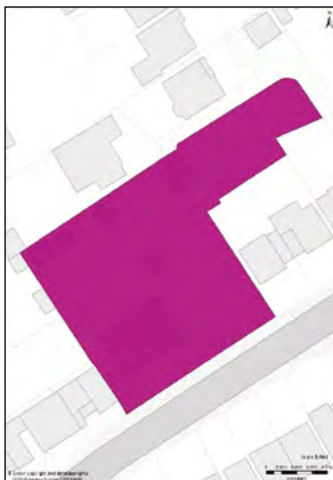
The site is considered suitable for residential development.

Development proposals should:

- Take account of the potential risk of contamination on site;
- Avoid any significant adverse impacts on the locally listed building, Garston Bus Garage, located directly opposite the site; and
- Be accompanied by a Preliminary Roost Assessment.

**Site: HS04 Land and buildings at 5 Sheepcot Drive**

<b>Size (ha): 0.17</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 6-15 years</b>	<b>Indicative yield = 9 units</b>
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**Development requirements and considerations**

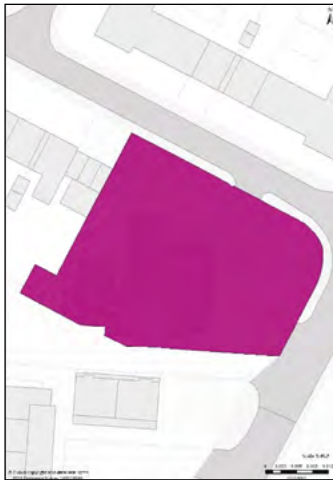
The site is considered suitable for residential development.

Development proposals should:

- Be accompanied by a Preliminary Ecological Appraisal;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site.

**Site: HS05 Land at the Badger Public House**

<b>Size (ha): 0.15</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 9 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.

Development proposals should:

- Be accompanied by a Preliminary Roost Assessment; and
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the west of the site.

**Site: HS06 Land at Russell Lane**

<b>Size (ha): 1.61</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 93 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

Development proposals should:

- Demonstrate that safe access has been provided to the site;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings and open space adjacent to the south of the site;
- Incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy; and
- Be accompanied by a Noise Assessment and provide the appropriate mitigation for noise associated with the road network.

**Site: HS07 Land at former Mothercare site**

<b>Size (ha): 1.3</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 98 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

Development proposals should:

- Be accompanied by a Preliminary Ecological Appraisal;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site; and
- Be informed by a Surface Water Drainage Strategy as the site is subject to surface water flood risk.

**Site: HS08 Land at the Longspring car park**

<b>Size (ha): 0.27</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 6-15 years</b>	<b>Indicative yield = 17 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

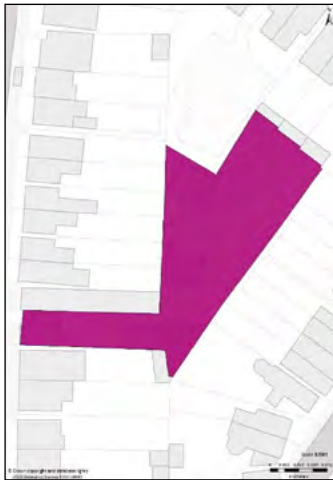
Development proposals should:

- Be accompanied by a parking survey to ensure that an appropriate level of car parking for the local shopping parade is retained;
- Avoid any significant adverse impacts on the locally listed buildings, 91-111 Longspring, located directly opposite the site;
- Be accompanied by a Noise Assessment and provide the appropriate mitigation for noise associated with the road network; and
- Take account of the potential risk of contamination on site.



**Site: HS09 Land and buildings at 420-420a St Albans Road**

Size (ha): <b>0.12</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>9 units</b>
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**Development requirements and considerations**

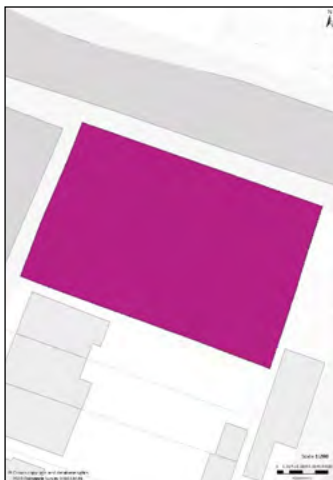
The site is considered suitable for residential development.

Development proposals should:

- Demonstrate that safe access has been provided to the site;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;
- Take account of the potential risk of contamination on site; and
- Be accompanied by a Preliminary Roost Assessment.

**Site: HS10 Land at Balmoral Road**

Size (ha): <b>0.06</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>5 units</b>
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**Development requirements and considerations**

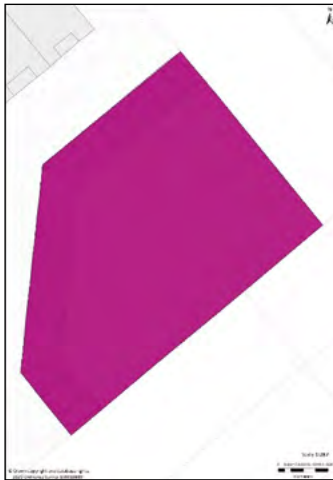
The site is considered suitable for residential development.

Development proposals should:

- Be accompanied by a Preliminary Roost Assessment;
- Be informed by a Surface Water Drainage Strategy as the site is subject to surface water flood risk;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and
- Take account of the potential risk of contamination on site.

**Site: HS11 Land to the rear of 53 Langley Way**

Size (ha): <b>0.09</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>7 units</b>
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**Development requirements and considerations**

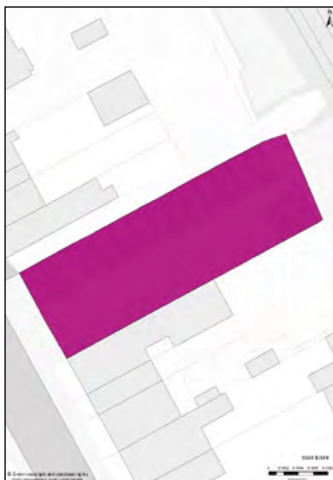
The site is considered suitable for residential development.

Development proposals should:

- Demonstrate that safe access has been provided to the site;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings and shopping parade adjacent to the site; and
- Take account of the potential risk of contamination on site.

**Site: HS12 Land and garages between 139 and 149 Queens Road**

Size (ha): <b>0.05</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>5 units</b>
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**Development requirements and considerations**

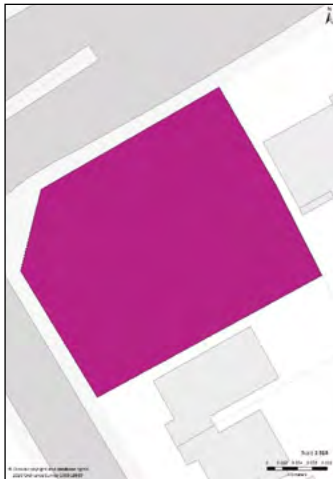
The site is considered suitable for residential development.

Development proposals should:

- Avoid significant harm to the setting of the Estcourt Conservation Area;
- Seek to enhance the setting and safety of the public footpath to the north west of the site;
- Take account of the potential risk of contamination on site;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line directly adjacent to the site;
- Be accompanied by a parking survey to avoid any adverse impacts on parking in the area; and
- Be accompanied by a Preliminary Roost Assessment.

**Site: HS13 Corner of Park Avenue and Rickmansworth Road**

<b>Size (ha): 0.1</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 9 units</b>
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**Development requirements and considerations**

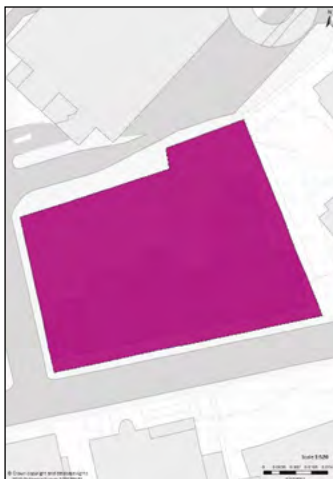
The site is considered suitable for residential development.

Development proposals should:

- Avoid significant harm to the setting of Cassiobury Registered Park, located north of the site; and
- Avoid any significant adverse impacts on the locally listed buildings located in the vicinity of the site.

**Site: HS14 Land at 14-20 Upton Road**

<b>Size (ha): 0.22</b>	<b>Location: CDA</b>	<b>Timescale: 6-15 years</b>	<b>Indicative yield = 48 units</b>
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**Development requirements and considerations**

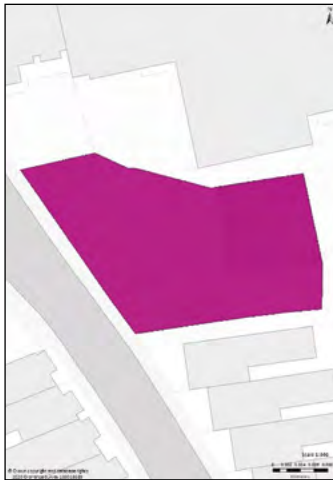
The site is considered suitable for residential development.

Development proposals should:

- Avoid any significant adverse impacts on the locally listed building, Exchange House, located opposite the site;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- Take account of the potential risk of contamination on site.

**Site: HS15 Land at 80 Cassio Road**

<b>Size (ha): 0.08</b>	<b>Location: CDA</b>	<b>Timescale: 6-15 years</b>	<b>Indicative yield = 17 units</b>
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**Development requirements and considerations**

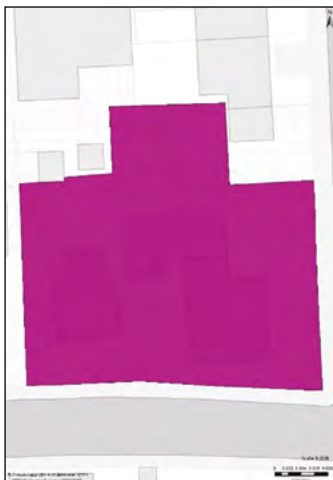
The site is considered suitable for residential development.

Development proposals should:

- Support the wider objectives of the Town Centre Strategic Development Area;
- Demonstrate that safe access has been provided to the site;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the south of the site; and
- Take account of the potential risk of contamination on site.

**Site: HS16 Land and buildings at 176-186 Rickmansworth Road**

<b>Size (ha): 0.16</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 12 units</b>
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**Development requirements and considerations**

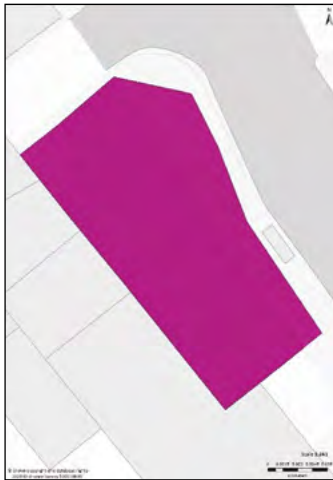
The site is considered suitable for residential development.

Development proposals should:

- Avoid any significant adverse impacts on the locally listed buildings, 195-199 Rickmansworth Road located directly opposite the site;
- Demonstrate that safe access has been provided to the site via Queen Mary's Avenue;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the north and east of the site; and
- Take account of the potential risk of contamination on site.

**Site: HS17 120-122 Exchange Road**

Size (ha): <b>0.05</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>5 units</b>
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**Development requirements and considerations**

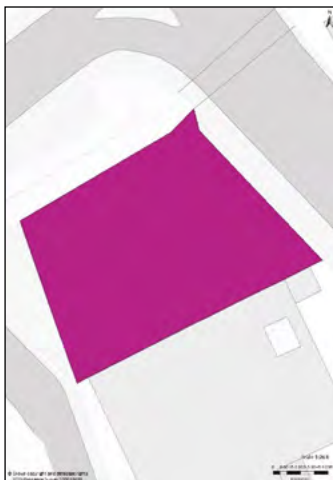
The site is considered suitable for residential development.

Development proposals should:

- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- Be accompanied by a Preliminary Roost Assessment.

**Site: HS18 Car park at Vicarage Road / Exchange Road**

Size (ha): <b>0.05</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>5 units</b>
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**Development requirements and considerations**

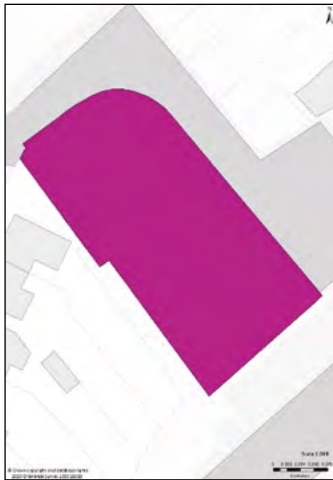
The site is considered suitable for residential development.

Development proposals should:

- Be designed to ensure safe pedestrian and cyclist access to and from the site;
- Avoid any adverse impacts on the locally and nationally listed buildings located in the vicinity of the site, including the Grade II listed Former Watford County Court House adjacent to the site. A Heritage Impact Assessment may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- Take account of the potential risk of contamination on site; and
- Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

**Site: HS19 Crown Passage car park**

<b>Size (ha): 0.1</b>	<b>Location: CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 18 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development. Development proposals should:

- Support the wider objectives of the Town Centre Strategic Development Area;
- Avoid significant harm to the High Street and Kings Street conservation area;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the west of the site;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- Incorporate the trees to the south of the site into the design of the scheme to provide a buffer to the adjacent road network;
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site. A Heritage Impact Assessment may be required; and
- Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

**Site: HS20 Land at Lower Derby Road**

<b>Size (ha): 0.27</b>	<b>Location: CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 59 units</b>
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**Development requirements and considerations**

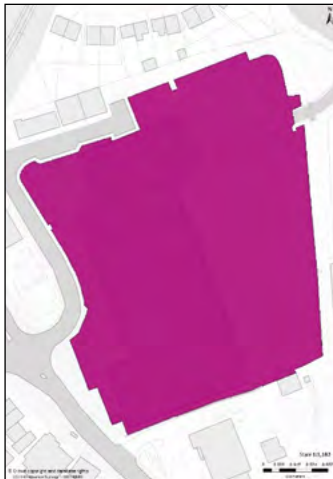
The site is considered suitable for residential development. An improved replacement skate park has been completed at Oxhey Park North.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Retain the current access to the site from Lower Derby Road; and
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site.

**Site: HS21 Land at Waterfields Retail Park**

Size (ha): <b>1.89</b>	Location: <b>CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>414 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Seek to engage with the landowners of sites MU16, located adjacent to the site, to maximise the benefits of development;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the north of the site;
- Retain significant trees on site wherever possible, including those with a Tree Protection Order; and
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site. A Heritage Impact Assessment may be required.

**Site: HS22 Land and buildings at 252-272 Lower High Street**

Size (ha): <b>0.5</b>	Location: <b>CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>110 units</b>
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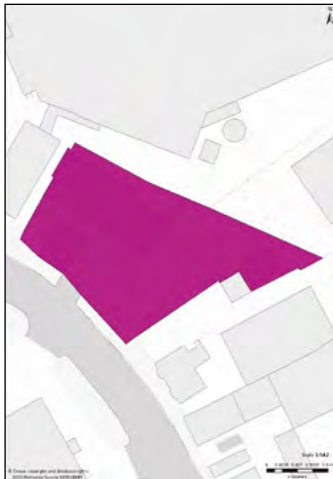
**Development requirements and considerations**

The site is considered suitable for residential development. Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the west of the site;
- Demonstrate that safe access has been provided to the site;
- Consider how the scheme contributes to the pedestrian and cyclist experience in the area and retain the footpaths adjacent;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zone 2 and 3a, and is also subject to groundwater and surface water flood risk;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided; and
- Take account of the potential risk of contamination on site.

**Site: HS23 Land and buildings at 247 Lower High Street**

Size (ha): <b>0.14</b>	Location: <b>CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>31 units</b>
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**Development requirements and considerations**

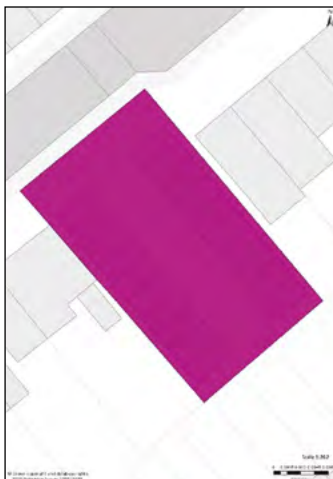
The site is considered suitable for residential development.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Seek to engage with landowners of sites MU16, located adjacent to the site, to maximise the benefits of development;
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zone 2 and 3a, and is also subject to groundwater and surface water flood risk;
- Take account of the potential risk of contamination on site; and
- Be accompanied by a Preliminary Roost Assessment.

**Site: HS24 Land and garages between 41 and 61 Brightwell Road**

Size (ha): <b>0.05</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>4 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

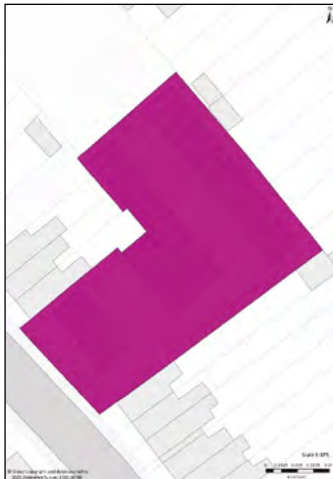
Development proposals should:

- Take account of the potential risk of contamination on site;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site; and
- Be accompanied by a parking survey to avoid any adverse impacts on parking in the area.



**Site: HS25 Land and garages to the rear of 15-17 Liverpool Road**

Size (ha): <b>0.12</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>11 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

Development proposals should:

- Take account of the potential risk of contamination on site;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site;
- Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area; and
- Be accompanied by a Preliminary Ecological Appraisal.

**Site: HS26 Land and garages to the rear of 2-24 Elfrida Road**

Size (ha): <b>0.08</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>8 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

Development proposals should:

- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the east of the site;
- Demonstrate that safe access has been provided to the site;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;
- Take account of the potential risk of contamination on site;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line directly adjacent to the site; and
- Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

**Site: HS27 Land at Croxley View**

<b>Size (ha): 3.2</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 240 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

Development proposals should:

- Enhance the green corridor and high quality cycle and walking route, which provides a key link between the Ebury Way and Cassiobury Park;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the east of the site; and
- Be accompanied by a Preliminary Ecological Appraisal.

**Site: HS28 Wiggenhall Depot**

<b>Size (ha): 1.5</b>	<b>Location: CDA</b>	<b>Timescale: 6-15 years</b>	<b>Indicative yield = 330 units</b>
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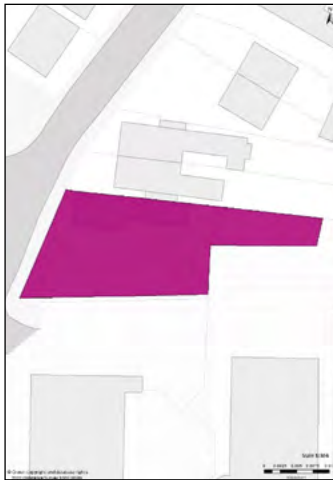
**Development requirements and considerations**

The site is considered suitable for residential development. Reprovision of the depot and waste transfer station is required. Development proposals should:

- Enhance the setting of the River Colne and be designed to minimise impact on wildlife habitats;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the west of the site;
- Retain the significant locally listed buildings on site where possible. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;
- Take account of the potential risk of contamination on site; and
- Be accompanied by a Preliminary Roost Assessment.

**Site: HS29 41 Aldenham Road**

Size (ha): <b>0.05</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>5 units</b>
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**Development requirements and considerations**

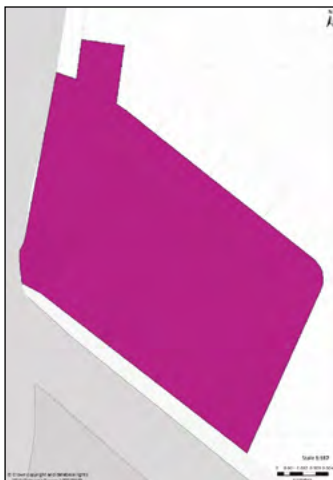
The site is considered suitable for residential development.

Development proposals should:

- Avoid any significant adverse impacts on the locally listed building, Bushey Baptist Church, adjacent to the site;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the north of the site; and
- Take account of the Pinner Road Air Quality Management Area, located to the south of the site.

**Site: HS30 Chalk Hill car park**

Size (ha): <b>0.04</b>	Location: <b>CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>9 units</b>
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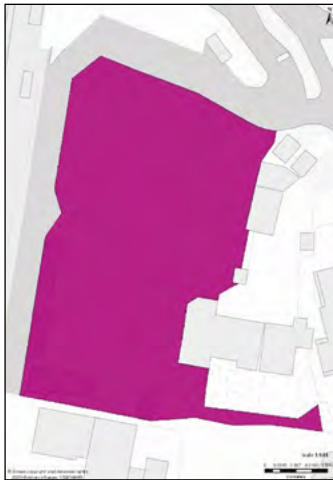
**Development requirements and considerations**

The site is considered suitable for residential development. Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Demonstrate that safe access has been provided to the site;
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;
- Take account of the Pinner Road Air Quality Management Area, located to the east of the site;
- Take account of the potential risk of contamination on site;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site; and
- Be accompanied by a parking survey to ensure that an appropriate level of car parking for Bushey station is retained.

**Site: HS31 Land at Bushey Station**

Size (ha): <b>0.31</b>	Location: <b>CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>68 units</b>
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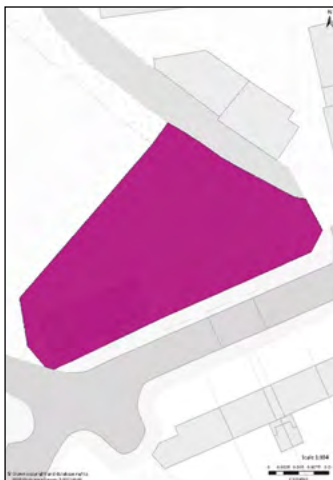
**Development requirements and considerations**

The site is considered suitable for residential development. Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Ensure the scheme is designed to provide high quality connections to Bushey Station for pedestrians and cyclists;
- Take account of the Pinner Road Air Quality Management Area, located to the north east of the site;
- Avoid any adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site; and
- Be accompanied by a parking survey to ensure that an appropriate level of car parking for Bushey station is retained.

**Site: HS32 Riverside Road and garages**

Size (ha): <b>0.1</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>5 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential development.

Development proposals should:

- Take account of the potential risk of contamination on site;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;
- Be accompanied by a Preliminary Roost Assessment; and
- Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

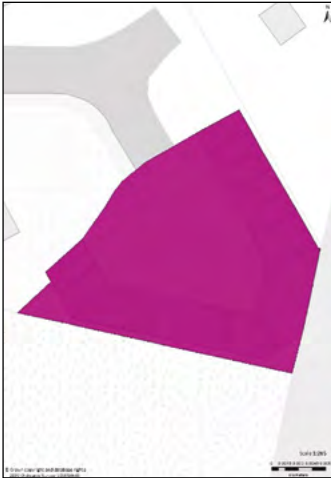
**Site: HS33 Land and garages at Kingsfield Court**

Size (ha): **0.06**

Location: **Outside of CDA**

Timescale: **6-15 years**

Indicative yield = **4 units**



**Development requirements and considerations**

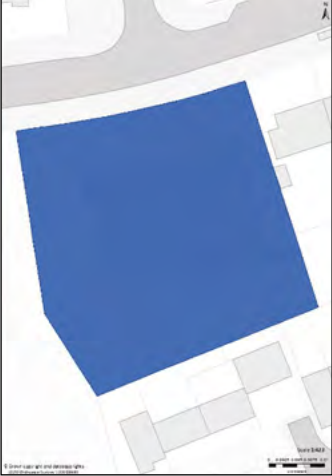
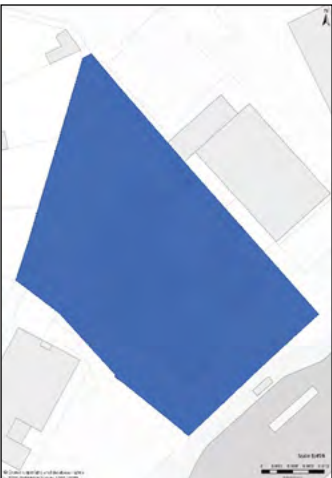
The site is considered suitable for residential development.

Development proposals should:

- Take account of the potential risk of contamination on site;
- Demonstrate that safe access has been provided to the site;
- Incorporate the trees to the south of the site into the design of the scheme. A Tree Survey may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site;
- Be accompanied by a Preliminary Roost Assessment; and
- Be accompanied by a parking survey.

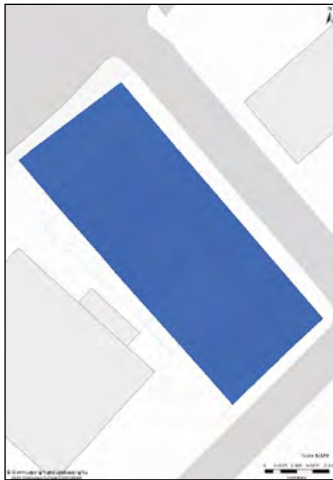


**Table 13.2: Mixed-use sites**

Site: MU01 Land at Woodside Community Centre			
Size (ha): <b>0.2</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>12 units</b>
	<p><b>Development requirements and considerations</b></p> <p>This site is considered suitable for mixed-use development, including residential and community uses. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Take account of the significant ground level change to the south of the site; and</li> <li>• Be accompanied by a Preliminary Roost Assessment.</li> </ul>		
Site: MU02 Land at 501 St Albans Road			
Size (ha): <b>0.21</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>13 units</b>
	<p><b>Development requirements and considerations</b></p> <p>This site is considered suitable for mixed-use development, including residential and community uses. Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Avoid significant adverse impacts on the locally listed building, North Watford Library, located opposite the site;</li> <li>• Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings located to the north west of the site;</li> <li>• Demonstrate that safe access has been provided to the site;</li> <li>• Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and</li> <li>• Be accompanied by a Preliminary Roost Assessment.</li> </ul>		

**Site: MU03 Land at the Lemarie Centre**

<b>Size (ha): 0.1</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 7 units</b>
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**Development requirements and considerations**

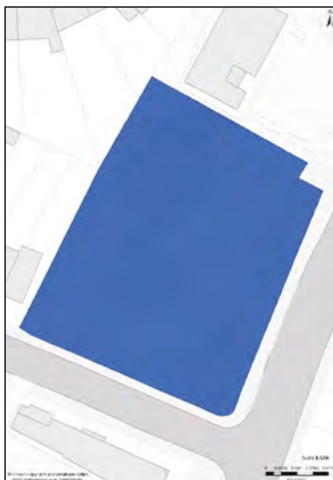
This site is considered suitable for mixed-use development, including residential and community uses. Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.

Development proposals should:

- Seek to work collaboratively with the landowner of site MU23, which is located adjacent to the east, to maximise the benefits of development;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- Avoid significant adverse impacts on the locally listed building, North Watford Library, located adjacent to the site.

**Site: MU04 453 St Albans Road**

<b>Size (ha): 0.3</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 18 units</b>
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**Development requirements and considerations**

This site is considered suitable for mixed-use development, including residential uses. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.

Development proposals should:

- Avoid significant adverse impacts on the locally listed building, North Watford Library, located opposite the site;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site.

**Site: MU05 Land and buildings at 94-98 St Albans Road**

Size (ha): **2.47**

Location: **CDA**

Timescale: **1-5 years**

**Indicative yield = 1,214 units**  
**295sqm of office floorspace**  
**4,960sqm of commercial and educational floorspace**



**Development requirements and considerations**

This site is considered suitable for mixed-use development, including residential uses. A primary school is also required on site.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Ensure that retail reprovision on site will not exceed the existing retail floorspace;
- Seek to work collaboratively with the landowner of site MU06, which is located adjacent to the east of the site, to maximise the benefits of development;
- Avoid significant harm to the Nascot Conservation Area, located directly to the west of the site;
- Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;
- Facilitate appropriately and proportionately towards the timely provision of required infrastructure identified in Watford’s Infrastructure Delivery Plan, including measures to improve access to the station for cyclist, pedestrians and vulnerable users; and
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.



**Site: MU06 Land at Watford Junction**

Size (ha): **7.46'**

Location: **CDA**

Timescale: **1-15 years**

**Indicative yield = 1,232 units  
20,998sqm of office floorspace**



**Development requirements and considerations**

This site is considered suitable for mixed-use development, including residential, employment and commercial uses. A replacement childcare facility and a new primary school is required on site.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area, including the necessary improvements to the station and it's functionality;
- Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including measures to improve bus priority around the station;
- Support the delivery of a new pedestrian and cycle bridge and the protection of a second crossing route from Penn Road across the railway line;
- Demonstrate that safe access has been provided to the site;
- Ensure the layout of the scheme has been designed to minimise any potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot. This may include locating non-residential floorspace in the lower storeys;
- Seek to work collaboratively with the landowners of sites MU05 and MU07, which are located adjacent to the site, to maximise the benefits of development;
- Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site;
- Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;
- Take account of the potential risk of contamination on site;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

**Site: MU07 Land and buildings at Astral House**

Size (ha): **1.32**

Location: **CDA**

Timescale: **1-5 years**

Indicative yield = **131 units**



**Development requirements and considerations**

This site is considered suitable for mixed-use development, including residential and employment uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Result in no net loss of employment floorspace on site;
- Seek to work collaboratively with the landowners of sites MU06 and EMO5, which are located adjacent to the east of the site, to maximise the benefits of development;
- Demonstrate that safe pedestrian and cyclist access to the site has been provided;
- Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land required for the bridge;
- Take account of the potential risk of contamination on site;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided; and
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

**Site: MU08 22-28 Station Road**

Size (ha): **0.12**

Location: **CDA**

Timescale: **1-5 years**

**Indicative yield = 21 units  
480sqm of office floorspace**



**Development requirements and considerations**

This site is considered suitable for mixed-use development, including residential and office uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Support the objectives of the Clarendon Road Primary Office Location;
- Facilitate improvements to cycle provision on St Albans Road, particularly the narrowing of the cycle lane approaching the junction from the west;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site.



**Site: MU09 Land at Watford Police Station**

Size (ha): **0.68**

Location: **CDA**

Timescale: **1-5 years**

**Indicative yield = 120 units  
2,770sqm of office floorspace**



**Development requirements and considerations**

This site is considered suitable for mixed-use development, including residential and office uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area and the Clarendon Road Primary Office Location;
- Position the tallest elements of the scheme along the Clarendon Road frontage;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings south and to the west of the site and to create a strong relationship with the street edge;
- Retain the trees on the Clarendon Road frontage;
- Avoid significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site, including the locally listed building within the site boundary. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided.

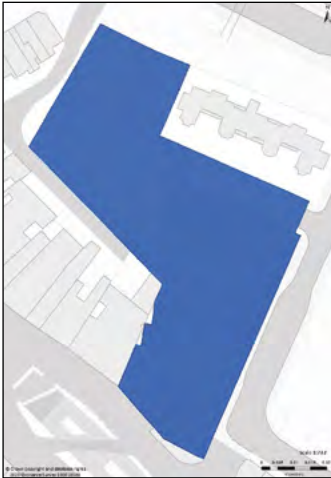
**Site: MU10 Land to the rear of 125-127 The Parade**

Size (ha): **0.51**

Location: **CDA**

Timescale: **1-5 years**

Indicative yield = **90 units**

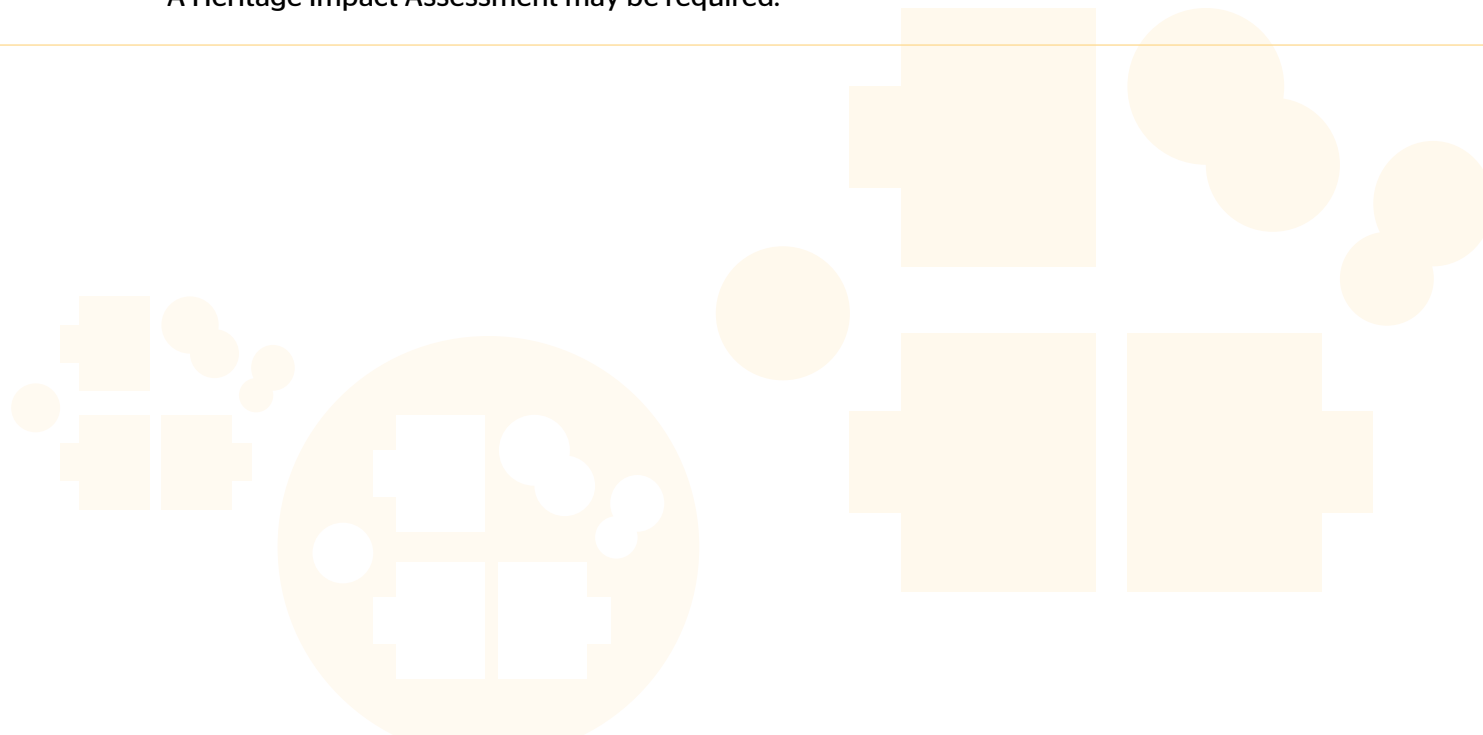


**Development requirements and considerations**

The site is considered suitable for mixed-use development, including residential and commercial uses.

Development proposals should:

- Support the wider objectives of the Town Centre Strategic Development Area;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings and shopping parade surrounding the site;
- Provide a quality frontage and landscaping along the Parade and Albert Street South;
- Seek to engage with the landowners of site MU13 located adjacent to the east to maximise the benefits of development;
- Avoid significant harm to the setting of the Civic Core Conservation Area;
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.



**Site: MU11 23-37 The Parade**

Size (ha): **0.41**

Location: **CDA**

Timescale: **1-5 years**

Indicative yield = **72 units**

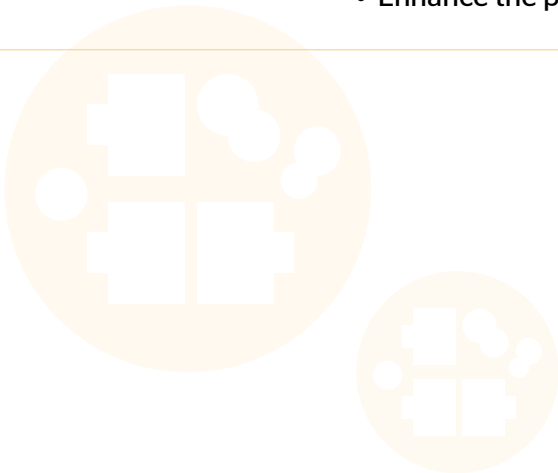


**Development requirements and considerations**

The site is considered suitable for mixed-use development, including residential uses and active commercial uses on the ground floor.

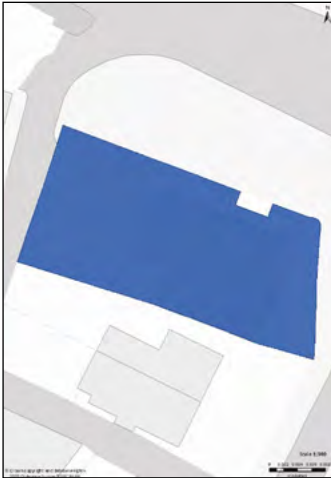
Development proposals should:

- Support the wider objectives of the Town Centre Strategic Development Area;
- Avoid significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site, including the locally listed shopfront within the site boundary. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building. A Heritage Impact Assessment may be required;
- Seek to engage with landowners of site MU12 located adjacent to the west to maximise the benefits of development;
- Comprehensive redevelopment should explore options for the provision of a high quality market which will capitalise on the increased residential occupancy of the Town Centre and an improved inter-relationship with Clarendon Road;
- Provide high quality pedestrian connections between Beechen Grove and the Parade; and
- Enhance the public realm along Beechen Grove.



**Site: MU12 19-21 Clarendon Road**

Size (ha): <b>0.08</b>	Location: <b>CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>14 units</b>
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**Development requirements and considerations**

The site is suitable for mixed-use development, including residential and commercial uses.

Development proposals should:

- Support the wider objectives of the Town Centre Strategic Development Area;
- Seek to engage with landowners of site MU11 located adjacent to the west to maximise the benefits of development;
- Avoid significant adverse impacts on the locally and nationally listed buildings and monuments located in the vicinity of the site. A Heritage Impact Assessment may be required; and
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.



**Site: MU13 Land at Sainsbury's, Town Centre**

**Size (ha): 1.0**

**Location: CDA**

**Timescale: 6-15 years**

**Indicative yield = 220 units**



**Development requirements and considerations**

The site is suitable for mixed-use development, including residential and commercial uses.

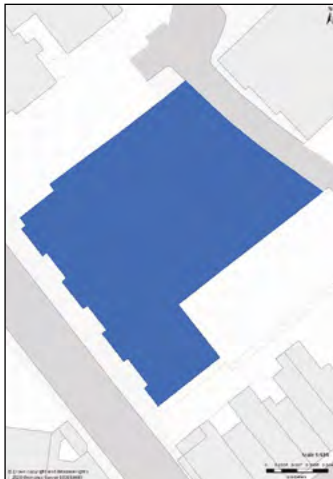
Development proposals should:

- Support the wider objectives of the Town Centre Strategic Development Area;
- Improve the setting and public realm along Beechen Grove and Albert Street South, as well as Gaumont Approach;
- Seek to engage with landowners of site MU10 located adjacent to the west to maximise the benefits of development;
- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings to the north of the site;
- Avoid significant harm to the setting of the Civic Core Conservation Area which lies directly south of the site;
- Avoid any significant adverse impacts on the locally and nationally listed buildings and monuments located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Provide no additional retail floorspace above the existing on site provision;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- Take account of the potential risk of contamination on site; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided.



**Site: MU14 Land at the car park, Wellstones**

<b>Size (ha): 0.23</b>	<b>Location: CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 40 units</b>
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**Development requirements and considerations**

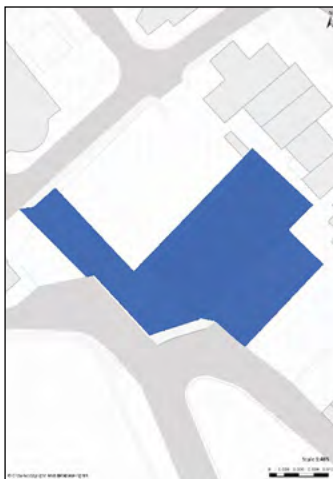
The site is suitable for residential-led, mixed-use development. E and F class uses are possible on the ground floor to maintain an active frontage.

Development proposals should:

- Support the wider objectives of the Town Centre Strategic Development Area;
- Avoid significant adverse impacts on the locally and nationally listed buildings in the vicinity of the site. A Heritage Impact Assessment may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- Take account of the potential risk of contamination on site; and
- Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

**Site: MU15 18 Watford Field Road**

<b>Size (ha): 0.11</b>	<b>Location: CDA</b>	<b>Timescale: 1-5 years</b>	<b>Indicative yield = 19 units</b>
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**Development requirements and considerations**

The site is suitable for mixed-use development, including residential and community uses.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Be designed to maximise the outlook across Watford Field Recreation Ground; and
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.

**Site: MU16 Land at Tesco, Lower High Street**

Size (ha): **7.6**

Location: **CDA**

Timescale: **6-15 years**

Indicative yield = **1,338 units**



**Development requirements and considerations**

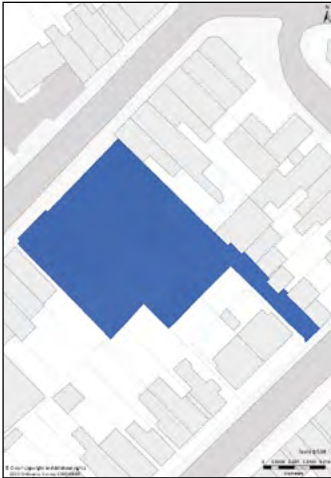
The site is considered suitable for mixed-use development, including residential, E and F class uses and a primary school.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area, including the linear park;
- Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as part of the linear park proposal. Re-naturalisation of the culverted River Colne will also be supported;
- Seek to engage with landowners of site HS21, located adjacent to the west, and HS23, located adjacent to the south, to maximise the benefits of development;
- Provide no additional retail floorspace above the existing on site provision;
- Enhance the strategic view from the railway line to the town centre. Proposals should be supported with images that demonstrate how a proposal will contribute towards the Watford skyline;
- Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;
- Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site, including the locally listed coal duty marker on site. If it is demonstrated to be unfeasible to retain the listed monument on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the monument. A Heritage Impact Assessment may be required;
- Adequately address the level changes on site;
- Have regard to the high pressure pipeline that traverses the site;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided;
- Take account of the potential risk of contamination on site;
- Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including a revised junction layout, crossing improvements and provision of a cycle path along Lower High Street; and
- Retain significant trees on site wherever possible, including those with a Tree Protection Order.

**Site: MU17 44-56 Vicarage Road**

<b>Size (ha): 0.13</b>	<b>Location: Outside of CDA</b>	<b>Timescale: 6-15 years</b>	<b>Indicative yield = 10 units</b>
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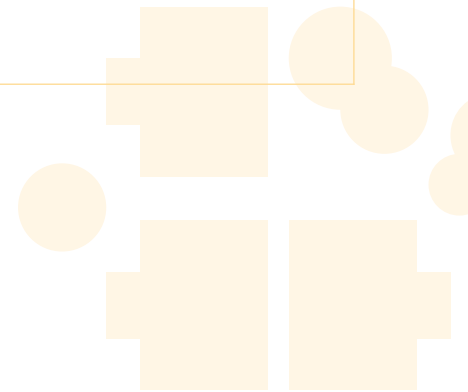


**Development requirements and considerations**

The site is considered suitable for mixed-use development, including residential. The retail uses on the ground floor should be reprovided to strengthen the offer of the designated local centre.

Development proposals should:

- Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site;
- Maintain the active retail frontage to Vicarage Road;
- Avoid significant harm to the setting of the Square Conservation Area which lies opposite the site; and
- Take account of the Hornets / Vicarage Road Air Quality Management Area, which the site is located within.



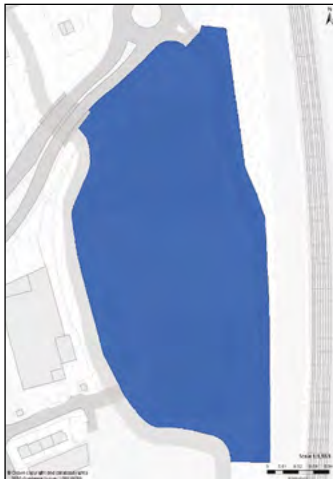
**Site: MU18 Land at Colne Valley Retail Park**

Size (ha): **2.65**

Location: **CDA**

Timescale: **6-15 years**

Indicative yield = **466 units**



**Development requirements and considerations**

The site is considered suitable for residential-led, mixed-use development. Reprovision of E class uses is possible on the ground floor.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area including the linear park;
- Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as part of the linear park proposal;
- Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;
- Provide no additional retail floorspace above the existing on site provision;
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;
- Have regard to the high pressure pipeline that traverses the site;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;
- Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including a revised junction layout, crossing improvements and provision of a cycle path along Lower High Street; and
- Take account of the potential risk of contamination on site.

**Site: MU19 Land to the west of and parallel to Ascot Road**

Size (ha): <b>0.71</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	Indicative yield = <b>43 units</b>
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**Development requirements and considerations**

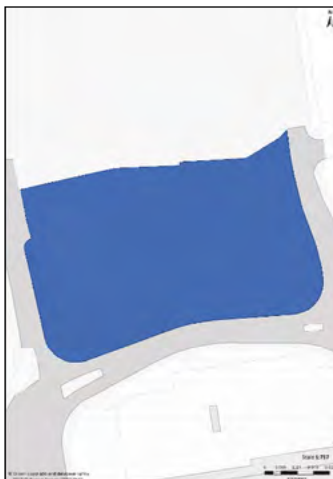
The site is considered suitable for residential-led, mixed-use development.

Development proposals should:

- Demonstrate that an appropriate amount of land has been safeguarded for the future provision of a mass transit route and station;
- Enable improvements to the contraflow cycle lane to provide a two way cycle lane;
- Enhance the green infrastructure network by enhancing the link between the Ebury Way and Cassiobury Park;
- Avoid any significant adverse impacts on the locally listed monument, the Former Sun Printer’s Clock Tower, located adjacent to the site; and
- Take account of the potential risk of contamination on site.

**Site: MU20 Land east of Ascot Road**

Size (ha): <b>0.45</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>27 units</b>
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**Development requirements and considerations**

The site is considered suitable for residential-led mixed-use development with E class uses suitable on the ground floor.

Development proposals should:

- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and
- Take account of the potential risk of contamination on site.

**Site: MU21 Land at Riverwell**

**Size (ha): 12.0**

**Location: CDA**

**Timescale: 1-15 years**

**Indicative yield = 1,383 units**



**Development requirements and considerations**

The site is considered suitable for mixed-use development, including residential, commercial uses and a primary school.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;
- Enhance the public realm through the provision of a new public square;
- Take account of the potential risk of contamination on site;
- Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided.



**Site: MU22 Land at Colne Bridge Retail Park**

Size (ha): **0.8**

Location: **CDA**

Timescale: **6-15 years**

Indicative yield = **141 units**



**Development requirements and considerations**

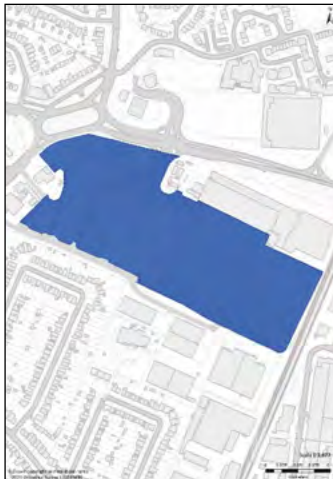
The site is considered suitable for residential-led, mixed-use development. Reprovision of the retail uses is possible on the ground floor.

Development proposals should:

- Support the wider objectives of the Colne Valley Strategic Development Area;
- Enhance connectivity to the River Colne;
- Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;
- Be designed to help facilitate provision of a potential pedestrian / cycle crossing over the River Colne in the future, as set out in the South West Hertfordshire Transport and Infrastructure Plan;
- Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- Provide no additional retail floorspace above the existing on site provision;
- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk; and
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;
- Take account of the potential risk of contamination on site; and
- Take account of the Pinner Road Air Quality Management Area, located to the north west and south east of the site.

**Site: MU23 Land at Asda, Dome Roundabout**

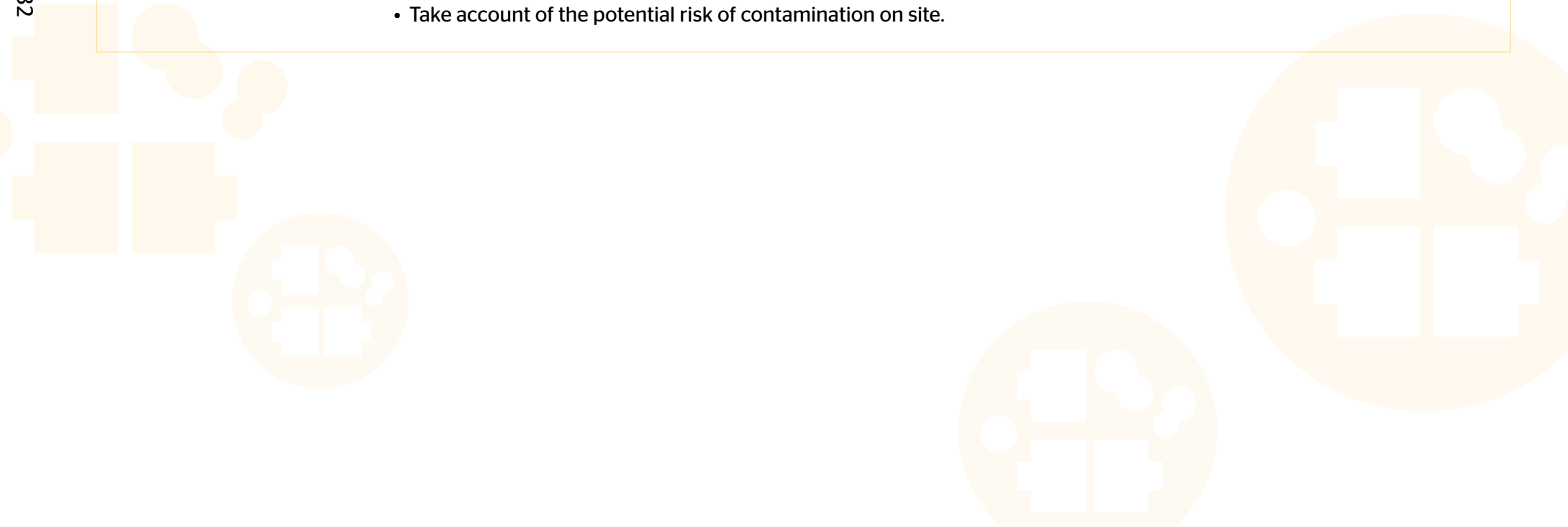
Size (ha): <b>7.03</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>	Indicative yield = <b>422 units</b>
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**Development requirements and considerations**

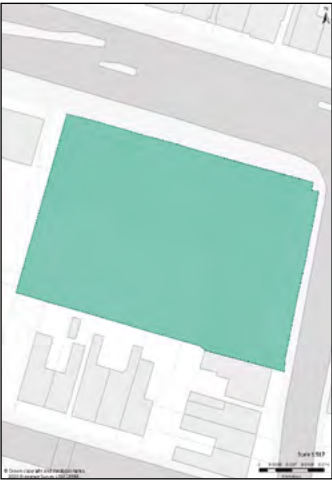

Development proposals should:

- Avoid significant adverse impacts on the locally listed buildings, the North Watford Library and Former Odhams Press Hall, located adjacent to the site;
- Provide no additional retail floorspace above the existing on site provision;
- Be informed by a Surface Water Drainage Strategy as the site is subject to surface water flood risk;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;
- Retain significant trees on site wherever possible, including those with a Tree Protection Order;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road and employment land adjacent to the site; and
- Take account of the potential risk of contamination on site.





**Table 13.3: Employment sites**

Site: EM01 Cassiobury House, 11-19 Station Road			
Size (ha): <b>0.24</b>	Location: <b>CDA</b>	Timescale: <b>1-5 years</b>	<b>Indicative yield = 2,530sqm of office floorspace</b>
	<p><b>Development requirements and considerations</b></p> <p>This site is considered suitable for office development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Support the wider objectives of the Watford Gateway Strategic Development Area and the Clarendon Road Primary Office Location;</li> <li>• Contribute towards the sustainability principles of the Plan while acknowledging that BREEAM ‘Excellent’ standards are not achievable;</li> <li>• Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required; and</li> <li>• Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the south of the site.</li> </ul>		
Site: EM02 Land to the South of Wighenhall Industrial Estate			
Size (ha): <b>0.58</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>	<b>Indicative yield = 11,600sqm of office floorspace</b>
	<p><b>Development requirements and considerations</b></p> <p>This site is considered suitable for office development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> <li>• Ensure that a safe access to the site has been provided; and</li> <li>• Take account of the potential risk of contamination on site.</li> </ul>		

**Site: EM03 Gateway Zone**

Size (ha): <b>1.7</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	<b>Indicative yield = 6,935sqm of industrial floorspace</b>
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**Development requirements and considerations**

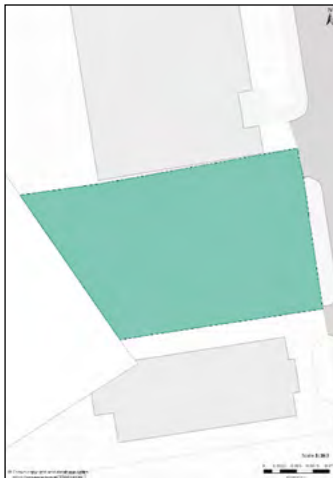
This site is considered suitable for industrial uses.

Development proposals should:

- Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;
- Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the ‘agent of change’ principle; and
- Take account of the potential risk of contamination on site.

**Site: EM04 Land Between 14-18 Greenhill Crescent**

Size (ha): <b>0.09</b>	Location: <b>Outside of CDA</b>	Timescale: <b>1-5 years</b>	<b>Indicative yield = 900sqm of industrial floorspace</b>
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**Development requirements and considerations**

This site is considered suitable for industrial uses.

Development proposals should:

- Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the ‘agent of change’ principle; and
- Take account of the potential risk of contamination on site.

**Site: EM05 Land at Colonial / Clive Way**

Size (ha): **1.98**

Location: **CDA**

Timescale: **6-15 years**

**Indicative yield = 9,200sqm of industrial floorspace**



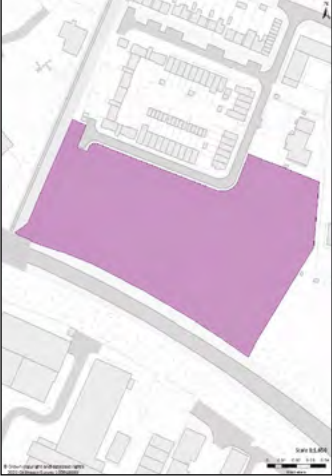
**Development requirements and considerations**

This site is considered suitable for industrial uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Seek to work collaboratively with the landowner of site MU07, which is located adjacent to the west of the site, to maximise the benefits of development;
- Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the ‘agent of change’ principle;
- Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations; and
- Take account of the potential risk of contamination on site.

**Table 13.4: Education facilities<sup>11</sup>**

Site: ED01 Former Meriden School Site		
Size (ha): <b>1.74</b>	Location: <b>Outside of CDA</b>	Timescale: <b>6-15 years</b>
	<p><b>Development requirements and considerations</b></p> <p>The site is considered suitable for the development of an education facility.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Provide appropriate mitigation for the lapsed playing field in line with the Playing Pitch Strategy (2020);</li> <li>• Have regard to the Colne Way Waste Transfer Station, which is located directly west of the site. Mitigation for any negative impacts arising from the site's proximity to the waste site should be provided in line with the 'agent of change' principle;</li> <li>• Complete a review of transport impact and safety as part of a full Transport Assessment which will include mitigation for pupils crossing the A41. Pedestrian and cycle access should be taken from The Meadows to the north;</li> <li>• Explore the potential for a pedestrian and cycle link across Meriden Park between the site and Garsmouth Way;</li> <li>• Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and</li> <li>• Be accompanied by a Preliminary Ecological Appraisal.</li> </ul>	

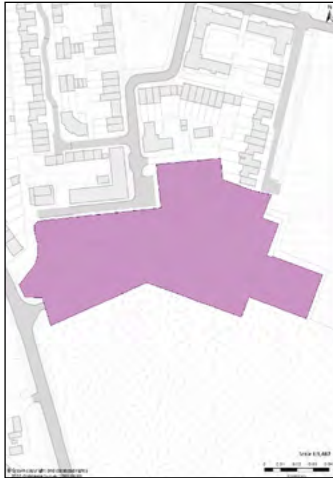
<sup>11</sup> Note that mixed use sites MU05, MU06, MU16 and MU21 are also required to provide a primary school on site as part of the wider scheme.

**Site: ED02 Former Bill Everett Centre**

**Size (ha): 1.07**

**Location: Outside of CDA**

**Timescale: 6-15 years**



**Development requirements and considerations**




The site is considered suitable for the development of an education facility.


Development proposals should:





- Establish clear connections and desire lines with the residential areas to the north;
- Complete a review of transport impact and safety as part of a full Transport Assessment. This will include consideration of the provision of a 'parent drop off' within the site to prevent parking and associated issues on the surrounding residential roads;
- Pedestrian and cycle access should be taken from Leggatts Way with potential for an additional access via Broad Road;
- Demonstrate suitable off-site playing field arrangements with consideration to safeguarding and land ownership and in consultation with Hertfordshire County Council;
- Ensure appropriate separation or buffers between development and the Harebreaks Wood Local Nature Reserve directly south of the site; and
- Be accompanied by a Preliminary Roost Assessment.





## Appendix A: Draft Monitoring Framework




Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 <b>Chapter 1: A Spatial Strategy for Watford</b>	Policy SS11: Spatial Strategy	Percent of floorspace on previously developed land	90% employment, 80% residential	Planning applications
		Number of jobs	13,000 jobs provided 2018-2036	Planning applications
		Completions data, for the Core Development Area Rest Of Town	N/A	Planning applications
 <b>Chapter 2: Core Development Area</b>	Policy CDA2.1: Watford Gateway Strategic Development Area; Policy CDA2.2: Town Centre Strategic Development Area; Policy CDA2.3: Colne Valley Strategic Development Area	Net additional home completions within each Strategic Development Area	Number of allocated homes	Planning applications
		Net office and industrial floor space within each Strategic Development Area	Amount of allocated office / industrial floor space	Planning applications
 <b>Chapter 3: Homes for a Growing Community</b>	Policy HO3.1: Housing Provision	Net completed dwellings and number of dwellings granted planning permission	14,274 dwellings 2018-2036 with 793 per year. Maintain 5 year housing supply	Planning applications and site visits
	Policy HO3.2: Housing Mix, Density and Optimising Use of Land	Density of residential developments (dph)	95+ dph within the Core Development Area and 45+ dph elsewhere in the town	Planning applications
		Percentage of family-sized units	20% of all new homes to be family-sized (three-bedrooms or more)	Planning applications
	Policy HO3.3: Affordable Housing	Percentage breakdown of affordable housing	35% of all residential units on sites of 10 or more dwellings to be affordable	Planning applications

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 <b>Chapter 3: Homes for a Growing Community</b>	Policy HO3.4: Build to Rent	Number of discounted market rent units	35% of all residential units (on sites of 10 or more dwellings) to be discounted market rent	Planning applications
	Policy HO3.9: Residential Conversions	Number of conversions refused planning permission based on exceeding 10% exceeding threshold	N/A	Planning applications
		Number of conversions permitted	N/A	Planning applications
	Policy HO3.5: Specialist Housing and Care Homes	Number of specialist and care bed spaces completed	102 bed spaces	Planning applications
	Policy HO3.6: Student and Co-Living Housing	Number of student bed spaces completed	N/A	Planning applications
	Policy HO3.8: Gypsies and Travellers	Number of pitches granted planning permission	Fulfil the identified need for 2 pitches if required	Planning applications
	Policy HO3.7: Self-Build and Custom Housebuilding	Number of self-build plots provided and completed	Proposals for 20 houses or more to provide a plot to contribute towards meeting the needs of people on the self-build and customhouse building list	Planning applications
	Policy HO3.10: Building Standards for New Homes	Delivery of accessible homes	All new homes to comply with M4(2) standard, 10% to comply with M4(3) standard and 2% of new homes on developments of 50 dwellings or more to be dementia friendly	Planning applications

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 <b>Chapter 4: A Strong Economy</b>	Policy EM4.2: Designated Industrial Areas	Loss of B class floorspace	No net loss	Planning applications
	Policy EM4.3: Office Development	E class office floorspace	No net loss	Planning applications
	Policy EM4.4: Economic Development Outside Designated Employment Locations	Loss of B class floorspace (outside designated areas)	No net loss	Planning applications
 <b>Chapter 5: A Vibrant Town</b>	Policy VT5.1: Supporting Vibrant Retail Centres	Percent of uses which are retail, office and leisure	N/A	Planning applications
		Maintain active ground floor uses	N/A	Annual shop survey
	Policy VT5.3: Local Centres	Maintain level of active ground floor uses	N/A	Annual shop survey
	Policy HC12.3: Built Cultural and Community Facilities	Number of community facilities	N/A	Annual shop survey
 <b>Chapter 6: An Attractive Town</b>	Policy QD6.2: Design Principles; Policy QD6.3: Public Realm; Policy QD6.4: Building Design	Number of planning applications refusals based on design grounds	N/A	Planning applications
	Policy QD6.5: Building Heights Policy	Number of buildings granted and refused planning permission that exceed the base building height	N/A	Planning applications
 <b>Chapter 7: The Historic Environment</b>	Policy HE7.2: Designated Heritage Assets; Heritage and The Historic Environment, Policy HE7.3: Non-Designated Heritage Assets; Policy HE7.4: Archaeology	Number of buildings on the at Risk Register	Reduce number on the risk register	Risk register
		Number of applications granted planning permission contrary to advice from Historic England	N/A	Planning applications



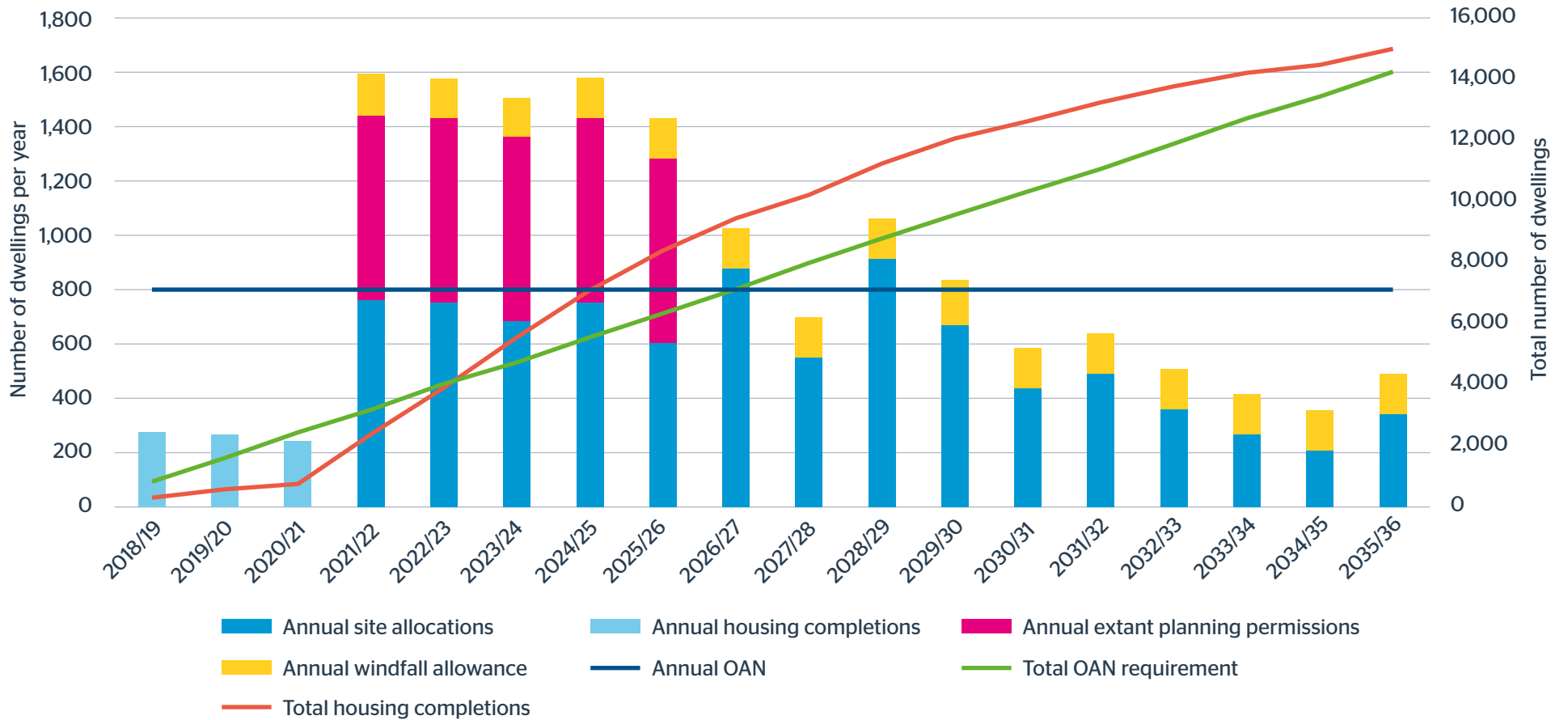
Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 <b>Chapter 8: A Climate Emergency</b>	Policy CC8.1: Mitigating Climate Change and Reducing Carbon Emissions	Number of new residential developments which meet carbon emission reduction standards	19% energy efficiency above Part L of the Building Regulations (2013)	Planning applications and post completion certificates
		Percentage of carbon reduction since 2008	40% reduction by 2030	UK local authority and regional carbon dioxide emissions national statistics
	Policy CC8.2: Sustainable Construction Standards for Non-Residential Development	Percentage of non-residential developments which meet BREEAM standards	100% of developments meeting either excellent or very good	Planning applications
	Policy CC8.3: Sustainable Construction and Resource Management	New homes achieving 110 litres per person per day	100% of new homes	Planning applications
	Policy CC8.4: Managing Air Quality	Number of Air Quality Monitoring Areas	Reduction in number of Air Quality Management Areas	Planning applications
	Policy CC8.5: Managing the Impacts of Development	Number of planning permissions refused on pollution grounds	Zero refusals	Planning applications
 <b>Chapter 9: Conserving and Enhancing the Environment</b>	Policy NE9.3: Blue Infrastructure Network; Policy NE9.4: Flood Risk and Mitigation; Policy NE9.5: Surface Water Management	Number of Environment Agency objections to planning applications	No planning permissions granted contrary to the advice of the Environment Agency on flooding and water quality grounds	Planning applications
	Policy NE9.2: Green Infrastructure Network; Policy NE9.6: Protecting Open Space; Policy NE9.7: Providing New Open Space	Area of designated green infrastructure	No net loss of green infrastructure	Planning applications

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 <b>Chapter 10: Infrastructure</b>	Policy IN10.1: Integrated Infrastructure Delivery	Delivery of infrastructure set out in the Infrastructure Delivery Plan	N/A	Planning applications and infrastructure funding statements
	Policy IN10.2: Providing Infrastructure to Support New Development	Delivery of infrastructure set out in the Infrastructure Delivery Plan	N/A	Planning applications and infrastructure funding statements
	Policy IN10.3: Development Contributions	Contributions paid on new developments	N/A	Section 106 agreements, planning applications and infrastructure funding statements
 <b>Chapter 11: A Sustainable Travel Town</b>	Policy ST11.1: Sustainable Travel Town	Percentage of new housing within 400m of a bus stop or rail station	100%	Planning applications
	Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub	Percentage of new developments granted planning permission with policy-compliant cycle parking provision	100%	Planning applications
	Policy ST11.4: A Walking and Cycling Infrastructure Improvement Town	Percentage of people walking and cycling for transport	Increase on baseline levels	HCC travel survey
	Policy ST11.5: Electric Vehicles, Car Parking and Car Clubs	Percentage of electric vehicles within the borough's total car ownership mix. Level of car ownership	Increase on baseline levels	Department for Transport
	Policy ST11.6: Managing the Transport Impacts of Development	Percentage of developments which have an active Travel Plan	Increase on baseline levels	Planning applications
 <b>Chapter 12: A Healthy Community</b>	Policy HC12.2: Health Impact Assessments	Number of Health Impact Assessments completed	All schemes over 100 dwellings	Planning applications

## Appendix B: Housing Trajectory

Year	Commitments (completions and extant permissions)	Housing Completions from site allocations	Windfall allowance	Annual housing completions	Cumulative housing completions
2018/19	268	0	0	268	268
2019/20	262	0	0	262	530
2020/21	235	0	0	235	765
2021/22	676	771	139	1,586	2,351
2022/23	676	759	139	1,574	3,925
2023/24	676	684	139	1,499	5,424
2024/25	676	757	139	1,572	6,996
2025/26	676	611	139	1,426	8,422
2026/27	0	881	140	1,021	9,443
2027/28	0	553	140	693	10,136
2028/29	0	916	140	1,056	11,192
2029/30	0	687	140	827	12,019
2030/31	0	444	140	584	12,603
2031/32	0	493	140	633	13,236
2032/33	0	365	140	505	13,741
2033/34	0	275	140	415	14,156
2034/35	0	212	140	352	14,508
2035/36	0	340	140	480	14,988
<b>Total</b>	<b>4,145</b>	<b>8,745</b>	<b>2,095</b>	<b>14,988</b>	<b>14,988</b>

# Housing Trajectory 2018-2036



## Appendix C: Transport Infrastructure Requirements

Infrastructure	Description
<b>Colne Valley Strategic Development Area</b>	
20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Internal Walking and Cycling Links	Linking town centre, Bushey Arches, Oxhey, Vicarage Road, Watford General Hospital and Riverwell.
High Street Sustainable Transport Hub	At junction of High Street / Water Lane to provide interchange for multiple modes.
Junction Improvement	Revised layout of Waterfields Way / Lower High Street junction to improve visibility of signals and safety of all road users.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
Bus Prioritisation	Bus priority along the length of Lower High Street, extending around Exchange Road / Beechen Grove Gyratory.
Cycle and Walking Access	Enhanced cycle infrastructure along length of Lower High Street.
Enhanced Public Realm	At Lower High Street / Exchange Road junction.
<b>Bushey Arches</b>	
Cycle and Walking Access	To Bushey Station through Oxhey Park and linking to enhanced provision on Lower High Street, reducing severance of Bushey Arches Gyratory.
Bus Prioritisation	Bus priority along the length of Lower High Street.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
<b>St Albans Road</b>	
Cycle and Walking Access	Enhanced cycle infrastructure along St Albans Road. Crossing improvements for both walking and cycling at Langley Road / St Albans Road junction.
Bus Prioritisation	Along length of St Albans Road from, and including, Dome Roundabout to town centre.

Infrastructure	Description
<b>Riverwell</b>	
20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Internal Walking and Cycling Links	Linking Watford General Hospital, Stripling Way, Thomas Sawyer Way and Ebury Way.
Cycle and Walking Access	Cycling infrastructure improvements along Vicarage Road between Hagden Lane and Fearnley Street. Cycling infrastructure improvements along Harwoods Road, Chester Road, Queens Avenue and Whippendell Road linking Watford General Hospital and Ascot Road.
Bus Prioritisation	Along Vicarage Road between Hagden Lane and Fearnley Street.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
<b>Ascot Road</b>	
Internal Walking and Cycling Links	Connecting Croxley View, Greenhill Crescent, Tolpits Lane, Watford Station, and all weather access to the Ebury Way from Tolpits Lane and King George V Playing Field.
Cycle and Walking Access	Resurfacing of the Ebury Way. Cycling infrastructure improvements along Vicarage Road between Hagden Lane and Fearnley Street. Cycling infrastructure improvements along Harwoods Road, Chester Road, Queens Avenue and Whippendell Road linking Watford General Hospital and Ascot Road.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.

Infrastructure	Description
<b>Town Centre Strategic Development Area</b>	
20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Internal Walking and Cycling Links	Across town centre both north / south and east / west.
Cycle and Walking Access	Overcome ring road severance via pedestrian and cycle crossing improvements at gateways to the town centre: Derby Road, Water Lane, Lower High Street, Vicarage Rd and Market Street. Enhanced cycle infrastructure along Hempstead Road. Enhanced cycle infrastructure along St Albans Road and Rickmansworth Road.
Junction Improvement	Full signalisation of Beechen Grove / Rickmansworth Rd roundabout and improved lane guidance and signage.
Bus Prioritisation	Bus prioritisation on the Exchange Road / Beechen Grove Gyratory.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
<b>Watford Gateway Strategic Development Area</b>	
20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Eastern Mobility Hub and Station Bridge	Eastern mobility hub at Watford Junction station with a new multi-storey car park, a new station bridge connecting the two platforms and infrastructure provision for vulnerable road users. Improved access to the new hub along Imperial Way, Clive Way and Reeds Crescent/ Orphanage Road.
Western Station Access Priority Reallocation and bus station upgrade	Prioritise pedestrian, cycle and bus movements whilst limiting through traffic at the western station entrance. Improvements to bus priority around the bus station.
Penn Road Connectivity and Station Access Improvements	New pedestrian bridge and cycle bridge over the Abbey Line to connect Penn Road and Colonial Way, improvements to station access for vulnerable users, improvements to the station car park access.
Bradshaw Road Quietway	Link for vulnerable road users from Watford Junction Station through the new Station Quarter West development and Bradshaw Road to Balmoral Road.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
Cycle and Walking Access	Crossing improvements at Langley Road / St Albans Road and Hempstead Road / Stratford Way junctions to improve connectivity for cyclists. Enhanced cycle infrastructure along St Albans Road.

## Appendix D: Cycle Parking Standards

Use Class	High Sustainability Area		Other Areas	
	Minimums			
Residential	Long-Term (employee / resident)	Short-Term (visitor)	Long-Term (employee / resident)	Long-Term (employee / resident)
C2 Residential Institutions	1 space per 5 staff	1 space per 20 units	1 space per 8 staff	
C3 Dwelling House 1 Bed C3 Dwelling House 2 Bed C3 Dwelling House 3+ Bed	1.25 spaces per unit 2.00 spaces per unit 2.50 space per unit	1 space per 20 units	1.25 spaces per unit 1.75 spaces per unit 2.25 spaces per unit	1 space per 20 units
C4 Houses and Multiple Occupation	1 space per 2 bedrooms	1 space per 20 units	1 space per 2 bedrooms	1 space per 20 units
Non-Residential	Long-Term (employee)	Short-Term (student / visitor)	Long-Term (employee)	Short-Term (student / visitor)
B2 General Industrial	1 space per 150 sqm	1 space per 1,000 sqm	1 space per 250 sqm	1 space per 1,000 sqm
B8 Storage and Distribution	1 space per 250 sqm	1 space per 1,000 sqm	1 space per 500 sqm	1 space per 1,000 sqm
C1 Hotels	1 space per 20 bedrooms	1 space per 50 bedrooms	1 space per 20 bedrooms	1 space per 50 bedrooms
E Shops, Financial Professional Services, Restaurants and Cafes	1 space per 150 sqm	1 space per 20 sqm	1 space per 175 sqm	1 space per 40 sqm
E Office, R&D, Light Industry in Residential Area	1 space per 100 sqm	1 space per 500 sqm	1 space per 125 sqm	1 space per 500 sqm
E Clinic, Health Centre, Crèche, day nursery or centre	1 space per 5 staff	1 space per 3 staff	1 space per 8 staff	1 space per 5 staff
E Sports facilities, gymnasiums etc.	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
F Schools and Nurseries	1 space per 5 staff	1 space per 8 students	1 space per 8 staff	1 space per 10 students



Use Class	High Sustainability Area		Other Areas	
	Minimums			
Non-Residential	Long-Term (employee)	Short-Term (student / visitor)	Long-Term (employee)	Short-Term (student / visitor)
F Universities and Colleges	1 space per 5 staff	1 space per 8 students	1 space per 8 staff	1 space per 10 students
F1 Other uses (including non-residential education and training, libraries, museums, religious institutions etc.)	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
F2 Community Halls	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
F2 Swimming Baths, Ice Rinks, Outdoor Sport or Recreation	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
Drinking Establishments and Takeaways	1 space per 175 sqm	1 space per 20 sqm	1 space per 175 sqm	1 space per 40 sqm
Cinemas, concert halls etc	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
Sui generis	As per most relevant other standard			
Transport Hubs	To be considered on a case by case basis in discussion with the Council			
<p>Developments requiring ten or more visitor parking spaces may be required to include within this provision bike share bays, either on the site or at a suitable location within the vicinity that would serve the development if agreed with the Council and appropriate stakeholders. The volume of bays and positioning for these will be determined on a case by case basis, but no more than half of visitor parking provision should be formed of bike share bays as opposed to regular cycle parking.</p>				

## Appendix E: Car Parking Standards

Use Class	Core Development Area	Other Areas
	<b>Maximums</b>	
<b>Residential</b>		
C2 Residential Institutions	n/a	n/a
C3 Dwelling House 1 Bed	0.3	1
C3 Dwelling House 2 Bed	0.3	
C3 Dwelling House 3+ Bed (spaces per unit)	0.3	
C4 Houses of Multiple Occupation (spaces per unit)	0.5	1
<b>Non-Residential</b>		
B2 General Industrial (spaces per 1,500sqm)	0.5	1
B8 Storage and Distribution (spaces per 1,500sqm)	0.5	1
C1 Hotels (spaces per bedroom)	0.5	1
E Shops (spaces per 100sqm)	Car free	1
E Financial / Professional Services (spaces per 100sqm)	Car free	0.5
E Restaurants and Cafes	Car free	n/a
E Office (spaces per 100 sqm)	0.5	1
E R&D, Light Industry in Residential Area (spaces per 150sqm)	0.5	1
E Clinic, Health Centre, Crèche, day nursery or centre	Car free	n/a
E Sports facilities, gymnasiums etc.	Car free	n/a
F.1 Schools and Nurseries	Car free	n/a

Use Class	Core Development Area	Other Areas
<b>Maximums</b>		
<b>Non-Residential</b>		
F.1 Universities and Colleges	Car free	n/a
F.1 Other uses (including non-residential education and training, libraries, museums, religious institutions etc.)	Car free	n/a
F.2 Community Halls	Car free	n/a
F.2 Swimming Baths, Ice Rinks, Outdoor Sport or Recreation	Car free	n/a
F.2 Shops smaller than 280 sqm mostly selling essential goods, at least 1km from another similar shop	Car free	n/a
Drinking Establishments and Takeaways	Car free	n/a
Cinemas, concert halls etc.	Car free	n/a
Sui generis	As per most relevant other standard	
Transport Hubs	To be considered on a case by case basis in discussion with the Council	
Where no standard is indicated car parking provision to be considered on a case by case basis in discussion with the Council, with car parking requirements to be evaluated within the Transport Assessment / Statement and will be expected to align with sustainable travel ambitions set out within the Local Plan Chapter 11 'A Sustainable Travel Town'.		

## Appendix F: Marketing Requirements

A number of policies in the Local Plan require evidence of marketing prior to allowing the redevelopment of change of use of a building or land. This appendix sets out the detailed requirements for marketing to justify that there is no longer a demand for the existing use and therefore to justify a change of use.

Vacant or under-used premises should be continuously marketed under their existing use. Where the premises are in poor condition or have been partially demolished, the exercise should be limited to marketing of the site as a potential redevelopment site to reflect the existing use.

### Length of Marketing

Prior to applying to change the use of a building protected under the relevant policies of the Local Plan (retail, employment and community facilities) the property should be marketed for a period of at least 12 months.

### Marketing Strategy

Before marketing begins, a strategy should be prepared to demonstrate how the property will be marketed. The marketing strategy should contain:

- **Background** - why the property is being marketed.
- **Location** - including consideration of context and links to transport networks as well as general setting (i.e. employment area/local centre).

- **Descriptions** - including details on floorspace, layout, and car parking as relevant.
- **Planning** - a summary of the existing planning use, site history and any restrictions (i.e. Article 4).
- **Marketing Recommendations** - this should consider:
  - Basis of instruction - sole agent or joint agent etc.
  - Method of disposal - private treaty or formal/informal bids.
  - Advertisement options - sale boards, internet, PR, publications, mailing etc.
- **Expenditure** - the budget for the marketing campaign should be proportionate to the anticipated return from the property. As a guide the budget should be about 3% of the anticipated return from the property (for example, a property with a guide rent of £120,000 per annum should have a marketing budget of around £3,600).
- **Guide Price** - this should be commensurate with the current market price for comparable premises. It is expected that the value of the property will be derived from an expert RICS registered value or accredited member of RICS (Royal Institute of Chartered Surveyors).
- **Guide terms** - these should be flexible and take into account prevailing market conditions. The length of leases should not be overly prescriptive.

The strategy should include a marketing matrix similar to the template below.

Marketing Initiative	Budget	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Marketing Board	£xx.xx												
Marketing Particulars	£xx.xx												
Local Newspaper	£xx.xx												

The extent of marketing initiatives will vary based on the type of premises being advertised. However, as a minimum the following initiatives should be employed for all premises:

- **Marketing Board** – this should be relative to the type and size of premises. A simple for sale board may be appropriate for small commercial premises and community facilities. For larger commercial units larger boards giving details of the property including the guide price should be employed. Boards should be clearly visible from main transport routes.
- **Marketing Particulars** – including the following:
  - Location
  - Internal and external photographs
  - Description of accommodation
  - Terms (leasehold, freehold, long lease etc.)
  - Guide Price/Rent
  - Current planning position
  - Services and Utilities
  - Energy Performance Certificate
  - Rateable value and business rates
  - VAT status
  - Legal and professional costs
  - Contact information for the agent

- For larger commercial units and tourist accommodation sites, which are more likely to have a regional or national audience, the particulars (including layouts and photos) should be set out in a bespoke brochure.
- **Press Advertisement** – for small commercial units and community facilities an advert should be placed and maintained in the local newspaper. For larger commercial units specialist publications should also be used. In addition, for large commercial units a press release should be given to local and regional press.
- **Online Advertisement** – the premises should be published on the agent's website as well as at least one national commercial property search engine. For very large or significant commercial units a bespoke website for the property could be created.
- **Targeted Advertisement** – where appropriate other providers should be informed directly that the premises is being marketed. This is likely to be particularly relevant for community facilities where there may be a requirement for alternative provision.

### Marketing Report

If, following the 12 months of marketing, there has been no success in selling or letting a unit then a report detailing the marketing undertaken and demonstrating compliance with these requirements should be prepared and submitted alongside any

planning application for redevelopment or change of use. The marketing period must have ended no more than nine months before the date of submission of a planning application.

The Marketing Report must demonstrate:

- The original marketing strategy (in accordance with the above requirements).
- The duration and dates of the marketing campaign (minimum 12 months).
- Evidence that the marketing strategy was delivered – photos of marketing boards, copies of particulars, screenshots of online adverts, copies of press articles and adverts.
- A full log of relevant correspondence throughout the marketing campaign. This should include, where relevant, details of reasons why the prospective occupier(s) deemed the premises unsuitable. If any offers were rejected the grounds for rejection must be provided.
- If the record of enquiries indicated a lack of interest the report should demonstrate measures taken to alter the strategy to increase interest.

In summary, the marketing statement should include all details and evidence of the steps taken to market premises as detailed above. If the Authority is not satisfied that these requirements have been met then additional marketing may be required before the proposal can be considered acceptable.

## Appendix G: Glossary

### **Active Travel**

Non-motorised travel, such as walking and cycling.

### **Active Frontage**

Ground floors where windows and doors face onto the street, avoiding blank walls and which enable people to see into and out of buildings.

### **Adaptation (Climate Change)**

Modifications necessary to maintain life in response to climate change effects and expected negative impacts.

### **Adaptations (Housing)**

Changes made to a home allowing safer, easier access.

### **Affordable Housing**

Housing for sale or for rent for those whose needs are not being met by the market. This includes social rented housing, affordable rented housing and intermediate housing.

### **Air Quality Management Areas**

Identified areas where air quality objectives are not being met.

### **Agent of Change Principle**

The new use is responsible for mitigating any future impacts on existing surrounding uses. Seeks to prevent development creating a negative impact on the local area (for example noise pollution).

### **Authority Monitoring Report (AMR)**

A report that summarises the performance of planning policies and is used to identify how effectively the Local Plan is implemented.

### **Base**

The lower section of a taller building which is seen and experienced from street level.

### **Bike Share Scheme**

A pool of bikes owned by a local authority or private company available for individual use on a short-term basis by members.

### **Biodiversity**

The amount of variety in plants, animals and insects within a specific area. Higher amounts of biodiversity are important for sustaining ecosystems and habitats.

### **Bioswales**

Channels which move and hold storm water and run off through vegetation and rock to remove debris and pollutants.

### **Blue Infrastructure**

Networks of water including (but not limited to) rivers, ponds, lakes and canals.

### **BREEAM (Building Research Establishment Environmental Assessment Method)**

An assessment that measures the sustainability of a new building including issues related to energy, health and wellbeing, innovation, land use, materials, management, pollution, transport, waste and water.

### **Brownfield Land**

Land that was previously developed with any type of fixed infrastructure.

### **Building Regulations**

Government standards set for design and construction which apply to most new buildings and alterations to existing buildings in England and Wales.

### **Car Club**

A pool of cars owned by a local authority or private company available for individual use on a short-term basis by members.

### **Carbon Neutral**

A combination of reducing and offsetting emissions of the greenhouse gas carbon resulting in no net release.

### **Carbon Offset**

A method to reduce emissions by compensating elsewhere. These offsets are measures in tonnes of carbon dioxide equivalent.

**Car-lite Development**

Residential development with minimal or no car parking, where travel is mainly via walking, cycling and public transport.

**Community Infrastructure Levy (CIL)**

A charge levied on new developments to support infrastructure delivery. Introduced by the Planning Act (2008).

**Comparison Retail**

Retail items not bought on a frequent basis, for example televisions and white goods (fridges, dishwashers etc).

**Conservation Area**

An area designated under the Planning Act 1990 (Listed Buildings and Conservation) as being of special historic or architectural interest the character of which should be preserved and enhanced.

**Construction Management Plan**

A plan to address procedures and methods of construction prior to commencement.

**Controlled Parking Zones**

An area where all on street parking is controlled and restricted by the local Council.

**Culvert**

An artificial, impermeable channel, tunnel or similar structure which enables water to flow under or through a built-up area.

**Combined Heat and Power**

A power system that generates both heat and electricity.

**Curtilage**

The boundary of a development site or property.

**Delivery and Servicing Plan**

A plan to manage logistics of how to provide services such as waste collection and freight delivery to a development.

**Demand Responsive Transport (DRT)**

Flexible form of bus services that vary routes and timetables according to demand, passengers' book spaces to join at an agreed time and place.

**Design and Access Statement**

A report statement submitted as part of a planning application which should explain how a proposed development is a suitable response to the site and its setting and how it will be accessed by future users.

**Development Contributions**

Contribution in the form of money, land or other means collected from developers to deliver infrastructure. This could be through the Community Infrastructure Levy (CIL) or a Section 106 Agreement as well as onsite contributions.

**Endemic**

Something that is native and regularly found in a certain area.

**Exception Test (Flooding)**

A test applied to sites with flood risk, when there are not enough suitable sites with lower or no risk of flooding available for use. The test is required to show that the sites with flood risk will be safe to develop and that any sustainability benefits of developing the site will outweigh the risk of flooding.

**Evidence Base**

Data collected by a local authority to support and justify policies.

**Flexible Workspace**

Shared working space in new developments, used by residents to work from home.

**Flood Risk Assessment**

A way to determine the likelihood of flooding in specific areas.

**Flood Zones**

Areas of land which are mapped by the Environment Agency into flood zones. Flood Zone 1 is least likely to experience a flooding event and Flood Zone 3 has the highest risk.

**Green Infrastructure**

Networks of green space which are multifunctional and offer environmental and social benefits for the surrounding area. This can include parks and gardens, green corridors, natural areas, amenity spaces and allotments.

**Greenhouse Gases**

Gases which occur naturally but due to human activity are intensifying climate change effects.

**Health Impact Assessment**

An assessment of how a proposal may potentially affect health and wellbeing of a population.

**Habitable Rooms**

Any room which is used (or intended to be used) for sleeping, cooking, eating or living. Rooms which are not included would be hallways, service rooms, laundry rooms and bathrooms.

**Hardstanding**

An area of hard surfacing which is often used for parking.

**Hectare (ha)**

A unit of measurement commonly used to measure land. 1 hectare = 10,000 square metres = 2.5 acres.

**Housing Mix**

The range of unit sizes (E.G. 1-bed, 2-bed, 3-bed units) and different types of homes (e.g. traditional houses, apartments).

**Infill Development**

When small areas of vacant land in urban areas are developed.

**Intensification**

Further development within the existing urban area.

**Land Assembly Powers**

An organisation that has legal powers to buy property at a fair price to combine land parcels from different ownerships.

**Local Centres**

An area including shops and facilities for local people.

**Locally Listed Building**

Buildings, structures or monuments of local interest that contribute to the heritage, identity and streetscape of Watford. Locally listed buildings do not merit statutory listing under the Planning Act (1990), but are considered to be of local architectural or historic value.

**Major Development**

In terms of residential development, greater than 10 dwellings or 0.5 hectares. In terms of other development, a floorspace increase of greater than 1000 square meters is considered to be major development.

**Mansard**

In relation to taller buildings this is the middle section of the buildings and is sometimes set in or narrower than the base section.

**Mass Rapid Transit (MRT)**

Urban transport system capable of carrying large numbers of passengers quickly. Encompasses transport modes that run on roads, rails or a combination of these.

**The Metropolitan Green Belt**

A statutory designation around London that exists to restrict urban sprawl, protect the countryside from encroachment, stop the merging of towns and encourage the recycling of brownfield land.

**Ministry of Housing, Communities and Local Government (MHCLG)**

The government department responsible for planning and local government.

**Minor Development**

In terms of residential development, less than 10 dwellings or 0.5 hectares. In terms of other development, a floorspace lower than 1,000 square meters would be considered to be minor development.

**Mixed-use Development**

A development that is comprised of different land uses, such as employment and residential uses.

**Nationally Listed Building**

A building or monument that is protected because of its national historical or architectural interest under the Planning Act (1990).

**National Planning Policy Framework (NPPF)**

The national policy document which provides the framework to government policies to guide Local Planning Authorities, particularly when preparing a Local Plan.

**Natural Surveillance**

When building design encourages people to overlook a space with windows, balconies, front gardens or entrances.

**Objectively Assessed Need (OAN)**

Using a standardised methodology, the number of new homes required to meet the future needs of the population.



**Overheating**

Discomfort to occupants from high temperatures caused by highly insulated and airtight buildings with inadequate natural or mechanical ventilation systems.

**Permeability**

Is a measure of the number of alternative routes which are available for movement through an area; areas with a high number of choices are considered to have good permeability.

**Place Making**

The process of creating high quality accessible places that people want to live, work, play and learn in.

**Planning Condition**

These can be attached to a planning permission which require a developer to address specific issues.

**Plot Ratio**

The ratio of the floor area of a building to the land on which it sits. It is often used to measure how intensively land is being used.

**Policies Map**

Areas covered by Local Plan Policies and proposals identified on an Ordnance Survey Map.

**Pop-up**

This is the top section of the building and is the section which is most visible in the skyline and panoramic views across a place.

**Positive frontage**

An edge or side of a building or a boundary wall/fence with an interesting and well designed elevation or boundary treatment which provides an engaging and attractive edge to the public space.

**Public Realm**

Parts of the town that are available for everyone to use, including streets, public squares and open spaces.

**Renewable Energy**

Energy from renewable sources such as sunlight, wind, rain and geothermal heat. The use of these resources to create energy is sustainable for human consumption.

**Retail Hierarchy**

Classifies and ranks retail areas based upon the role, range of choice, distance people will travel and popularity from outside the town.

**Retail impact assessment**

An assessment undertaken for an application for retail use (normally on developments over 2,500 square metres gross floorspace, but they may occasionally be necessary for smaller developments, such as those likely to have a significant impact on smaller centres) on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

**Riparian**

Area adjacent to a river or similar body of water.

**Section 106 Agreement**

A reference to Section 106 of the Town and Country Planning Act (1990) allows a Local Planning Authority to enter a legally-binding agreement or planning obligation with a landowner in association with the granting of planning permission. These agreements are a way of delivering or addressing matters that are necessary to make a development acceptable in planning terms. They are used to support the provision of services and infrastructure.

**Self-Build and Custom Build Housing**

When an individual, or a group of individuals, organises the design and construction of their own home.

**Severance Effect**

The dividing effects of busy roads on the movement of people and communities.

**Single and Dual Aspect**

A single aspect dwelling only has windows and openings to the exterior on one side and a dual aspect dwelling has openings and windows to the exterior on at least two sides.

**Sequential Test (Flooding)**

A test that aims to steer new development to the areas with the lowest probability of flooding.

**Sequential Test (Retail)**

A test that aims to steer main town centre uses towards town centre locations first. If no town centre locations are available, the test steers the uses towards edge of centre locations next, then out of centre locations.

**Street Canyon**

A street which has tall buildings along both sides which results in the ground level experience being similar to a natural canyon.

**Soakaways**

A ditch or pit which is filled with loose rock or rubble used to manage water.

**Statutory**

Something that is required by law.

**Sui Generis**

A type of land use that is not defined by other land use classifications.

**Supplementary Planning Document**

A document which supports the Local Plan by providing more detail and guidance on a topic or an area. These are non-statutory documents.

**Surface Water Flooding**

Flooding caused by rainwater that cannot be absorbed into the ground or is caused by poor drainage systems.

**Sustainable Development**

Defined by the United Nations General Assembly as 'meeting the needs of the present without compromising the ability of future generations to

meet their own needs'. In terms of planning, the National Planning Policy Framework states that sustainable development should be viewed in a social, economic and environmental context.

**Sustainable Drainage Systems (SuDS)**

An approach to drainage which seeks to control the flow of water and reduce the risk of sewer discharge and/or flooding.

**Target Emission Rate (TER)**

A standard for energy efficiency of a building expressed as kilograms of CO2 per square metre.

**Tenure**

The ownership or rental of a property.

**Tenure Blind**

Homes designed to make types of housing indistinguishable.

**Topography**

The shape and relief of the land resulting in a particular and distinctive landscape or town scape, often relating to height above sea level.

**Town Centre Uses**

Defined by the National Planning Policy Framework as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Transport Assessment**

A comprehensive review that sets out transport issues, and proposed mitigations for these, relating to a proposed development. The assessment also identifies measures to improve accessibility and safety for different travel modes, including walking and cycling.

**Travel Plan**

A long-term management strategy for a site that seeks to encourage sustainable travel.

**Urban Grain**

The size, shape and pattern of plots, buildings and streets in an area or neighbourhood that are a constituent part of the character of the places.

**Use Classes**

The Town and Country Planning Order (1987) places different land uses into categories. In practice, changes between use classes are likely to require planning permission. A list of the planning use classes can be found in Appendix B.

**Viability**

Ensuring that developer costs and policy obligations do not compromise the deliverability of a development.

**Water Stress**

When the amount of water being consumed exceeds the amount that is readily available for use it leads to water stress. Areas of water stress are determined by the Environment Agency.

**Windfall Development**

Development sites that are not specifically identified in the Local Plan.

## Appendix H: Planning policies to be Superseded by the Watford Local Plan 2018-2036

### Watford District Plan 2000 Policies Retained in the Core Strategy 2006-2031

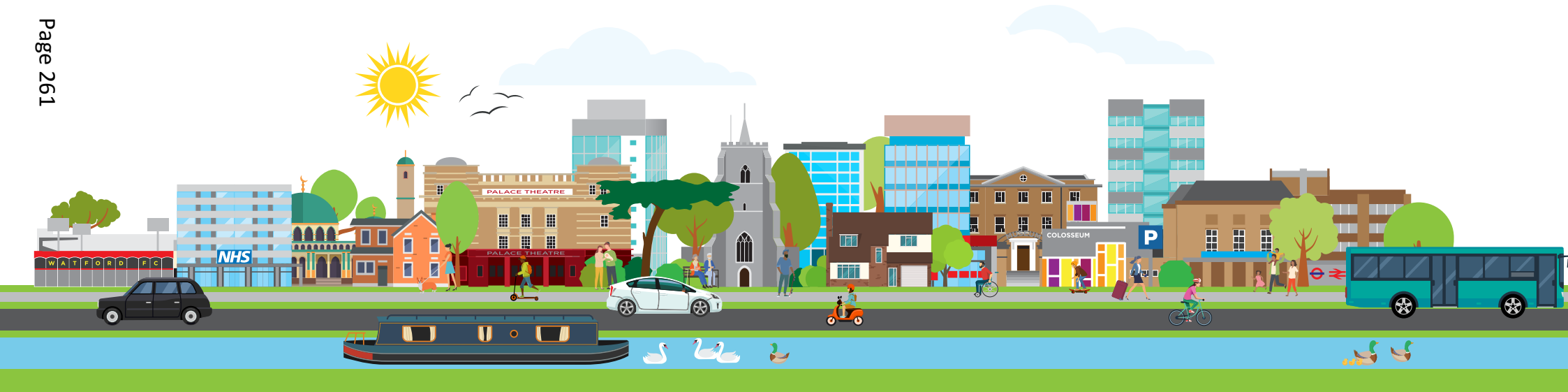
Policy No.	Title
SE7	Waste Storage, Recovery and Recycling in New Development
SE20	Air Quality
SE21	Air Quality Management Areas
SE22	Noise
SE23	Light Pollution
SE24	Unstable and Contaminated Land
SE25	Potentially Hazardous or Polluting Devt
SE26	Watercourses
SE27	Flood Prevention
SE28	Groundwater Quality
SE36	Replacement Trees and Hedgerows
SE37	Protection of Trees, Woodlands and Hedgerows
SE39	Tree and Hedgerow Protection in New Development
SE40	Landscape Character Assessment
T10	Cycle Parking Standards
T21	Access and Servicing
T22	Car Parking Standards
T24	Residential Development
T26	Car Free Residential Development
H9	Back Garden Development
H10	Planning Agreements for Educational and Community Facilities
H13	Conversions
H14	Conversions: Provision of Family-sized Units
H15	Non-Residential Proposals in Residential Areas
H16	Retention of Affordable Housing

Policy No.	Title
E1	Employment Areas
E2	Employment Use Outside Identified Employment Areas
E5	Environmental Considerations
S5	Non-Retail Uses in Prime Retail Frontage
S6	Non-Retail Uses within the Harlequin Shopping Centre
S7	Secondary Retail Frontage
S9	Non-Retail Uses in North Watford Shopping Centre/Local Shopping Frontages
S11	Use Class A3 Food and Drink
S12	Planning Conditions for Use Class A3 Food and Drink
E2	Employment Use Outside Identified Employment Areas
E5	Environmental Considerations
S5	Non-Retail Uses in Prime Retail Frontage
S6	Non-Retail Uses within the Harlequin Shopping Centre
S7	Secondary Retail Frontage
S9	Non-Retail Uses in North Watford Shopping Centre/Local Shopping Frontages
S11	Use Class A3 Food and Drink
S12	Planning Conditions for Use Class A3 Food and Drink
U15	Buildings of Local Interest
U17	Setting of Conservation Areas
U18	Design in Conservation Areas
U19	Small-scale Developments in Conservation Areas
U20	Demolition in Conservation Areas
U24	Shopfronts
U25	Advertisements and Signs

**Core Strategy 2006-2031 Policies**

Policy No.	Title
Vision	Vision of Watford in 2031
SO1	A Family Friendly Town Centre
SO2	Sustainable Neighbourhoods
SO3	Enhance Watford’s regional, economic and transportation role
SO4	Enhance Watford’s regional health, recreational, educational, cultural and social role.
SO5	Enhance Watford’s environment, green infrastructure and heritage assets.
SS1	Spatial Strategy
SPA1	Town Centre
SPA2	Watford Junction
SPA3	Health Campus
SPA4	Lower High Street
SPA5	Dome Roundabout
SPA6	Western Gateway
IP1	Croxley Rail Link
IP2	Abbey Flyer
IP3	Watford Junction Interchange
SD1	Water
SD2	Climate Change

Policy No.	Title
TLC1	Town Centre Development
TLC2	Neighbourhood Centres
HS1	Housing Supply and Site Selection
HS2	Housing Mix
HS3	Affordable Housing
HS4	Gypsies and Travellers
EMP1	Economic Development
EMP2	Employment Land
T1	Regional Transport Node
T2	Location of New Development
T3	Improving Accessibility
T4	Transport Assessments
T5	Providing New Infrastructure
INF1	Infrastructure Delivery and Planning Obligations
UD1	Delivering High Quality Design
UD2	Built Heritage Conservation
GI1	Green Infrastructure
GI2	Green Belt
GI3	Biodiversity
GI4	Sports and Recreation



**WATFORD**  
**BOROUGH**  
**COUNCIL**

Watford Borough Council

# Final Watford Draft Local Plan

Track Changes to the Final Watford Draft Local Plan, Regulation 19  
version

June 2021

## Track Changes Version

### Watford Final Draft Local Plan

This document shows the track changes to the Final Watford Draft Local Plan since the Regulation 19 version of the Local Plan was published. Modifications are aimed at resolving any potential soundness and/or legal compliance issues identified during the Regulation 19 Consultation as well to update and provide clarity within the document.

The proposed modifications and reasons for them are detailed in Schedule A Main Modifications and Schedule B Minor Modifications.

#### How to use track changes:

1. Open this document in Microsoft Word.
2. Choose the **Review Tab** at the top of the document.
3. Ensure that 'All Markup' is selected from the drop down menu in order to see the track changes.
4. Ensure 'No Markup' is selected in order to see a clean version of the document which includes the proposed changes.

The nature of the changes may result in formatting abnormalities and require additional updates to paragraph numbering which will be finalised when changes are agreed.

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## How to use this document

The Local Plan covers a wide range of complex and inter-related issues that need to be considered when new development is proposed to ensure change can be managed to deliver benefits for the community. The Plan sets out planning policies to guide planning decisions, identifies strategic areas for growth. Strategic policies are indicated in the policy titles, any policies that are not specified as strategic are local policies. Each policy issue has been assigned an icon. Where icons are shown at the top of a policy box, this broadly indicates that there are shared policy considerations.

Section of Local Plan	Purpose of the section
<b>The Local Plan and the Spatial Strategy</b>	
Introduces the Local Plan and sets out the objectives to be achieved when development comes forward.	
Chapter 1: A Spatial Strategy for Watford	Introduces the Local Plan and provides an overview of key planning themes through the document. Sets out the approach to growth and the principles behind the Core Development Area. Proposals for new development are to accord with the respective strategic development area policy and with the strategic and local planning policies elsewhere in the Local Plan.
Chapter 2: Core Development Area	Sets out the principles for development in the Core Development Area and locally specific opportunities and constraints in the Strategic Development Areas.

<b>Planning policies to guide development</b>	
Proposals for new development are to accord with strategic and local planning policies across different chapters in the Local Plan.	
Chapter 3: Homes for a Growing Community	<del>Provides a framework to deliver the housing needed in the borough, including types and sizes of homes for people with different needs from single people, to families, to those with disabilities. Introduces the Local Plan and provides an overview of key planning themes through the document. Sets out the approach. This section sets out the design standards new development will be expected to achieve in order gain planning permission.</del>
Chapter 4: A Strong Economy	Provides a structure to support economic growth and enable an economy that can adapt to changing economic conditions.

Chapter 5: A Vibrant Town	A framework to retain Watford town centre as the focus for retail, leisure, entertainment and cultural activities with flexibility to adapt to changing economic conditions. This will be supported by a network of sustainable local centres.
Chapter 6: An Attractive Town	This section sets out the design standards new development will be expected to achieve in order gain planning permission.
Chapter 7: The Historic Environment	<u>Sets out the key principles to protect Watford's heritage and what proposals will need to consider if they affect a heritage asset, such as a listed building or conservation area.</u> <del>This section sets out the design standards new development will be expected to achieve in order gain planning permission.</del>
Chapter 8: A Climate Emergency	Sets out requirements that new buildings need to achieve to reduce carbon emissions and contribute towards the borough becoming carbon neutral, while mitigating impacts associated with climate change, such as living environments, building quality and flood risk.
Chapter 9: Conserving and Enhancing the Environment	Policies to manage and improve the outdoor environment for people and wildlife, enhance biodiversity and manage impacts on the environment when new development comes forward.
Chapter 10: Infrastructure	Provides the framework for delivery of the infrastructure needed to support new development.
Chapter 11: A Sustainable Travel Town	Sets out an approach to enable better mobility and access to services and facilities, a more balanced reliance on different modes of transport and to encourage a shift towards greater use of public transport, walking and cycling.
Chapter 12: A Healthy Community	The role of promoting good health in the built environment is increasingly recognised and this chapter discusses the key threads that run through the Plan.

<b>Sites for development</b>	
Proposals for new development are to accord with strategic and local planning policies across different chapters in the Local Plan.	
Chapter 13: Site Allocations and New Development	Identifies land suitable for new development and the types of land uses that would be acceptable, along with site-specific issues that should be considered by applicants.

The information used to support the policies and site allocations is set out in the Council's evidence base which includes a diverse range of topic areas exploring local and strategic issues.

# Chapter 1: A Spatial Strategy for Watford



## What is the Local Plan and what does it do?

- 1.1 The Local Plan lies within the national town and country planning system. It sets out the policy framework for how land is used and guides development so that it comes forward in a way that is coordinated and planned for.
- 1.2 The Local Plan is a 'statutory' or legally required document that forms part of the Council's strategy to deliver sustainable development, tackle climate change and to deliver new homes, jobs and infrastructure for current and future generations. It covers the period from 2021~~18~~ to 2036~~7~~ and will guide new development so that it goes ahead in a coordinated manner, making the best and most appropriate use of land to meet the needs of the community.
- 1.3 The Watford Local Plan sits within a wider structure of planning documents. This includes national guidance set out by the government, strategic plans, neighbourhood plans, supporting strategies and background studies. The hierarchical relationship between these policy documents is set out in Table 1.1.



National Planning Policy Framework	Sets out the national guidance to which local plans must conform.
South West Herts Joint Strategic Plan	Provides a framework to deliver strategic needs across five local authority areas.
Watford Local Plan	Sets out the growth strategy for the borough and policies to guide planning decisions and protect environmental and heritage assets.
Hertfordshire Minerals and Waste Local Plans	Sets out policies on minerals and waste for new development to comply with (forms part of the Watford Local Plan).
Neighbourhood Plans	Prepared by the members of the community to address locally specific planning issues (must be in conformity with Watford Local Plan).
Local Development Documents	These include documents which form part of the Development Plan such as Supplementary Planning Documents that support the Local Plan.
Background Studies	Provides a robust evidence base to inform the Local Plan and planning decisions.

Table 1.1: Planning structure around the Watford Local Plan

1.4 Planning policies can be supported by additional guidance to explain how a policy is to be implemented in greater detail, these are referred to as Supplementary Planning Documents. Where required, the Council will prepare and update Supplementary Planning Documents to support the Local Plan.

## South West Hertfordshire Joint Strategic Plan

1.5 Watford is one of five authorities in South West Hertfordshire that share administrative boundaries and issues across the wider area, such as housing, employment and infrastructure. To plan strategically for growth in the area, Watford Borough Council, in conjunction with Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council and St. Albans City & District Council, is preparing the South West Hertfordshire Joint Strategic Plan.

1.6 The Plan will influence the end phase of the current Local Plans and the direction of travel for the next generation of Local Plans that will follow. It is not a statutory document, however, local authorities that share cross-boundary issues are encouraged by the government to prepare strategic plans as a way of maximising opportunities for growth and create greater benefits for communities.

## Preparation of the Local Plan and stakeholder engagement

1.7 When the Local Plan is being prepared, it goes through several stages from its inception, pulling together evidence to support decision making, through to the adoption of the Local Plan, at which point the policies can be applied to manage change in the town effectively (Table 1.2). The consultation has involved members of the public, the development industry, infrastructure organisations and other stakeholders that have an interest in the area.

Collect evidence
Issues and Options stage with public consultation
First draft Local Plan stages with public consultation
Final draft Local Plan stage with public consultation
Submission of the final draft Local Plan to the Secretary of State for examination
Examination of the final draft Local Plan by an independent Planning Inspector
Adoption of the Local Plan

Table 1.2: Stages in the preparation of a Local Plan

#### *Issues and Options 2018*

1.8 In September - October 2018 the Council consulted on what the community thought were the key planning issues and options affecting the borough and if they should be addressed as part of the new Local Plan. Key issues that were raised were:

- The impact of growth (including future infrastructure provision and parking);
- Climate change and pollution;
- Affordable housing;
- Taller buildings and achieving good design; and
- Improvements to sustainable travel options.

#### *First Draft Local Plan 2019*

1.9 In October - November 2019 the Council consulted on the first draft Watford Local Plan. Key issues that were raised were:

- The impact of growth (including future infrastructure provision and parking);
- The potential impacts of proposed development sites;
- Taller buildings and high density development; and
- Affordable housing.

#### *Final Draft Local Plan 2021*

1.10 The final draft Local Plan is the version of the Plan the Council intends to submit to the Planning Inspectorate for examination by an independent Inspector to ensure the Plan is consistent with national guidance for it to be adopted by the local authority. Any proposed changes to the final draft Local Plan are submitted alongside the Plan for the Planning Inspector to decide which are appropriate.

#### *Stakeholder engagement*

1.11 During the preparation of the Local Plan, stakeholders were involved in different aspects of the work. Early consultations seeking potential sites for development included members of the public, landowners and the development industry to identify those suitable for development. Public consultations provided further avenues to engage with stakeholders and comment on the different elements of the Plan they were interested in. This included online engagement, public events, working with elected members and local organisations to raise the profile of the Local Plan and the importance of having 'your say' to help shape future growth in Watford.

1.12 At each stage of the process a Sustainability Appraisal was carried out, to assess the social, environmental and economic effects of any plans, from the outset. In doing so it helped ensure that decisions were made which contribute to achieving sustainable development in Watford.

1.13 Background studies have been undertaken to create a robust evidence base. A number of these studies have been commissioned jointly with other South West Hertfordshire authorities in recognition of the cross-boundary issues shared across the area. These have involved engagement and the sharing of information with stakeholders who have a direct interest in the Local Plan such as organisations that

provide or manage infrastructure, and also engagement with people and organisations involved with the social and business community.

- 1.14 Working with the neighbouring authorities in South West Hertfordshire has been ongoing from early in the Plan preparation process, through the duty to cooperate. It has also been reflected in the undertaking of the Joint Strategic Plan. There has also been continued engagement with Hertfordshire County Council, the local Highways and Education Authorities, as well as a strategic approach with other organisations, such as the Hertfordshire Growth Board and the Local Enterprise Partnership.

## A brief portrait of Watford

- 1.15 In the middle of the nineteenth century Watford was a small market town in Hertfordshire with a population of around three thousand people. It saw growth from 1860 due to the introduction of the railways (various routes were developed in the years 1837 - 1925) and there was a rapid rise in the population from 1890 onwards. It was known for traditional industries including printing and brewing.
- 1.16 Today there are around 96,700 people (Office for National Statistics (ONS), 2019) living in approximately eight square miles. It is one of the smallest districts in England and the town has a high population density, averaging 45 people per hectare, compared to a 7 people per hectare average in Hertfordshire (ONS, Census 2011). There are approximately 39,900 homes in the borough with an average household size of 2.4 persons per dwelling.
- 1.17 The town has a relatively young population and a high proportion of family sized households compared to other areas in South West Hertfordshire (ONS, Census 2011). The town is ethnically diverse, with 62% of the existing population being White British, while 38% of people come from Black and Minority Ethnic backgrounds.
- 1.18 Watford is adjacent to north London and, as such, is facing similar growth pressures and related issues. Historical development has resulted in the built up area extending up to its boundaries and consequently much of the development taking place in the borough is located on previously developed land. Approximately 19% of the land in Watford's administrative area is designated as Green Belt. Most of this performs a community function, being designated as public open space with other areas important for wildlife habitats and biodiversity.
- 1.19 There are four railway stations in the borough serving the mainline, London Overground and London Underground, connecting Watford to London, while the Abbey Line with two railway stations (in Watford) connects the town with St. Albans. The M25 is located just north of the town. Watford has long been a commuter town, yet one that maintains its independence and distinctive character.

## Sustainable development in England: The economic, environmental and social objectives

- 1.20 The National Planning Policy Framework states there are three overarching objectives to achieving sustainable development; these are economic, environmental

and social. They are interdependent and need to be pursued in mutually supportive ways:

- **An economic objective:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time, to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- **A social objective:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- **An environmental objective:** to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land; helping to improve biodiversity; using natural resources prudently; minimising waste and pollution; and mitigating and adapting to climate change, including moving to a low-carbon economy.

## The key challenges and sustainable objectives for Watford: economy, society and environment

- 1.21 Watford will see a lot of change in the 18 years covered by the plan period, as it grows and makes a transition towards being a more sustainable town, actively tackling climate change, with the aim of becoming carbon neutral.
- 1.22 This will be achieved by promoting the three overarching objectives of the National Planning Policy Framework at a local level, thereby creating a different and better place in 2037<sup>6</sup>. The Council will work with organisations including Hertfordshire County Council to help implement the objectives set out in local and strategic strategies including the Local Transport Plan, Watford Corporate Plan and the Sustainability Strategy.
- 1.23 The following highlights the key Economic, Social and Environmental characteristics of Watford now, and where the Council wants it to be in 2037<sup>6</sup>.

## Watford's economy and the key challenges

- New employment floorspace is important to support economic growth, and based on past trends, the East of England Forecast Model indicates that the number of jobs in Watford will increase by 11.4%.
- There is limited land available in the borough to allocate new sites for industrial, storage and distribution uses with low plot ratios.
- 136,000sqm of office and industrial floorspace is needed in Watford. A variety of sites and floorspace of different quality is needed to support different sectors and employment skills.

- Business start-up rates are well above the national and regional average, indicating there is a demand for flexible and affordable workspace to foster new businesses.
- The town centre contains a mix of chain and independent retailers, creating a varied mix of retail, restaurant and leisure provision that make the area a retail and leisure hub for South West Hertfordshire.
- The town supports a variety of different sectors, 20% of jobs are in professional services and other large employers are in the retail and health care industries. Equally, there are also a number of people employed in industrial sectors, such as manufacturing, construction and wholesale.
- In Watford and across South West Hertfordshire, there is a shortfall of land available for employment. Since 2015, changes to permitted development right changes have coincided with a loss of employment floorspace.
- The resident workforce in Watford is generally highly skilled overall (Nomis, 2019), however, this is not met with the same level of growth in high-skilled jobs in the borough.
- Watford developed as part of the London commuting belt in the 1850s and has retained that role, with 47% of outward commuters travelling into the London area.
- Watford has good access to strategic transport rail routes and roads with the A41, M1 and M25 while Luton and Heathrow airports are within 20 miles.

### Watford's economy in 2037~~6~~ - the sustainable objectives

- The Plan will have helped attract business investment to support jobs growth, strengthening its key role in the sub regional economy.
- The employment opportunities in the town will have increased with a highly skilled labour force and the provision of quality education facilities.
- Employment areas will have been intensified, making more effective use of land and higher employment densities, with appropriate areas supporting a mix of complementary uses.
- Watford town centre will have been enhanced as a place to socialise, as well as to shop, providing an enjoyable experience for people of all ages.
- The town and wider area will have an attractive range of activities available, reinforcing Watford's appeal as a destination for leisure and recreation.
- Redevelopment and delivery of high quality office floorspace in Clarendon Road will have brought in new investment, facilitating growth.

### Watford's society and the key challenges

- Watford is one of the most densely populated non-metropolitan districts in England.

- The town experiences some of the highest levels of in-migration in Hertfordshire, reflecting its attractiveness as a place to live.
- Watford has the lowest level of car ownership in Hertfordshire; a lot of its congestion is caused by through traffic.
- Rising house prices mean many people cannot afford a home of their own (the affordability ratio is ~~11.142.1~~ times the median average income (~~2020+9~~)).
- Life expectancy is marginally below the national average with males expected to live 79 years and women 83 years (NHS Health Profile), and is lower in more deprived areas
- Overall, Watford is ranked the 194th least deprived of 391 local authority areas in England, with no areas identified as being in the 10% most deprived parts of the country
- Despite areas of high prosperity, poverty is an issue with Tudor Ward being the fifth highest level of deprivation in Hertfordshire (ONS, Census 2011).
- There has been an increasing proportion of smaller one- and two-bed homes built in recent years compared to family-sized housing.
- There is limited space available for new social infrastructure such as new schools and healthcare facilities and to improve transport systems to encourage less car reliant travel.

### Watford's society in 2037~~6~~ - the sustainable objectives

- New development will have met the needs of a population projected to increase to 97,~~156980~~ people in 2037~~7~~ (ONS, ~~2011 Census and~~ 2018 based population projections).
- The town will be characterised by mixed and balanced communities and new development that will have made a positive contribution towards this.
- It will be a socially inclusive place for everyone, with a mix of homes for single occupancy, couples, families and older people including people with special needs.
- There will be a high quality, safe, clean and attractive public realm that encourages people to be more active through walking and cycling, encouraging social interaction and better health.
- Traffic congestion will be reduced and air quality improved, with priority given to public transport, shared car use, walking and cycling.

### Watford's environment and the key challenges

- The River Colne and River Gade, along with the Grand Union Canal, provide structure to much of the green infrastructure network in the borough, but in places it is poor in quality.

- Historical patterns of development have created constraints within the built up area that limit the potential to deliver new open space of any significant size.
- Watford has the highest number of open spaces with Green Flag status in Hertfordshire, but some areas of the town have limited access to quality open space.
- The number of heritage assets protected in the town as nationally and locally listed buildings make an important contribution towards the character of the town.
- The built up area is traversed by a number of strategic road corridors that results in a vehicle dominated environment with air, noise and light pollution.
- Traffic modelling shows that congestion and associated impacts on the environment will worsen without a modal shift in the town and also in the surrounding areas.

### Watford's environment in 2037~~6~~ - the sustainable objectives

- The town will have a more sustainable pattern of urban development and transport, minimising the impact on the environment and reducing pollution.
- New development will be high quality, designed to minimise impact on the environment through greater energy and resource efficiency and adapted to climate change. These adaptations and renewable energy opportunities will have been incorporated into new and existing developments.
- The network of open spaces, parks and waterways, and the connections between them, will have been improved to support increased recreational activities.
- Important biodiversity and wildlife habitats will have been protected and connections within the green and blue infrastructure networks improved, increasing their value for wildlife.
- New development will also have made improvements to biodiversity and strengthened Watford's ecosystems, reversing the national trend of biodiversity decline.
- Important heritage assets, such as locally and nationally listed buildings, historic green spaces and conservation areas will have been protected and the historic environment enhanced.

## Helping to make Watford a better place for everyone

1.24 The housing targets set by the Government have placed considerable development pressure to deliver new homes in the town, increasing targets three-fold since 2013. In conjunction with this growth, the Local Plan needs to support economic development and make provision for infrastructure and community facilities to come forward alongside these developments. This change will need to be managed, which is one of the key roles of the Local Plan.



1.25 New development provides opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community. To maximise these opportunities, it is important for the Local Plan to set out the key sustainability objectives that will contribute towards achieving the vision for Watford, which will be delivered through a mix of corporate strategies and other approaches, with the Local Plan making the key contribution.

1.26 The Local Plan is a roadmap of where we want to be, and when looking ahead to 2037~~6~~, whilst it is difficult to predict the future, the Plan is aspirational and it seeks to lay the building blocks for a vision that is both deliverable and achievable. It will help strengthen the town's pre-eminent role in the South West Hertfordshire sub-region, in terms of being a desirable place to live, a desirable place to invest and a desirable place to visit. The overall growth strategy and sustainability objectives will help Watford with taking steps forward to deliver growth and embrace change in a positive and sustainable way.

## Helping to create a better Watford in 2037~~6~~: our vision

At the edge of London, and also a part of the County of Hertfordshire, Watford will embrace its role as a major urban centre that acts as a focus for employment, homes, [Housing and Economic Land Availability Assessment \(20201\)](#)~~leisure, caring for its town centre and green spaces while and~~ making the most of its excellent connections to the capital and surrounding areas.

Watford will be an exemplar town in how it embraces the challenge of sustainability and climate change, with environmentally friendly construction and design, working towards being carbon neutral.

High quality design will be showcased as part of new development, with accessible and inclusive high density, mixed use development and enhanced open spaces.

Green and blue infrastructure will be conserved and enhanced, maximising their value for biodiversity and other important ecosystem services.

The Town Centre will retain its key role as a retail destination in the sub-region, home to a mix of uses including residential, commercial, cultural and leisure, creating a vibrant place for people to socialise, live and work.

The town will have a comprehensive network of cycle and walking routes, encouraging a more active population. Public transport will also be enhanced, encouraging a move from car based travel for shorter journeys, reducing congestion and air pollution.

Watford's social, cultural, built environment and heritage assets will be protected, and where possible their settings enhanced.

Local economies will be supported by creating opportunities for local businesses to access new markets and providing a mix of employment spaces to support business growth.

The population will be healthier, with more opportunities to get active, through walking and cycling and access to high quality open spaces.

Growth will be supported by a range of high quality infrastructure delivered in a comprehensive, timely and coordinated manner, making the most efficient use of land.

In 2037~~6~~, Watford will continue to be a welcoming and vibrant place and home to a wide range of communities, where people enjoy a high quality of life.

## Planning for growth

- 1.27 Many of the growth issues facing Watford are also being considered by other local authorities in South West Hertfordshire. All five authorities face different constraints making the delivery of development required over the respective plan periods challenging. In Watford, this challenge is primarily related to a shortfall of land available for development.
- 1.28 Watford has achieved 94% of its housing growth on brownfield land in the last ten years, reflecting the scarcity of greenfield land. Early in the stages of the Local Plan it was recognised that this trend of brownfield development would continue given the constrained nature of the borough.
- 1.29 The borough was assessed against a number of criteria including access to public transport, employment areas, schools and local shopping centres. This led to the identification of three sustainability zones across the borough with the centre of Watford being significantly more sustainable than the rest of the town (Figure 1.1). These areas formed the basis for calculating housing capacity of the borough as part of the Watford Housing and Economic Land Availability Assessment (2021<sup>9</sup>).
- 1.30 As demonstrated by the Housing and Economic Land Availability Assessment, the majority of the land available for development is located in the area of highest sustainability. It is also the part of the borough that will see significant investment in the future and that will help facilitate infrastructure improvements integral to supporting the objectives of the Plan. Given its proximity to the town centre, business district and strategic transport hubs located at Watford Junction and Bushey this part of the borough has the greatest capacity to absorb new development in a way that will contribute towards achieving sustainable development.
- 1.31 The concentration of sites in the high sustainability zone led to the designation of three areas identified as being strategically important in the Local Plan; Watford Gateway, the Town Centre and the Colne Valley Strategic Development Areas. These are recognised as growth areas likely to experience transformative change. This area

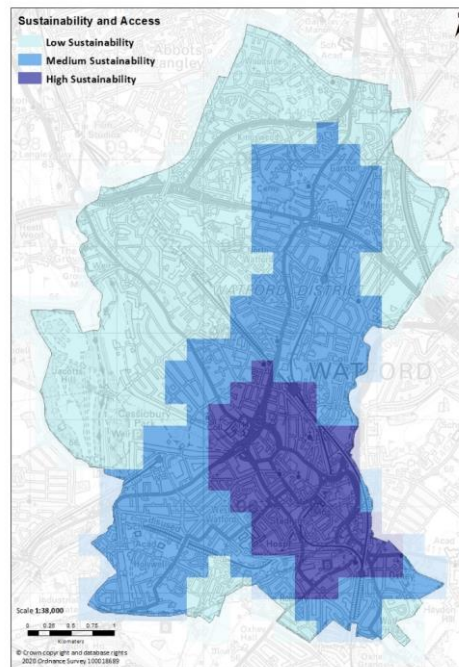


Figure 1.1: Sustainability zones in Watford

of growth encapsulating these designations is referred to as the Core Development Area, shown on the key diagram (Figure 1.2). In locations outside of these areas, while still likely to support development as areas of renewal, change will be more limited in scale and not transformative.

### Key Diagram

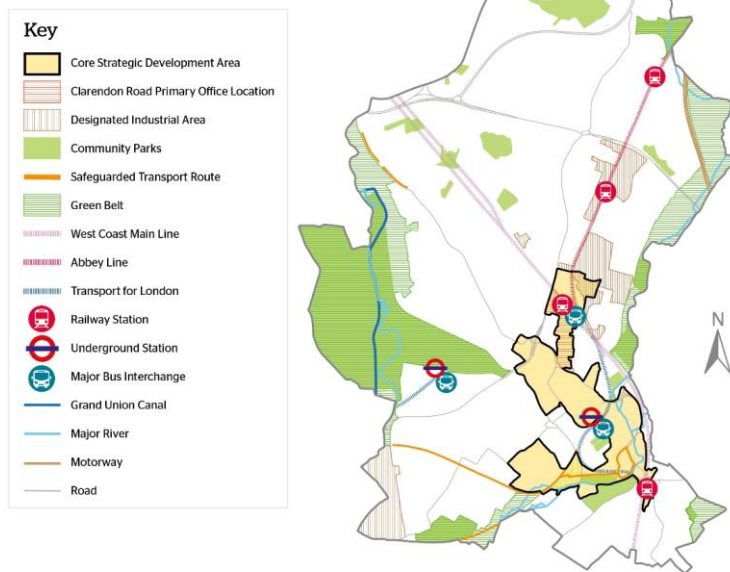


Figure 1.2: Key Diagram

## A sustainable development strategy for Watford

- 1.32 Sustainable development is integral to creating good places. To achieve it, proposals should seek to find a balance of economic, environmental and social considerations in order to ensure the town's success without compromising the potential growth and use of resources in the future. For a development to be successful, these fundamental elements need to work together to benefit the scheme and the community.
- 1.33 The Spatial Strategy [underlying Chapter 1](#) sets out the approach for development to contribute towards the Council Plan and long-term vision for Watford as an inclusive place for everyone and the aim to be a town that has embraced sustainability. As a largely urban borough, and given the findings of the Housing and Economic Land Availability Assessment and the trend for developing brownfield land

in the last ten years this will continue. There will be a general presumption against inappropriate development in the Green Belt, so the extent of the Green Belt will be largely maintained. Other policies in the Plan support delivery of this strategy and will collectively ensure development takes place in the most appropriate way.

1.34 To successfully achieve sustainable development, a wide variety of factors need to be balanced and delivered. One of the ~~most important key aspects~~ is climate change. This responds to the Climate Change Act (2008, as amended) when the government legislated that the United Kingdom will reduce greenhouse gas emissions by 100% by 2050. The Local Plan makes an important contribution towards achieving this target by guiding planning decisions to ensure they embrace and prioritise these principles.

1.35 In July 2019, Watford Borough Council declared a Climate Change Emergency. Key elements of the declaration included integrating climate change into planning policy and the Local Plan. ~~This is to place greater~~ ~~having a~~ focus on greener homes and buildings, taking into account climate impacts within Council decision making processes with the overall objective to be carbon neutral by 2030.

1.36 Addressing climate change is intrinsically linked to public health and wellbeing. Public health, physical and mental, is an important part of achieving sustainable development. Closely linked to this is the quality of homes people live in and how people feel included as part of their community. The design of buildings and the spaces around them is integral to encouraging people to be more active, have a greater sense of belonging in their community through more social interaction, and ~~improving~~ ~~increasing~~ the perception of a place and in turn health and wellbeing.

#### *The Spatial Strategy*

1.37 The approach is to meet a significant proportion of Watford's future development needs in the Core Development Area. The residential character of the rest of the borough will largely see development that is more modest in scale.

1.38 This ~~will enable a greater approach increases the~~ number of people ~~to live~~ ~~ing~~ in locations where there is good access to services and facilities, reducing the need to travel by car and making investment in public transport, walking and cycling infrastructure more viable and attractive by responding to demand. In turn, less reliance on private vehicles will help reduce traffic congestion, to benefit the economy and reduce air and noise pollution. ~~This will create space to support walking, cycling and public transport and encourage people to be more active and have healthier lifestyles, while improving the quality of the built environment.~~

1.39 Creating sustainable neighbourhoods in this way has multiple benefits. New development can attract investment to the area as ~~a~~ ~~business~~ ~~es~~ cluster, creating local jobs and providing opportunities for new skills and training through apprenticeships. ~~New e~~Employment opportunities bring workers into Watford, which, in turn, increases demand for ancillary goods and services supporting local businesses, particularly in the town centre. Delivering a mix of new homes to meet the needs of local people and those wanting to move here supports a more inclusive, equitable and balanced community. ~~The~~ ~~Alongside this growth, the~~ inclusion of measures, such as improvements to the green infrastructure network, benefits people and biodiversity,

while making better use of resources and helps to create high quality places and habitats.

#### *Collaborative working*

1.40 Collaborative working is an integral part of preparing development schemes that will contribute towards delivering growth to help achieve sustainable development. Early engagement with the Local Planning Authority to discuss planning proposals is encouraged to ensure that schemes will comply with strategic and local planning policies that seek to achieve economic, environmental and social objectives. Engagement is also encouraged to help ensure that development comes forward efficiently from the time of its design to when it is completed, whilst minimising the risk of unforeseen delays and costs that could adversely impact upon a proposed scheme.

#### *Monitoring the Local Plan*

1.41 Monitoring of the Local Plan is important to determine the effectiveness of planning policies. It identifies if policies are impacting on Development Management decisions and whether they are contributing towards achieving the Council's objectives and targets. Policies in the Local Plan will be monitored to ensure they are being successfully implemented and the overall strategy is being achieved. These indicators are set out in Appendix A along with the source data to be collected to monitor the Plan. This findings will be presented in the Council's Authority Monitoring Reports.

#### *South West Hertfordshire Joint Local Plan*

1.411.42 Watford forms part of the South West Hertfordshire Housing Market Area and Economic Market Area. The Council will have an active role promoting and supporting high quality development that will benefit the community, support the economy, enhance the environment and are consistent with policies in the Local Plan. Development facilitated through the Local Plan will also contribute towards achieving strategic objectives set out in the future South West Hertfordshire Joint Strategic Plan.

1.421.43 Where monitoring, particularly the updated housing trajectory that will be published in the Authority Monitoring Reports, demonstrates that there will not be sufficient progress towards meeting housing need, the Council will consider the reasons for this and whether the extent of under-performance is sufficient to trigger a partial or full review of the Local Plan.

## Strategic Policy SS1.1: Spatial Strategy

The Local Plan makes provision for ~~13,171~~<sup>14,988</sup> additional homes and ~~10,700~~<sup>11,500</sup> additional jobs between 20~~21~~<sup>18</sup> and 203~~7~~<sup>6</sup>, along with other supporting infrastructure. Proposals for new development will be supported, where they demonstrate that they will contribute towards the Local Plan's economic, social and environmental objectives, cumulatively achieving sustainable development.

Growth will be focused in the Core Development Area, which has excellent access to public transport and facilities, and where development can be accommodated sustainably, creating a high quality place to live, work and visit by 203~~7~~<sup>6</sup>. Heritage assets and areas of greenspace will continue to be protected.

Development will make an effective and efficient use of land. This will need to support a mix of uses compatible with each other, with high quality design, and innovative technology to address climate change and reduce carbon emissions.

Proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian ~~cycling and passenger transport~~<sup>and cycle</sup> travel will be prioritised.

These high standards and a positive and integrated approach to development will be expected across the whole of the borough. This will contribute towards creating attractive and inclusive neighbourhoods, supporting people to be more active, healthy and encourage greater social inclusion as part of a balanced community.

Across the borough, new infrastructure and improvements to existing infrastructure will be delivered to support development. Infrastructure proposals will be progressed collaboratively with relevant stakeholders and providers to maximise the benefits and success of any scheme.

All development will take place on brownfield, or previously developed land and only in exceptional circumstances will development on greenfield land be supported. Development in the Metropolitan Green Belt will not be supported unless it can be demonstrated that exceptional circumstances apply.

### The Core Development Area

The Core Development Area is expected to support 80% of allocated development in the borough and provides opportunities for further redevelopment. Proposals in this area will be supported where they optimise the use of land in this location through mixed-use high-density development, with excellent access to services, facilities and public transport. Development should deliver positive social and environmental gains, incorporating high quality design and innovation to ensure high environmental standards are achieved.

The scale of change will be transformational in places. Collaboration between development partners and stakeholders on larger sites will be the key to unlocking the potential of the area. Ongoing and effective community engagement will also be required. Proposals should demonstrate a holistic approach to development, optimise opportunities for higher density development, create linkages to adjacent areas and ensure proper infrastructure provision.

**Areas outside the Core Development Area**

Outside the Core Development Area, proposals will be supported where they optimise densities to make efficient use of land and manage change with greater regard to the existing context and local character. Development should make the most of its location, such as access to public transport, cycling and walking and seek to provide off-site infrastructure to enhance them, and facilitate access to services and facilities.

High quality connections between people and destinations within the Core Development Area, wider town and locations outside of the borough will be sought.



## Chapter 2: Core Development Area

## Core Development Area

2.1 The Core Development Area constitutes 8% of the built area of Watford (2,150 hectares), and is an area where significant revitalisation and transformative change are expected to bring new investment into the town (Figure 2.1).

2.2 The Core Development Area comprises three distinct locations, based on their character and the opportunities that each presents to contribute towards making Watford a place that people want to be and where businesses want to invest.

2.3 These areas are:

- **Watford Gateway**, which is focused on the transport hub of Watford Junction and business district of Clarendon Road;
- **The Town Centre**, where the majority of the retail and leisure offer of the borough is located; and
- **The Colne Valley**, which encompasses the out-of-town retail area, hospital and stadium and adjoins the River Colne flowing through the area.

2.4 The scale of development envisaged in the Core Development Area during the plan period provides opportunities to deliver new homes and provide more employment space for businesses, infrastructure to support new development and community facilities to make the area a focal point for the borough. To help achieve the vision and deliver the objectives of the Local Plan, the policies and site allocations have been informed by the Watford Sustainability Strategy (2019). Applicants will need to embed sustainability principles, such as; appropriate land uses, active travel, energy and water efficiency, and good design resulting in high quality buildings and public realm into their proposals.

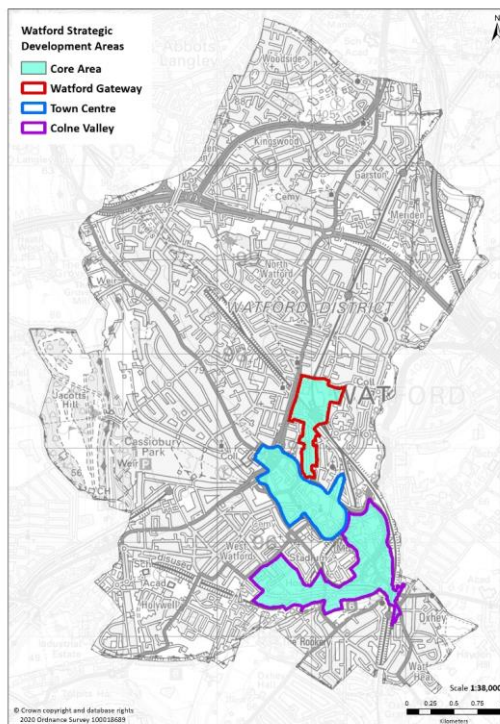


Figure 2.1: Core Development Area and the Strategic Development Areas

2.5 The requirements set out in the policy for each Strategic Development Area are to be considered alongside other planning policies in the Local Plan and applied collectively. Further information about site-specific allocation considerations and requirements are set out in Chapter 13 'Site Allocations and New Development'.

## Watford Gateway Strategic Development Area

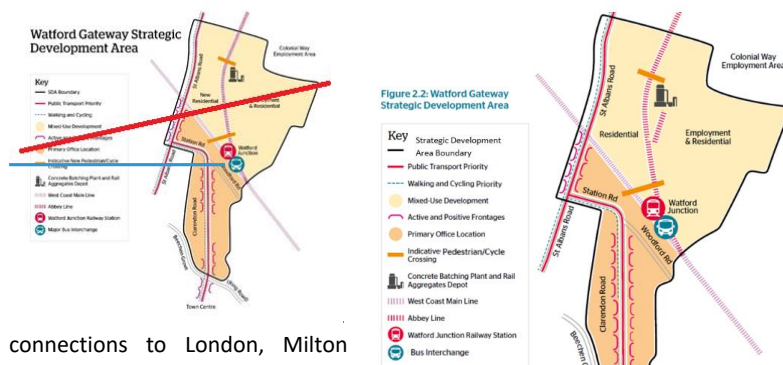
### Context

2.6 The Watford Gateway Strategic Development Area encompasses 31 hectares of land north of the town centre and comprises two key locations in the town; the Watford Junction railway and bus station, surrounding retail and employment land and Clarendon Road, which is the primary business district in the area (Figure 2.2).

2.7 Nearly all of this Strategic Development Area sits within the High Sustainability Area (Figure 1.1). This area Watford Junction is recognised by the Hertfordshire Growth Board as one of the key locations for redevelopment in the county.

### Watford Junction Station area

2.8 The railway and bus station provide the main transport interchange for the town, in conjunction with five other railway stations in Watford. These provide excellent



connections to London, Milton Keynes and further north to Birmingham and destinations beyond. With good access to local services, facilities, employment and leisure activities the Watford Gateway area provides a focal point for sustainable development.

2.9 The rail station and bus interchange, including the associated public realm, is to be improved, to increase capacity and make for better access to services and facilities to help people intuitively find where they are going using rail, bus, cycle, pedestrian and taxi facilities, as part of a modern transport hub.

2.10 The area north of the station along Station Road and Bridle Path is characterised as an area with inconsistent urban grain. New schemes should make use of design opportunities to reinstate a network of streets that improve the layout of the area. Schemes should be designed to improve connections with the residential area north of St Albans Road, including the pedestrian link from the station along the railway line to St Albans Road.

#### Clarendon Road

- 2.11 Clarendon Road acts as a sub-regional business centre that provides offices to businesses that require good access to London, but which do not necessarily need to be located in the city. The objective of the area during the plan period is for Clarendon Road to continue to be a focal point for high value office uses and the primary link between Watford Junction station and the town centre.
- 2.12 Proposals should reflect the potential of Clarendon Road as an area of high density development, while having regard to its underlying character. Where buildings of greater height than adjacent areas are proposed close to low lying residential areas, they will need designed so that they minimise their impact on the amenity of residents and demonstrate how they have embraced a transition from higher density development to areas of a different residential character. Where possible, taller parts of a building should be designed to have a frontage on the main road while new building heights on land which is next to existing buildings of lower heights should reflect the existing lower building heights. the lower areas of a scheme should be located closer to areas characterised by lower building height.
- 2.13 To improve the quality of the environment along Clarendon Road, proposals should be designed to ensure there is a good relationship between new buildings, their frontages and street users. They should also create a positive route for people walking and cycling between the station and the town centre. Frontages along the side streets should also focus on making a positive contribution to the street scene.

#### Land east of the railway line

- 2.14 Land east of Watford Junction Station and the ~~railway lines~~ Abbey Line consists primarily of industrial, storage and distribution uses including a concrete batching plant and rail aggregates depot. These premises generally support businesses that have low jobs per square metre. They make a contribution towards sustainable development by providing local jobs for industries where future land allocations is extremely limited in the borough. Consistent with Policy EM4.1 'Providing New Employment', appropriate intensification to make more effective use of the land will be supported in this part of the Strategic Development Area.
- ~~2.14~~ 2.15 The transformation of the area from an under-utilised employment area to a mixed-use area inclusive of new homes, employment space, community facilities and a new Watford Junction Sustainable Transport Hub will take place throughout the plan period and likely come forward in phases as infrastructure is delivered and development opportunities present themselves.
- ~~2.15~~ 2.16 In the first part of the plan period employment proposals will be supported where landowners wish to bring forward schemes which can be redeveloped at a later date by mixed-use development that may include residential units that will contribute towards the long-term vision of the area. However, the compatibility of new and existing uses will need to be carefully considered, particularly where residential uses are also being proposed in the area as the 'agent of change principle will need to be addressed.
- 2.17 The concrete batching plant and rail aggregates depot (including road access from Orphanage Road and rail sidings running parallel to the Abbey Line) is

safeguarded by the Hertfordshire Minerals Local Plan and subject to a 250m Minerals Infrastructure Consultation Area. ~~Its~~ Re-location of the facility will be challenging to achieve and its relocation will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria.

2.162.18 New development coming forward in the surrounding area should assume that the facility will remain for the long-term. New development will be required to be designed and mitigated to ensure that it will not prejudice existing or future use of the safeguarded site and associated operations in accordance with the 'agent of change' principle. Appropriate mitigation provided by new development may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and providing buffer development or screening between the sensitive uses and the safeguarded facility.

2.172.19 Re-provision of car parking, including access, will need to be considered at a strategic level across the area to avoid fragmentation and inefficient use of land, with particular focus being placed on the Watford Junction Sustainable Transport Hub. Large areas of scattered car parking throughout the Strategic Development Area should be avoided. Proposals for car parking that come forward independently of a car-parking strategy for the area, or a future masterplan, will not be supported where they could compromise the road network or infrastructure for alternative forms of active travel, such as cycling and walking.

2.182.20 The area is presently severed by the railway lines from other parts of the Strategic Development Area, including the station and Clarendon Road, and improved access is needed to mitigate the impact of this. The delivery of a new pedestrian and cycle bridge will connect Watford Junction station to the land east of the Abbey Line. This bridge will need to be accessible for commuters and local people to ensure that development is integrated into the existing built-up area. The location of the bridge landing points will be identified as part of discussions with landowners. The legal agreement for this will need to be in place before redevelopment can progress. When the area comes forward more comprehensive mixed-use development in the second part of the plan period and longer-term, a route for a second bridge that connects Penn Road with Watford Junction is to be protected so that new development does not compromise potential access to the area in the future.

#### *Community infrastructure*

2.192.21 New development in the Watford Junction area is anticipated to include at least 2,718 new homes and some additional windfall development. This will generate additional need for school places and increase demands placed on existing health facilities.

2.202.22 A primary school has been identified as part of the scheme located in the north of the Strategic Development Area. Additional education facilities east of Watford Junction Station will be required. However, much of that area is sub-optimal given the constraints of the site including proximity to railway lines and the concrete batching plant and rail aggregates depot. A second primary school will be required east of the station and applicants are encouraged to work collaboratively to identify where it can

be provided that provides good amenity for young children. If an alternative location for a new primary school is identified outside of the Strategic Development Area and will meet the needs of new residents this will be supported.

[2.212.23](#) The Herts Valleys Clinical Commissioning Group has indicated that a new health facility, with a floorspace area of approximately 1,300sqm, is required in the Watford Gateway Strategic Development Area. Applicants should work collaboratively with other landowners and the Clinical Commissioning Group to identify how this facility can be delivered. Where provision is made on site, this will be considered in the context of other developer contributions. As part of the redevelopment of the area, a childcare facility should be re-provided within the Strategic Development Area. The location of this facility, and how it will be delivered, will need to be agreed with the Local Planning Authority prior to redevelopment of the existing premises.

#### *Building height*

[2.222.24](#) The Tall Buildings Study (2021) suggested that a suitable prevailing base building height in the Watford Junction and Clarendon Road area would be eight to ten storeys tall. Development will be required to comply with Policy QD6.5 'Building Height' where proposals are above this base height on a street frontage, or more than ten storeys to the rear. Other Local Plan policies and the relationship with existing low lying areas will also be considered in determining acceptable building heights.

[2.232.25](#) Located adjacent to the east and west of the Strategic Development Area are the Estcourt and Nascot Conservation Areas. Developments will need to be considered with regard to how they may impact on these designations and their sensitivities, particularly where proposals are designed to exceed the base building height.

## Strategic Policy CDA2.1: Watford Gateway Strategic Development Area

The Strategic Development Area will see co-ordinated change around Watford Junction railway station / bus station and the Clarendon Road area, creating a mixed use urban quarter of high quality design and place making, with excellent connectivity to support a mix of housing, employment and other subsidiary land uses and community orientated facilities. To achieve this, applicants will be required to demonstrate how proposals will make provision for and contribute towards the following criteria:

- a) The regeneration of land north of Watford Junction railway station and how they will help transform the area into new, high density development providing homes, jobs and other uses;
- b) In locations where new development is of a scale and is notably different in character to adjacent existing residential uses, proposals will need to be designed so that they demonstrate a transition of taller urban form to lower lying character and mitigate any significant impact on neighbouring residential or community amenity;
- c) A [site for a new 3FE3 form entry primary school within site MU05 'Land and Buildings at 94-98 St Albans Road and a site for a new 3FE3 form entry primary school within Site MU06 'Land at Watford Junction'](#), to meet the demands generated by the development;
- d) Provision of a circa 1,300sqm of healthcare floorspace;
- e) A high quality ~~transport Sustainable Transport Hub interchange hub~~ located at Watford Junction connecting rail, bus, taxi, cycle and pedestrian facilities;
- f) New walking, cycling and public transport infrastructure will be required to contribute towards the Local Transport Plan and supporting strategies;
- g) [Prior to the granting of planning permission for development proposals which include residential uses on land east of the Abbey Line railway line](#), a pedestrian and cycle bridge for commuters and residents across the Abbey Line must be agreed ~~before planning permission is granted~~;
- h) A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded [for delivery in the second part of the plan period as part of a comprehensive mixed-use redevelopment of the area](#);
- i) The land east of the West Coast Mainline will support a mix of uses including replacement car parking, new homes and employment uses;
- j) Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace [unless the office use is replaced with industrial uses](#) and the proposed use will not undermine existing uses through the ['aAgent of Cchange' pPrinciple](#). [If a proposal is to include the loss of the child care facility, a replacement facility should be provided as part of the commercial floorspace](#)~~As part of the commercial floorspace a replacement childcare facility should be provided~~;

In the first part of the plan period employment redevelopment proposals will be supported as will further redevelopment that will enable a transition towards increased mixed-use schemes and supporting infrastructure in the second part of the plan period;

h) Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line. Applicants will be required to demonstrate this has been achieved as part of any proposal;

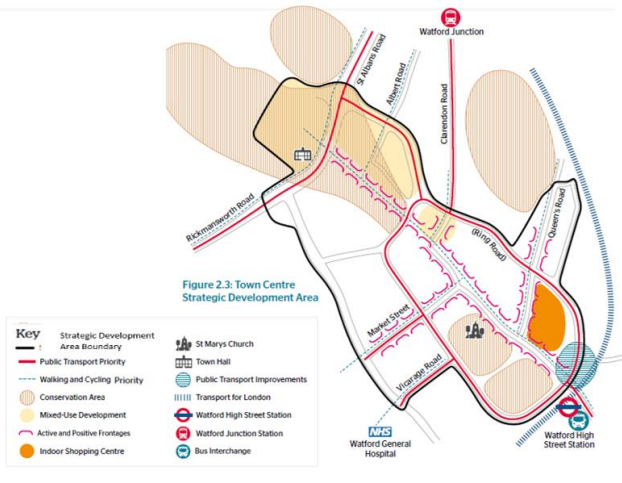
k) New development will not compromise vehicle access from Colonial Way and Clive Way via Colonial Way into the site and access to the Watford Junction sustainable travel hub station;

l) The concrete batching plant and rail aggregates depot, including its rail sidings and road access will be safeguarded as significant mineral infrastructure, as shown on the Policies Map. Proposals for development will be required to demonstrate that the proposed use will not undermine the existing safeguarded uses through the 'Agent of Change' principle

## Town Centre Strategic Development Area







### Context

**2-242.26** The Town Centre Strategic Development Area encompasses 52 hectares of land at the heart of Watford (Figure 2.3). The area is a sub-regional destination for town centre uses including retail and leisure, and supports a significant number of jobs. Its historical importance is reflected in the high number of heritage assets present. This area of high sustainability is home to a growing residential community

**2-252.27** The Strategic Development Area extends from Watford High Street overground station in the south to West Herts College in the north. It has good access to rail and bus links and strong connections to the other Strategic Development Areas. The town centre does however suffer from an 'island effect' created by the severance caused by the surrounding ring road.

### A thriving Town Centre

**2-262.28** The Town Centre has existing residential areas alongside a wide range of facilities with large amounts of comparison retail alongside a variety of leisure, cultural and entertainment **provision facilities**. The evening economy is strong and draws visitors from a wide area to the restaurants, bars and in particular the Watford Colosseum and Watford Palace Theatre.

**2-272.29** To continue to thrive, Watford Town Centre will need to evolve and diversify in response to current and future retail and social trends, be adaptable to changes in technology, consumer behaviours and the shift from 9am-5pm towards longer, flexible, active hours. This need for adaptation and diversification, together with access to good public transport, makes the Town Centre also appropriate for

Figure 2.3: Town Centre Strategic Development Area

residential-led or mixed-use high density development.

~~2.282.30~~ The Strategic Development Area contains three distinct character areas: the North High Street from the Exchange Road flyover north to Rickmansworth Road; the central part of the High Street from the flyover, south to ~~Queens Road~~~~King Street~~; and the south part of the High Street, which extends south of King Street to the Colne Valley Strategic Development Area.

#### *Development in the Town Centre*

~~2.292.31~~ The Town Centre provides opportunities for further residential development as part of a wider mix of uses. This additional footfall will contribute towards the vitality in the Town Centre through the day and into the evening, particularly to support convenience and retail leisure uses. More people living in the area also encourages a sense of ownership.

~~2.302.32~~ Achieving an appropriate mix of residential types, sizes and tenures, including family-sized units, across the area, will be of great importance to meet Watford's housing need, as will providing essential services to ensure the area is an attractive place to live. The growth in the number of people living in the area will mean a need for additional community facilities to support the new residents of the town as well as providing community uses for the whole borough.

~~2.312.33~~ The importance of the retail offer in the Town Centre is reflected in the South West Hertfordshire Retail and Leisure Study (2018). Retaining active and positive ground floor shop frontages will be the key to maintaining this position. Further discussion is provided in Chapter 5 'A Vibrant Town' and Chapter 6 'An Attractive Town'.

~~2.322.34~~ New development, particularly new homes, will need to be sensitive to potential environmental issues, noise and light pollution that occur with some town centre uses. Applicants will need to design building servicing and waste management facilities into schemes to avoid adverse impacts on amenity and the public realm.

~~2.332.35~~ It is important that development proposals consider how they are integrated with other projects in the Town Centre and nearby. In this context, proposals will be expected to contribute towards the vision for Watford to 2037~~6~~, which has been informed by Watford's Cultural Strategy and reinforces the importance of the town centre as a destination with an improved visitor experience.

#### *North High Street area*

~~2.342.36~~ This area from the Exchange Road flyover to Rickmansworth Road is currently the focal point for the evening economy in Watford. The north part of the High Street itself is a wide boulevard with listed buildings at the north end but much of the area's character has been compromised by low-quality development and public realm. The area lies outside of the Core Shopping Area, and a mix of uses that provides positive and active frontages, quality public realm and contributes towards the vibrancy of the town centre will be supported. Proposals to make better use of the public space along the High Street in the area north of Albert Road South will be supported, where they meet the requirements of licensing and do not create conflict with other uses in the vicinity.

~~2.352.37~~ At the north end of the High Street is the area known as The Parade, where several listed buildings are located. Proposals will need to be designed to minimise

impact on the listed buildings and use heights that are sympathetic to the surrounding character.

[2.362.38](#) The Civic Core Conservation Area encompasses several listed buildings, including the Town Hall and Watford library. A number of cultural facilities are also nearby including the Colosseum, leisure centre and West Herts College. Development in this area will be guided by the North Hub Masterplan, which seeks to deliver a variety of facilities reflecting the cultural and heritage value of the area. Proposals will need to consider heritage-related Supplementary Planning Documents. They must also improve the function and setting of the buildings, reduce the dominance of the road system around the Avenue Car Park, and make more efficient use of land. A short distance to the west is Cassiobury Park, the largest park in the borough. Proposals for the wider area should seek to improve connectivity to this area given the limited recreation space available in the Town Centre.

[2.372.39](#) East and west of the north part of the High Street are areas that have a low quality urban grain that does not relate well to the main retail area. Proposals in these areas should consider the potential for high-density development that will reinstate a street pattern that improves connectivity through a high-quality public realm, and uses building design to create a balanced approach to openness, enclosure and natural surveillance.

[2.382.40](#) **Allocations Development** around Albert Road South provide an opportunity for comprehensive redevelopment of this area to create a distinct identity with improved public realm. Proposals in this area will be supported to provide pedestrian and cycle connections across Beechen Grove.

#### *Central High Street area*

[2.392.41](#) The central High Street area lies within the core shopping area and is a focus for retail and leisure uses, to encourage a variety of activities for all ages and a positive visitor experience. Development proposals should reinforce these uses and make a positive contribution towards the town centre as a destination.

[2.402.42](#) The east side of the High Street is dominated by the indoor shopping centre, formerly intuWatford, where the extension into Charter Place, which opened in 2018, has also created a significant leisure draw. Flexibility for retail and leisure uses will be required to help ensure that the complex continues to make a positive contribution towards the town centre, while complementing the more traditional High Street retail offer.

[2.412.43](#) Towards the south end of the area is the St Mary's Conservation Area, which includes St Mary's Church, the oldest building in Watford, and several other listed buildings. Proposals in this area will need to be designed to reflect the sensitivity of the historic environment and the setting of the listed buildings.

[2.422.44](#) Located at the north end of this area is Watford Market. The market has two elements, with a covered 'box park' facility of retail and eateries and outdoor stalls on the open High Street. There are aspirations to improve the market and make it a more attractive destination for local people. Proposals to relocate the market will be supported where they align with the ambition to improve the quality of the town centre as a vibrant retail destination and visitor experience.

[2.432.45](#) Adjacent to the High Street are the distinctive street areas of Market Street (to the west) and Queens Road (to the east). These are local retail areas that complement the High Street offer and have pedestrian and cycle links to other parts of Watford. Both reflect the residential character around them, being characterised by low-level built form and shops operated as private enterprises, rather than national operators. Development in these areas should enhance the retail offer and community-orientated facilities. Projects that will improve the public realm and the pedestrian experience through urban greening and street works will be supported. The Council encourages engagement with local stakeholders in a coordinated approach to enhancing Market Street and Queens Road.

[2.442.46](#) The Local Plan [also](#) encourages increasing accessibility for people using public transport, walking and cycling, however, private vehicles will still be the choice for some. Should the redevelopment of large-scale parking facilities be considered in the future, proposals must be supported with evidence setting out the potential impacts and benefits for the town centre as a thriving retail destination and a place people want to visit. This will need to consider good access to retail, recreational and leisure facilities and the relationship to other strategies associated with walking, cycling, taxis and public transport.

#### *South High Street area*

[2.452.47](#) The south High Street area is more reflective of a traditional High Street, characterised by smaller independent units and specialised retail that create a continuous active frontage. The existing built form consists of buildings with a small footprint and is generally two storeys in height.

[2.462.48](#) Much of the south part of the High Street lies within the High Street / King Street Conservation Area and includes several listed buildings. Proposals will need to consider their potential impact on these heritage assets, and be designed using high-quality and innovative approaches to improve the built environment and contribute towards the distinctiveness of Watford.

[2.472.49](#) At the base of the south High Street area is the junction with Beechen Grove and Exchange Road, creating severance between the Town Centre and Lower High Street and is a poor-quality and vehicle-dominated environment. Highways improvements to the junction will be supported, particularly where they prioritise walking and cycling. This area acts as a gateway to the Town Centre from the Watford High Street Overground Station and opportunities to improve local transport [with improved cycle, pedestrian and bus connections which could potentially be developed further as part of which could potentially be developed further as part of](#) ~~with connections to a future~~ Mass Rapid Transport System ~~will be supported~~. Where necessary the Council may use land assembly powers to secure proposals that are of high quality.

#### *Improving connectivity*

[2.482.50](#) The Local Plan reflects objectives set out in the Local Transport Plan and will be further informed by the Local Cycling and Walking Infrastructure Plan and Sustainable Transport Strategy. One of the overarching objectives of the Local Plan is

to improve the environment for people to move through and make it an attractive place to live, work and visit.

[2.492.51](#) The Town Centre is bound by the ring road, creating significant severance for people not using private vehicles to get around. Of particular importance are improvements to key junctions that should prioritise non-vehicle users (except for buses), including the junctions at the High Street / Rickmansworth Road, Albert Road South / Beechen Grove, Clarendon Road / Beechen Grove, south part of the High Street / Beechen Grove and Market Street / Exchange Road.

#### *Community infrastructure*

[2.502.52](#) New development in the Town Centre Strategic Development Area is anticipated to include at least 546 new homes. This will generate additional need for school places and increase demands placed on existing health facilities.

[2.512.53](#) Applicants are encouraged to work collaboratively to identify where a new primary school can be provided that provides good amenity for young children. If an alternative location for a new primary school is identified outside of the Strategic Development Area and will meet the needs of new residents this will be supported.

[2.522.54](#) Applicants will need to demonstrate collaborative working with other landowners and the Clinical Commissioning Group to identify how additional health facilities can be delivered. Where provision is made on site, this will be considered in the context of other developer contributions.

#### *Building Heights*

[2.532.55](#) Developments within the Town Centre will need to consider how they relate to their surroundings, including heritage assets, and the impact they may have on the character and function of the area. Schemes will need to comply with policies set out in Chapter 6 'An Attractive Town' and consider how they relate to the existing built form. Informed by the ~~Building Heights~~ Tall Buildings Study the future base height in the Town Centre is considered to be up to five storeys on the High Street, stepping up to eight storeys to the rear. Proposed buildings taller than this will need to satisfy the requirements set out in Policy QD6.5 'Building Height'.

## Strategic Policy CDA2.2: Town Centre Strategic Development Area

Proposals in the Town Centre Strategic Development Area will be supported where good design contributes positively towards creating a vibrant town centre, focused on people, healthy lifestyles and quality of life. To achieve this, applicants will be required to demonstrate how proposals will make provision for, and contribute positively towards, the following criteria:

- a) New development will make effective use of land to intensify town centre uses and increase the amount of people living in the Town Centre, intensifying footfall and adding vitality to the town throughout the day and evening;
- b) New uses should make a positive addition to the vitality and functionality of the Town Centre. Residential uses should be sensitively designed and located to avoid negatively impacting on existing town centre uses. Leisure uses that contribute towards the vibrancy and functionality of the Town Centre will be supported;
- c) Development along the High Street, Market Street and the north part of the High Street should retain and enhance active frontages on the ground floor. Uses, such as flexible workspace, where activity occurs throughout the day, will be supported in these areas;
- d) Public realm should be improved to create distinct places throughout the Town Centre to increase dwell time. Proposals should support the delivery of green infrastructure, and in particular, tree planting, to enhance the visitor experience;
- e) Proposals should contribute to clear and coordinated wayfinding across the Town Centre and permeability into surrounding areas, including the rail and bus stations, Clarendon Road office hub, the football stadium and hospital. Priority will be for pedestrians and cyclists;
- f) Opportunities should be taken to reduce the vehicle dominance of the ring road, proposals that provide active frontages to the ring road will be supported, transforming the environment into a street that is a positive experience to use for pedestrians and cyclists that will support the use of the new transport hub at the southern part of the high Street, as well as vehicle users, will be a priority;
- g) Linkages to open spaces, particularly Cassiobury Park and the proposed Colne Valley Linear Park, should be improved, contributing to the creation of a well-connected, accessible and integrated network of open spaces;
- h) Heritage assets, in particular St Mary's Church and the surrounding conservation areas, are key to the character of the Strategic Development Area and proposals should be sensitive to these heritage assets, enhancing their character and setting;
- i) Proposals should demonstrate the provision of innovative waste management and recycling storage and collection systems, to reduce the need for service vehicles along the High Street.
- ii) A site for a new 3FE3 form entry primary school should be located within the Strategic Development Area that is BB103 compliant, including external areas.

Applicants are encouraged to identify where a new primary school can be provided.

## Colne Valley Strategic Development Area

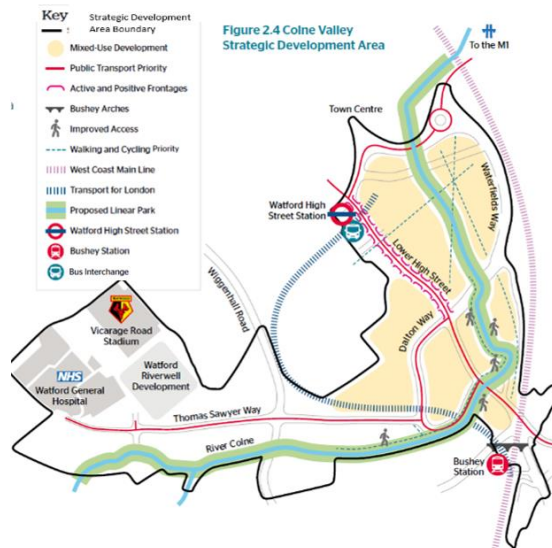


### Context

**2.542.56** The Colne Valley Strategic Development Area encompasses 83 hectares in the southern part of the Core Development Area. ~~T~~with the defining feature ~~is being~~ the River Colne. It includes destinations such as Vicarage Road Football Stadium; Watford General Hospital; Trade City employment area and a distribution of retail parks that perform an out-of-town shopping role in the borough and Bushey and Watford High Street railway stations (Figure 2.4).

**2.552.57** The overarching vision for the Strategic Development Area is to transform it from a car-

dominated environment with large retail and commercial sheds, into a new mixed use urban quarter with a quality public realm and an enhanced and accessible river environment for all to enjoy. The Strategic Development Area comprises three areas of



different character and objectives; Lower High Street, River Colne and Watford Riverwell.

[2.562.58](#) Located in an area of high sustainability, ~~there are new development provides~~ opportunities for people to have excellent access to public transport, services and facilities including the town centre. New development is envisaged to transform this part of the town and create a built and natural environment that is increasingly focussed on people and high quality place making. ~~Proposals New development~~ should be designed to reinstate an urban grain that creates a legible network of streets and public spaces and a quality public realm. This should improve connectivity for all users and more widely makes a contribution towards creating a high quality neighbourhood where people want to live.

[2.572.59](#) Proposals should maximise the opportunities and be designed to make effective use of land. They should ensure design measures are implemented to mitigate any adverse impact of the scheme on existing residential areas. Within the Strategic Development Area, proposals should not increase the amount of retail floorspace on site unless small-scale provision is needed to support the local community. Existing retail floorspace can be re-provided, where appropriate, however a reduction of retail provision will be supported to contribute towards the objective of transforming this area into a residential and mixed-use quarter.

[2.582.60](#) Watford Museum (Grade II listed building), the Pump House Theatre and Frogmore House are important heritage assets located along the Lower High Street. Where there is a potential adverse impact on a heritage asset a Heritage Impact Assessment may be required. Design measures to minimise impacts on these assets should be set out as part of any proposals.

[2.592.61](#) The area is dominated by a network of busy roads that include the Lower High Street, Dalton Way and Waterfields Way (which links to the M1). The high volumes of traffic have resulted in the designation of an Air Quality Management Area ~~at~~ Bushey Arches and another at Pinner Road just outside the Strategic Development Area boundary. The road network has also resulted in fragmented pedestrian and cycle provision and significant severance between people and local destinations. Informed by the Local Transport Plan and the ~~forthcoming~~ Local Cycling and Walking Infrastructure Plan, proposals will contribute towards reducing the influence of the motorised vehicle in this area and prioritising active travel and public transport. Projects such as junction improvements and giving priority to non-private-vehicular traffic along the Lower High Street will be supported.

[2.602.62](#) Major development proposals should use a masterplan led approach that demonstrates how they have maximised local opportunities for development of appropriate densities, to improve the public realm and increase access to services and facilities.

#### *River Colne area*

[2.612.63](#) Development in this area will primarily be residential. Located at the lowest point of the valley between the town centre and Bushey Arches, proposals will need to be designed to reflect their location near the River Colne while intensifying existing land uses given the close proximity to Bushey Station.



[2.622.64](#) New development fronting the river should be designed to minimise disturbance to semi-natural areas. Proposals should do this by including measures that will enhance the setting of the river, the avian, riparian and aquatic habitats it supports and improve pedestrian and cycle routes. To do this, proposals should by consider the location of other green spaces and community facilities in the wider area that the community will use.

[2.632.65](#) The area has been subject to a Strategic Flood Risk Assessment and this should be used to inform how proposals are designed in order to mitigate flood risk. Sites affected may require a site specific flood risk assessment and this should consider other flood risk mitigation measures that may be forthcoming in the Core Development Area. Applicants are encouraged to engage with the Environment Agency as an early part of scheme preparation. Further discussion is set out in the 'Flood risk and ground water management' section of Chapter 9 'Natural Environment'. On sites where the River Colne has been culverted, measures need to be taken to re-naturalise the waterway.

[2.642.66](#) The impacts of new development will need to be managed given the sensitivities of the environment, particularly those located in Flood Zones 2 and 3 or with potential to affect biodiversity. Building design measures that reduce noise and light spill should be integrated into all development proposals. Building heights in this area will need to be appropriate and reflect the context and constraints of this part of the Strategic Development Area.

[2.652.67](#) The River Colne is an important asset in the area as part of the network of green and blue infrastructure, and a connection from the Ebury Way and Oxhey Park to Waterfields Recreation Ground and further north along the valley. The area lies to the north of the Colne River Regional Park and shares many of the same characteristics ~~as part of the green and blue infrastructure network~~. The Colne Valley provides an opportunity to improve the natural environment and increase the recreational value for local people.

[2.662.68](#) A key objective of the Strategic Development Area, informed by the Watford Green Infrastructure Strategy (2011), is to create a linear park along the river basin. Proposals along the River Colne should be designed to help create this park and make provision for a publically accessible shared use path along the site. This will contribute towards open space requirements set out in Policy NE9.7 'Providing New Open Space'. As part of the linear park, proposals should be designed to facilitate continuous access to adjacent greenspaces, play areas, allotments and playing fields. ~~T~~his may require measures to address road crossings in the vicinity.

#### *Watford Riverwell, Vicarage Road Football Stadium and Watford General Hospital area*

[2.672.69](#) The western part of the Strategic Development Area incorporates Watford Riverwell, an area of residential development and supporting community facilities; the Vicarage Road Football Stadium and Watford General Hospital, an important sub-regional health facility. The surrounding area has an overarching residential character and development schemes will need to be designed to reflect and integrate with this character.

2.70 The stadium and hospital are next to each other and important local landmarks in the Vicarage area. Improvements to the hospital will be supported, and planning consent has been granted for a new multi-level car park. Any future development proposals in this area should also positively contribute towards the existing residential character and enhance community facilities.

2.71 Redevelopment of the hospital is likely to consist of multiple phases; delivery of the multi-storey car park, redevelopment of the hospital and land between the new hospital and Vicarage Road. Development of Riverwell and Watford General Hospital area should be considered in the context of the wider Strategic Development Area and existing built-up area adjacent and ensure opportunities to connect people with local destinations are optimised such as creating easily legible routes through the site that are enhanced through each phase. The layout of buildings and their access points should ensure there is good accessibility for people using sustainable transport such as walking, cycling, public bus services and those with mobility issues.

2.682.72 The existing hospital located in the north part of the site is adjacent to existing the residential area of Vicarage. Redevelopment schemes will need to take into account how new development may affect existing residents and implement design measures to mitigate any possible negative impacts. The area is capable of supporting a base building height of up to six storeys, however, buildings of significant scale are likely to have an impact on the character of the residential area and listed buildings in the vicinity. If proposed, an approach to taller buildings that demonstrates a transition from higher elements in more central parts of the site transitioning to lower lying buildings closer to the boundary of the Strategic Development Area, such as Vicarage Road, will need to be set out.

2.692.73 Part of the site includes the former Metropolitan Line Extension, a route safeguarded by Policy ST11.2 'Protecting and Enhancing Future Public Transport routes and Watford Junction Station Area as a Transport Hub'. This route offers the potential to provide a high quality sustainable transport link between West Watford and the high Street area which could potentially be used for a new public transport system such as Mass Rapid transit will form part of a Mass Rapid Transport system linking Watford High Street and Ascot Road to the west (on the boundary with Three Rivers District). Development proposals adjacent to the safeguarded route should be designed to enable pedestrian and cycle connections into the route and to any future infrastructure. More generally, proposals are expected to enhance the local walking and cycle network and enable good access to public transport along Vicarage Road and Thomas Sawyer Way.

#### *Community infrastructure*

2.702.74 New development in the Colne Valley Strategic Development Area, is anticipated to include 4,361 new homes. Of these, 1,383 form part of the Watford Riverwell scheme which already has planning permission. These will generate additional need for school places and increase demands placed on existing health facilities.

2.712.75 The Watford Riverwell scheme will provide one new primary school with one other provided within the Colne Valley SDA and there is some projected capacity at

existing schools in the wider area. Proposals will be required to make provision for primary school facilities. For sites larger than 1,000 dwellings, this will be required on site. For sites that are located in close proximity to each other and will have a cumulative impact that will generate demand for a new school, applicants are encouraged to work collaboratively with other landowners and the education authority to best meet this need. There is a need to identify where a new primary school can be provided that provides good amenity for young children. If an alternative location for a new primary school is identified outside of the Strategic Development Area and will meet the needs of new residents this will be supported.

[2.722.76](#) Applicants should work collaboratively with other landowners and the Clinical Commissioning Group to identify how additional health facilities can be delivered. Where provision is made on site, this will be considered in the context of other developer contributions.

#### *Building height*

[2.732.77](#) Informed by the Taller Buildings Study, the base future building height in the area is ~~five~~ up to six storeys. New development should be designed to reflect this character and where proposals exceed this height, they will need to comply with the requirements set out in Policy QD6.5 'Building ~~H~~height'. To make a positive contribution to the Watford Skyline, proposals should use appropriate densities, site layouts, building heights and reflect the topography which is lowest around the River Colne and highest near the town centre. Important views across the borough, such as from the rail viaduct and Oxhey Park, should not be compromised.

### Strategic Policy CDA2.3: Colne Valley Strategic Development Area

The Colne Valley Strategic Development Area is designated to facilitate transformative and co-ordinated change around the River Colne, ~~and Lower High Street area, and the area of the Watford General Hospital~~ producing a sustainable and mixed-use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses.

Development will be supported where it contributes towards the objectives for the area and is consistent with other policies in the Local Plan. Applicants will be required to set out how their proposals contribute positively towards the following:

- a) The redevelopment of retail and commercial land will be intensified with mixed used development. Where retail use is re-provided, this should not exceed the existing net retail floorspace on site;  
Redevelopment of the existing Watford General Hospital will provide modern facilities that are well integrated and co-ordinated with other developments, designed to minimise impacts on nearby residential areas and are well connected to support sustainable transport options including walking, cycling and bus services;  
A car multi-storey car park with a capacity of approximately 1,450 car parking spaces located east of the existing Watford General Hospital car park;
- b) In locations adjacent to existing residential areas, new development should be designed to minimise the potential impact on these areas by providing a transition in built form between existing homes and higher-density development;
- c) Proposals located in areas of flood risk will need to consider the cumulative impact of development and ensure that mitigation measures do not conflict with other measures that may have been agreed on other sites in the Core Development Area;
- d) New development will contribute towards the creation of, and connections to a linear park along the River Colne, from Water Lane to Oxhey Park, enabling public access for pedestrians and cyclists and the enhancement of wildlife habitats;
- e) Proposals adjacent to the River Colne are to be designed to enhance its setting, facilitate public access, and to include measures to minimise the impact of development on the river-based habitats including the re-naturalisation of the River Colne between Water Lane and Waterfields Way;
- f) A site for a new primary school within Site MU21: Land at Riverwell and a site for a new 3 form entry primary school within Site MU16: Land at Tesco, Lower High Street to meet demand generated by new development; New primary school sites to meet the demands generated by the development;
- g) A new pedestrian and cycle crossing or underpass at Waterfields Way should be provided as part of the linear park along the River Colne;
- h) The Lower High Street should be prioritised for improved public transport (including bus priority measures) and the creation of an improved walking and cycling -shared surface-route;

☞ Priority systems at junctions and crossings to improve access and permeability in the wider area for public transport, pedestrians and cyclists.

## Chapter 3: Homes for a Growing Community

## Homes for a Growing Community

- 3.1 The Spatial Strategy to 2037<sup>6</sup> seeks to deliver at least ~~13,171,498~~ new homes. This figure includes the amount of housing required to meet local need as determined using the government’s standard method (~~12,544,274~~ homes) and an additional 5% allowance (~~647,714~~ homes) to reduce the risk of sites identified in the plan not coming forward as anticipated. The figures that make up this housing target are set out in Figure 3.1.
- 3.2 The Housing and Economic Land Availability Assessment (2021<sup>9</sup>) identified 56 sites suitable for residential and mixed-use development that includes new homes. The location of these sites are shown in Figure 3.2. This assessment sets out the number of homes that will come forward. This includes identified sites and also how many homes will come forward on sites that are either: not identified as a site allocation, or come forward with a housing density that is different from the indicative capacities calculated in the Housing and Economic Land Availability Assessment.

Figure 3.1 Housing figures in the Local Plan

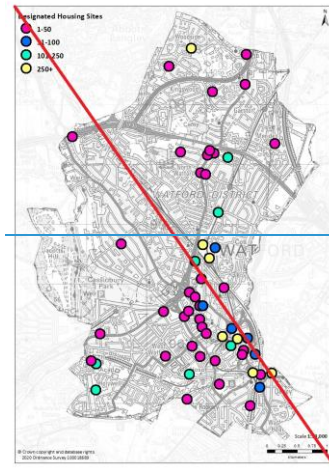


Figure 3.1 Housing figures in the Local Plan



Figure 3.1: Housing figures in the Local Plan

3.3 As part of the housing to be provided to 2037, a windfall allowance of 2,031 units is included. This is based on a combination of three factors including the historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall development will contribute, on average, 156 new homes per year over the plan period with the windfall contribution as part of the housing trajectory from 2024/25.



3.4 The South West Hertfordshire Local Housing Needs Assessment (2020) identified the local authorities of Dacorum Borough Council, Hertsmere Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council as forming the South West Hertfordshire Housing Market Area. It demonstrates a relationship between housing need and movement between the five authority areas. The Council's all face challenges to meet their housing need, however they have agreed to continue to work together to deliver the housing required across the wider area.

3.5 The delivery of new homes over the plan period is set out in the housing trajectory (Appendix B). This forecasts the anticipated delivery of new homes each year to 2037~~6~~ and provides a mechanism to evaluate the performance of the Plan. It also highlights when the provision of supporting facilities and infrastructure are required. The housing trajectory will be kept up to date and monitored as part of the Council's Authority Monitoring Report.

3.6 To provide more certainty about when schemes will be coming forward and assist with projecting when other types of supporting development may be required, such as infrastructure, as part of their proposals, applicants are expected to provide a year by year housing trajectory setting out when new homes will be completed.

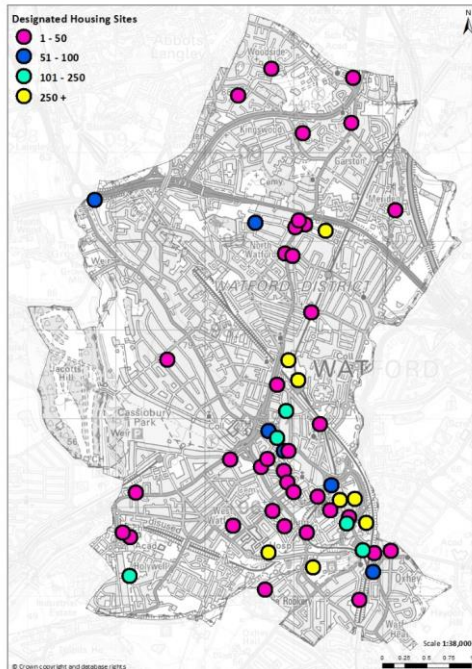


Figure 3.2: Housing sites in the Local Plan



### Strategic Policy HO3.1: Housing Provision

Provision will be made for ~~13,171,498~~ new homes, inclusive of a 5% buffer of ~~647,714~~ homes, in Watford Borough for the period ~~2021~~ to ~~2037~~. Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development.

Residential developments should demonstrate how they will make an optimal use of land and provide a mix of homes including size, tenure and specialist adaptations to support people with different needs to ensure good quality homes are provided for all, both now and in the future.

## Housing mix, density and optimising use of land

### *Design-led schemes and housing density*

3.7 The Spatial Strategy [underlying Chapter 1](#) sets out an approach to maximise the land available for redevelopment, reduce its impact on the environment through carbon reductions and deliver sustainable development. Housing density provides an indication of how effectively a site is used and its contribution towards meeting housing need. However, it does not provide wider context about efficient use of land, which is more closely related to site-specific opportunities, constraints and sensitivities. Design-led schemes should make efficient and effective use of land by responding to character, existing or intended as appropriate, the opportunities, constraints and sustainability of a particular site and its surroundings.

3.8 Within the Core Development Area higher density development of at least 95 dwellings per hectare is expected. Higher density development will be particularly supported in areas where there is good access to Mass Rapid Transport, such as at Watford Junction. Outside of the Core Development Area, proposals should start with a minimum of 45 dwellings per hectare and be revised up or down, based on the character and attributes of the area. This lower figure reflects the lower sustainability of these areas which have fewer services and facilities compared to the Core Development Area.

### *Housing mix*

3.9 The variety of housing types enable people to live and move within the town at different times in their lives as their needs change. The types of new homes coming forward during the plan period should reflect the needs of local people, present and future, and account for market trends.

3.10 A balance between housing demand and housing need should relate to what is deliverable. This can vary on a site-by-site basis. During the plan period Watford is likely to provide a higher proportion of smaller one-and two-bed properties than other local authorities in the South West Hertfordshire housing market area. This is reflective of Watford's character, which is more intensively built up, has a higher

population density and better access to public transport, which makes it a more sustainable location compared to its neighbours. Over the plan period the mix of housing types may need to be rebalanced across the housing market area to ensure an appropriate amount of family housing is provided.

- 3.11 The Local Housing Needs Assessment suggests that a high proportion of demand for new homes will be generated by households with one and two dependent children. Providing a mix of homes of different sizes is therefore important to support a balanced community and ensure that housing demand and housing need are both met through new development. Therefore, proposals for residential development will be expected to provide a housing mix that includes a proportion of family-sized homes with three or more bedrooms.
- 3.12 Proposals with a residential element are to provide a Housing Schedule. This should set out the total number of units; type and tenure of units; the number of habitable rooms and floorspace for the different elements of the market; and affordable and specialist housing, provided as appropriate. In conjunction with this, a housing trajectory setting out the anticipated annual completions should be provided as part of a planning application.

## **Policy HO3.2: Housing Mix, Density and Optimising Use of Land**

### **Housing mix**

Proposals for new residential development will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms).

### **Housing density and optimising land**

Residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings per hectare. Outside of the Core Development Area, new residential developments are expected to achieve at least 45 dwellings per hectare, but the optimal density for individual sites should be established through careful consideration of local character, context and access to amenities and public transport.

### **Protecting existing housing stock**

If a net loss of residential accommodation is proposed, applicants will be required to demonstrate how the benefit of the scheme outweighs this loss.

## Affordable housing

### *The need for affordable housing*

- 3.13 Affordable housing can refer to rented or sales properties and is defined by the National Planning Framework. Definitions of affordable housing are set out in Annex 2 of the National Planning Policy Framework. To best reflect affordable housing as a proportion of the total number of homes completed on a site, the requirement will be based on habitable rooms, with supporting information to be provided by an applicant including the number of units, floorspace and bed spaces as part of the housing schedule. Applicants are encouraged to partake in pre-application discussions to determine the affordable housing mix early in the planning process.

### *Type and size of affordable housing*

- 3.14 The National Planning Policy Framework requires new development to provide different types of affordable housing, including shared-ownership products on qualifying sites in conjunction with other affordable housing products, such as social and affordable rent. The level of [affordable housing](#) provision required, [35%](#), has been determined through a viability assessment of the Local Plan to ensure sites are deliverable.
- 3.15 Social rented housing provides homes for those who need it most and cannot access the property market. To prioritise this need, at least 60% of affordable housing provided on qualifying needs should be social rent, with the remaining made up of other tenures, such as affordable rent and discounted home ownership products. Social rented units are in greatest demand, but are the costliest to deliver. In some circumstances it may be preferable for a proposal to include a greater number of social rented properties, which would reduce the total number of affordable units. Where this is agreed with the Local Planning Authority, the applicant will be required to demonstrate how the provision is of equivalent value to meeting the affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.
- 3.16 The type and quality of an affordable home to meet the needs of local people is often reflected in the size of the units provided. New homes can have bedrooms designed for one-bed space (single bed) or two-bed spaces (double bed or twin beds). Unit sizes are commonly expressed in terms of the number of beds and persons. The Council's preference generally being for larger bedrooms which are more reflective of local need. The types of units in terms of bedroom and bed spaces should reflect the needs set out in the Council's Housing Strategy.

### *Deliverability*

- 3.17 [In exceptional circumstances, a viability assessment may be acceptable to demonstrate that the affordable housing requirement is not achievable. Viability assessments submitted as part of a planning application will be made publically available.](#) Where delivery of 35% affordable housing on site is not possible and a reduced requirement is agreed with the Local Planning Authority at the time of planning consent, permissions will be subject to a late-stage review to determine if

the scheme could deliver affordable housing more akin to the full policy requirement of 35%.

### Policy HO3.3: Affordable Housing

Residential developments, including residential institutions of ten homes or more will be supported where they provide at least 35% affordable housing (by habitable room).

Proposals will be required to provide a mix of affordable housing tenures, including a minimum of 60% of new affordable homes as homes for social rent. The homes for social rent should seek to prioritise family-sized (three+ bedrooms) accommodation and reflect the most up-to-date [Housing Strategy](#).

Affordable housing should be provided on site. The Council will not support provision in lieu through commuted sums, other than in exceptional circumstances where it can be clearly demonstrated that it is not feasible to provide affordable housing on site.

Affordable housing is to be fully integrated in the development and to be designed and built to the same standard as market housing.

In exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a late-stage review mechanism, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority) will be required. Where it is demonstrated the number of affordable units achievable on site is higher than agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development.

## Build to Rent

### *Build to Rent proposals*

- 3.18 The National Planning Policy Framework defines Build to Rent as ‘purpose-built housing that is typically 100% rented out.’ Additionally, the South West Hertfordshire Local Housing Needs Assessment states that ‘it can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and / or contiguous with the main development. Schemes are usually of a large scale in terms of the number of residential units and offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control’

### *Discounted market rent and affordable housing*

- 3.19 Build to Rent schemes will be required to provide affordable housing based on the criteria set out in Policy HO3.3 ‘Affordable Housing’. Where a developer is proposing a Build to Rent scheme that requires affordable housing to be provided, the affordable housing offer may be entirely Discounted Market Rent, if agreed with the Local Planning Authority. Discounted Market Rent units should be fully integrated into the development, with no differences between these units and the market units, tenure blind.

3.20 The discount on the market rent should be provided in line with the findings of the Local Housing Needs Assessment. It identified that for a person or family to afford a home in Watford, a discount of between 26-34% would need to be applied to market ~~sales~~rents, with the variation reflecting different sizes of homes, and 33% to market rented properties. This level of discount reflects a local approach to meeting the needs of local residents who cannot afford market rents.

3.21 As part of a planning application, applicants should provide the following information to demonstrate how the scheme will be operated and provide well-managed, high quality rented homes:

- a) There is unified ownership and unified management of the development;
- b) Longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months;
- c) The scheme offers rent certainty for the period of tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases, which should always be formula linked;
- d) There is on-site management, this does not necessarily mean full-time, dedicated staff, however, all schemes need to have systems for prompt resolution of issues and some daily on-site presence;
- e) Providers have a complaints procedure in place and are a member of a recognised ombudsman scheme;
- f) Providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits in advance.

3.22 Discounted Market Rent units that are provided as affordable housing will be allocated to eligible households on Watford Borough Council housing register. The allocation of the Discounted Market Rent properties that are not offered as affordable housing should be allocated in a manner agreed between the operator and to people in a manner agreed with the Local Authority.

#### *Clawback agreements*

3.23 Private affordable rented properties will be subject to a 15-year covenant or a clawback agreement, agreed through planning conditions. For units provided as affordable housing, these will be provided in perpetuity.

3.24 Affordable housing, whether it be publicly or privately operated, provides a long-term community benefit. This benefit is likely to increase over the plan period if past trends continue, with property values increasing significantly faster than household incomes. Therefore it would be reasonable to expect an operator who wishes to sell any discounted market rent properties to:

- Clearly set out how the property(s) will be re-provided, by identifying a specific development to provide certainty to the local authority that there will be no net loss of affordable housing provision and the community will not be adversely affected;
- Re-provide with a unit(s) of the same size as the unit(s) being withdrawn for sale;

- Locate the replacement units where they will meet the needs of people on the discounted market rent housing register.

3.25 This requirement should be set out through the use of planning conditions.

### Policy HO3.4: Build to Rent

Proposals for Build to Rent homes will be supported in locations appropriate for residential development. Affordable housing should be provided in accordance with Policy HO3.3 'Affordable Housing', although Discounted Market Rent, at a genuinely affordable rent, will be accepted in place of other affordable housing tenures. Genuinely affordable rents should be established against the most up-to-date Local Housing Market Needs Assessment and should be capped at a level equivalent to the Local Housing Allowance.

To qualify as a Build to Rent scheme, proposals should meet the following criteria:

- a) The development, block or phase within the development has at least 50 units;
- b) The homes are retained as Build to Rent under a covenant for at least 15 years;
- c) A clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken;
- d) All the units are self-contained and let separately.

On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, this policy will only be applicable to the Build to Rent component. The scheme should be assessed as a whole, with affordable housing calculated as a proportion of the total habitable rooms across the scheme.

## Accommodation for vulnerable people

3.26 With an ageing population comes changing housing needs. These include differing design principles and the types of support required to enable people to live independently for longer, with care services and facilities available. Specialist housing for elderly people can include:

- Age-restricted general market housing;
- Retirement living or sheltered housing;
- Extra care housing or housing with care;
- Residential care homes and nursing homes.

3.27 People may have disabilities such as ambulatory difficulties, blindness, learning difficulties, autism and mental health needs, which may generate a range of housing requirements that change over time. These should be considered when new homes

are built and if any special requirements should be incorporated into the design of a new building.

New extra care housing should be situated in close proximity to good public transport links, be a short walk to local amenities, local shops and health care facilities, have private outdoor space as well as shared private gardens, a communal lounge plus a range of staff facilities. Supplementary facilities including a communal café, activity/health/fitness spaces will create higher quality places to live.

### Policy HO3.5: Specialist Housing and Care Homes

Existing specialist and supported housing will be protected where it is up to the standards set out in Hertfordshire County Council guidance.

The redevelopment of any site that includes housing for vulnerable people will only be acceptable where it meets the standards set out in Hertfordshire County Council guidance and when it meets the following criteria:

- a) There is no longer an identified need for the existing facility;
- b) The needs will be met elsewhere in the Borough, preferably close to the existing building or in a preferential location for specialist housing;
- c) Re-provision would result in improved quality of specialist housing.

Proposals for new specialist housing should be located within 400m of a district or local centre and public transport, be designed to include pick-up and drop-off facilities close to the principle entrance that are able to accommodate specialist transport vehicles. To aid mobility, development should provide space for the storage of mobility scooters.

New specialist housing and care homes that are provided at market value will be required to comply with the affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.

## Student, co-living and non-self-contained accommodation

- 3.28 Watford has a thriving town centre with a diverse range of services and facilities in the borough. The population is relatively young compared to neighbouring districts, with population projections indicating this demographic will continue.
- 3.29 West Herts College is the largest education institution providing tertiary education opportunities up to diploma and apprenticeship levels. The University of Westminster branch in Harrow, Middlesex University in Hendon, as well as a number of technical colleges in the area, offer wider education opportunities, attracting people from other areas or abroad who will seek accommodation. Increasingly Watford is seen as a possible location for a more affordable lifestyle.
- 3.30 Student and co-living accommodation is a type of housing primarily focused on younger people, where they can share communal facilities while having their own accommodation. These types of developments have a high ratio of people per square

metre and are best suited to areas where there is good access to services and facilities. In Watford, the town centre and nearby railway stations provide good access for people walking, cycling and those using public transport.

- 3.31 For other forms of non-self-contained accommodation, these should be located where residents have good access to services and facilities and will not have an adverse impact on residential amenity.

### Policy HO3.6: Student, Co-living and Non-Self-Contained Accommodation

New student and co-living and non-self-contained accommodation will be supported where it is located within the Core Development Area, or within 800 metres of a railway station located in the Core Development Area.

Proposals for student accommodation will be supported where they provide evidence of support and need from an educational institution or a registered provider of student accommodation.

A covenant protecting the premises for student use only will be secured through planning conditions.

Co-living and non-self-contained accommodation will be supported where it incorporates a high quality of design and generous communal shared space and amenities for all occupants.

To differentiate co-living and non-self-contained accommodation from other types of residential accommodation, proposals will be required to have a minimum provision of 50 units. Proposals will need to be supported with a management plan submitted as part of a planning application.

Proposals will be required to make a financial contribution to comply with affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.

## Self-build and custom housebuilding

- 3.32 Self-build and custom housebuilding is an approach to delivering new homes that are designed and built by people to meet their needs and aspirations. The limited amount of land available for new development, as identified by the Housing and Economic Land Availability Assessment, makes it inappropriate to allocate land specifically for self-build homes and custom homebuilding. However, self-build and custom housebuilding will be supported on windfall sites where proposals are for 50 new houses or more.
- 3.33 If the scale of development is large enough to support one or more self-build plots, applicants are encouraged to consider how these self-build plots can be integrated into the overall scheme. Marketing of the site should be demonstrated to



have been undertaken proactively to gauge potential interest in a self-build plot by those registered on the Council's Self-build Register.

### Policy HO3.7: Self-build and Custom Housebuilding

Residential proposals for 50 houses or more (excluding houses to be provided as affordable homes) will be supported where they provide one self-build plot for every ten houses, in agreement with the Local Planning Authority. This will be secured through legal agreement.

The average size of a self-build plot should be comparable to the average size of the market sized plots provided on site.

If the plot has been offered to people registered on the Council's Self-build Register and has not been sold within 12 months of completion of the overall scheme, the property will return to the developer to be built out.

## Gypsies and Travellers

- 3.34 Gypsies and Travellers are part of our community and have housing needs that are to be addressed as part of the Local Plan. Presently, there is one permanent Gypsy and Traveller site in Watford at Tolpits Lane, with ten authorised pitches. There are no private long-term sites or sites for temporary stays in the borough.
- 3.35 The Watford Gypsy and Traveller Accommodation Assessment (2018) was undertaken to identify the local needs of Gypsies and Travellers up to 2036. The study identified a need for two additional pitches for Gypsy and Traveller households.
- 3.36 The assessment found there is a need for seven additional pitches for households that do not meet the planning definition of Gypsies or Travellers. This need will be addressed as part of the general housing need.
- 3.37 One site with two pitches located adjacent to the existing site at Tolpits Lane is allocated for Gypsies and Travellers to meet projected need during the plan period. There is no further requirement to allocate land to meet future need. However, should that change in the future, proposals for new Gypsy and Traveller accommodation will be assessed using Development Management policies.

### Policy HO3.8: Gypsies and Travellers

Existing designated sites used by Gypsies and Travellers will be protected, unless it is demonstrated they are no longer required.

Proposals for new sites will be supported when there is no further capacity at existing or allocated sites for Gypsies and Travellers and the Gypsy and Traveller Accommodation Assessment is considered out of date.

Proposals for new sites for Gypsies and Travellers should:

- a) Have good access to the highway network;
- b) Have good access to health and education facilities by walking and cycling;
- c) Not have a significant adverse impact on the physical or visual character of the area;
- d) Contribute towards biodiversity net gain and not adversely impact upon habitats or trees;
- e) Not be located in an area of significant flood risk; and
- f) Not have an adverse impact on the amenity of existing or future residents.

## Residential conversions

### *Residential conversions*

3.38 Properties converted into smaller units contribute towards new homes required in an area through the sub-dividing of existing properties. This can make effective use of existing dwellings, particularly where there is high-density housing in an area of high sustainability. However, they can reduce the number of family-sized homes available in the area and impact upon local amenity if not properly managed. A mix of dwelling sizes (number of bedrooms) is important to maintain balanced communities and enable people to move and live in areas where they share social connections and are affordable.

### *Houses in Multiple Occupation*

3.39 Houses in Multiple Occupation perform an important role in the availability of housing, particularly for people only able to afford lower rents, and are supported in the borough. However, Houses in Multiple Occupation, in conjunction with other residential conversions, can create issues where there is a high concentration in a particular area. This can be visible through inappropriate numbers of parked vehicles and declining maintenance, affecting the property and amenity in the immediate area.

3.40 Proposals for changes of use to a House in Multiple Occupation will only be acceptable where residential amenity is not significantly affected, family housing is re-provided and the dwelling has good access to services and facilities (Figure 1.1). To enable good management and support, and ensure that they are available in the right locations without having an adverse impact on the surrounding area, only ten percent of the total number of dwellings along a residential frontage (or for a long street, defined as a residential frontage between two main roads or junctions) will be permitted.

### Policy HO3.9: Residential Conversions

Proposals to sub-divide existing residential accommodation in-to self-contained flats or large scale Houses in Multiple Occupation will be supported where:

- a) In the case of conversion to self-contained flats, proposals resulting in the loss of purpose-built, family-sized accommodation with three or more bedrooms include a family-sized unit (three+ bedrooms) with direct access to garden space at ground floor on site as part of the development;
- b) In the case of conversion to self-contained flats, all residential units on site meet the nationally described space standard;
- c) In the case of conversion to a House in Multiple Occupation, the property has an original, unextended, floor area of at least 150sqm and is located in an area with good access to public transport and other amenities;
- d) Appropriate amenity space and facilities for refuse and recycling storage are provided; and
- e) The proposal is car-free or parking provision is provided on site, or in nearby off-street parking facilities.

## Building standards for healthy, accessible and adaptable Homes

3.41 To achieve sustainable development and improve health and wellbeing, new homes need to be of a quality to enable people to live comfortably in circumstances that meet their needs. This applies to all members of our community who may be at different stages of their lives and have different family circumstances. Physical and mental health are often affected by household circumstances such as cramped accommodation and poor soundproofing and in part, can be related to the quality of how a home has been built.

### *Internal space standards*

3.42 New housing is an opportunity to improve new housing for local people.. This is particularly pertinent with an increasing number of homes being delivered through permitted development rights, where Internal Space Standards are not regulated, and an increasing awareness of the importance of healthy homes to support physical, mental health and wellbeing. To ensure the delivery of high quality housing, proposals will be required to meet the Internal Space Standards set out in the national Building Regulations.

### *Adaptability and accessibility*

3.43 People should have the opportunity to stay in their own homes as they grow older; enjoy a good quality of life, and continue to live in the community where they

have lived their lives; feel more connected to their communities; and help reduce costs to the social care and health systems. To do this, homes need to be adaptable. Most existing homes have not been designed in this way and are increasingly unlikely to meet the needs of a changing demographic. Alterations useful to support people as they get older, or those with disabilities, include wider doors and ramps for wheelchair access, and walls fitted with grab rails. More generally, it is important that the internal layout of a home is designed to enable it to support people with mobility issues and disabilities.

3.44 The demographic in Watford is one of an ageing population, with the number of elderly people expected to increase (ONS, 2011 Census). The Local Housing Needs Assessment highlights the projected increase in the number of people with a range of disabilities from existing levels, including those with mobility issues, autistic spectrum disorders, learning disabilities and challenging behaviour.

3.45 The Local Housing Needs Assessment states there is an existing shortfall of adaptable homes in the borough. It suggests there is a significant need for new housing that is designed to address the needs of the changing demographic. More specifically, the study suggests that a higher proportion of people using wheelchairs are likely to be living in social housing.

*Dementia Friendly homes*

3.46 It is estimated that nationally the number of people living with Alzheimer’s will more than double by 2040 and directly affect one in three people aged over 65 (Alzheimer’s Society). In Watford this translates to about 2% of people who could be living with Alzheimer’s by 2036. This is recognised locally by Watford Borough Council, having declared their intention to be a ‘Dementia Friendly Town’ in 2019.

3.47 Good quality housing and sensitively planned environments, whether a family home, extra-care housing, residential care or nursing care, can have a substantial impact on the quality

of life of someone living with dementia. Small changes can often be enough to help someone living with dementia to be more independent, by providing an environment that is clearly defined, easy to navigate, and feels safe. Design considerations to support people with dementia are set out in Figure 3.3.



Figure 3.3: Dementia Friendly design principles

**Policy HO3.10: Building Standards for New Homes**

All new homes will meet or exceed the nationally described internal space standard.

All new housing will be designed and built to comply with M4(2) of the Building Regulations unless they are built to comply with M4(3) of the Building Regulations.

For developments of 10 or more homes, at least 10% of the dwellings will be built to be wheelchair adaptable and comply with M4(3) of the Building Regulations.

For developments of 50 homes or more, 2% of dwellings should be designed to support someone living with dementia.

## Private and communal open space

### *Private open space*

- 3.48 In addition to internal space standards that contribute towards quality homes, access to private outdoor space is just as important for health and wellbeing. Most of the residential development to come forward in Watford during the plan period will be apartments. To provide healthy home environments, access to private outdoor space is essential.
- 3.49 Proposals should consider how private outdoor space can add quality to a scheme and how it will improve the relationship between the building and its surroundings. This includes the provision of a high quality built environment, and should increase natural surveillance early in the design process. All dwellings should have level access to one or more of the following forms of private open space: garden, terrace, roof garden, courtyard garden or balcony.
- 3.50 Private open space should be practical in terms of its shape and utility, offering good amenity so it can comfortably accommodate a table and at least four chairs. The space should also be suitably screened, to protect the area from high noise levels and provide privacy.

### *Communal amenity space*

- 3.51 Where communal amenity space is provided this should be of a minimum size of 50sqm for two units, plus 15sqm per additional two units. The use of roof areas, including podiums and courtyards for additional private or shared amenity or garden space is encouraged. While the standard is set out, this will need to be considered in the wider context of the scheme, in terms of the opportunities and constraints of a site.
- 3.52 Family housing on upper floors should have access to shared amenity space, informal play space and equipped play space (if no facilities are located nearby) and / or a balcony or terrace, subject to acceptable amenity and design considerations. This should be considered in conjunction with Policy NE9.7 'Providing New Open Space'. Where communal amenity space is provided, it should be designed to provide places to sit, play and the exercise. It should be adaptable to accommodate the changing needs of residents and be easy to maintain, whilst not compromising its contribution towards creating a quality public realm. Importantly, communal open space should be designed into the scheme so as not to be overshadowed or suffer low levels of daylight.

### Policy HO3.11: Private and Communal Outdoor Amenity Space

A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and at least one additional square metre should be provided for each additional occupant. The minimum depth and width for all balconies and other private external spaces should be 1.5m. This does not contribute towards the minimum internal space standards.

Provision of private amenity space is to meet the following standards:

Size of dwelling	Apartment*	House/Duplex/Maisonette
1-bed	5sqm	12sqm
2-bed	7sqm	24sqm
3-bed	8sqm	25-40sqm
4+bed	9sqm	25-40sqm

~~The provision of communal outdoor amenity space, including roof and terrace areas should be provided for all flatted schemes, which are more than 400 metres walking distance (260 metres straight line) from a public green space of 0.1 hectares in size. The space should be for the exclusive use of residents of the development and should be a minimum area of 50 square metres supported. Communal outdoor amenity space should will need to be designed to be usable by all residents.~~

## Chapter 4: A Strong Economy



## A Strong Economy



4.1 Watford is a sub-regional economic centre, home to the UK headquarters of some well-known companies as well as many smaller local businesses. A short commute to central London means that Watford is strategically placed for business, although it remains a distinct and competitive economic centre in its own right.

4.2 Watford has a diverse economy, with a mix of office and industrial-based employment that reflects the multi-skilled community living in the borough. Information and communications technology based industries (ICT) are key employers in Watford, with professional services and knowledge based

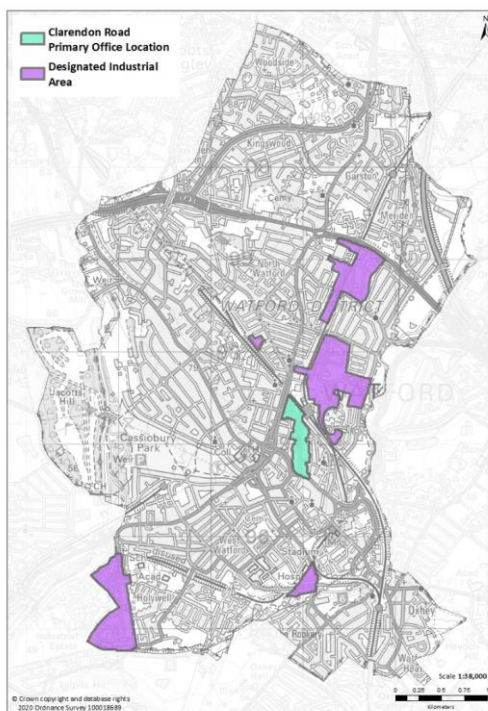


Figure 4.1: Areas designated for office and industrial uses

industries being its largest sector. Equally there is a strong industrial base in the borough, with five distinct industrial areas operating across a variety of different industries (Figure 4.1). This includes businesses related to storage, distribution and manufacturing.

- 4.3 Watford is also part of the South West Hertfordshire Functional Economic Market Area (FEMA) along with Dacorum, Hertsmere, St Albans and Three Rivers. Watford shares a strong relationship with its neighbouring areas, as demonstrated by the interlinked commuting flows.
- 4.4 The planning system can help to support the growth of Watford's economy by ensuring that the right type of land is available in the right places. [The South West Herts Economic Study Update \(2019\)](#) has identified a need across the sub-region for 188,000sqm of additional office floorspace and 481,500sqm of additional industrial floorspace. To contribute towards this requirement, Watford has planned for ~~113,789~~111,175sqm of office floorspace and ~~44,159~~40,759sqm of industrial floorspace. This means that there is an under-provision of industrial floorspace due to land availability, which is compensated for through an overprovision of office floorspace.
- 4.5 Providing more office floorspace than required for Watford can support our neighbouring authorities in meeting their need, provide high quality office floorspace to replace aging stock and reinforce Watford's role across the sub-region as an office hub. It also allows for new offices to be provided at the most sustainable locations, as Clarendon Road allows for the benefits of its proximity to Watford Junction to be maximised.

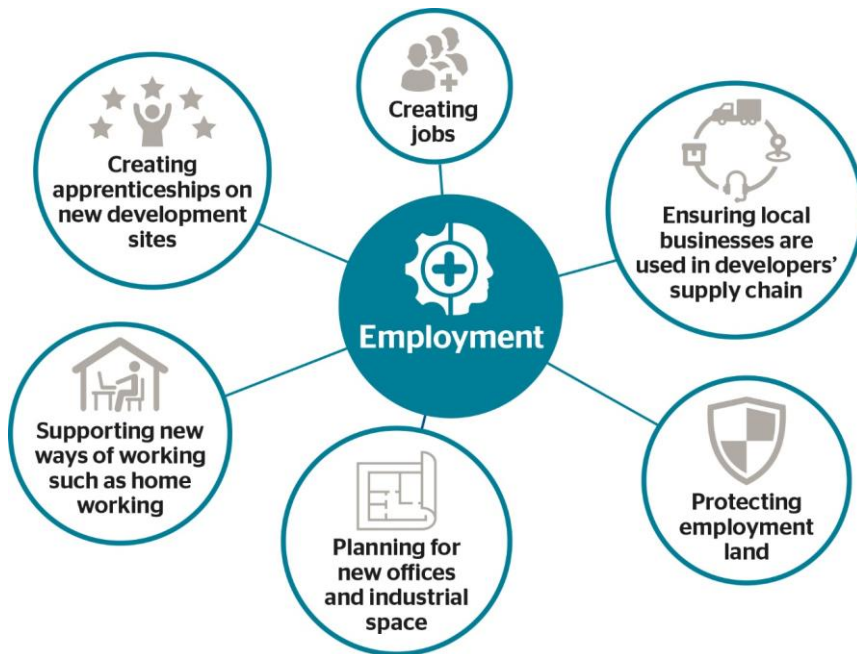


Figure 4.2: Role of employment policies

- 4.6 The policies in this chapter seek to encourage further economic growth by supporting increased provision and intensification of employment floorspace, including industrial (Figure 4.2).
- 4.7 COVID-19 has greatly impacted the economy to date, with the full, long-term effects upon employment remaining relatively unknown. The policies have been designed to continue to support business investment and development in Watford, whilst also being sufficiently flexible to allow for any potential transformative impacts. This may include increased flexible and home working. There is also the potential for an economic recession which could lead to a period of high unemployment and vacancy before any long-term recovery.

### Strategic Policy EM4.1: Providing New Employment

Proposals for new employment floorspace will be supported where they contribute towards meeting the identified employment need in the borough and Functional Economic Market Area.

To meet these challenging targets, the Local Plan will seek to prevent the net loss of both office and industrial floorspace across the Borough. New office growth will be prioritised at the Clarendon Road Primary Office Location, while new industrial growth will be prioritised in the five Designated Industrial Areas. Over the plan period, the Council will seek to plan for the creation of ~~10,700~~<sup>11,500</sup> new jobs.

The Council will continue to work with neighbouring authorities in the South West Hertfordshire Functional Economic Market Area to deliver the shortfall of industrial floorspace that cannot be provided in Watford over the plan period.

The Council will seek to support sustainable economic growth in the borough and the wider Functional Economic Market Area where possible by:

- a) Protecting existing employment land from inappropriate development;
- b) Encouraging the growth of new businesses and industries;
- c) Supporting new models and ways of working, including more flexible working practices;
- d) Ensuring employment land is intensified to make the most effective use of land;  
and
- e) Attracting new inward investment.

## Designated industrial areas

4.8 Watford contains five industrial areas, which host a wide variety of businesses, from large warehouses for storage and distribution, to smaller workshops. These industrial areas are vibrant during the day time and vacancy rates are low. Yet as the demand for housing grows, so too will the number of jobs required in Watford. A key issue facing the borough is that the identified need for new industrial land is met with a limit in land supply. The South West Herts Economic Study Update has shown there to be a large demand for industrial floorspace within the plan period, although the borough's Housing and Economic Land Availability Assessment (HELAA) (2021) has identified a shortfall of land for industrial uses up to 2036.

4.9 This shortage has been exacerbated by large scale losses of floorspace over recent years. In Watford, industrial floorspace has seen a net loss of 24,657sqm between 2007 and 2018. Evidence shows that these losses have often been to residential uses, which enjoy higher land values and have been subject to conversions through Permitted Development Rights. There have also been losses to other non-employment

uses that generate few jobs, such as bulky retail units and community spaces that are better suited to other locations. These losses, combined with high future demand for industrial land, mean that protecting and intensifying designated industrial areas will play an important role in meeting future industrial growth requirements. Sites within designated industrial areas that have scope to be intensified have been identified as part of the Housing and Economic Land Availability Assessment.

- 4.10 While any new industrial floorspace could be dispersed across the borough, the colocation of industrial uses in a designated area can have benefits. Although evidence shows productivity is higher when industry is clustered, there are some more practical advantages of consolidating designated industrial areas. The noise, vibration and odour often caused by industrial processes can make it more sensible to locate these industrial uses together, as opposed to dispersing them directly amongst residential and office uses.
- 4.11 Uses that would be considered inappropriate in designated industrial areas are destination uses that do not complement the existing industrial uses in the area. These destination uses generate specific trips to the industrial areas that are not related to the employment offer on site. For example, some retail uses such as showrooms may attract customers to the industrial area, but cannot be used by the employees on site on a daily basis. These types of uses can undermine the effectiveness and value of the employment area to Watford's economy and are better suited to other locations.
- 4.12 Some non-industrial uses can support the function of the designated sites, making a valuable contribution to the area. These uses can be referred to as supporting uses, or 'walk to' uses, reflecting their strong relationship with neighbouring businesses. Providing small facilities under 100sqm in size such as fitness gyms, nurseries, some retail units and cafés can complement existing uses by providing facilities that can frequently be used by staff working in the employment areas while also creating jobs. Offices may also support the industrial function of some businesses in the site, although larger premises will be subject to Policy EM4.3 'Office Development'. Existing office in the Designated Industrial Areas can retain the same use, but will be encouraged to intensify where possible.
- 4.13 Development should also have regard to the Waste Local Plan and the identified Employment Land Areas of Search (ELAS) which overlaps with some of the sites in the Local Plan.

Industrial potential supply 20 <u>2118</u> -20376	Floorspace (sqm)
Site allocations	<u>19,035</u> <del>17,035</del>
Sites with planning permission	23,724
Total	<u>420</u> ,759

Table 4.1: Future industrial supply

## Policy EM4.2: Designated Industrial Areas

Designated industrial areas are identified on the Policies Map.

Proposals for new industrial employment uses will be supported where they contribute to the identified need for industrial land set out in the South West Herts Economic Study Update. To achieve this, proposals will be supported that incur no net loss of industrial floorspace unless:

- a) An up to date evidence base demonstrates that the site is no longer required for industrial use; or
- b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for industrial use in the medium term.

Proposals for supporting uses under 100sqm will be supported where their job generating potential can clearly be demonstrated. This should be assessed on a case by case basis. Proposals for supporting uses must show that the development proposed would not compromise any industrial or other employment activities in the designated site in terms of their continued efficient function, access, service arrangements and operating times.

## Office development

4.14 The professional service industry is the largest sector of employment in Watford and accounts for 14% of employment, with these types of businesses often being office based.

4.15 The majority of Watford's offices are clustered around Clarendon Road, which functions as Watford's central office district. The draw that Clarendon Road has across the sub-region is reflected in the South West Herts Economic Study Update, which emphasises the strategic role that the area plays in the Functional Economic Market Area. The provision of office floorspace in the Local Plan is set out in Table 4.2.

Office potential supply <del>20213</del> -20376	Floorspace (sqm)
Site allocations	<del>41,286</del> 38,672
Sites with planning permission	72,503
Total	<del>113,789</del> 111,175

Table 4.2: Future office floorspace supply

- 4.16 The Housing and Economic Land Availability Assessment has shown that the vast majority of new office growth in the plan period can be met at Clarendon Road. There are many economic and environmental benefits of concentrating Watford's office growth at this established office location. Developing an intensified office cluster will help sustain Clarendon Road as an eminent and distinctive office location, with an increased focus on sustainability and high quality design. Ensuring that Watford's offices are grouped at Clarendon Road would also help retain its vibrancy, whilst enjoying the benefits of agglomeration.
- 4.17 The area sits within the Watford Gateway section of the Core Development Area, which is set to be an area that will experience some transformative change during the plan period. Potential exists to redevelop sites within the Clarendon Road office area and intensify land use to ensure that office growth requirements are met. This includes high density development and taller buildings.
- 4.18 Similar to designated industrial areas, some smaller, supporting or walk-to uses of under 100sqm may also be considered appropriate, where they support the office function of the area. This may include cafés or convenience stores for employees to purchase lunch, hot drinks or other everyday items. Residential uses will also be supported in the area, to create a vibrant, mixed use quarter. However, any mixed use development should be office led to ensure that the quarter retains its key office function.
- 4.19 To preserve the strong sub-regional role that Clarendon Road plays in supporting growth in the office sector, the area will be the preferred location for future office growth. It is important to protect existing office use at this location, in line with the findings of the South West Herts Economic Study Update. For proposals for new office floorspace, the [Office Development Hierarchy](#) should be followed (Figure 4.3). The approach aims to direct new office development to the Clarendon Road Primary Office Location. If it is not possible for the new office to be located within the Clarendon Road Primary Office Location, the sequential test should be used to direct the office use to the wider Core Development Area, in line with the office hierarchy. This ensures than new office use outside of Clarendon Road contributes to

small clusters first, to minimise any potential negative impacts on residential or industrial areas elsewhere.



Figure 4.3: Office Development Hierarchy

### Policy EM4.3: Office Development

The Clarendon Road Primary Office Location is located on the Policies Map.

Proposals for new office development that result in no net loss of office floorspace in the Clarendon Road Primary Office Location will be supported. Proposals that would incur a net loss of office floorspace will be resisted unless:

- a) An up to date evidence base demonstrates that the site is no longer required for office use; or
- b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for office use in the medium term.

Mixed use development, including residential, will be supported where there is no net loss of office floorspace and a predominantly commercial frontage is maintained on to Clarendon Road.

Proposals for development of new office uses outside the Clarendon Road Primary Office Location must support the Office Development Hierarchy. Where these are 2,500sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no significant adverse impact on the office function of Clarendon Road, and that good accessibility by walking, cycling and public transport is provided or available.

Proposals for supporting uses under 100sqm will be supported where their job-generating potential can clearly be demonstrated. This should be assessed on a case-by-case basis.



## Economic development outside of designated employment areas

- 4.20 The Watford Employment Land Review (2019) has shown that losses of B (employment) class floorspace have been most prevalent in non-designated employment locations. This has largely been through changes to residential uses through permitted development and other means. These losses remain in conflict with the need to increase floorspace to support Watford's economic growth to meet the identified need set out in the South West Herts Economic Study Update. Whilst the majority of employment growth is expected to come through the redevelopment and intensification of designated sites, the designated industrial areas and the Clarendon Road Primary Office Location, smaller non-designated sites also have the potential to assist in supporting Watford's economy.
- 4.21 In the first instance, new offices should be directed to the Clarendon Road Primary Office Location and industrial uses to the Designated Industrial Locations. However, the loss of existing offices and industrial sites should be avoided to ensure that viable employment sites are not lost to other uses. The policy seeks to protect the employment offer outside of designated employment areas to address recent losses of B (employment) class floorspace.
- 4.22 Changes in the market may mean that some sites are no longer viable for employment use and either lie vacant, or are better suited for another use. In these circumstances, changes of use should be enabled to ensure that the most effective use of land is being pursued.

### Policy EM4.4: Economic Development Outside Designated Employment Locations

The net loss of existing employment floorspace outside designated industrial areas or the Clarendon Road Primary Office Location will only be permitted where:

- a) An up to date evidence base demonstrates that the site is no longer required for employment use; or
- b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for employment use in the medium term; or
- c) The job generating potential of the alternative proposed use can clearly be demonstrated; or
- d) The proposal achieves clear sustainability objectives, such as the provision of residential development in close proximity to key public transport nodes.

## Different ways of working

- 4.23 One of the impacts of COVID-19 to date has been the move towards more flexible working practices. This includes a rise in home working for those who are able to do so. This change in working culture may spell an increase in demand for different types of premises.
- 4.24 Small and medium-sized enterprises (SMEs) dominate the working base in South West Hertfordshire and account for 99.6% of all businesses and 50% of employment. This means that there may be a greater demand in Watford for smaller, non-traditional workspaces. This issue was also raised during the preparation of the Local Plan, where public consultation identified the need for the provision of more flexible workspace, as well as more start up and incubator units for small businesses. The demand for more communal office facilities to be provided as part of new development was also highlighted as part of the public consultation.
- 4.25 Creative industries are a fast-growing sector in South West Hertfordshire and providing the right types of spaces could support their growth. The Cultural Strategy (2019) highlights the need to improve the range of facilities for creative industries, which could strengthen Watford's cultural offer. This could include the provision of exhibition or studio space on the ground floor of new developments or in stand-alone spaces.

### Policy EM4.5: Different Ways of Working

Development proposals for new forms of workspace including flexible workspace, start-ups, micro businesses and space for social and cultural enterprises will be supported across the borough where there is demonstrated to be no significant harm to the amenity of neighbouring land uses.

## Training, skills and professional development

- 4.26 It is important that when new development comes forward, this benefits local people. Development contributions are sought to ensure that new development provides the required infrastructure to support the current and future needs of the community. These contributions, such as Section 106 contributions, can be used to fund social infrastructure, such as opportunities for training and professional development. Although the labour force in Watford is considered to be highly skilled, there exist opportunities to help address social inequalities by offering opportunities to those seeking apprenticeships or further training. This could be during the construction phase of new development or in the completed development itself.
- 4.27 There are high levels of deprivation in parts of the borough, including the fifth most deprived area (LSOA) in Hertfordshire. This is often linked to income deprivation, which can be exacerbated by unemployment and lower levels of education.

Supporting apprenticeships or training schemes would seek to capture the social value of new development.

4.28 New development can also support local businesses in Watford by ensuring that fair tender opportunities are given to local small and medium-sized enterprises and social enterprises, and that local businesses are used in the developer's supply chain.

4.29 The process for providing these employment and training initiatives will be set out in a Supplementary Planning Document. Applicants will be required to provide a training, skills and employment strategy to demonstrate their contribution.

#### **Policy EM4.6: Training, Skills and Professional Development**

The Council will work with its partners and use development obligations to require major developments to provide appropriate employment and training initiatives for local people.

To achieve this, major development proposals will be required to submit a training, skills and employment strategy, in agreement with the council, which demonstrates:

- a) Training programmes and apprenticeships provided on new development sites and / or as part of new development;
- b) Fair tender opportunities offered to local small and medium-sized enterprises and social enterprises; and
- c) Opportunities offered to local businesses in their supply chains.

## Chapter 5: A Vibrant Town

## A Vibrant Town

5.1 | Watford has a strongly performing Town Centre, with St Albans Road District Centre supporting by also offering a wide range of services and facilities. In addition, there is a network of Local Centres that provide for much of their communities' day-to-day needs. The approach for the Plan is to build on these strengths and focus growth in these centres, providing retail, leisure and entertainment for all ages and groups of people. Protecting smaller centres will help ensure built up areas in the borough have good access to services and facilities and contribute towards achieving sustainable development.

5.2 The opportunity to participate in activities, whether for recreation, community events or learning, is important for people living in and visiting Watford. The availability of a variety of facilities and shops attracts people to the Town and Local Centres (Figure 5.1) and helps them remain dynamic and vibrant.

5.3 Watford, as a sub-regional centre, serves residents of the town and beyond, drawing people from throughout South West Hertfordshire. The vibrancy and vitality of the Town Centre will be maintained and enhanced through the plan period, providing the opportunity to access a wide range of 'town centre uses' (as identified in the National Planning Policy Framework) including retail, leisure, entertainment, office, arts and culture. These functions are vital to long-term sustainability and underpinning Watford as an attractive place to live, work and invest.

5.4 Continued vitality in these areas can reduce the need to travel, by providing goods and services in easily accessible locations and allowing combined trips. This encourages sustainability and creates opportunities for focal points within residential areas, particularly those with the potential to support higher housing densities.

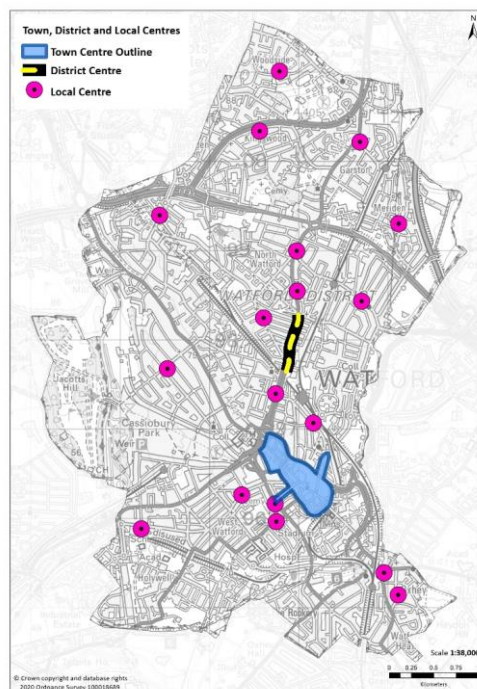


Figure 5.1: Watford Town, District and Local Centres

*The changing nature of retail in Watford*

- 5.5 Watford has a successful town centre but the Local Plan also recognises that the retail environment is changing with traditional retail declining and service sectors, such as food and drink, health and fitness, and hotels increasing. This highlights the importance of retaining flexibility in retail policy to encourage footfall with popular uses, such as leisure and food and drink.
- 5.6 The nature of our Town Centre and, to a lesser extent, Local Centres is continuing to evolve. Increasingly they are becoming hubs for leisure, social and community activities, not just for shopping. Retaining flexibility in retail policy to encourages footfall, ensuring centres remain vibrant while continuing to meet the needs of people that use them. The council is seeking to enhance the offer for families in the town and create a balanced centre that meets the needs of all residents and users at different times of the day and night. New proposals for cultural and social uses will be encouraged as appropriate town centre uses that can add vibrancy and activity. It is anticipated that a building may be in a number of different uses concurrently or at different times of the day.
- 5.7 The Town, District and Local Centres also play a critical role in place making. To support this, developers will be expected to maximise the proportion of ground floors in town centre uses, fronting on to streets or public spaces that are active, by taking steps to reduce the amount of blank frontage and space given over to building servicing and management, such as bin stores and plant. Proposals must ensure that units are accessible and designed to the highest quality, considering how proportions, materials and detailing relate to, and complement, their surroundings.
- 5.8 Where opportunities arise to develop new centres or to enhance existing local shops to perform as Local Centres, some limited additional retail development may be acceptable, subject to the Sequential and Impact Tests.

**Sequential Test**

National policy sets out a 'town centre first' approach through the Sequential Test adopted for the delivery of new retail and other town centre uses. This means that such uses should be located in central locations first to ensure the continued vitality and viability of those town centre locations. Town centre uses should be delivered in the following order of preference:

- a) Locations within the Town Centre;
- b) Edge of centre locations, with preference given to those sites which are or will be well connected to the town centre;
- c) Local Centres

Where appropriate the Local Planning Authority will support applicants in undertaking a proportionate and appropriate sequential test. This should consider whether there is scope for flexibility in the format and /or scale of the proposal and assess the contribution more central sites are able to make individually to accommodate the proposal.

5.9 There are a number of out-of-centre retail **and leisure** parks in Watford. These generally provide for shops selling large value items, less suitable for Town Centre locations. They are generators of car travel and are poorly integrated into their surroundings. Redevelopment of these sites, such as Waterfields and Lower High Street, should make a better use of land by providing new residential development alongside appropriate retail that is easily accessible and well integrated with the surrounding area. Redevelopment of these sites could also provide an opportunity to reassess the transport network in the vicinity, securing improvements to public transport, cycling and walking. Consolidation of retail floor space in such locations may be appropriate to support additional economic spend or investment in the Town Centre, Watford's primary retail destination.

5.10 This chapter should be read in conjunction with the Town Centre Strategic Development Policy CDA2.2 'Town Centre Strategic Development Area'.

## Strategic Policy VT5.1: Supporting Vibrant Retail Centres

Planning permission will be granted for the development of town centre uses (retail, leisure, entertainment, office, arts and culture) within the defined Town, District and Local Centre boundaries, providing the use is appropriate for the scale and function of each centre. Development within these boundaries should contribute towards the enhancement of the public realm.

### Town Centre

Alongside new homes, Watford Town Centre will remain the focus for; comparison shopping, leisure, entertainment, civic and cultural activities. Development proposals within the Town Centre that are 'family friendly' will be encouraged.

To ensure the long-term vitality and viability of the Town Centre, the Council will apply a 'Town Centre first' approach to proposals for retail, leisure, cultural facilities and other town centre uses.

Proposals that optimise the use of land and floorspace within the Town Centre, through mixed-use development, including new or re-used space above shops and commercial premises, will be supported, providing they have regard to the role and function of the centre, impact on vitality and viability and the compatibility of proposed and existing surrounding uses.

### Outside the Town Centre

Where appropriate, a limited amount of retail development will be supported on strategic sites to provide for the new community, subject to: compliance with the Sequential Test; proposals being of an appropriate scale; provision of good accessibility by walking, cycling or public transport; and there being no significant adverse impact on the vitality and viability of the Town Centre or Local Centres in the vicinity. Any additional town centre floorspace of over 2,500 should be assessed against the Impact tests

### District and Local Centres

The vitality and viability of the District and Local Centres will be enhanced to provide local goods and services for local communities. Proposals that optimise the use of land and floorspace within the District and Local Centres, through mixed-use development, including new or re-used space above shops and commercial premises, will be supported, providing they have regard to the role and function of the centre, impact on vitality and viability, including that of existing business, and the compatibility of proposed and existing surrounding uses.





Figure 5.2: Components of a vibrant town

## Retail Hierarchy

- 5.11 The Retail Hierarchy focuses town centre uses that generate high footfall in accessible locations for those working, living and visiting Watford (Table 5.1). It is important that new retail development takes place in the right locations and at an appropriate scale. Watford's Retail Hierarchy will be used to direct town centre uses to the most appropriate location, with regard to their scale, function and character. The Town Centre will be the preferred location for these uses.
- 5.12 It is acknowledged that 'walk-to' Local Centres can help provide premises for small-scale manufacturing or shared working premises, where businesses may wish to sell their produce. These uses can help to serve the needs of the local community and improve the function by increasing footfall in the area. Proposals for these uses will be supported, but will be considered against the policy criteria.

Retail Hierarchy		Description
Town Centre	Watford Town Centre	Watford Town Centre performs a role as a <u>sub</u> -regional centre, with its catchment extending beyond the borough boundary. The centre offers a full range of town centre uses, including: retail, leisure, business, community and cultural facilities.
District Centre	St Albans Road	St Albans Road District Centre contains a good range of town centre uses, including a large public library. The District Centre has a smaller catchment than the Town Centre, but a wider draw and a larger number and range of units than the Local Centres.

Local Centres	Buckingham Road Bushey Arches Garston Park Parade Goodwood Parade Langley Road Langley Way Leavesden Road Longspring Merton Road North Approach St Johns Road The Brow The Gossamers Tudor Avenue Vicarage Road Villiers Road Whippendell Road East Whippendell Road / Ascot Road	Local Centres include a range of small shops, meeting the day-to-day needs of a small catchment area. It is expected that Local Centres will also contain facilities, such as GPs, dentists, dry cleaners and community facilities, to support the retail offer. Typically, Local Centres are categorised as being over seven units, with a range of at least three different uses.
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Table 5.1: Watford Retail Hierarchy

## Watford Town Centre

- 5.13 Given the scale of development envisaged within Watford over the plan period, the rapidly changing economic market and the way people are increasingly using town centres to socialise, it will be important for proposals to be designed to be sufficiently flexible to allow for changing conditions and needs. Proposals that allow for varying size requirements, for example, by providing for expansion through the future creation of mezzanines, or the subdivision / amalgamation of units, will be supported. Consideration should also be given to future-proofed design that allows for units to readily change uses. This flexibility should be demonstrated as part of a planning application submission.
- 5.14 It is acknowledged that there may be instances where some loss of floorspace contributes towards achieving wider objectives, such as the redevelopment of the site, or improving access to upper levels. In such cases, ground floor units should remain of

a size and scale that is viable to current or future occupants and the access to upper levels be designed so as not to undermine the activity and function of the frontage.

5.15 The South West Herts Retail and Leisure Study (2018) recognises the prominent position of Watford Town Centre, whilst also acknowledging the need to broaden the offer to include a wider range of leisure and cultural activities. No specific allocations are required to meet any leisure capacity identified within Watford, however, such facilities should be promoted, providing that such uses would not adversely impact the operation or function of existing retail provision and the vitality and viability of the town centre.

5.16 Other uses, such as employment and residential, would be appropriate on upper floors, however, access must be designed to promote street level activity and not undermine the viability of ground floor units or interrupt the active frontages.

#### *Learning and non-residential institutions*

5.17 These uses (class F1) are acceptable in the Town Centre, however, it is important that they do not negatively impact on the function. It is acknowledged that large numbers of people travel to large-scale attractor uses at a specific time; applications will need to demonstrate that such uses would have no negative impact on the transport network. In addition, uses that remain closed for large portions of the day or week are not appropriate. Windows and doors should face on to the street, creating interest and activity for significant portions of the day, with lively internal uses visible from the outside, or spilling on to the street in appropriate locations.

#### *Outdoor uses*

5.18 Uses that help to keep the public realm active will play an important role in place-making and are, in principle, encouraged. However, the impacts on the amenity of residents and workers would need to be carefully considered. Any proposals for street markets would need to be accompanied by a management plan that identifies its hours of operation and storage arrangements when not in use, types of traders, advertising, servicing and pedestrian and transport impacts. Event spaces will also require a management plan regarding types of events, frequency of use, noise levels, advertising, servicing and pedestrian and transport impacts.

#### *Convenience food takeaways*

5.19 There has been a growing concern in recent years about the proliferation and over-concentration of hot food takeaways and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on childhood obesity. In 2020 government reclassified hot food takeaways into a separate use class. The type of food on sale nearest to schools can influence the diet of schoolchildren and the availability of 'unhealthy' foodstuffs can make healthier choices less likely. While it is acknowledged that takeaway uses can be beneficial to the function of the Town Centre and reduce vacancies, an over-concentration of these uses would be detrimental to the character and function, or vitality and viability, of the Town Centre, and, as such, proposals that would result in potential clustering will be resisted.

## Policy VT5.2: Watford Town Centre

Within Watford Town Centre, as shown on the Policies Map, applications for town centre uses will be supported where they:

- a) Maximise the proportion of the ground floor fronting a street as a positive and / or active frontage; and
- b) Support flexibility and adaptability to future-proof for changing uses (subject to appropriate permissions).

Applications for learning and non-residential institutions will be supported where they:

- c) Retain active frontages throughout the day;
- d) Demonstrate no negative impact on the road network;
- e) Serve the local community.

Applications providing outdoor uses, such as eating and drinking uses with outdoor seating, event space or street markets are encouraged and will be supported where they:

- f) Do not detract from residential amenity;
- g) Demonstrate no negative impact on connectivity and the ease of getting around for pedestrians and cyclists.

Applications for new hot food takeaway will be supported where they:

- h) Retain a separation of at least four units between each hot food takeaway unit;
- i) Protect the amenity of surrounding properties.

## Local Centres

5.20 Retail and service provision outside the Town Centre is an important element towards achieving sustainable development and healthy communities. The network of Local Centres across the borough allows easy access to multiple services and contributes positively towards the identity of neighbourhoods. Local shops, alongside other services, are a key component of Local Centres and their protection will help shape how services are provided in the future.

5.21 Proposals will need to provide flexibility for Local Centres to address the challenges of new forms of retailing, while realising their potential for higher-density, mixed-use residential developments and environmental improvements. Redevelopment will be supported where it can make centres more viable and functional, but existing floorspace will be protected, to provide more facilities and amenities in local communities and reduce the need for travel. Proposals should demonstrate that the continued operation of existing facilities is not compromised by redevelopment.

5.22 The focus is on the consolidation of a viable range of functions and uses that make Local Centres a recognisable destination in the local area, particularly

convenience retailing, leisure, local employment and workspaces. The design, accessibility and layout of Local Centres will have an important impact upon their success, and, in turn, the health and wellbeing of local people. Proposals should promote a range of unit sizes and retain a variety of uses, to meet the needs of the local community.

- 5.23 Smaller Neighbourhood Centres should focus on a limited but variety of uses and provide convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.

### Policy VT5.3: District and Local Centres

New development must contribute positively to the function, vitality and viability of the District and Local Centres. This will include sufficient provision of local shops and services to meet the day-to-day needs of local communities.

Proposals for commercial, business and service uses, or appropriate community uses, will be supported. Development proposals should:

- a) Maximise the proportion of the ground floor fronting a street as a positive and / or active frontage;
- b) Demonstrably relate to the character, scale and role of the existing centre;
- c) Ensure centres are accessible, active, attractive and safe during the day and night;
- d) Provide convenient and attractive access by walking and cycling; and
- e) Support temporary and community uses where they help to activate and revitalise units.

Applications for new hot food takeaway will be supported where they:

~~— Are located more than 400m walking distance from the entrance of an existing or permitted primary school.~~

f) Are not likely to have an adverse health effect on people living close by. Where proposals for new hot food takeaway shops will likely to have significant health effects, especially among adolescents of the nearby existing and newly proposed schools, colleges, and youth centres, a Rapid Health Impact Assessment (HIA) will be required;

~~f)g)~~ Retain a separation of at least four units between each hot food takeaway unit; and

~~g)h)~~ \_\_\_\_\_ Protect the amenity of surrounding properties.

# Chapter 6: An Attractive Town

## An Attractive Town

- 6.1 The Spatial Strategy identifies areas of the town where transformational change is appropriate, areas where the scale of change is lower and some areas where very little change is expected. Within Watford's urban fabric there are existing areas of distinctive and high quality character, which should be retained and reinforced, and other areas where the character has been eroded through past developments that present opportunities for creating new, distinctive, high quality places.
- 6.2 New development provides an opportunity to make a positive contribution through high quality design. To help deliver the objectives of the Local Plan, applicants will need to demonstrate how they have integrated high quality design in a fashion that reflects the character of the area. The National Planning Policy Framework requires new development to take opportunities to improve the character and quality of an area and the way it functions. The National Design Guide sets out detailed practice guidance which new development should follow. Development proposals should take account of guidance [which includes the Residential Design Guide \(2016\) and Character of the Area Study \(2011\) and any future revised versions of these which are adopted.](#)



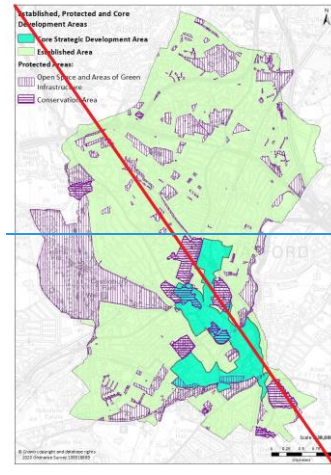
~~provided in the Council's supporting planning documents and guidance.~~

Figure 6.1: Principals of good design

- 6.3 To ensure that the growth proposed can be delivered in a way which will retain and reinforce the character and identity of Watford three types of area within the town have been identified.
- The core development area, where most of the growth for the town will take place and the scale of change is expected to be transformational;
  - protected areas where the scale of growth will be very limited and very respectful of the local context; and

- c. established areas (parts of the town not in the Core Development Area or Protected Areas) where the scale of change is more limited than the Core Development Area but where some intensification is expected.

6.4 Protected areas include all parks and open spaces (detailed map at Figure 9.1) and all conservation areas (detailed map at Figure 7.2)





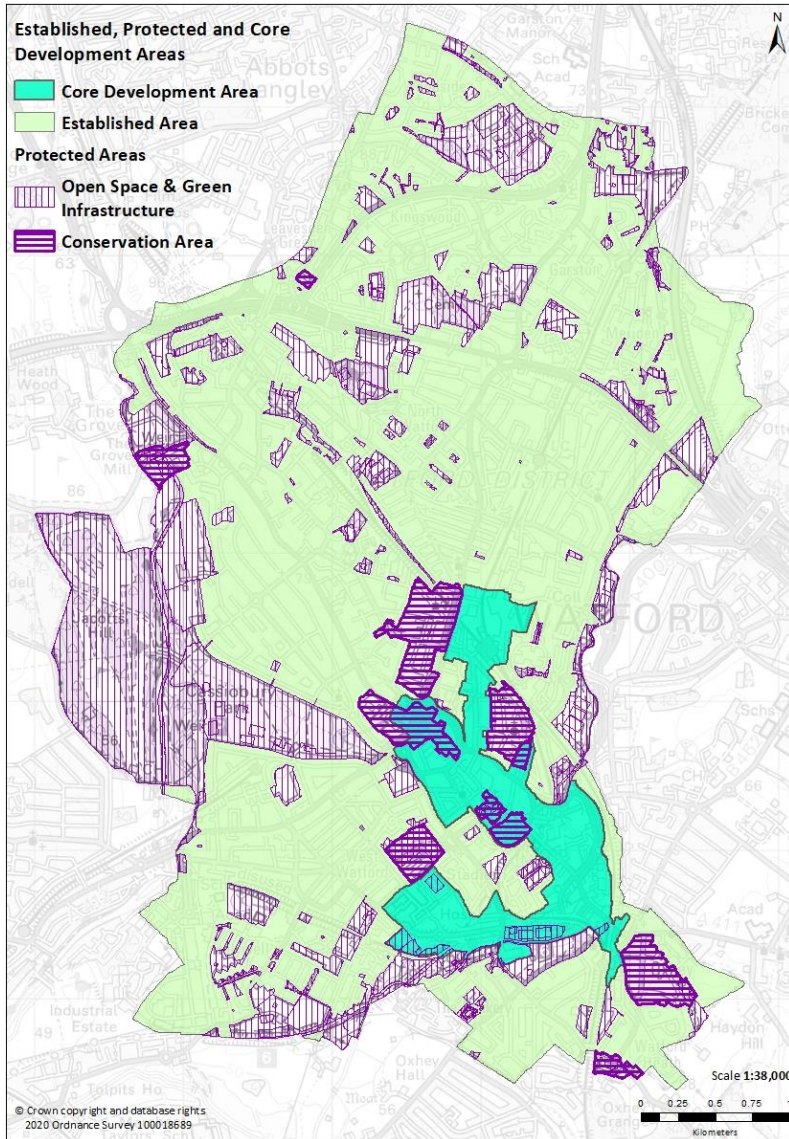


Figure 6.2: Established, Protected and Core Development Areas

## Strategic Policy QD6.1: Design for an Attractive Town

New Development in Watford is required to deliver high quality design. Buildings will be designed to minimise environmental impact including mitigating climate change impacts, deliver attractive and functional spaces and reinforce and develop a distinctive local character with durable, lasting materials. Proposals will be required to demonstrate that they have responded positively to sensitive areas. New public realm will be attractive, accessible and reflective of the needs of the community.

There are three areas in Watford, each of which requires a separate approach when considering the design of new development.

### Core Development Area

The approach to design will encourage a new positive character, enhance areas of poor quality and build on existing aspects of positive design. High density development will be supported, with the highest densities to be located in the most sustainable locations. Proposals for taller buildings will be of an appropriate height that reflects its location, role in the built up area, contributes to wayfinding as a key marker in the townscape and which makes a positive contribution towards an attractive skyline

Proposals for major developments will be required to achieve high quality design, with taller buildings required to demonstrate exceptional design and innovation that are well connected through a quality public realm that is interesting and people can easily interpret and use. Together, these will contribute towards achieving a compact and walkable town.

Proposals will demonstrate how they maximise the relationship between new buildings, environmental features and people, maximise site specific opportunities and contribute towards their integration with the surrounding area.

In locations where the Core Development Area is adjacent to existing areas of established residential character, proposals will need to be designed to reflect this sensitivity and demonstrate how they enable an appropriate transition between these areas.

### Established Areas

This includes all areas that lie outside the Core Development Area and the Protected Areas. The degree of change will be more limited than in the Core Development Area but is expected to result in a gentle uplift in the density of the area. Development proposals in these areas should be led by the existing characteristics of the local area and will reinforce and where appropriate enhance the character of the local area.

### Protected Areas

The degree of change within these areas or which affects their setting will be more limited. Development proposals will be of the highest design standard and particular attention should be paid to the detailing and materials proposed for the scheme. Design cues should be taken from heritage assets and designations to inform and guide the character and identity of new development.

## Design principles

6-46.5 The quality and distinctiveness of a place is the result of decisions made about how the buildings relate to one another and to the spaces between them. This affects the way the place looks, feels and is used. It is important that new developments in the town make a positive contribution to the identity and character of the local area and support and enhance the local movement network whilst providing opportunities for businesses to thrive, spaces for people to enjoy and leisure activities.

6-56.6 The ground floor of new buildings should provide animated and active frontages. This can be achieved through the provision of direct access to ground floor uses and the positioning of ground floor uses so that the active uses animate the adjoining public space. This will help streets and spaces to be lively areas and contribute to social wellbeing and strong communities.

6-66.7 New development inclusive of individual buildings and the public spaces between them should be designed for all users, link well into the existing network and provide safe and attractive areas for cyclists and pedestrians. Street layouts should follow a logical structure and hierarchy to aid navigation including: incorporating local landmarks; other distinctive features that help wayfinding and be designed to provide a logical sequence of key points. Further more detailed guidance on creating safer places is provided through the Secured by Design set of guidance documents. The use of this guidance and direct liaison with crime prevention teams is supported.

6-76.8 Local and town wide views are important to residents and those arriving in the town, and are an important aid to finding key locations. Key views are identified in supporting planning documents.

### Policy QD6.2: Design Principles

Proposals for new development will be required to show how they will make a positive contribution to high quality design and place making. To achieve this, proposals for new development will need to show how they have responded to the following design principles.

#### Sustainable design

New developments will need to be designed to minimise their impact on the environment and embrace sustainability principles. This should include measures to reduce the use of resources including energy, water and waste and incorporate soft measures to improve the environment such as green roofs, green walls and multifunctional green spaces.

#### Character and identity

New buildings and streets are to be attractive and distinctive. This includes consideration to the way an area looks, feels, sounds, smells and how it functions, both presently and in the future. Street scenes are to be of high quality, welcoming and take design cues from

existing buildings, where they make a positive contribution to the character of the area ensuring it is identifiable and relatable to residents.

#### **Built form**

The scale and massing of proposed buildings will need to relate to the local context and the role of the area. Building footprints are to be of an appropriate scale, enhance the relationship between buildings individually, collectively and the spaces between them to create environments that are relatable to people, easy to understand, have good light, minimise wind effects and improve connections with the surrounding area. New buildings should make use of local topography, to reinforce Watford's distinctiveness.

#### **Active and positive frontages**

On main streets and in public spaces, new buildings should include active frontages and / or positive frontages and ensure an active visual and physical relationship between the street, or space, and the building. Uses on the ground floor should incorporate active uses to animate the interface between buildings and the public realm.

#### **Movement and connectivity**

Streets are to be designed so they are efficient, convenient, legible, ~~and permeable, to support all users~~ and prioritise non-vehicular travel. They should encourage people to be more active, support healthy lifestyles and be designed to be used by everyone. Routes need to be designed for their anticipated level of use and be clearly defined, to make it easy for different users to interpret using appropriate wayfinding measures, including sightlines.

#### **Views**

New development will need to make a positive contribution towards important views in the borough. This includes views from high vantage points, ground level and long distance views. New development should enhance the setting of local landmarks where appropriate. New developments that have an impact on the local skyline will need to be designed to an exceptional standard that will improve the distinctiveness of Watford in a positive way.

## **Public realm**

**6-96.9** High quality and functional public realm is crucial to creating places in which communities and businesses can thrive. Streets and spaces should be designed to promote social interaction and inclusion, where people of all ages and abilities can mix, feel safe and be comfortable. In areas of higher density development, it is crucial that the streets and spaces accommodate a wide range of uses to meet the needs of the communities around them such as areas for play, fitness, quiet spaces and more generally to contribute towards improving health and wellbeing.

**6-96.10** The spaces created between buildings should be convenient for a wide range of users, adaptable and flexible so they can accommodate the changing needs and

lifestyles of users and changing uses over time. Building lines and active frontages should be used to define the public realm and building height used to create a sense of enclosure that results in a comfortable and usable space or street.

[6-106.11](#) Complementary elements, such as materials, finishes, furniture, planting, signage, lighting and public art should be used to ensure that the spaces and streets created in new developments are at a human scale. Design details should consider the health and well-being of the people using them, for example the provision of shade and shelter, places to rest as well spaces for more active uses. The creation of 'gated communities' which do not contribute to well connected, accessible and a permeable public realm should be avoided.

[6-116.12](#) The delivery of high quality public realm within new schemes and within the Strategic Development Areas will be secured through the use of conditions or S106 Agreements.

### Policy QD6.3: Public Realm

All areas of public realm need to be designed so they are safe, accessible, inclusive and attractive. Public spaces in new development will be supported where it is demonstrated they meet the following criteria:

- a) Create spaces that positively reinforce local identity;
- b) Routes and spaces are designed to accommodate social interaction, activity and green infrastructure for everyone to use;
- c) Use appropriate street furniture to enable informal play, areas for rest, encourage social interaction, wayfinding measures and linkages between local destinations taking care to avoid unnecessary street clutter, and consider how spaces will be used during the day, evening and night;
- d) Provide safe environments, using active frontages, natural surveillance, sightlines, good lighting and well located building entrances
- e) Create an attractive environment using tree / shrub planting and soft landscaping, prioritising native species; consideration will need to be given to maintenance and how soft landscaping is used to reduce the sense of car dominance, where car parking is provided; and
- f) Use public art where it will animate the public realm and foster a sense of identity.

## Building design

[6-126.13](#) High quality building design is important to creating successful places, in terms of the impact that the external appearance has on the spaces and streets around it and the internal living environment which occupiers experience. Good building design

will contribute to high quality living environments and will have a beneficial impact on the health and wellbeing of users and occupiers.

#### *Relationship between buildings and streets*

**6-136.14** New buildings should be designed so that the external appearance enhances the positive aspects and features of existing local character and identity. There are some parts of the urban area where the positive character has been eroded through inappropriate past development and proposals to redevelop in such locations should take the opportunity to enhance and upgrade the character and identity of the area, drawing on the positive aspects of the wider area.

**6-146.15** The detailed design of the building facades should have a positive relationship with the street and, in particular, should be at a scale that people walking in the street can relate to and feel comfortable with. Façades facing the street and other public spaces should have entrances and windows at regular intervals allowing access to the building and the sense that the space is over looked from the surrounding buildings.. The details and materials should reflect those found in the local area but may be interpreted in a more contemporary and innovative way. Materials should be of high quality and designed to age well, retaining their quality and finish; care should be taken when introducing new materials alongside traditional ones, so that they work well together and also reinforce local character, whilst creating a distinctive new identity.

#### *Flexibility in design*

**6-156.16** The design of new buildings should consider how the building and the spaces in the area will be used now and in the future, and ensure that they can be adapted to accommodate the needs of future users. In particular, consideration should be given to how new residential buildings can facilitate changing working patterns, where more people may be working at home more of the time. This may be achieved by providing additional space within residential units or in appropriate locations, providing a shared workspace on the ground floor of a new building. Applications for residential development should demonstrate how this has been considered.

#### *Designing for comfortable environments*

**6-166.17** The effects of climate change mean that buildings should be adequately heated and cooled to deal with more extreme hot and cold spells. Where possible, new residential units should be able to be cooled using natural cross ventilation, which will result in a more energy efficient building. This can be achieved using dual aspect units in residential schemes which will also improve the daylight levels. Internal design measures, such as higher ceilings, can be used to aid cooling and ventilation.

**6-176.18** Proposals for new buildings should consider this at an early stage of the design process and use building layouts that maximise the number of dual aspect units delivered. The size of glazed areas should be adjusted to avoid overheating, particularly on south and west-facing elevations, which receive more sunlight during the hottest part of the day. Other measures to shield the impacts of afternoon sun should be an integral part of the building design.

### Safe and attractive environments

6.19 To assist with delivering active frontages and improving social interaction within larger residential developments, buildings should be designed to have multiple cores that access directly onto the street at the front of the building. Reducing the number of units served by a core area will provide better opportunities for residents to meet and get to know their neighbours and to develop stronger local communities. Shared internal areas should be light and airy and provide sufficient circulation space for residents to pass each other easily and for informal social interaction; this is particularly important where the number of people using a single core is high (this is a factor of both the number of units and their size. Where it is not possible to deliver an internal layout where the units per floor sharing a core is eight or less; measures to ensure that the circulation space and living environment is of high quality should be used; these include increasing the corridor widths so that it is easy to pass and providing good levels of natural daylight and ventilation to these spaces.

6.186.20 It is important that residents have somewhere safe and convenient for package and parcel delivery. Where possible, this should be located within the buildings on the ground floor of each core. Other large item and cycle storage should be conveniently located, easily accessible and safe, so that residents feel comfortable using it. The best location is within the building and on the ground floor of the core area. If this cannot be achieved, then storage should be located close to the buildings, visible from the buildings and secure. External refuse and recycling and cycle storage should be located to minimise visual and physical obstruction, whilst being easily accessible for residents and operatives.

6.196.21 To provide attractive environments and buildings it is important to consider the location of services, utilities, down pipes and gutters carefully and early in the design process so that they are an integral part of the design. Where possible, service and utility boxes and pipes should be located inside buildings with access to boxes from communal areas on the ground floor. On taller buildings the removal of excess rainwater from the roof of buildings to the drainage network should be integrated into the building and external gutters and downpipes avoided. On a more domestic scale, buildings external downpipes and gutters should be carefully positioned to avoid a cluttered appearance.

6.206.22 Internal space standards and amenity space standards are set out in Policy HO3.10 Building Standards for New Homes and Policy HO3.11 Private and Communal Outdoor Amenity Space. Policies relating to sustainable construction are located in Chapter 8 'A Climate Emergency'.

## Policy QD6.4: Building Design

Well-designed buildings that are visually attractive, functional, accessible, sustainable, mitigate climate change, and which reflect the character and wider objectives for the area will be supported.

### Enhancing character and identity

New buildings are to positively contribute towards the local area using the following design principles:

- a) In areas where the local character and identity has been eroded, the design of new buildings should enhance the positive and improve the negative qualities of the area;
- b) The proportions of new buildings need to be appropriate to the existing or emerging character of the area;
- c) Façades and their detailing are to have a positive relationship with the street, be of a human scale, reflect its role and function and enhance the character of the area;
- d) Materials should be of high quality, robust, durable, age well, reflect their function and sit comfortably with buildings in the area, adding to local distinctiveness.

### Safe, healthy and attractive internal and external environments

New residential buildings should be designed to provide internal and external spaces that support the health and wellbeing of all those who use and experience them. New building design should adhere to the following:

- e) All ground floor units facing the street or public realm should ~~to~~ be designed so that the primary access for each individual unit is directly on to the street or public realm; deviation from this (by exception) will need to demonstrate that individual ground floor access is not feasible due the constraints of the site;
- f) Include a high proportion of dual aspect units to create quality internal spaces, able to receive good light and air ventilation and, where possible, avoid using a single aspect form;
- g) Internal layouts should provide for working at home, implementing the technical internal space standards; this could be the inclusion of space within individual dwellings for a home office, or a shared workspace within the building;
- h) Internal cores are to serve no more than eight units per floor; deviation from this (by exception) will need to be justified and mitigated through design measures that demonstrate internal living standards will not be adversely affected.;  
Buildings should be designed to promote the use of stairs and provide secure cycle parking in easily accessible locations.

Getting the details right: storage, waste, servicing and utilities



All new developments will be designed so they are effective and attractive by meeting the following criteria:

- h) Access to service and utility boxes should be inside the building and avoid unnecessary clutter; where this is not possible they should be an integral part of the design;
- i) Refuse and recycling should be located within the building envelope; where this cannot be achieved, bin stores which are carefully positioned, easy to use and attractive should be provided;
- j) Secure provision for parcel receipt and storage should be provided on site;
- k) The location of drainpipes and gutters and pipes for services and utilities should be integrated into the wider design, to avoid a cluttered appearance.

## Building height and taller development

6-216.23 To meet the borough's need for new homes and jobs the Local Plan anticipates development coming forward at higher densities than currently exist across the borough. This means Watford is more likely to see new buildings that are taller than the existing prevailing height within an area.

6-226.24 The Tall Buildings Study (2021) examines the prevailing height of existing buildings across a series of defined character areas and the likely base building heights that will need to be achieved in order to meet the need for homes and jobs across the borough. The findings have been drawn from an assessment of relevant factors, including: an area's sensitivity to taller buildings and suitability for them; consideration of strategic growth designations; and potential visual impacts of tall buildings when seen within the townscape including important views). The report provides an evidence-driven approach, which establishes appropriate thresholds for base building heights in each character area for future development.

6-236.25 Base building heights are not intended to act as an absolute 'cap' on the height of new buildings but instead set a presumption in favour of developments where the predominant height falls within the threshold set for that character area. Four distinctive character areas have been identified including:

- **Watford Gateway:** Potential development sites within Watford Gateway are generally less constrained by their urban context, particularly in the area around Watford Junction Station. They are well connected to the local and strategic transport network, and higher density and mixed-use development is generally appropriate here. The Watford Junction area is relatively low lying, while Clarendon Road is characterised by buildings taller than the surrounding area. The station area is a key node with limited sensitivity and excellent access to public transport; strengthening the role of Clarendon Road as a gateway into the town centre through good design and use of buildings with added height can make a contribution towards this. Sites in this area will be expected to make a significant contribution to streetscape and connectivity

improvements, particularly the transformation of the ring road. Proposals that adjoin existing residential areas will need to demonstrate a transition between the two areas.

- **Town Centre:** The Town Centre contains a diverse range of uses, buildings and public spaces. The area is suitable for higher density development in the right locations, however, this needs to be appropriate to the site and its surroundings and to clearly justify why a site is suitable for a taller building. Proposals will need to be explicit as to why a taller building is appropriate for the location. This includes demonstrating which landmark, node or location the building is marking; how it relates to and enhances the existing built form, including scale and massing; how the frontage will positively contribute towards the public realm and place-making; in locations near the High Street, how it relates to the shopping area and provides a quality living environment; and how the proposal has responded to heritage assets that may be affected by the proposal.
- **Colne Valley:** The Colne Valley area has a greater sensitivity to building height and proposals will need to consider the local topography and views across the area. Proposals should embed place-making aspirations to open up the river, protect and enhance existing or future views and mitigate sensitivities associated with biodiversity. On larger sites, through a masterplan approach, well designed schemes may identify opportunities that maximise changes in topography to achieve additional height.
- **Areas outside the Core Development Area:** These areas have an established character and the prevailing height is lower. Proposals will need to clearly demonstrate how they relate to the existing character and make a positive contribution towards the area. In very limited cases, specific locations might be suitable for taller elements above the proposed base building heights. However, in the absence of significant improvements to public transport accessibility, building heights and density are likely to be more modest. Locations outside the Core Development Area where taller elements may be appropriate include:
  - Ascot Road, where a character for taller buildings has been established; and
  - On large sites close to the Dome Roundabout, which is a key entry point to the town.

[6.246.26](#) Where a proposed building would exceed the base building height for the area, this will need to be clearly justified and will be subject to detailed consideration under the criteria set out within the Building Height Policy. To demonstrate why a proposal for a taller building should be supported the starting point should be to demonstrate that the location is appropriate, based on an evaluation and assessment of suitability and sensitivity, as set out in the Tall Buildings Study:

- **Suitability:** Proposals should demonstrate the suitability of the proposals in relation to excellent public transport and cycling accessibility, proximity to town centres or local facilities, access to green spaces and designations for strategic development.
- **Sensitivity:** Proposals must consider potential impact on designated and undesignated heritage assets, views, ecological assets and greenspaces.

**6.256.27** Proposals that involve higher densities should be based on careful consideration of local character, context and access to amenities and public transport. Relevant plan policies include: housing and amenity space (Chapter 3 'Homes for a Growing Community'); design (Chapter 6 'An Attractive Town'); and heritage (Chapter 7 'The Historic Environment'); sustainability and climate change (Chapter 8 'A Climate Emergency'); open space (Chapter 9 'The Environment') and sustainable transport (Chapter 11 'Sustainable ~~Transport~~ Travel Town'). The approach to building heights should also be considered alongside the Spatial Strategy and Local Plan objectives (Chapter 1 'Spatial Strategy for Watford') and aspirations for the Strategic Development Areas (Chapter 2 'Core Development Area').

*Exceptional design, high quality living environments and community benefits*

**6.266.28** Where consideration of the suitability and sensitivity of a site suggests that a taller building, or built element, may be justified proposals will need to demonstrate how they will deliver exceptional design quality, high quality living environments and public benefits for the town and community.

**6.276.29** Taller buildings can have a significant impact on townscapes and views and therefore, in relation to their prominence, it is important that taller buildings are of the highest design quality. To ensure taller buildings are of exceptional design, applicants should make appropriate use of tools and processes for assessing and improving the design of their proposals, including making use of design review. More specifically, when taller buildings are designed, they should demonstrate that consideration has been given to the three main elements: base, mansard and pop-up. Guidance should refer to the specific massing rules that apply to each of these elements, as set out in the Tall Buildings Study.

**6.286.30** Buildings that would be taller than the base building height for their area will also be required to demonstrate their positive contribution in terms of public benefits to the town and the community. These benefits should clearly exceed the benefits that could be achieved for a building that would be lower than the base height for the appropriate area. These benefits should include, but may not be limited to:

- a) Provision of affordable housing and a good mix of dwelling sizes;
- b) Provision of infrastructure, including public transport, cycling and walking infrastructure and social infrastructure to support communities' health and wellbeing, including public open space and access to services and facilities;
- c) Building to high environmental standards, with comfortable internal living environments that provide good air ventilation, daylight and minimise overheating;
- d) Maximising opportunities to generate energy, using low-carbon and renewable sources and taking advantage of the scale of development;
- e) Make a positive contribution towards place-making, including measures to reflect local character and signify a recognisable landmark; and
- f) How the building will contribute towards Watford as a place, in terms of distinctiveness, design quality and how this relates to the urban form.

*Definition of prevailing height and taller building thresholds*

6.31 The Tall Buildings Study has identified future prevailing building heights in all parts of the borough. This has been used to inform an approach where higher density development up to a certain height will not be defined as a taller building. This is referred to as the 'base building height' and is set out as the number of storeys. This base building height for each respective area reflects the balance between existing character, constraints and opportunities (Table 6.2). Buildings at this height or lower will not be assessed against Policy QD6.5 'Building Height', but will need to comply with other policies in the Local Plan. Where a building is proposed that exceeds the appropriate base building height, it will be defined as a 'taller building' and will trigger the implementation of Policy QD6.5 'Building Height' alongside other Local Plan policies.

Area of the borough	Base building height
Watford Gateway	Up to 8 storeys on a street frontage, stepping up to 10 storeys to the rear.
Town Centre Strategic Development Area	Up to 5 storeys on the High Street, stepping up to 8 storeys to the rear.
Colne Valley Strategic Development Area	Up to 6 storeys.
Outside of the Core Development Area	Up to 4 storeys.

Table 6.1 2: Base building heights

### Policy QD6.5: Building Height

Proposals for buildings that exceed the base building height set out in Table 6.1 will be classified as a taller building.

Proposals for taller buildings should clearly demonstrate:

- a) Exceptional design quality, including height, massing, proportion, materials, detailing, site layout and its relationship with the surrounding area, which set it apart in terms of quality and distinctiveness, and which positively contribute towards the context and character of the area;
- b) Significant public benefits that the development will provide, clearly setting out why these would not be achievable as part of a development restricted to the base building height;
- c) Significant sustainability benefits including the building design, construction, operation and connections to the surrounding area;
- d) A clear townscape rationale for the specific siting of taller buildings, marking key locations or nodes, and responding to public transport accessibility and activity
- e) A positive relationship with relevant heritage assets and their setting and the historic character that contributes to the town's distinctiveness;
- f) A desire to achieve a specific skyline shape or cluster;
- g) That proposals have been designed to avoid harmful impacts on daylight, sunlight, wind conditions, overheating and microclimate, including the provision of appropriate mitigation where required;
- h) That appropriate amenity and play spaces are incorporated to a high standard for all residents;
- i) That the setting of the development will not be dominated by car parking as a result of the higher density. In this context, a car-lite approach should be taken where this would be an appropriate response to higher local public transport accessibility;
- j) A balanced and comprehensive approach to servicing to avoid impact on local streets and spaces.

Proposals for tall buildings are unlikely to be accepted in Outline form.

# Chapter 7: The Historic Environment

## The Historic Environment

7.1 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their setting.



Figure 7.1: Heritage benefits

7.2 Watford has a diverse and rich range of heritage assets including listed buildings, historic parks and gardens, conservation areas and assets of archaeological significance which make an important contribution towards the character and distinctiveness of the town (Figure 7.2). Some key elements of the town's heritage include:

- Surviving buildings from the medieval core of the town (St Mary's Church, Almshouses, Fuller Free School);
- 18th Century town houses (Frogmore House , 97 High Street, Little Cassiobury and Watford Museum);
- Industrial heritage;
- Parks, gardens and cemeteries;
- Residential streets and buildings of the Victorian period; and

- Innovative twentieth century buildings and housing developments.

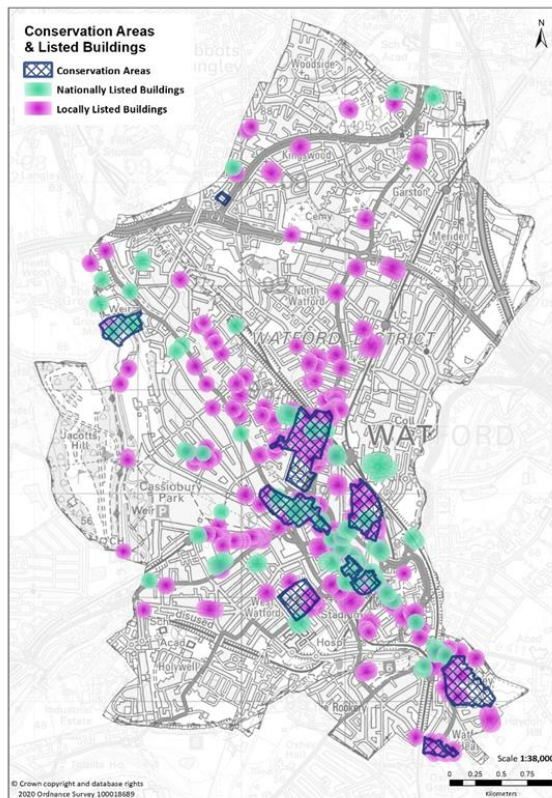


Figure 7.2: Conservation Areas, Listed buildings and Locally Listed Buildings in Watford

- 7.3 All heritage assets (designated and undesignated) will be appropriately protected reflecting the importance of the designation and where appropriate enhanced.
- 7.4 New development can make a positive contribution to, or better reveal the significance of heritage assets and the Council will encourage this where appropriate. Well-designed proposals which protect and enhance the significance, character and setting of heritage assets which may be affected by the development will be supported.
- 7.5 The Council has a proactive approach to managing heritage assets and in addition to the Local Plan policies the Council protects the historic environment through the following guidance which should be considered as part of planning proposals where they apply:
  - Conservation Areas Management Plan;



- Conservation Area Appraisal documents;
- Local list of undesignated assets of local interest;
- Register of buildings and structures at risk;
- Supplementary planning documents to provide more detailed guidance on specific issues;
- Article 4 Directions to protect designated and undesignated assets from small scale changes which are allowed under permitted development rights and which would erode the significance of those assets.

7.6 Proposals for new development which involve heritage assets or their setting should be accompanied by supporting material which shows that the development has understood the significance of the asset. This should be a combination of desktop and on-site investigation making use of the Historic Environment Records (HERs) database and relevant supplementary planning documents.

7.7 Detailed plans to an appropriate level will need to be submitted with applications, alongside design and access or heritage statements, to demonstrate how the heritage asset and its setting will be affected and to ensure that its significance is protected or enhanced.

7.8 Where a new heritage asset is revealed during the early phases of new development, the developer will be expected to work with the Council to seek a solution, as far as is practicable, which protects the significance of the new asset. Depending on the importance of the revealed assets proportionate changes to the scheme being proposed may be necessary.

## Strategic Policy HE7.1: Enhancement and Protection of the Historic Environment

Development proposals should embrace opportunities to use the historic environment to support good design and enhance the setting and understanding of the historic environment and improve Watford's historic character.

All development proposals involving heritage assets (designated and undesignated) should avoid causing harm to the significance of those assets, including their setting. Where this cannot be avoided measures to minimise or mitigate the harm caused will be considered and balanced against the heritage and public benefits arising from the development according to the importance of the asset and the extent of the impact to its significance.

Where loss, wholly or partly, is unavoidable developers are required to record and enhance the understanding of the significance of any heritage asset and to make this record publicly available.

Proposals will need to consider the potential adverse impacts on a heritage asset or its setting associated with cumulative development. Where there are potential cumulative effects, applicants should include design measures to mitigate this impact.

All development proposals involving heritage assets (designated and undesignated) or affecting the setting of assets should be supported by a Heritage Impact Assessment, proportional to the scheme proposed and significance of the heritage asset, prepared by a suitable qualified person.

## Designated heritage assets

7.9 Designated assets within the borough include statutorily listed buildings, registered parks and gardens and conservation areas. It is important to ensure the significance of these assets is protected and where possible, better understood through any changes which have to be made to the assets. Proposals involving listed buildings and registered parks will need to clearly justify the positive contribution it will make and show that the proposal has been designed to avoid, and where possible, minimise the impact on the significance of the asset through appropriate enhancement and conservation measures.

7.10 Designated assets and in particular listed buildings and structures make an important and valued contribution to the distinctive character and appearance of the town and provide attractions for people visiting the town and cherished local landmarks.

### Listed buildings

7.11 New development proposals involving listed buildings should avoid total or substantial demolition including those which propose the rebuilding behind the façade. Proposals should avoid causing harm to the setting of listed buildings and

structures and where appropriate should seek to enhance and better reveal the significance of that setting.

7.12 Many minor alterations and some repairs to listed buildings, including those to the interior, which may affect the special interest of the building will require listed building consent. Proposals for changes to listed buildings may present opportunities to improve disabled access to those buildings. Solutions to improved accessibility will require a balancing of the need for access with the conservation and preservation of the asset. Design approaches for this should be supported by an audit of conservation constraints and access needs and should have considered all available options.

7.13 Proposals which seek to reduce energy consumption in listed buildings will be welcomed provided they do not cause harm to the significance of the building. Energy use can be reduced without harming the fabric or appearance of the building such as roof insulation, draught proofing, secondary glazing, more energy efficient boilers, heating and lighting and the use of green energy sources.

#### *Conservation areas*

7.14 Changes within conservation areas will be managed in a way which retains the distinctive character and appearance of that area and new development should make a positive contribution to this. Design and access statements or heritage statements should include an assessment of the character and context and show how the development proposed has been informed by this and how it contributes positively to it.

7.15 When considering applications for demolition in conservation areas account will be taken of group value, context and setting of buildings as well as their quality as individual structure and any contribution made to the setting of listed buildings. Applications for total / substantial demolition will be expected to:

- a) Demonstrate to the Council's satisfaction that effective measures will be taken during demolition and building works to ensure structural stability of retained parts and adjoining structures;
- b) Be justified in terms of the optimisation of resources and energy use in comparison with the existing building;
- c) Include plans which clearly show which parts of buildings are to be demolished;
- d) Provide detailed plans for redevelopment which are to be approved prior to permission for demolition being granted.

## Policy HE7.2: Designated Heritage Assets

~~There is a presumption in favour of the preservation and enhancement of designated heritage assets and therefore substantial harm to or loss of an asset will be strongly resisted. Where appropriate proposals will be supported which enhance or better reveal the significance of designated heritage assets. Proposals will be supported where they will not result in the loss of, or substantial harm to an asset unless this will provide substantial public benefits that outweigh the harm or loss caused; where any harm caused to the significance of an asset is deemed to be less than substantial the public benefits from the scheme should convincingly outweigh the harm caused.~~

### Designated buildings, structures and parks

Development involving a statutory listed building, scheduled ancient monument, its setting or a registered park or garden will be determined in accordance with their significance and value. To ensure the conservation of the listed buildings in Watford proposals should:

- a) Avoid total or substantial demolition of a listed building;
- b) Avoid changes of use, alterations, and extensions that would cause harm to special architectural and historic interest of the building; and
- c) Not cause harm to the significance of the listed building or its setting.

### Conservation Areas

Development in conservation areas will be supported where they preserve and, where possible, enhance the character, appearance and significance of the designation and clearly demonstrate they:

- d) Use building design that is of an appropriate scale and materiality;
- e) Enhance existing features and structures which contribute to the significance of the Conservation Area;
- f) Do not significantly harm important views into, out of, or within the conservation area; and
- g) Preserve trees and other significant built and landscape features which contribute to the character and appearance of a conservation area or which provides a setting for local architectural heritage.

## Non-Designated heritage assets

- 7.16 Watford has many attractive and locally significant buildings and features including archaeological remains and landscapes which contribute to the distinctiveness of the town but which are not formally designated as heritage assets.

The [National Planning Policy Framework](#)<sup>NPPF</sup> identifies these as non-designated assets [which includes buildings, monuments, sites, places, areas or landscapes that have a degree of significance and merits consideration in planning decisions](#). These can either be identified as part of the planning process or be on Watford's Local List or logged on the local Historic Environment Record (HER database). Watford's Local List identifies historic buildings and features which are valued by the local community. When planning permission is required for any proposal which directly or indirectly affects the significance of a non-designated asset then the Council will treat the significance of that asset as a material consideration when determining the application. Proposals for development must have regard to Watford's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent and should take account of other non-designated assets which are logged on the Historic Environment Record database.

- 7.17 Proposals should be of a design and scale which preserves or enhances the features which contribute to its significance and should use building materials, features and finishes for features such as gates, walls, railings and hard surfacing which are appropriate to the setting of the asset and the local context. Where possible proposals should take the opportunity to remove unsympathetic alterations and restore or reinstate missing features.

### Policy HE7.3: Non-Designated Heritage Assets

To preserve and enhance the character, appearance and setting of Locally Listed Buildings all planning applications that affect Locally Listed Buildings will be determined in accordance with the following:

- a) Where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building; and
- b) All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building.

Where other non-designated assets which are logged on the Historic Environment Record database lie within a site or are discovered during the course of site investigation work related to development proposals measures taken to enhance and protect those assets in line with Policy HE7.1 'Enhancement and Protection of the Historic Environment' should be explained and provided to support any applications for planning permission.

## Archaeology

- 7.18 Archaeological remains can provide great insight into the social and economic lives of people living many years ago and it is important to ensure that such remains, whether known or unknown are protected.
- 7.19 Where an application site includes, is considered to, or is found to have the potential to include, heritage assets with archaeological interest, it must be

accompanied by an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation.

7.20 Where the loss of the whole, or a material part of, the significance of a heritage asset of archaeological interest is justified, planning conditions will be included in any permission to ensure that an adequate record is made of the significance of the heritage asset before it is lost. This will be secured through an archaeological Written Scheme of Investigation which must include provision for appropriate publication of the evidence. The potential for local public engagement and dissemination should also be considered and included in the Written Scheme of Investigation where this is deemed to be appropriate.

Arrangements should be made to store a copy of any reports and other materials which arise from archaeological investigations in relation to development proposals to be stored in a location agreed with local planning authority which is publicly available.

#### Policy HE7.4: Archaeology

New developments should protect remains of archaeological importance. Where a development may affect archaeological remains applicants will be required to submit an archaeological assessment as part of a planning application.

To protect the significance of archaeological assets, measures will need to be taken that are proportional to their importance to ensure the physical preservation of the assets and their setting. These measures should be prepared in collaboration with the county council's Historic Environment team archaeologist and secured through planning conditions.

# Chapter 8: A Climate Emergency

## Sustainable construction and resource management

8.1 The Climate Emergency Declaration by the Council in July 2019 led to the ambitious objective of becoming carbon neutral by 2030. Planning has an important role to play in creating carbon neutral developments to meet this objective and work in conjunction with the wider council initiatives to combat climate change as set out in the [Watford Sustainability Strategy \(2020\)](#)<sup>‡</sup>.

8.2 New development will be expected to use design and a mix of passive and active low carbon and renewable energy technologies to reduce emissions and support greener industries. Sustainable building construction and operations will be encouraged.

8.3 Major developments in the Core Development Area should consider how they can reduce carbon emissions through the use of large-scale renewable energy schemes, such as community energy networks. Areas with potential for community energy schemes are identified on the Watford Energy Opportunities map (Figure 8.1)

8.4 To be most effective, minimise costs and avoid time delays, applicants should consider sustainable principles from the start of the design process. A Sustainability Statement should be used to set out how proposals will mitigate the impact of climate change and contribute towards sustainable development.

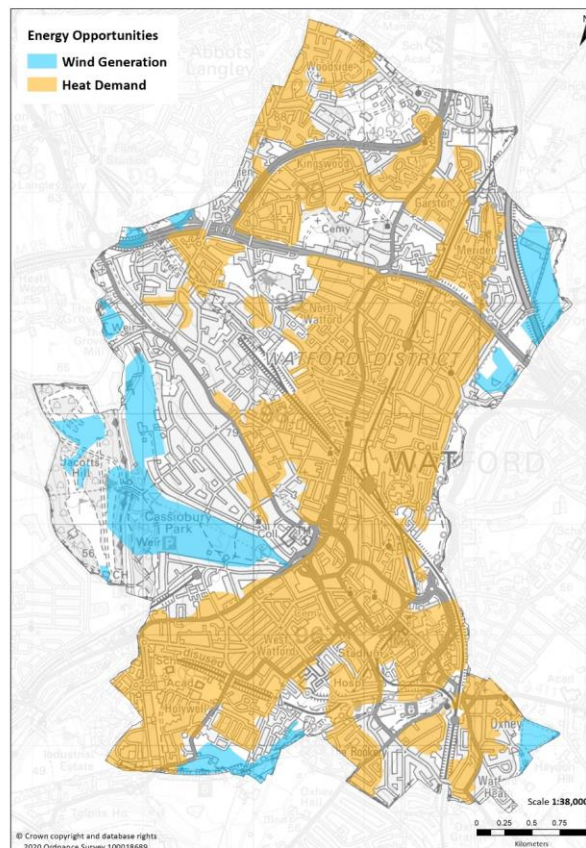


Figure 8.1: Energy Opportunities map

<sup>‡</sup> [https://www.watford.gov.uk/downloads/file/3229/sustainability\\_strategy\\_part\\_1\\_2020\\_to\\_2023](https://www.watford.gov.uk/downloads/file/3229/sustainability_strategy_part_1_2020_to_2023)



## Strategic Policy CC8.1: Mitigating Climate Change and Reducing Carbon Emissions

The Council will support proposals that help combat climate change and ensure the borough becomes more resilient, sustainable and adaptable to climate change. Developments should provide a sustainability statement with their application. New development will need to demonstrate how it is contributing positively towards:

### A Carbon Neutral Watford

Developments are expected to contribute towards the borough becoming carbon neutral and reducing the overall environmental impact.

### Sustainable construction

Proposals need to consider how they will affect the environment from start to finish including the construction process and how occupants will use the building and surrounding area.

### New buildings

New buildings will need to be high quality, use resources efficiently, reduce pollution, be safe to live in and encourage healthy lifestyles.

### Cumulative development

New development should consider opportunities associated with cumulative development. This includes materials used in construction, the layout of the scheme and measures that will create a comfortable micro-climate such as light, shading and landscaping.

### Low carbon and renewable energy

On-site low carbon and renewable energy technologies will be encouraged, particularly where the scale of growth can support community energy networks.

## Sustainable construction standards

8.5 The scale of development in Watford presents significant opportunities to improve the quality and sustainability of new residential and non-residential buildings and how they can contribute towards a wider goal of achieving sustainable development. All new development should strive for sustainable consumption of resources, including energy, water and materials, with the latter reflecting guidance set out in the [Hertfordshire Waste Local Plan<sup>2</sup>](#).

8.6 As indicated in Chapter 4: 'A Strong Economy, Watford will see significant employment and other non-residential development coming forward. This provides an opportunity to reduce their impact on the environment through the use of high quality construction methods. The Building Research Establishment Environmental

<sup>2</sup> <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/waste-planning/waste-planning.aspx>

Assessment Method (BREEAM) is intended improve the design quality of new non-residential schemes. Therefore, major non-residential developments are to meet the BREEAM 'excellent' standard, or equivalent. While more limited in scope, smaller schemes also have opportunities to reduce their environmental impact, Minor non-residential proposals are encouraged to achieve BREEAM 'very good' standard or individual requirements that form part of the overall assessment to improve their environmental quality.

- 8.7 To be effective and reduce costs of retrofitting buildings, applicants are to provide a pre-assessment certificate to the Local Planning Authority which will set out how sustainability measures can be achieved as part of the development early in the process. Submission of a certificate by an accredited assessor will be required upon completion.

### Policy CC8.2: Sustainable Construction Standards for Non-residential Development

Proposals should be designed to reduce their impact on the environment and create high-quality internal and external space for people to use. Proposals will be supported where it is demonstrated that resources will be used efficiently as part of the construction and operation of a building. This includes appropriate use of technologies, building design and layout, while taking into consideration the effects of climate change. To achieve this, non-residential major developments should achieve BREEAM excellent standard.

Applicants should provide a BREEAM pre-assessment completed by a suitably qualified assessor as part of an application. The submission of a Compliance Certificate to the Local Planning Authority upon completion will be secured through planning conditions.

## Resource management

### Energy efficiency

- 8.8 Energy use should be prioritised in line with the **E**nergy **H**ierarchy (Figure 8.2). The first priority is to be lean. This is to ensure less overall energy use with good building design and high energy efficiency using passive design measures, such as building orientation, internal and external building layout, tree planting (prioritising endemic and deciduous species) and the size and location of windows.
- 8.9 The second priority is to be clean; to use energy that is supplied efficiently. Developments should consider connecting to decentralised energy networks (energy generated off the energy grid). This can include technologies such as solar energy and water, heat pumps, biomass-fuelled energy generation and larger-scale schemes, such as Combined Heat and Power (CHP) systems.
- 8.10 The final priority is to be green and use renewable low or zero-carbon energy sources. To reduce the impact on the environment and contribute towards the borough becoming carbon neutral, energy generation using sustainable sources is strongly encouraged.



Figure 8.2: Energy Hierarchy

- 8.11 In June 2019, parliament passed legislation to legally bind the UK government to reduce greenhouse gas emissions by 100% from 1990 levels, by 2050. The design of new buildings will make an important contribution towards this goal. To plan, design and save unnecessary retrofitting of buildings, new homes should be designed to be adaptable to zero carbon in the future.
- 8.12 The Council will be more ambitious with energy performance standards as technologies improve, become more accessible and cheaper, and therefore the impact on development viability is reduced. Developments are to either achieve the applicable percentage of improvement required over the Target Emission Rate (TER) set out in Building Regulations or updated government standards that exceed this requirement, whichever is greater.

### Carbon off-setting

- 8.13 If developments demonstrate exceptional circumstances, resulting in an inability to meet the required standard of efficiency, they are to contribute to Watford's Carbon Offset Fund. Contributions will be used within Watford for carbon reduction projects, such as retrofitting. The amount to be paid will be agreed in advance using the equation:  $Cost = (T - O) * X * Y$ . Where T = Total carbon emissions;

O = Amount already offset on site; X = Cost per tonne of carbon emitted and Y = Number of years found applicable.

#### *Overheating*

- 8.14 Building energy efficient homes is important to reduce carbon emissions, however, it is also important to build new homes that are healthy to live in and support a person's wellbeing. Overheating can be uncomfortable and dangerous, making it an important health issue. Smart design, such as dual aspect windows, passive ventilation and the incorporation of cooling measures like trees and shrubs, to increase light or provide shading, reflecting the seasons, are important to prevent overheating and avoid health risks. Further detail is set out in Chapter 6 'An Attractive Town'. Developers will be expected to integrate good design to support health and wellbeing and reduce overheating as part of their schemes. Use of traditional, energy dependent, cooling systems is not appropriate.
- 8.15 Where apartments are single aspect, which reduces airflow, and need to be supported by mechanical ventilation in addition to passive cooling measures developers should demonstrate how this is addressed using low carbon technologies.

#### *Water efficiency*

- 8.16 The borough is within an area classified as under serious water stress by the Environment Agency. Water security can be put at risk, especially during droughts and with an increasing population, if not carefully managed.
- 8.17 To secure a sustainable water supply, new standards and technologies should be incorporated as part of new development schemes to reduce water use. Residential developments are to meet the technical standard for water efficiency set at a maximum consumption level of 110 litres per person per day. All developments should utilise opportunities to install internal water efficient fixings and incorporate rainwater use and harvest greywater where possible.

#### *Materials and waste management*

- 8.18 Generating large amounts of waste can be detrimental to the health of the public, the environment and wildlife. To be more resource efficient, new developments should actively plan to reduce waste by minimising residual waste and by using recycled and recyclable materials as much as possible.
- 8.19 Proposals are to be in accordance with the Hertfordshire Waste Local Plan, including aligning construction practices and building operations with the Hertfordshire Waste Hierarchy (Figure 8.3). Practices to manage materials and waste through mechanisms such as Site Waste Management Plans and circular economy statements, as appropriate, are supported:
- 8.20 Site waste management plans outline the types and amounts of waste expected from a construction site, including how each will be reused, recycled or disposed of.
- 8.21 Circular economy statements consider how materials are used and keep their main use for as long as possible, before planning on reusing or recycling the material.



Figure 8.3: Hertfordshire Waste Hierarchy

## Policy CC8.3: Sustainable Construction and Resource Management

### Energy efficiency

To minimise the impact of new homes on the environment and achieve Net Zero Carbon, a phased approach to improve the energy efficiency of new homes is set out. To achieve this residential developments should:

- a) Be designed so they can be adapted to be Net Zero Carbon;
- b) Avoid overheating and use passive ventilation when possible;
- c) Achieve the minimum applicable percentage, as set out below, of improvement for carbon emissions over the target emission rate (TER) as outlined in [National Building Regulations Part L \(2013\)<sup>3</sup>](#), or any updated government standards, whichever results in a higher target.

20 <del>21</del> <sup>18</sup> – 2025	19%
2025 – onwards	35%

Proposals that do not meet these energy efficiency targets will only be supported if it is unfeasible due to exceptional circumstances and a financial contribution is made towards the Carbon Offset Fund to provide equivalent carbon savings off site.

### Water efficiency

All residential developments should meet the technical standard for water efficiency of 110 litres per person, per day.

In new, non-residential developments, [that are unable to achieve BREEAM 'excellent' standard](#), water conservation measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM 'very good' for the appropriate building typology.

### Materials and waste management

Development proposals should reduce construction waste through the re-use and recycling of materials. Practices undertaken should reflect the Hertfordshire Waste Hierarchy. As part of an application, applicants should set out how waste management of the site is in accordance with the Hertfordshire Waste Local Plan.

### Sustainability Statements

A Sustainability Statement will be submitted to the Local Planning Authority to demonstrate compliance with this policy for new-build residential developments (other than householder applications). The Sustainability Statement will include details as to how energy, water and waste requirements will be complied with and monitored.

## Managing air quality

8.22 A polluted environment can result in a severe cost to public health, the natural environment and the economy. The links between poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk. Mitigating the impact of development on air quality and minimising exposure to poor air quality across Watford is important. This can help to safeguard residents from the impacts of a polluted environment.

8.23 There are currently two Air Quality Management Areas (AQMAs) in Watford, where national objectives for ambient air quality have been exceeded. The predominant pollutants in Watford are those commonly associated with road traffic.

8.24 The exposure of vulnerable residents, such as children, the elderly, and those with respiratory issues to poor air quality, is a particular concern. Air pollution can affect anyone's health; nevertheless, some individuals can be more susceptible than others. These include:

- children;
- the elderly;
- individuals with existing cardiovascular or respiratory diseases;
- pregnant women;
- communities in areas of higher pollution, such as close to busy roads; and
- low-income communities.

8.25 Sensitive development may include, but is not limited to, schools, residential care homes and health facilities. Air pollution also has potential to have increased impacts on the wider global environment and society with a changing climate.

8.26 Air quality is often managed through soft measures, such as active modes of travel, urban greening and the use of sustainable construction methods. The ways new developments are designed can also assist in mitigating against the negative impacts of poor air quality. For instance, strategically planting trees and hedges between major roads and residential development can create a barrier to shield residents from poor air quality caused by traffic. Measures such as these will be supported as part of the Plan. However, to ensure that national and international objectives for ambient air quality are met, additional steps must be taken to guide new development.

8.27 Development should seek to achieve overall improvements to air quality and minimise the potential adverse impacts. The policy intends to ensure that the potential impacts of new development upon air quality is an issue considered early

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<sup>3</sup> Link:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/226965/Part\\_L\\_2013\\_IA.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/226965/Part_L_2013_IA.pdf)

in the design process and when planning applications are determined. Regard should be given to the location of development where users may be more sensitive to poor air quality.

- 8.28 Development will be expected to support the aspirations of the Air Quality Action Plan, as well as Public Health England's 2019 'net health gain' principles and the Public Health Outcomes Framework. Regard should also be given to the Ambient Air Quality Directive (2008) and the European Union Limit Values to determine compliance with national and international air quality standards.

### Policy CC8.4: Managing Air Quality

Development will be supported where it does not contribute towards a worsening of existing air quality and, where possible, seeks to improve existing air quality. Appropriate mitigation measures will be required to address any potential impact on air quality, along with encouraging the provision of electric vehicle charging points where parking is provided.

An Air Quality Assessment will be required for all major developments and other forms of development that are considered to be at risk of impacts from significant emissions or pollutants. This includes, but is not limited to, development where the occupiers/users may be sensitive to poor air quality and development in close proximity to an Air Quality Management Area. Assessments will be required to consider the cumulative impacts in conjunction with other developments in the vicinity and include mitigation measures where necessary.

Where the Air Quality Assessment indicates that a development would cause harm to air quality, planning permission will not be granted unless appropriate mitigation measures are proposed, which demonstrate that:

- a) Public exposure to the pollution source has been minimised;
- b) Sensitive development has been located an appropriate distance away from the source of exposure; and
- c) The development would not lead to the creation of a new street canyon or a building configuration that inhibits effective pollution dispersion.

## Managing the environmental impacts of development

- 8.29 There are other types of pollution in addition to air quality that can have a negative impact on the environment and residential amenity, including light, noise, contamination, odour and vibration. Pollution can be brought about by new development and can have a severe impact on the amenity and function of existing properties and businesses, and the quality of life in an area.
- 8.30 The Council places responsibility on the applicant, or the party responsible for the development, to provide mitigation for any significant adverse impacts that may be generated by the proposed development. This is set out in national policy as



the 'Agent of Change Principle' and ensures that new development does not cause existing uses in the vicinity to curtail their activities. Applicants will need to demonstrate how mitigation has been provided for any potential issues related to noise and light pollution, odour, contamination and other negative impacts. The Council will seek to ensure that quality of life, health, wellbeing and the environment are not adversely affected by harmful pollutants and other negative impacts that could be associated with new development.

8.31 The relevant national policy and guidance, including [Building Regulations](#), should be referred to for information regarding ambient levels for each individual pollutant. There are also various key stakeholders who are able to give advice on minimising the risk of pollution and effective mitigation. These bodies should be engaged early in the process for good practice. For instance, where overhead powerlines traverse the site, early engagement with the operator should be undertaken and where development may have an impact on groundwater, the Environment Agency should be consulted.

### Policy CC8.5: Managing the Impacts of Development

Development should be designed to protect the amenity of adjacent land uses and their occupants and local amenity, and to enhance the public realm. In accordance with the 'aAgent of cChange' pprinciple', new development [must ensure it does not cause existing uses in the vicinity to curtail their activities](#). New development will be required to assess its potential impacts on neighbouring land uses, including the cumulative effects, and set out mitigation measures where appropriate. To achieve this, development must have regard to the risk related to:

#### Light pollution

Developments must be designed to minimise any significant detrimental impact of external lighting on local amenity and safety, biodiversity, heritage assets, roads and watercourses.

#### Noise pollution and vibration

Where development is [noise sensitive](#), noise-generating, or the surrounding area is sensitive to noise and vibration, applicants must undertake a noise assessment to identify potential issues and the required attenuation measures to achieve acceptable noise levels, as defined in national guidance. Noise assessments should also consider the risk of noise reflection, particularly on new developments near to railway lines and major roads.

Contamination, including contamination of groundwater

Applicants are required to carry out a comprehensive ground investigation report and take appropriate remediation measures for development on or near a site that is potentially contaminated.

Development that could adversely affect the groundwater quality, flow or volume will not be granted permission.

Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), infiltration via deep borehole soakaways will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated. Certain discharges into the ground may require an Environmental Permit.

#### **Odour**

Development must address the adverse impact of odour through the incorporation of appropriate mitigation measures where the development is considered to generate or development is sensitive to odours.

#### **Unstable land**

Applicants will be required to remediate unstable land and further issues related to subsidence, before development can commence. Appropriate measures must ensure that the proposed development will not lead to land instability during works or following completion. A Land Stability Risk Assessment report may be required in line with [national guidance](#) if unstable land is considered to be a potential risk.

#### **Power lines**

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.

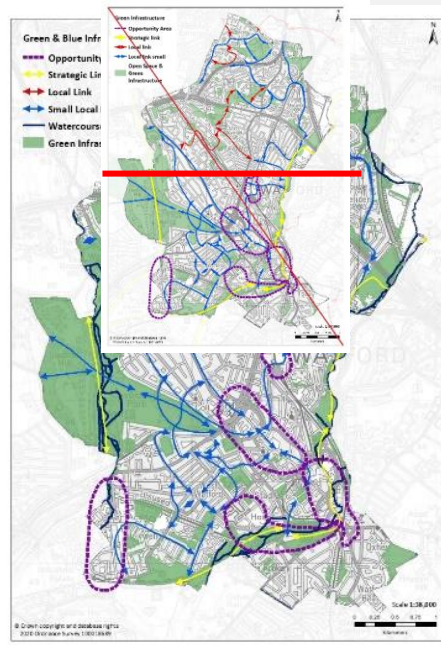
## Chapter 9: Conserving and Enhancing the Environment

## Conserving and Enhancing the Environment

9.1 Although Watford is a densely populated urban borough, the natural environment is relatively rich. There are many high quality and high value open spaces, including 12 Green Flag parks, ancient woodland and sites of national and regional significance. Two rivers run through the borough, as well as the Grand Union Canal, which stretches from London to Birmingham. Watford supports wider green and blue links to other natural areas of significance in the region, including Colne Valley Regional Park and the Chilterns Area of Natural Beauty. Urban planning can be an important instrument for the natural environment, for it seeks to balance the need for new development while also striving to conserve and enhance the natural environment.

9.2 Designated green infrastructure and open spaces in Watford are shown on Figure 9.1. Ecological resources and opportunities have been identified and mapped as part of data held by the Hertfordshire Ecological Records Centre. This data includes species and site records and maps, as well as the Local Nature Partnership's Network Mapping.

Figure 9.1: Green and blue infrastructure in Watford



### Strategic Policy NE9.1: The Natural Environment

The Local Plan will support the conservation and enhancement of the natural and local environment. Development proposals will be required to demonstrate a positive impact on Watford's natural environment by:

- a) Protecting and enhancing Watford's natural and environmental assets and seeking to create new environmental features where possible;
- b) Conserving and enhancing the extent and quality of green infrastructure and ecological networks by seeking to create, expand and restore links within the network, and support the wider benefits from natural capital and ecosystem services at a landscape scale where appropriate;
- c) Ensuring all new development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, following the 'Mitigation Hierarchy' of avoidance, mitigation or compensation locally, where possible;

- e)c) Following the 'mitigation hierarchy' of avoidance, mitigation or compensation as appropriate;
- e)d) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, as required under the Water Framework Directive;
- f)e) Reducing/Minimising the risk of flooding, including surface water flood risk;
- f)f) Bettering access to open space across the borough where there is an identified need and delivering new green spaces as part of new development;
- h)g) Delivering non-traditional forms of urban greening as part of high density development, as well as traditional open space, including green roofs and walls;
- h)h) Improving the quality of Watford's existing open spaces through development contributions;
- h)i) Where necessary, ensuring that protected species and their habitats are a material consideration when determining planning applications; and
- h)j) Protecting trees and encouraging native planting on new development; and
- h)k) Considering the cumulative impacts of development on green and blue infrastructure. Where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.

## The green infrastructure network



Figure 9.2: Benefits of green infrastructure

9.3 Green infrastructure is defined as multi-functional networks of open spaces, green corridors and natural green space. Together, these networks perform a variety of functions for the environment and the people who live here. The importance of green infrastructure is highlighted in Figure 9.2. Watford's green infrastructure network contains critical links across the borough, but also across wider Hertfordshire and beyond.

9.4 To conserve and enhance the green infrastructure network, new proposals adjacent or in close proximity to open space and green corridors should consider the impact of development on existing networks and prevent fragmentation. New development can help deliver enhancements to the green infrastructure network and improve connectivity between green spaces if opportunities are proactively identified in the early stages, as proposals are being drafted. The potential impact of landscaping, access, excessive lighting, overshadowing and noise should also be considered and appropriate mitigation provided to protect the intrinsic quality of the network.

9.5 Opportunities to improve the green infrastructure network have been set out in the Green Infrastructure Plan and have been illustrated on Figure 9.1. The projects identified are:

- Cassiobury Park enhancement;
- Whippendell Woods enhancement;
- Grand Union Canal enhancement;
- Colne Valley Wetland enhancement;
- Urban greening and legibility for Watford.

9.6 Trees also make an important contribution to biodiversity and should be protected where possible to support the government's [England Tree Strategy \(2020\)](#)<sup>4</sup>. Opportunities should also be taken to increase native planting to support biosecurity.

### Policy NE9.2: Green Infrastructure Network

Proposals must demonstrate how they will appropriately conserve, restore, expand or enhance the green infrastructure network, including how the site connects with the wider network. Development should protect the function and amenity of green routes, including public rights of way.

A proposed loss or damage ~~of non-protected~~to trees, woodland or hedgerows ~~will be refused, should be avoided, if and if~~ demonstrated as being unavoidable, ~~a measurable net gain assessment will be required to provide adequate~~appropriate replacement or compensation ~~will be required~~. Native planting should be ~~used in any proposed new open spaces or habitat creation. Non-native species planting should be kept to a minimum and should be carefully assessed to ensure no impact to native flora and fauna. Where invasive~~

<sup>4</sup> [https://consult.defra.gov.uk/forestry/england-tree-strategy/supporting\\_documents/englandtreestrategyconsultationdocument%20%20correctedv1.pdf](https://consult.defra.gov.uk/forestry/england-tree-strategy/supporting_documents/englandtreestrategyconsultationdocument%20%20correctedv1.pdf)

non- native species are found on site, prior to site enabling and clearing works, developers should create a long-term management plan to stop the spread, and where feasible, eradicate the species prioritised.

Priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan.

## The blue infrastructure network

- 9.7 The Grand Union Canal, River Gade and the River Colne all flow through Watford and form the borough's blue infrastructure network. Rivers Colne and Gade are designated as main watercourses by the Environment Agency, whereas the Grand Union Canal is designated as an ordinary watercourse for the length it runs through Watford. Protecting and enhancing these watercourses is important for many reasons, such as to effectively manage flood risk, to conserve and enhance river habitats and to maximise opportunities for active travel and leisure. The [Water Framework Directive \(WFD\)](#) also sets an objective to improve these watercourses to 'good' status by 2027.
- 9.8 During the plan period, there is expected to be new development occurring near to Watford's watercourses and their corridors. High quality development presents an opportunity to enhance the role of watercourses and make them a central feature of new development. This would maximise the contribution that blue infrastructure can make to creating successful places.
- 9.9 New development also presents an opportunity to enhance the quality of watercourses, to support them achieving Water Framework Directive 'good' status within the established timeframe. The potential impact of landscaping, access, lighting, overshadowing and noise should be considered and appropriate mitigation provided to protect the intrinsic quality of the water environment. This is particularly pertinent for taller buildings, which can overshadow rivers and result in the loss of habitats.
- 9.10 Development that occurs too close to the banks of watercourses can increase the risk of pollution and limit capacity to manage run off. The [South West Hertfordshire Strategic Flood Risk Assessment Stage 1](#) (2018) identifies the need for 8m undeveloped buffer zones between the top of the bank of any main watercourse and the built environment (including formal landscaping, sport fields, footpaths, lighting and fencing). The buffer zone must be free of hard standing, paths or lighting and must not be used for storage of materials. Planning conditions will require the developer to provide details of an appropriate management scheme to ensure that the buffer is well maintained.
- 9.11 Many of Watford's watercourses have been culverted, to support historic development and infrastructure projects. However, the culverting of watercourses can be harmful for the ecology, as it creates barriers to the movement of fish and causes the loss of bankside habitats.<sup>5</sup> Culverts also contribute to an increased risk of

<sup>5</sup> Environment Agency, Fluvial Design guide

blockage, which in turn, increases flood risk. As new development comes forward, it is important that de-culverting and the re-naturalisation of the watercourse occurs as much as possible to improve the water environment. Culverting, among other issues, has meant that routes for cyclists and pedestrians along canals are also relatively fragmented. New development can help deliver enhancements to watercourses and their corridors by providing new connections and routes for active travel and leisure uses and by enhancing interconnectivity with the green infrastructure network.

9.12 This policy should be read in conjunction with Policy NE9.4 'Flood Risk and Mitigation', which provides more detailed guidance on mitigating flood risk.

### Policy NE9.3: Blue Infrastructure Network

Development proposals in close proximity to watercourses must support the strategic importance of Watford's blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits. Where development is adjacent to a watercourse, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives. Development proposals in close proximity to, or that include a watercourse must:

- a) Maintain an undeveloped and unobstructed buffer strip of eight metres from the top of the bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Buffer zones should be natural in character, distinct from the built environment, with no light pollution greater than 2 lux, and with native species of all watercourses. Where this enables public access, proposals should be accompanied by a management plan;
- b) Conserve and enhance the biodiversity value of the watercourse and its corridor by including WFD action measures within the proposal. Action measures could include but are not limited to, through the inclusion of in-channel enhancements, the creation of priority wetland habitats, prioritising native planting schemes and ~~by~~ addressing misconnections and the eradication and management of Invasive Non-Native Species;
- c) Enhance the role of ~~the~~ watercourse corridors as an accessible active travel and leisure route for pedestrians, cyclists and boaters, and increase connectivity along the length of the watercourse. This includes connectivity and access, where appropriate, to the green infrastructure network;
- d) Integrate the watercourse into the scheme as a vital part of the public realm; and
- e) Open and re-naturalise modified watercourses, including culverted and piped waterways. New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A WFD assessment should be submitted as part of proposals and should include an

<http://evidence.environment-agency.gov.uk/FCERM/en/FluvialDesignGuide/Chapter8.aspx?pagenum=6>



assessment of the works to preventing future improvement, in addition to how the proposal will impact WFD status.

The provision of crossings and bridges will be supported where they improve connectivity for pedestrians and cyclists, are in keeping with the setting of the area, and are designed to avoid obstructing flood flows and damage to a watercourse.-

## Flood risk and groundwater management

9.13 The National Planning Policy Framework supports a risk-based, sequential approach to manage flood risk and ensure development is located in areas of lowest risk. Along with the Flood and Water Management Act (2010), there is a requirement for new development to minimise vulnerability and improve resilience to the impacts of climate change including flooding.

### Flood risk

9.14 Flood zone classifications reflect the local risk to people and property and indicate types of development that may be suitable in that zone due to risk level. In Watford, zones of fluvial and surface water flood risk and groundwater protection are identified in the Level 1 (2018) and Level 2 (2020) Strategic Flood Risk Assessments. These areas are largely, but not exclusively, associated to the water basins of the Rivers Colne and Gade.

- Sites located within Flood Zone 1 are subject to lower levels of flood risk, however, they may still require a Flood Risk Assessment where new development could affect the floodplain and increase risk on site or on other sites nearby. A sequential test may be required for development where there is a previously identified flood risk issue.
- Development located in Flood Zones 2 and 3 is at high risk of flooding. Site specific Flood Risk Assessments are required for all developments within these zones. Development should be prioritised outside of these areas, however, where this is not

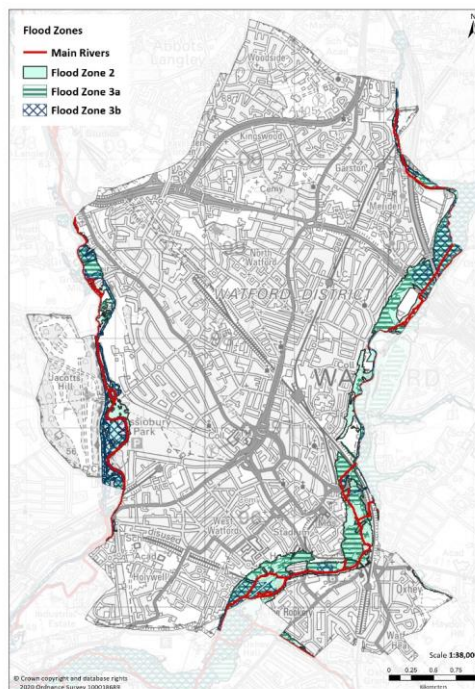


Figure 9.3: Flood Zones with climate change allowances in Watford

possible, sites will need to comply with Sequential and Exception Test requirements, as appropriate, before planning permission can be granted.

- 9.15 Flood risk should be discussed when development proposals are prepared. Applicants are expected to consider how their proposals affect, or could potentially impact other sites in the vicinity and the cumulative impact on flood risk, taking into account climate change. In some circumstances this may require further modelling to determine the overall impact and potential mitigation measures that may be needed. Developments should seek betterment of existing flood risks, both within the site and in the surrounding area. External organisations such as the Environment Agency and the Lead Local Flood Risk Authority (Hertfordshire County Council) should be consulted to provide guidance when required.

#### *Groundwater protection*

- 9.16 The River Colne basin is designated as Groundwater Source Protection Zone 1, most sensitive with an area buffering the waterway covering much of east Watford identified as Groundwater Source Protection Zone 2 and sensitive to contamination. This means several land uses including industrial, petrol stations and waste management may not be suitable in certain areas of Watford due to the high risk of contamination to the aquifer and drinking water. Developers are expected to implement measures to minimise avoid these potential negative impacts on the ground source. Where these are required these should be prepared in collaboration with the Environment Agency and the Lead Local Flood Authority.

#### *Flood risk mitigation*

- 9.17 There are different causes that can trigger fluvial, surface and ground source flooding, and appropriate mitigation measures are required to reflect this. Proposals located in different parts of the borough that are subject to any type of flood risk will need to consider suitable measures to minimise the potential impacts. This should include measures to address safe access and egress, particularly for changes of use to a 'more vulnerable' classification (e.g. commercial to residential). These should satisfy the requirements set out in the Hertfordshire Local Flood Risk Management Strategy (2019) and should be prepared in collaboration with the Environment Agency.
- 9.18 Developments located in Flood Zones 2 or 3 are encouraged to have early and ongoing discussions with the Environment Agency (EA) and Lead Local Flood Authority to ensure proposals comply with their requirements. New residential developments should be designed to withstand a 1-in-100 year flood, plus a 35% climate change allowance while considering the impacts of plus 70% climate change during the process, to ensure longevity and safety of the development over time.

#### *Sequential and Exception Tests*

- 9.19 Sites designated for development in this Plan have already been put through the Sequential and Exception Tests. However, the Exception Test may need to be reapplied if relevant aspects of a proposal were not considered initially. Windfall sites located within Flood Zones 2 or 3, or sites within Flood Zone 1 where there is an

identified flood risk, which have not been subjected to Sequential and Exception Tests, will be required to do so.

- 9.20 In some instances, following the application of the Sequential Test, it may be necessary for a developer to make a contribution to the improvement of flood-management provision that would benefit the proposed new development and the existing community. Where a proposed development is deemed to have a harmful impact on flood risk, a contribution towards flood mitigation may be required through planning conditions.

## Policy NE9.4: Flood Risk and Mitigation

### Fluvial flooding

When located within areas identified as being at risk of flooding, applicants are required to demonstrate how appropriate and effective mitigation measures have been integrated into the scheme, including management of residual flood risk.

Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. Only water compatible and essential infrastructure are will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within Flood Zone 3b. Developers should seek to increase the extent of Flood Zone 3b where possible and appropriate. To demonstrate compliance with the Exception Test, a flood resilient design and emergency planning considerations will need to be accounted for, over the lifetime of the development including:

- a) The development to remain safe and operational under flood events;
- b) Safe evacuation and/or safely remaining in the building under flood conditions;
- c) Key services must continue to be provided under flood conditions; and
- d) Buildings are to be designed for quick recovery following a flood.

Any development within Flood Zones 2 and 3, and those over one hectare in Flood Zone 1, should use a Flood Risk Assessment to show how they have considered flood risk beyond the site boundaries, including cumulative impacts arising from other developments. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the Strategic Flood Risk Assessment) and that where possible, development will reduce flood risk overall. Proposals for development in the floodplain must ~~should~~ demonstrate that suitable flood compensation storage ~~is available~~ will be provided to avoid any net loss in floodplain. Additionally, all new development within flood zones require an assessment of the impact of climate change on flood risk on site and elsewhere.

Developers should seek to provide an undeveloped buffer zone of 8 metres between the top of the bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing).

Proposals located in areas where waterways have been culverted or altered should seek to re-naturalise the river and surroundings, improve water storage and enhance riparian habitats, in line with requirements to meet Water Framework Directive objectives and the Thames River Basin Management Plan. There is a presumption against the use of hard engineering, including gabions. For any development within 8 metres of a culvert, the developer must demonstrate that they have sought to de-culvert, as well as undertake a survey of the culvert to assess its exact location, condition and whether it is commensurate with the lifetime of the development or demonstrate how it will be repaired/upgraded. Flood defences and Main Rivers adjacent to development sites within the site boundary must be maintained, repaired or replaced by the developer for the lifetime of the development. For any development within 8 metres of a main river, the developer must demonstrate that access to the river and banks will still be possible for maintenance and emergency works.

#### Groundwater protection

Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), ~~deep~~ infiltration via deep bore soakaways will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated ~~should be the last resort~~. Certain discharges into the ground may require an Environmental Permit.

## Surface ~~W~~ater ~~m~~anagement

9.21 A well-considered drainage strategy plays a vital role in the management of surface water flood risk. Sustainable Drainage Systems (SuDS) are water-management measures that use natural methods designed to manage surface water as close to the source as possible. To be effective, a Sustainable Drainage System can be designed to use a combination of approaches including rainwater collection, grey water recycling, infiltration, soakaways, bio-swales and discharge to a watercourse as appropriate. Design requirements for effective drainage systems can be found in the CIRIA (Construction Industry Research and Information Association) Sustainable Drainage Systems ~~u~~DS-Manual (2015) and Hertfordshire Local Flood Risk Management Strategy (2019).

9.22 Sustainable Drainage Systems should be multifunctional in their approach and be designed to maximise their benefits in other areas such as biodiversity and useable space for periods when they are not actively managing water for flood risk. Sustainable Drainage Systems can also aid in pollution mitigation when implemented correctly, but it is important that they are designed carefully to avoid contamination. For example, soakaways should not be implemented on contaminated land and infiltration should only be incorporated when using uncontaminated water. A surface water management plan is necessary to ensure Sustainable Drainage Systems are effectively designed, maintained and monitored.

9.23 The quality and effectiveness Sustainable Drainage Systems can vary. The hierarchy below sets out an approach that should be considered where a scheme could use single or multiple measures. From preferable, to least preferable:

- a) storage rainwater for later use
- b) use of infiltration measures, such as porous surfaces in non-clay areas
- c) attenuate rainwater in ponds or open water features for gradual release
- d) attenuate rainwater by storing in tanks or sealed water features for gradual release
- e) discharge rainwater direct to a watercourse
- f) discharge rainwater to a surface water sewer/drain
- g) discharge rainwater to a combined sewer.<sup>6</sup>

9.24 Where management and maintenance of Sustainable Drainage Systems are required, the applicant should set out how this will be approached. This will need to be discussed with the appropriate stakeholders and required through the use of planning conditions.

9.25 Site specific and Strategic Flood Risk Assessments for surface water management should consider both central and upper-end climate change allowances as stated in the National Planning Policy Framework. Details on the locations and necessary allowances are provided in the most recent Strategic Flood Risk Assessment. Predicted climate change allowances are increasing with time, and developments must consider this increase based on the expected duration of the structure.

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<sup>6</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-five-londons-response/pol-12>

## Policy NE9.5: Surface ~~w~~Water ~~m~~Management

Proposals that incorporate well-designed Sustainable Drainage Systems that are appropriately integrated into the scheme, aim to achieve greenfield run-off rates manage surface water and improve resilience will be supported.

Sustainable Drainage Systems should make effective use of land by being multifunctional, to maximise ecological benefits such as biodiversity, provide open space or incorporate tree planting and landscaping. Developments will need to ensure the implementation of Sustainable Drainage Systems does not worsen contamination effects, and soakaways should not be located within land affected by land contamination. Details of the Sustainable Drainage System should be submitted to the Council as part of the Sustainability Statement.

Developments should seek betterment of existing surface water flood risk, both within the site and surrounding area, as an opportunity to have a positive impact on cumulative risk, using appropriate drainage measures. Allowances for changes and increases in flood risk due to climate change need to be considered. Sustainable Drainage Systems must be designed to respond to risk for the lifetime of a development, including the appropriate climate change impacts.

Sustainable Drainage Systems should be designed and integrated into the proposal to effectively manage the existing surface water flow paths on the site, [protect and enhance water quality](#) and help to mitigate other flood risks. Measures should be agreed with the ~~lead flood risk authority~~ [Lead Local Flood Authority](#) and be consistent with the Hertfordshire Local Flood Risk Management Strategy. As part of an application, an applicant should provide a management plan that clarifies how any measures will be managed and maintained and agreed with the lead Local Flood Risk Authority.

## Protecting open space

9.26 Watford's open spaces are a great source of pride for our communities. Our award-winning parks are not the only types of green spaces that Watford's residents can enjoy, as the borough contains a wide variety of types of open space. From allotments to playing pitches, these different open spaces can provide for a variety of different uses, functions and activities. Open space can make an important contribution to the green infrastructure network and offer valuable space for recreational and amenity use. Open spaces can also contribute towards flood risk management schemes and sustainable drainage systems.

9.27 Everyone living, working in and visiting Watford should have access to high quality open space and sports and recreation facilities. The types of open spaces provided and protected through new development should reflect a locally identified need. This can help to avoid deficiencies in different types of open space, and to ensure that open spaces are being effectively used. Watford's open spaces are not evenly distributed across the borough. Some communities are deficient in open space and require improved access to these recreational areas, whereas in some neighbourhoods there may be opportunities where alternative open space and

ancillary uses could be considered if there is a demonstrated need. [This should be informed by the evidence base, which includes the Playing Pitch Strategy \(2020\) and Green Spaces Strategy \(2013\), and subsequent updates.](#)

### Policy NE9.6: Protecting Open Space

Open space and ancillary facilities used for leisure and recreation will be protected, unless an up to date assessment [of needs](#) demonstrates the space is surplus to need. For an open space or an ancillary facility to be considered surplus to requirements, the following must be demonstrated:

- a) An assessment [of needs](#) has been undertaken that has clearly shown the open space, buildings or land to be surplus to requirements, having regard to the Council's most recent evidence base; and
- b) The open space is not needed for alternative open space uses; or
- c) An equivalent or better facility in terms of quality and quantity is to be provided in a more suitable location that meets the needs of the local community.

Development proposals for alternative open space uses will be supported where an up-to-date assessment [of needs](#) clearly shows the benefits outweigh [any adverse impacts on the community and the environment](#).~~the loss.~~

The absence of identification of an open space on the Policies Map does not imply that development is appropriate.

## Providing new open space

9.28 As new development comes forward, there will be opportunities to create new communal open space on site. While some level of private amenity space will be expected (Policy HO3.11 Private and Communal Outdoor Amenity Space<sup>4</sup>), larger developments can also help to provide communal sports and recreational facilities, such as:

- Parks, public gardens and recreational grounds;
- Amenity green spaces;
- Equipped play space;
- Natural and semi-natural green spaces;
- Outdoor sports facilities;
- Churchyards and cemeteries; and
- Allotments.

9.29 The different types of open space have been defined in the Green Spaces Strategy. The strategy sets out where these different facilities are located in the

borough and appropriate catchment distances for each type of open space. Where a development does not lie within the catchment distance of a type of open space, it will be imperative that this is provided on site to reverse the deficiency.

9.30 In circumstances where on site open space provision is not practical, feasible or would not benefit the scheme, a financial contribution may be acceptable with the agreement of the local planning authority. This contribution will be secured through planning conditions. In these cases, some level of communal open space and landscaping should be provided on site.

9.31 For outdoor sports facilities, it is not expected that provision will generally be possible on site. For areas deficient in outdoor sports facilities, contributions will be sought through the Playing Pitch Calculator, in line with the Playing Pitch Strategy (2020). Therefore, new residential developments will be required to provide open space, such as amenity and equipped play space on site, or where practical, other forms of open space such as allotments or semi-natural areas, where opportunities exist to enhance the green infrastructure network and support local residents.

9.32 The design of new play areas and other formal open spaces should take account of good practice provided in Sport England's 'Active Design' guidance and any subsequent replacements.

### Policy NE9.7: Providing New Open Space

New developments proposals will be supported where they contribute to the provision, enhancement and maintenance of open space, either by means of on-site provision or through developer [obligation contributions](#).

Where there is an identified deficiency, as set out in an up-to-date open space needs assessment, development proposals of ten dwellings or more will be required to provide publicly accessible open space on site. Provision should reflect the type of open space required in the area through accessibility, quality and value.

Proposals that include new open space should be accompanied by a site management plan, in agreement with the Council, which sets out a proactive approach to the long term maintenance of the site.

## Biodiversity

9.33 Despite being a largely urban borough, Watford is rich in biodiversity. Watford contains a number of Local Nature Reserves and Local Wildlife Sites and is home to European Protected Species such as great crested newts and pipistrelle bats. Other locally important but non-designated wildlife sites also make a significant contribution towards biodiversity in the area. [There are no Special Areas of Conservation \(SAC\) or Special Protection Areas \(SPA\) within Watford, however, there are designations in the wider area. For large-scale developments, applicants are](#)



encouraged to liaise with Natural England to determine if a Habitats Regulations Assessment may be required as part of a planning application.

- 9.34 The sustained loss of green infrastructure and the breaking up of its networks can have a damaging effect on ecosystems in Watford. Inappropriate development could threaten the future of different species through habitat fragmentation and the loss of habitats. Given development pressures, it will important to ensure that Watford's biodiversity is protected and enhanced. Development proposals should contribute positively to ecosystems in Watford through the delivery of net gains in biodiversity.
- 9.35 New development should support the creation of new wildlife habitats, which can be integrated into the layout and design of sites, as well as offsite where this cannot otherwise be achieved. Traditionally, this would include habitats incorporated as part of open space, such as water courses, vegetation and planting. However, some contemporary schemes have evolved to include green/brown roofs, living walls and roof and rain gardens, which support biodiversity, amongst other benefits. Where appropriate, smaller alterations can include providing integrated bat or bird boxes within the fabric of new buildings, or hedgehog highways to make gardens more permeable.
- 9.36 The Council will take a hierarchical approach to assessing proposals, as set out in national guidance. Compensatory measures will only be considered when no other measures are demonstrated to be feasible as set out in the [Mitigation Hierarchy](#) (Figure 9.4). In such an instance, Biodiversity Offset Agreements must be secured through Section 106 Agreements. The process for this will be set out in a Supplementary Planning Document.



Figure 9.4: Biodiversity [Mitigation Hierarchy](#)

## Policy NE9.8: Biodiversity

~~Development proposals should apply the mitigation hierarchy to avoid or mitigate harmful effects on biodiversity. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.~~

New development should seek to achieve an overall net gain in biodiversity. This must be measured through the use of the latest ~~Natural England Defra B~~ biodiversity metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.

Development should apply the ~~m~~Mitigation ~~H~~ierarchy to ~~avoid~~minimise or mitigate harmful effects on biodiversity. Mitigation and compensation measures must offset any losses to achieve a measurable net gain for biodiversity. Where it is not possible to avoid or mitigate all impacts on site, an offsite Biodiversity Offset Agreement should be submitted to demonstrate that any off-site measures proposed seek to enhance locally and nationally important priorities.

To ensure the long-term net gain, all development proposals should prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on- and off-site measures.

All development proposals will be required to prepare a proportionate ecological survey and assessment report. Where there is a reasonable likelihood of the presence of a protected species or its habitat is found to be present, applications must be supported by an ecological survey. If present, the proposal must mitigate or compensate appropriately in accordance with the legislation that protects them. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.

# Chapter 10: Infrastructure

## Infrastructure

10.1 The provision of sufficient and appropriate infrastructure is required to support the growth and change set out in the Local Plan, in line with the sustainable development objectives in the National Planning Policy Framework.

10.2 Infrastructure is provided by public and private bodies and includes:

- **Social infrastructure:** schools, healthcare, community facilities, leisure and cultural centres, places of worship and emergency services.
- **Physical infrastructure:** roads, footpaths, cycle-ways, water provision and treatment, sewerage, ~~flood prevention~~ [the management of flood risk](#) and drainage, waste disposal, electricity, gas and electronic communications networks.
- **Green Infrastructure:** open spaces, recreation facilities, trees, green corridors, wildlife corridors and landscape features.

10.3 Details of these requirements are set out in Watford's Infrastructure Delivery Plan (IDP). The IDP considers the infrastructure improvements that are needed to support the planned increase in new homes, businesses and other facilities arising from the population and job growth in the borough. It identifies essential infrastructure and prioritises projects according to their importance in delivering the growth strategy.

10.4 The Watford Infrastructure Delivery Plan considers the infrastructure improvements that are needed to support the planned increase in new homes, businesses and other facilities arising from the population and job growth in the borough. The Council will seek to protect existing community facilities in line with Policy HC12.3 'Built and Community Facilities'.

10.5 Developers will be expected to engage early with the Council and appropriate infrastructure service providers to discuss relevant requirements. Some will be specific to a particular site, whilst some will relate to the wider area. It is important that each development provides a fair contribution towards both site-specific and area-wide infrastructure. Alongside this, the cumulative impacts arising from the development across the area will need to be coordinated and adequately mitigated. Where necessary, the use of compulsory purchase powers to assist in the timely delivery of infrastructure will be considered.

10.6 Significant infrastructure items such as, but not limited to, schools, community centres, public realm, or, public transport provision, and will often require different landowners or stakeholders to work together to secure timely and efficient delivery. Infrastructure should be delivered in a way and at a time that does not compromise development coming forward on connected sites.

### Strategic Policy IN10.1: Integrated Infrastructure Delivery

Proposals should demonstrate a comprehensive integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and:

- a) Contributes appropriately and proportionately towards required infrastructure identified in Watford's Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan;
- b) Where applicable, connects to area-wide infrastructure and enables future connections;
- c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the Watford's Infrastructure Delivery Plan, Site Allocations and / or other policies in the Local Plan;
- d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; this will be delivered on site;
- e) Is appropriately designed so that it complements and does not unduly restrict development on adjacent or connected sites.

Developers will be expected to ~~undergo engage~~ early pre-application engagement with the Council and infrastructure service providers to discuss their requirements and to demonstrate that there is sufficient infrastructure capacity, on on-and off-site, to support the proposed development from commencement.

Developer contributions will be sought where needs arise, in line with the policy requirements of this plan; where provision is made on site, this will be considered in the context of other developer contributions.

## Providing infrastructure to support new development

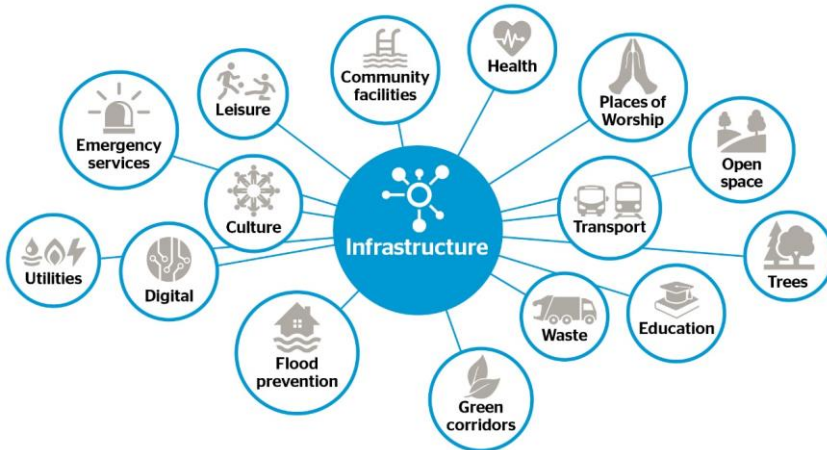


Figure 10.1: Types of infrastructure

- 10.7 Infrastructure should be well integrated alongside new development with the phasing agreed, alongside providers, as part of a planning application. Wherever possible, especially on larger developments, infrastructure should be provided on-site creating sustainable neighbourhoods.
- 10.8 The Infrastructure Delivery Plan highlights the need for new schools, healthcare and sustainable transport to support Watford's population growth over the plan period. As infrastructure is provided by various agencies, the onus is on developers to ensure there is capacity to meet requirements arising from a proposed development.

### Health facilities

- 10.9 Applicants will need to demonstrate collaborative working with other landowners and the Clinical Commissioning Group to identify how additional health facilities can be delivered. The scale and range of service provision will need to be appropriate to the level of demand generated by developments. Contributions towards new or enhanced healthcare facilities will be sought to ensure the health care requirements arising from new development are met.

### Education

- 10.10 As the Borough's population grows, demand for school places will continue to increase, placing pressure on existing facilities. It is therefore vital that where housing growth results in increased demand, investment is made across each education tier, as necessary, to ensure there are enough places to serve the Borough's pupils within their community.
- 10.11 For sites larger than 1,000 dwellings, education provision will be required on site. For sites that are located in close proximity to each other and will have a cumulative impact that will generate demand for a new school, applicants are encouraged to work

collaboratively with other landowners and Hertfordshire County Council to best meet this need, identifying where a new primary school can be provided that provides good amenity for young children. Education opportunities should be maximised on any site given the high demand and limited suitable sites for school provision.

#### *Sustainable Transport*

10.12 Applicants will need to demonstrate collaborative working with other landowners, Watford Borough Council and Hertfordshire County Council, as well as other providers to deliver transport infrastructure improvements to support development, in line with Chapter 11 'A Sustainable ~~Transport~~ Travel Town'. This will include delivery of onsite infrastructure as well as contributing towards projects identified in the Infrastructure Delivery Plan, Local Cycling and Walking Infrastructure Plan and Watford's Sustainable Transport Strategy.

#### *Metropolitan Line Extension*

10.13 The Metropolitan Line extension, commonly known as MLX, was a proposal to extend the existing line to Watford Junction, creating two new stations including one in Vicarage Road. It was a project costing more than £300 million, with funding secured from the government, Hertfordshire County Council, Watford Borough Council, and Transport for London (TfL). However, the financial contributions from Transport for London were withdrawn in 2018.

10.14 Watford Borough Council continues to support the Metropolitan Line Extension, or a comparable alternative, and ~~considers that~~ the route along the disused former Croxley Rail Line is safeguarded and provides the opportunity for a walking and cycling link and a potential future route for Mass Rapid Transit, as well as an opportunity for a walking and cycling link. As such, the route and access to it should be safeguarded to maintain the possibility of its use by these modes; details of the land to be preserved are set out within the Watford ~~Mass Rapid Transport~~ Metropolitan Line Extension Safeguarding ~~Technical~~ Report and reflected on the Policies Map.

#### *Quality communications*

10.15 Communication technology is an integral part of modern society. It is important to work with developers and providers to ensure that schemes are well designed and have sufficient capacity to meet the anticipated demand and embrace technological change to continue to be socially connected and economically competitive.

10.16 For a scheme to be successful and be able to adapt to future technological changes, developers are expected to engage with utility providers early in design process. This enables all stakeholders to understand as early as possible if, and where, there may be a need for additional capacity in the network. It provides opportunities for development to be designed in such a way as to support the provision of utilities.

10.17 Future-proofed, high quality digital infrastructure is considered vital to support well-functioning residential and employment areas. The National Planning Policy Framework requires planning policies to set out how high quality digital infrastructure is expected to be delivered.

## Policy IN10.2: Providing Infrastructure to Support New Development

Planning permission, except for householders, will be granted where it is demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from proposed development. Where necessary planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades. Infrastructure provision will reflect the Infrastructure Delivery Plan and its successor documents to; meet the needs arising from development, and mitigate adverse social, economic or environmental impacts arising from development.

Developers must demonstrate they have explored existing infrastructure capacity, and how this could be future-proofed, with appropriate providers and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the borough, opportunities should be taken to maximise infrastructure provision on suitable sites.

Water supply and provisions for wastewater must be taken into consideration, and development should improve and not cause harm or deterioration to the water environment. Where there is a capacity constraint, the Council will require a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.

Proposals for employment uses and new residential areas should demonstrate that provision is made for high quality digital facilities as part of the application.

## Development contributions

- 10.18 The Local Plan will deliver new homes and jobs to meet Watford's identified need. To support this, significant supporting infrastructure will be required to be delivered at the right time to meet the Council's aspirations for sustainability, affordable housing delivery, health and well-being and placemaking. To ensure that the burden of providing the additional infrastructure needed does not fall on existing communities, planning authorities are able to seek appropriate funding for this infrastructure from developers.
- 10.19 Housing and employment density, site constraints, affordable housing, ambitious sustainability standards, infrastructure delivery and other planning obligations all have associated costs. There will be a need to consider the ability of each site to contribute its fair share towards infrastructure, affordable housing and sustainability standards, whilst ensuring new development is viable and that the market is appropriately incentivised to deliver. Site constraints may include exceptional or abnormal costs relating to contamination or poor ground conditions for example. The presence of such issues will be expected to impact on land values, rather than through a reduction in planning obligations or sustainability standards. In taking a balanced approach, development will need to deliver on the principles of sustainable development as set out in the National Planning Policy Framework.
- 10.20 Watford's Infrastructure Delivery Plan identifies and prioritises the key infrastructure required to support the growth outlined in this plan. It is an important supporting



document that is regularly updated to react to the infrastructure delivery requirements and challenges associated with delivering the Local Plan.

10.21 A substantial amount of the infrastructure required to deliver sustainable development, including (but not limited to) enabling works, public realm and open space improvements, [high-quality walking and cycling access](#), and street greening, will be sought on site and it is expected that developers will directly fund these.

10.22 The Council will primarily use Section 106 Agreements and Community Infrastructure Levy payments to secure appropriate contributions from developments for affordable housing and items of infrastructure, or financial contributions towards their delivery, such as new schools and transport network improvements. Non-financial contributions may include employment and training opportunities.

10.23 The Council's Infrastructure Funding Statement provides a summary of all financial and non-financial Section 106 and Community Infrastructure Levy planning obligation receipts and projects.

### Policy IN10.3: Development Contributions

There will be a need to balance the priorities for infrastructure delivery with those for affordable housing, other non-infrastructure related planning obligations and sustainability standards.

The council will secure the infrastructure necessary to support the growth outlined in this plan, ensure sustainable development, meet the needs of development and, where necessary, mitigate the impacts of development by:

- a) Securing appropriate on-site enabling and development works;
- b) Charging the Community Infrastructure Levy on developments as required by any charging schedules in operation for the area within which the development is located;
- c) Securing Section 106 Agreements to provide affordable housing and make provision to mitigate the impacts of the development where necessary, or appropriate, having regard to any relevant supplementary planning documents or guidance;
- d) Securing off-site highway works, [including provision for cycling and walking](#) where necessary;
- e) Working with relevant service providers to identify and secure infrastructure funding or financing mechanisms.

# Chapter 11: A Sustainable Travel Town

## A Sustainable ~~Transport~~ Travel Town

- 11.1 The approach to managing transport in Watford is a key challenge, given its significant impact on major factors, such as economic productivity, air quality, public health and carbon emissions. With respect to the Climate Emergency, transport remains the largest emitting sector of greenhouse gases in the UK ([ONS, UK Greenhouse Gases, 2018](#))<sup>7</sup>, whilst the town also has the highest levels of deaths attributed to air pollution in Hertfordshire. Working collaboratively with transport providers including Hertfordshire County Council as the Local Highway Authority, Highways England, and both bus and rail operators, the importance of a strategic direction to the development of transport options for Watford is reflected in the development of a Sustainable Transport Strategy, which should be considered alongside the Local Plan. Without significant change, the transport network will increasingly be a limiting factor on the borough's aspirations for economic productivity, environmental sustainability, community vitality and public health, amongst others.
- 11.2 Watford's compact urban form has significant potential to encourage people to walk and cycle more to local destinations, services and facilities, reflected by the fact that of trips made by Watford residents, 19% are less than one mile, with a further 36% being between one and three miles. This highlights the opportunity for more active travel if people have access to routes that get them to where they want to be in a way that is safe, efficient and enjoyable.
- 11.3 The combination of the Climate Emergency, the dominance of the car in the current modal share, and the potential for active travel based upon the volume of short-distance trips, means that new developments will need to be designed to encourage a modal shift in the town that reduces local people's dependency on cars in favour of increased walking, cycling and public transport use. This will contribute towards reducing congestion, addressing climate change and air quality issues, as well as bringing health and economic benefits.
- 11.4 Hertfordshire County Council has adopted the Hertfordshire Local Transport Plan (2018). The South West Herts Growth and Transport Plan (2019) is the key supporting document to the Local Transport Plan, with an emphasis on improving health and generating modal shift away from car use. The Local Plan supports the Local Transport Plan and will facilitate delivery where possible. Additional county-wide transport strategies, to which development should align, include the Intalink Bus Strategy (2019), draft Rail Strategy (2020), [the Speed Management Strategy \(2020\)](#)

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<sup>7</sup> 2018 UK Greenhouse Gas Emissions, Final Figures, ONS, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/862887/2018\\_Final\\_greenhouse\\_gas\\_emissions\\_statistical\\_release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/862887/2018_Final_greenhouse_gas_emissions_statistical_release.pdf)

and forthcoming Highways Network Management Strategy. To encourage more sustainable forms of travel, applicants should design schemes to reflect the Transport User Hierarchy priorities in the sequential order shown in Figure 11.1.

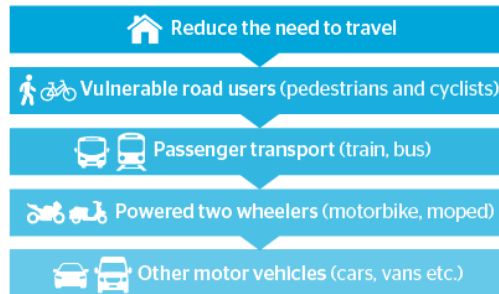


Figure 11.1: Transport User Hierarchy

11.5 Measures that encourage the uptake of sustainable modes, including new, high quality cycle networks, walking infrastructure and bus prioritisation will be supported. In addition, measures that reduce through traffic flows and speeds, including low traffic neighbourhoods and 20mph speed limits, will be encouraged. The enhancement of public transport provision will be prioritised through the safeguarding of land required for major interventions, such as new interchange spaces, mass rapid transit and upgrades to existing hubs, as well as supporting the County Council in delivering the public transport actions set out in its transport strategies.

11.6 Watford Borough Council aims for Watford to become a Sustainable Travel Town (Figure 11.2), as advocated by the Local Transport Plan, where the perception to all highway users is that pedestrians, cyclists and public transport users will have a greater priority than they do at present. It will be expected that major new development will be located in areas of high sustainability where there is existing, or the potential for, high public transport accessibility, and that key services will be accessible by walking or cycling, with developments contributing to significant improvements to sustainable transport routes. Where this is the case it is expected that the provision of car parking will be highly limited, effectively removing in-built car dependence.



Figure 11.2: Elements of a sustainable travel town

11.7 Land use decisions made through the Local Plan development process can shape and facilitate change in transport provision and travel choices. However, to successfully achieve a meaningful and sustained shift in travel behaviour, attractive alternatives to the private car are required. This is the start of a long-term process of change that will continue beyond the Local Plan end date of 2037, and will work within the framework of the South West Herts Joint Strategic Plan and the multi-modal study that goes up to 2050.

## Strategic Policy ST11.1: Sustainable Travel Town

New development will be supported in principle where it contributes towards sustainable and active travel behaviour, respecting the Transport User Hierarchy (Figure 11.1) set out in the County Council's Local Transport Plan and Watford's ambition to be a sustainable travel town. It should create an urban environment where people choose to walk and cycle, whilst reducing the impact of cars on the transport network, and promoting the use of public transport. Proposals will need to demonstrate how they contribute positively towards the Council's Climate Emergency declaration and are expected to bring public health, air quality and economic productivity benefits.

Development proposals should align with the principles set out below that aim to achieve better integration of land use planning and transport planning and develop a Sustainable Travel Town with a more active population. They should support the objectives of Hertfordshire County Council's Local Transport Plan, and supporting strategies, plus contribute to the Growth and Transport Plan packages in the Local Transport Plan and subsequent updates, as well as aligning with Watford's forthcoming Sustainable Transport Strategy and Local Cycling and Walking Implementation Plan.

To promote active travel the following initiatives should be embedded in development plans:

- a) Developing Watford as a Walking and Cycle Infrastructure Improvement Town, supporting the growth of shared mobility offerings that include bike share schemes;
- b) Creating neighbourhoods that encourage people to walk or cycle, through the provision or contribution to high quality walking and cycle routes that enhance connectivity and reduce severance; and
- c) Measures that reduce traffic speed and flow.

Developments will be supported where they improve public transport connectivity through:

- d) Contributing to the development of comprehensive priority measures for buses with supporting high quality, accessible bus stops and service improvements where required, to enhance existing services and demand responsive transport throughout the town;
- e) Supporting the development of mass rapid transit in Watford;
- f) Preserving and improving Watford Junction as a strategic transport hub for both rail and bus users, with excellent access routes, interchanges and other facilities enabling sustainable 'first and last mile' travel; and
- g) Supporting a Sustainable Transport Hub within the town centre that serves as a focal point for multiple modes [and links to the High Street](#).
- h) [Enhancing pedestrian and cycle facilities at key junctions with the ring road](#).

To reduce car dependency and the impact of private motor vehicles developments should:

- i) Contribute to traffic-demand management measures introduced that promote mode shift away from private cars;

- j) Provide provision for car clubs and electric vehicles, as set out in Policy ST11.5 'Car Parking, Car Clubs and Electric Vehicles'; and
- k) Produce Travel Assessments and Travel Plans where required by, and in line with, Hertfordshire County Council's relevant guidance.

## Protecting and enhancing future public transport routes and Watford Junction station area as a transport hub

- 11.8 Watford benefits from being home to a number of key transport interchanges and routes, and is an established transport hub for the South West Hertfordshire area. This transport infrastructure should be retained and enhanced where necessary to meet the needs of those who live, work and visit. There is an expectation that an uplift in densities will also aid the provision and maintenance of public transport on a borough-wide basis.
- 11.9 A variety of measures will need to be pursued and supported, including those identified in the South West Herts Growth and Transport Plan. The Council will support all of these where it can, including safeguarding routes for future active or public transport provision. The disused former Croxley Rail Line provides a potential future route for mass rapid transit, as well as an opportunity for a walking and cycling link. As such, the route and access to it should be safeguarded to maintain the possibility of its use by these modes; details of the land to be preserved are set out within the Watford ~~Mass Rapid Transit Safeguarding Technical~~ Metropolitan Line Safeguarding Report.
- 11.10 The Ebury Way cycle path provides a direct, traffic-free cycle and walking route between Watford and Rickmansworth, providing a valuable commuting and leisure route. It should therefore be preserved, including access to it, with opportunities sought to enhance its quality, particularly in making it an all-weather route.
- 11.11 The Abbey Line is an important public transport link between Watford and St Albans, enhancing regional connectivity. The status of this route, as being used for public transport, should be safeguarded.
- 11.12 Plans for an enhanced walking and cycling network are set out within the Local Cycle and Walking Infrastructure Plan. This network will be critical to Watford being a town where active travel is the natural first choice for short journeys. Thus, development should not prevent the ability of these networks to be delivered.
- 11.13 Hertfordshire County Council is developing plans for a new, mass rapid transit system to significantly increase connectivity across the county. This will bring significant benefits to Watford, and it is expected therefore that proposed routes for this system will not be prevented by new development although a route has yet to be finalised. The introduction of the Enhanced Partnership measures and priority schemes in the feasibility study, forms the first step in moving towards a network with the Mass Rapid Transit.
- 11.14 Watford Junction is the busiest railway station in Hertfordshire. The adjacent bus station, along with taxi rank provision, cycle and walking links and car parking

mean that it serves as a multi-modal transport hub for both the town and the wider region. Growth around the station is unlikely to be possible without alterations to the built environment to unlock sites and improve accessibility to sustainable travel. The ability to deliver key transport infrastructure must therefore be preserved. This should include the provision of two new pedestrian / cycle bridges to overcome severance caused by the rail lines. One of which should cross both the West Coast Main Line and Abbey Line, preferably as part of, or within the vicinity of, Watford Junction Station, and the second being between Penn Road and Colonial Way. Links to these should accommodate both pedestrians and cyclists, and be accessible to non-station users 24 hours a day, to maximise the permeability of the area.

- 11.15 A key requirement in developing Watford Junction as a transport hub is ensuring the existing bus station is well integrated with Watford Junction Station, as well as making travelling by bus as attractive as possible. Opportunities for improved infrastructure and facilities for passengers and bus operator staff should be preserved, and the bus and rail station should not be separated. A further element to the re-development of the area is a new sustainable transport multi-mobility hub, containing a multi-storey car park as well as facilities for a range of other modes, to be located immediately east of the station, space for which should be preserved. Improvements to the road network through an extension of Imperial Way, to provide access from Colonial Way via Clive Way with upgrades to the necessary road junction and road extension to provide a connection with the proposed Watford Sustainable transport Hub, a connection with the new proposed mobility hub and ~~the potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot via Imperial Way~~, should also be facilitated.



## Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub

To prevent development that would compromise future mass transit, bus prioritisation, walking, and cycling infrastructure, set out in either the South West Hertfordshire Growth and Transport Plan, the Local Cycling and Walking Infrastructure Plan or Watford's Sustainable Transport Strategy, the following routes will be protected from development whose designs would compromise their ability to prioritise public transport and active travel routes:

- a) The disused, former Croxley Rail Line, including access points, as set out in the Watford MRT Safeguarding Technical Report;
- b) The current Ebury Way cycle path and access to it;
- c) The Abbey Line;
- d) Current and planned cycle routes identified in the Local Cycling and Walking Infrastructure Plan;
- e) Planned mass rapid transit routes identified by Hertfordshire County Council.

All routes are represented in Figure 11.3.

The role of Watford Junction as a multi-modal hub should be preserved, meaning that development must not hinder the provision of the following on-site and cross-boundary infrastructure;

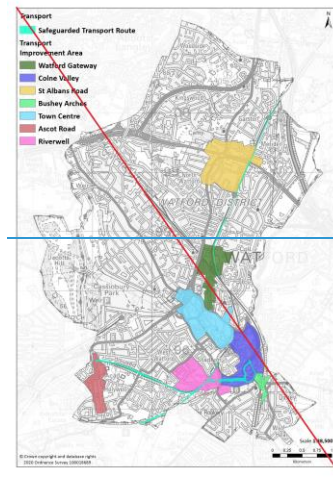
- f) New pedestrian / cycle bridges over the West Coast Main Line and Abbey Line and connecting Penn Road with Colonial Way, plus access to these;
- g) Bus and rail access that also provides for cycles, electric vehicles, drop-off movements, taxis, coaches and future mass rapid transit access;
- h) ~~Extension of Imperial Way as part of a comprehensive redevelopment of the area) that will -Way to~~ Pedestrian and cycling access from Colonial Way (or Imperial Way) to provide a connection to the station and ~~not compromise potential the re-routing of~~ vehicle access to the ~~safeguarded concrete batching plant and rail aggregates depot and concrete batching plant via Imperial Way;~~ safeguarded concrete batching plant and rail aggregates depot
- i) Upgrading of the bus station and bus priority improvements to roads in the vicinity of the station.

## Providing sustainable transport infrastructure for major development

11.16 A number of areas within the town are anticipated to experience significant levels of development within the Local Plan timescales or are located around major transport infrastructure. These areas are shown in Figure 11.3. Without appropriate mitigations, new development will likely affect the functioning of the local transport

network. A key mitigation will be the reduced provision of car parking (Policy ST11.5, 'Car Parking, Car Clubs and Electric Vehicles') that, in turn, will require the provision of alternative transport options. The sustainable transport requirements for these areas are set out within this policy. In particular, attention should be paid to providing internal permeability to walking and cycling, as well as complete, high quality routes to key destinations, overcoming severance where encountered.

Lower High Street area Colne Valley



11.17 Modelling forecasts that, without mitigation, potential development will have an impact on all major links into Watford, with particularly high impacts on Lower High Street, Beechen Grove Gyratory, and Waterfields Way. Therefore, where development sits within the Core Development Area it is expected that sites will be car-lite, with car-free being encouraged for those in closest proximity to Watford High Street Station.

11.18 Given its central location, and proximity to existing public transport networks, there is significant potential for the area to be supported by sustainable transport. Development should support the creation of a sustainable, multi-modal transport hub at the High Street / Water Lane junction.

The location of the site between the town centre, Bushey Arches, Watford General Hospital, and Watford Riverwell means that development will be supported where permeability for people walking and cycling is enhanced from current levels through the provision of direct, high quality routes and an internal road network that ensures traffic volumes and speeds are low. Provision should also be made for active travel links to the termination of the former Croxley Green Line on Wiggshall Road.

11.19 Lower High Street should be seen as a corridor primarily for sustainable transport, preserving the current high frequency bus service, as well as accommodating helping to link the potential future Mass Rapid Transit system, plus being a key walking and cycling route for the site. To enhance bus services, introducing bus priority measures on the ring road should also be supported. Ensuring access to the site for people walking and cycling should also be considered as part of development in the area, including upgrading the public realm and reducing severance at the Lower High Street / Exchange Road junction, plus providing high quality cycle routes on Lower High Street and Wiggshall Road. As a noted accident hotspot,

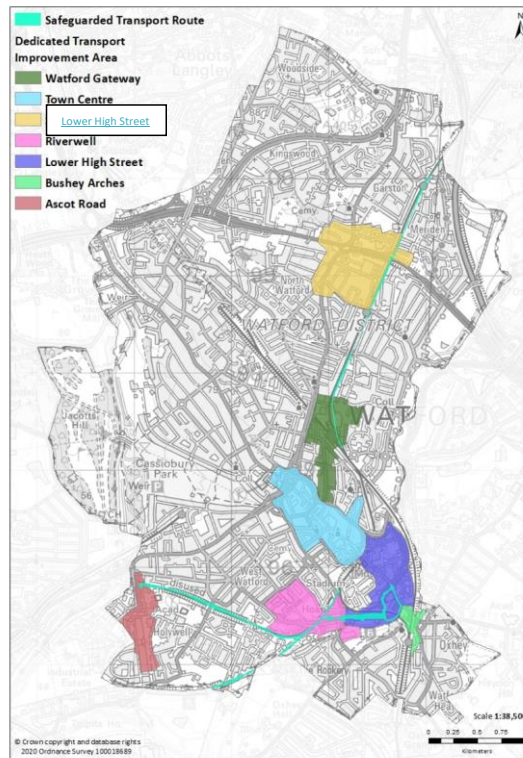


Figure 11.3: Areas for transport improvements in Watford, and routes to be safeguarded

contribution should also be made to a revised junction layout at the intersection of Waterfields Way and Lower High Street.

#### *Bushey Arches*

11.20 Whilst the scale of expected development is relatively limited, Bushey Arches is a known congestion hotspot, and an Air Quality Management Area has previously been declared for Pinner Road and Chalk Hill. It is therefore of crucial importance that vehicle movements from new development are minimised through restrictive car parking standards, so the traffic impacts of any development will need to be carefully considered. Without additional intervention, modelling suggests increasing stress on Lower High Street, south of Waterfields Way, and the Buses Arches Gyratory, as well as a number of further links, including Pinner Road being over capacity. It is therefore expected that development around Bushey Arches will support a package of sustainable transport interventions that is coherent with those to the north, around Lower High Street. Developments should make sure that best use is made of existing public transport in the area, in particular by contributing to high quality walking and cycling links to Bushey Station and upgrading those around the Bushey Arches Gyratory. Bus priority measures around the gyratory and connecting to a Lower High Street sustainable transport corridor should also be supported.

#### *Watford Riverwell*

11.21 Development beyond that already granted permission is not anticipated to be significant. However, new trips from development in the Riverwell area are likely to increase congestion and delays on the town centre road network and links such as the A4178, Vicarage Road and Harwood Road in the immediate vicinity. It is therefore expected that new development must contribute to sustainable transport infrastructure that makes the most of the area being within walking distance of the town centre and local transport hubs. Contributions could be expected to bus prioritisation measures on Vicarage Road, whilst permeability for cycling and walking should be substantially improved. In particular, active travel routes should link Watford General Hospital, Stripling Way, Thomas Sawyer Way and Ebury Way through the area, and additional infrastructure should be provided on routes around the site, such as Vicarage Road and Wiggshall Road. Land should also be safeguarded to provide access to the former Metropolitan Line Extension corridor (and a potential station area).

#### *Ascot Road*

11.22 Whilst the highway network of the Ascot Road Area currently operates without congestion at most times, several locations are expected to see large increases in traffic levels during the Local Plan period, particularly around the Ascot Road / Hatters Lane / Blackmoor Lane / Greenhill Crescent Roundabout.

11.23 To ensure bus services become a primary travel option for residents and employees in this area, development should support Ascot Road becoming a sustainable transport corridor, with significantly improved cycle infrastructure and bus priority measures. Existing pedestrian and cycle links between Croxley View and Greenhill Crescent improve local connectivity, and the Council will support new

development that ensures this access is protected and enhanced, to maximise the permeability of the area. The road network within the area features few high quality cycle lanes. New developments will therefore be required to provide significantly upgraded cycle lanes on key routes to sites, and site layouts should integrate connections to these routes where possible, to deliver a cohesive cycling environment. The Council will support proposals to improve cycle links in the Holywell area including re-surfacing the Ebury Way (and new connections to it) to maximise use, alongside enhanced east-west cycle facilities along Harwoods Road / Chester Road / Queens Avenue to Whippendale Road and along Vicarage Road. New development in the Ascot Road Area should preserve the opportunity for providing mass rapid transit and walking and cycling on the disused Croxley Railway line, including safeguarding land for a potential terminus.

#### St Albans Road

- 11.24 Several congestion hotspots exist within this area, with St Albans Road, the A41 and the Dome Roundabout particularly under stress. It should also be noted that an Air Quality Management Area was required on St Albans Road (revoked in 2019) and journey times for bus travel are long. These issues will be exacerbated if new development does not support sustainable transport.
- 11.25 St Albans Road is a key strategic route serving the Dome Roundabout area for both car and public transport users, due to its connections with the town centre to the south and strategic roads to the M1. A shift to non-car-based modes of travel should be targeted for this corridor via improved highway infrastructure for bus priority. The corridor also has the potential to become a key cycle route, providing direct links to destinations and transport interchanges. Developments will therefore be supported that contribute to significantly enhanced, continuous walking and cycling infrastructure along the corridor, including overcoming severance and bus journey time delays caused by the Dome Roundabout.

#### Town Centre

- 11.26 Development sites within Watford Town Centre have high accessibility to public transport options, as well as services, amenities and employment opportunities within convenient walking and cycling distances. Many of the arterial roads leading towards the town centre are congested at peak times currently, and high traffic levels on the central ring road affect bus journey times and reliability as well as it causing significant severance. It will therefore be expected that parking provision will be minimised at all new developments with car-free development encouraged, and contribution made to the development of enhanced public transport and active travel infrastructure in the town centre.
- 11.27 This ~~would~~ should include bus priority interventions along and in the vicinity of the ring road which in the future could develop to potentially support the provision, as well as preserving its ability to become part of a ~~m~~Mass ~~R~~apid ~~£~~Transit ~~route~~ system. The potential to develop a ~~S~~sustainable ~~£~~transport ~~h~~Hub and interchange point at the High Street / Water Lane junction should also be supported. High quality and convenient cycle routes, especially those that facilitate north-south and east-west movement are required to encourage people to choose cycling as a primary mode of

travel for short-to-medium-distance trips, notably along Hempstead Road, Rickmansworth Road and St Albans Road. All developments should support significantly enhanced cycle and walking infrastructure provision, through being highly permeable and contributing to complete routes that overcome the severance of the ring road, particularly at the Derby Road, Water Lane, Lower High Street, Vicarage Rd and Market Street junctions.

#### *Watford Gateway*

11.28 Being focused on a strategic, multi-modal transport hub, public transport accessibility in Watford Gateway is high and thus it is expected that developments will be car-lite, with car free encouraged. In addition to the internal requirements set out in Policy ST11.2, 'Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub', contribution should be made to high quality cycle and walking infrastructure to access the area from all directions. This should include a link north via Bradshaw Road to Balmoral Road as well as infrastructure along, and to cross, St Albans Road.

### Policy ST11.3: Providing Sustainable Transport Infrastructure for Major Development

Major developments should maximise opportunities for sustainable transport, protecting and supporting current and future active and public transport routes.

Cycling and walking infrastructure should be high quality and provide complete routes to key destinations, such as the town centre, transport hubs, employment centres, educational or community facilities. In addition, for each of the following areas, as indicated in Figure 11.3, the principles set out below should be observed and the infrastructure requirements set out in Appendix C be positively supported by major developments, in addition to the safeguarding requirements set out in Policy ST11.2 'Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub'.

#### Colne Valley Strategic Development Area

Developments should expect that their transport needs here are met primarily by sustainable transport objectives, and as such should be car-lite. Lower High Street should serve primarily as a sustainable travel corridor, with high quality direct pedestrian access from sites. The provision of an internal travel network that is highly permeable to those who wish to walk or cycle, with direct, high quality links and low-traffic streets between the town centre, Oxhey, Vicarage Road, Watford General Hospital and Riverwell should be ensured. Bus prioritisation measures should be provided on key access links.

#### Bushey Arches

Developments should support the ambitions for sustainable transport options around Lower High Street, and also make best use of existing public transport infrastructure, by supporting the delivery of new and significantly improved high quality walking and cycle links to Bushey Station and Arches; overcoming the severance caused by the current highway layout.

#### St Albans Road

Developments will be expected to support significant improvements to walking and cycling infrastructure along St Albans Road and at the Dome Roundabout, alongside implementation of bus priority measures, mitigating potential junction delays for buses on main thoroughfares and junctions.

#### Watford Riverwell

Permeability for active travel should be substantially improved, linking to bus stops, Watford General Hospital, Vicarage Road, Stripling Way, Thomas Sawyer Way and Ebury Way, along with the potential upgraded former Metropolitan Line Extension corridor. Developments should contribute to bus priority or cycle infrastructure on Vicarage Road and Wiggshall Road.

**Ascot Road**

Development should contribute positively towards Ascot Road becoming a sustainable transport corridor through new and significantly enhanced bus priority measures and pedestrian / cycle infrastructure. Improvement to active travel permeability and routes should include significant enhancement to links between Croxley View and Greenhill Crescent, to Tolpits Lane, to the Ebury Way and further east-west routes to the town centre.

**Town Centre Strategic Development Area**

Development should at a minimum be car-lite, and car-free should also be considered. Bus priority interventions along, and in the vicinity of, the ring road should be supported. Development should support the delivery of high quality cycle and walking routes across and to the Town Centre, linking to key destinations. Development should contribute to reducing the severance caused by the ring road.

**Watford Gateway Strategic Development Area**

All major developments will be expected to significantly enhance pedestrian and cycle routes through the Watford Gateway area by providing high quality internal infrastructure and links to the Town Centre, North Watford and towards Bushey. The development of the station as a multi-modal hub should also be supported, including the access requirements for this across all modes.



## A walking and cycling infrastructure improvement town

11.29 Consideration of how best to facilitate walking and cycling trips must be integral to all design. A key principle of the Local Transport Plan is 'modal shift and encouraging active travel', noting that 'the potential public health benefits of increased levels of active travel indicate this should be a high priority, and a key feature of the future transport system we are planning for'. This contributes towards the wider objective within the Local Transport Plan promoting Watford as a Walking and Cycling Infrastructure Improvement Town.

### *Local Cycling and Walking Infrastructure Implementation Plan*

11.30 The forthcoming Watford and Three Rivers Local Cycling and Walking Implementation Plan will identify routes and improvements that comprise, but are not limited to, the provision of pedestrian crossings, segregated cycle routes, and enhanced junctions, to facilitate a more comprehensive and safe cycling and walking network that connects to local destinations and encourages less reliance on private vehicle travel.

11.31 Developments should ensure that their design encourages walking and cycling and respects the Local Transport Plan Transport User Hierarchy that prioritises active travel, through being permeable to people both walking and cycling, with high quality footpaths, and design that reduces vehicle dominance and encourages cycling by all. This should be supported by signage that aligns with Watford's existing wayfinding approach.

### *Cycle parking*

11.32 Consideration of the needs for cycling parking play a key part in ensuring that design encourages cycling. The absence of high quality cycle parking, with its resulting inconvenience and fear of theft, is a key barrier to people choosing to cycle. Without an easily accessible and secure place for people to store their cycle, both at home and at their destination, they are unlikely to choose to cycle their journey.

11.33 In designing cycling parking, attention should be paid to the difference in requirements for long-stay parking, required where people will leave their cycle for an extended period, for example, at home, work, place of education or a station, and thus place a premium on security, compared to short-stay parking, for example, outside a retail location, where convenience is the key factor. Cycle parking standards are set out in Appendix D and parking should be laid out in accordance to the Watford Cycle Parking Supplementary Planning Document.

### *Cycle parking in residential developments*

11.34 The manner in which residential cycle parking is provided will depend on characteristics of the development:

- a) In large apartment complexes, single, large, communal storage does not provide sufficient security. Multiple cycle storage areas or individual storage compartments located outside the apartment, within the blueprint of the building, that are capable of taking cycles, prams and other large items, should be provided;

- b) For smaller developments or converted buildings, a secure, accessible communal area should be provided that includes space for non-standard cycles, such as cargo bikes, adapted cycles or tandems;
- c) For houses, cycle storage should be at the rear, the side or within the building, as storage at the front can be unsightly, and tends to advertise to thieves that cycles are there. Where adequate cycle parking cannot be provided within residential developments, alternative cycle parking arrangements for residents should be provided, such as the provision of a provision of a cycle hangar on the highway in a location agreed with the Council.

#### *Cycle parking in non-residential developments*

- 11.35 Secure cycle storage for staff and visitors should be provided as part of new non-residential developments. These should be part of a wider approach to encourage cycling that includes the provision of changing facilities and showers, encouraging a long-term modal shift away from single-occupancy vehicle use.
- 11.36 To support commuting to employment and education destinations, security is particularly important. Provision for employees or students should have employee-only access storage areas that are covered and include space for non-standard cycles, along with showering and changing facilities within the building. At primary and nursery schools, an appropriate proportion of long-stay cycle parking for students may be met through scooter parking.

#### *Location of cycle parking*

- 11.37 All major non-residential developments and residential developments should provide short-stay cycle parking for visitors who will not be able to access parking provided for employees or residents. This should be convenient and readily accessible, preferably in the form of Sheffield Stands within 15m of the main entrance where possible, so that the ease of cycling is not undermined by a lengthy search for suitable parking. For primary schools and nurseries, short-stay cycle parking should be located and designed to accommodate at least two parental cargo bikes or cycles with trailers.

#### *Bicycle hire and share schemes*

- 11.38 Not all residents or visitors to Watford will own or have access to a cycle within the town. The town's bike-share scheme provides access to bikes for those without access to a personal cycle. These bikes are stored at bays across the town and can easily be hired for use via a mobile phone app. Users collect and deposit the bikes at a bay at the start and completion of their trip, thus it is important that sufficient bays are available near to all potential destinations to support the scheme. The provision of bike share bays where it would support the wider bike share network, in agreement with the Local Authority, will be encouraged and could replace some on-site visitor parking provision.
- 11.39 In the largest of developments it is encouraged that this is in the form of a bike share parklet that combines standard cycle parking with bike share bays. The requirements for bike share bays is specified in the cycle parking standards in Appendix D. To preserve the ability to enhance the bike share infrastructure, any land

set aside to support the installation of a bike share bay will be safeguarded should installation not take place immediately.

### Policy ST11.4: A Walking and Cycling Infrastructure Improvement Town

New development will be supported where it will contribute towards achieving a modal shift and make walking and cycling a convenient and efficient way to access local destinations. To be integrated into the adjacent and strategic walking and cycling network, proposals should demonstrate how they have prioritised walking and cycling through the provision of on-site infrastructure including cycle parking facilities, wayfinding measures and good design for safety and security. Major developments should contribute towards the delivery of significantly improved walking and cycling routes to key destinations, prior to first occupancy, where viable.

#### Walking

Developments should be permeable and safe to walk through, including high quality footways and pedestrian crossings, adequate lighting and signposting. They should facilitate or deliver the links required to connect to existing and proposed walking routes as well as local amenities and public transport. Developments adjacent to the borough's walking routes, as identified in the Local Cycling and Walking Infrastructure Plan, will be expected to accommodate them through allocating space and supporting off-site contributions.

#### Cycling

Developments will encourage people to cycle by providing an urban environment that is accessible and safe for all cycle trips. This requires high quality cycle routes that are segregated, unless both traffic flows and speeds are low. These routes should connect to local amenities, transport interchanges and the existing and proposed cycle network, as set out in the Local Cycling and Walking Infrastructure Plan. Developments adjacent to existing and new cycle routes will be expected to facilitate and deliver these links through allocating space and contributing to infrastructure improvements.

#### Cycle parking

All development proposals will be required to provide on-site cycle parking facilities in line with the cycle parking standards detailed in Appendix D. Secure and convenient cycle parking facilities should be designed at the outset of the scheme. Should the standards for visitor cycle parking mean a requirement in excess of ten spaces, part of this provision can be replaced with a contribution to publicly-accessible bike share bays in a suitable location nearby, further detail on this is provided in Appendix D.

## Car parking, car clubs and electric vehicles

- 11.40 Controlling car parking and providing alternatives to personal vehicle ownership have been found to be some of the most effective methods for managing demand and thus addressing issues such as the perception of a car-dominated environment, congestion, unreliable journey times, diminished air quality and higher carbon emissions amongst others. Advancing transport technology has the potential to drastically change how travel is managed and undertaken and opportunities are to be taken through new development to help future-proof the borough to support electric vehicle charging and shared mobility solutions, such as car clubs.
- 11.41 There is limited space available to support new development, and new schemes will be expected to make the most efficient use of the land available for redevelopment. Continuing to provide excessive car-related infrastructure, particularly overgenerous parking, will exacerbate existing issues associated with the transport network and the environment. These requirements will also support Watford becoming a Sustainable Travel Town (Policy ST11.1 'Sustainable Travel Town') by encouraging mode shift away from private car trips and thus reducing the impact of transport on the environment.

### *Car parking standards*

- 11.42 New development in all areas of the borough is to provide car parking that is reflective of the needs of its location and encourages greater proportions of people to use alternative transport modes to the private vehicle in the long term.
- 11.43 Car parking standards (Appendix E) have been set in consideration to the Core Strategic Development Area, the availability of public transport modes and the type of development, in accordance with the National Planning Policy Framework. The car parking standards provided are maximums, to support Local Plan objectives by helping reduce overall car use and pressure on highway networks and infrastructure. Provision should take into consideration alternative forms of mobility, such as car club vehicles and seek to minimise the risk of off-site parking impacts.
- 11.44 Developments that are likely to result in material impacts to highway safety as a result of insufficient parking will be refused. Development in the Core Development Area will be severely restricted (i.e. 'car-lite'), and this will be enforced via Section 106 agreements. This is to minimise congestion in this area by discouraging vehicles where there are excellent public transport options available.

### *Allocated and unallocated parking spaces*

- 11.45 For all new residential developments, the standards set out a requirement for a proportion of parking spaces to be unallocated to any particular user. This is intended to accommodate vehicles that visit the site irregularly (such as visitors) who may otherwise struggle to find a parking space on site, and car club vehicles. Where parking spaces are allocated, they should be leased rather than sold. This will ensure that parking areas are used efficiently and reduces the risk of spaces being left vacant for any period of time. This policy requirement also supports development land being adaptable for the needs of subsequent users.

#### *Car parking and controlled parking zones*

11.46 There is a recognition that for low levels of on-site car parking to work most effectively, it needs to be combined with on-street parking restrictions, one of the most effective modes of traffic demand management. This is particularly important for the areas located in the Core Development Area. Controlled Parking Zones are well established in the borough and will be kept under review as part of the Council's approach to traffic management. New development should not increase parking demand in Controlled Parking Zones and users will therefore be exempt, or subject to restriction, from obtaining permits to existing Controlled Parking Zones.

#### *Parking for disabled persons*

11.47 Though parking may be restricted across the borough, the need to provide parking for people with reduced mobility remains an important requirement as part of Watford's ambitions to become a more accessible, inclusive borough. Disabled persons' parking should form a proportion of the overall parking provision, rather than being treated as additional. Demand for accessible parking spaces may change over time, and so developers are required to future-proof residential car parks by identifying additional parking spaces that could be converted to disabled persons' parking spaces if needed.

11.48 Disabled persons' parking spaces should not be allocated to specific dwellings, unless they are provided within the curtilage of the dwelling, and all disabled persons' parking spaces should follow relevant design guidance. Recommended parking provisions for non-residential land uses are also provided. Where it is not possible to provide disabled persons' parking at developments due to site constraints or highway safety concerns, the applicant will be required to demonstrate where a disabled person can park to access the development conveniently.

#### *Parking for powered two wheel vehicles*

11.49 Powered two wheeled vehicles, such as motorcycles, scooters and mopeds, contribute to reducing congestion and emissions and also provide more efficient use of space than car parking. Providing space to park powered two wheeled vehicles will increase the attractiveness of powered two wheeled vehicles as an alternative to car ownership, and reduce instances of illegal parking which often obstructs footways. Guidance on designing for powered two wheeled vehicles is available from the Institute of Highway Engineers and motorcycle industry groups.

#### *Electric vehicles*

11.50 Electric vehicles, that is any road vehicle with a battery that is intended to be charged from mains supply, will be encouraged for use where people are unable to use public transport, walk, or cycle to destinations. Whilst not reducing congestion, a move towards electric vehicles will reduce air pollution in the borough and contribute to local and national carbon-reduction targets. [Hertfordshire County Council's Local Transport Plan supports the uptake of Ultra Low Emission Vehicles \(ULEV\).](#)

11.51 The number of electric vehicles is expected to increase further with the ban on the sale of petrol and diesel vehicles from 2030, and as electric vehicle technology becomes cheaper. It is therefore necessary to ensure that new developments are

future-proofed to facilitate this progression. Sufficient electrical capacity in new developments for current and future demand for charging points will therefore be required.

11.52 The parking standards require consideration for the provision for electric vehicles, including one of two types of charging infrastructure:

- a) 'Active provision' requires fully wired and connected charging points at parking spaces;
- b) 'Passive provision' requires the necessary underlying infrastructure (e.g. capacity in the connection to the local electricity distribution network and electricity distribution board, and cabling to parking spaces) to enable simple installation and activation of a charge point at a future date.

11.53 As electric vehicles become more commonplace around Watford, locations for new electric vehicle charging infrastructure will naturally be focused on trip origins and destinations, where longer charges can take place (such as homes and workplaces). Where charging points are provided at commercial developments, the infrastructure must be able to support a rapid charging service (i.e. a 43kW connection, taking less than one hour for a full charge).

#### *Car clubs*

11.54 Car clubs are a form of shared mobility that allows individuals and businesses to have access to a locally parked vehicle for a short-term rental period. Various models are possible including 'back-to-base' and more flexible one-way trip options, and dedicated parking bays are sometimes provided. Coinciding with changing population demographics, there is a recognition that the desire to own a car is reducing, and access to a vehicle for occasional use is becoming increasingly favourable. To support this change, people need to have a choice of easy and convenient transport options on a daily basis to best meet their circumstances. Having car club vehicles located at key journey origins and destinations will mean people can rely on this method of travel being possible when needed, and new developments must therefore support the growth of car clubs in the borough.

11.55 For residential schemes above ten units, developers are required to identify, and safeguard, one unallocated parking space for every 50 units which would become a car club space if needed. Car-free residential developments will be expected to provide such spaces alongside disabled spaces, or contribute to the equivalent volume of on-street car club spaces within short walking distance, if required by the Council. This will help to facilitate and support effective travel planning measures being taken throughout the lifespan of the development.

11.56 Car club spaces should be situated where they are easily accessed and are visible to occupiers of the development and the surrounding neighbourhood. Where parking is inaccessible to the public, the Council may secure contributions to fund on-street car club spaces in the local area or require alterations to parking layouts to allow for accessible parking. Should a car club network become active in the borough, the Council will expect contributions to secure car clubs at new developments and incentivise membership as deemed necessary.

## Policy ST11.5: Electric Vehicles, Car Parking and Car Clubs

### Electric vehicle charging

For all schemes, 20% of parking spaces should have active charging infrastructure for electric vehicles provided, all other spaces should have passive provision. Proposals to increase the availability of publicly accessible electric vehicle charging infrastructure within the borough will also be supported and encouraged.

### Car parking

Development proposals should only provide car parking where it complies with the car parking standards set out in Appendix E. All new development proposals within the Core Development Area should be car-lite. Where these standards and requirements are met, the parking element of the proposal will be supported.

For residential schemes of ten units or more, 20% of all parking spaces should be unallocated.

### Disabled parking

For residential schemes of ten units or more, disabled persons parking should be provided for at least 5% of units, with a minimum of one space; potential disabled persons' parking spaces for a further 5% of units should be identified on a plan to facilitate conversion as required; wheelchair accessible or adaptable accommodation should provide one unallocated disabled persons' parking space per unit.

For non-residential schemes, provision for disabled persons' parking will be determined on a case-by-case basis through pre-application discussions and an accurate estimate of potential demand provided in the Transport Statement/Assessment.

All disabled parking spaces should be located within 50m of the entrance to the building that it serves, via level access.

### Car club parking

The Council will support the development of car club networks within the borough, particularly those using low-emission vehicles.

For residential schemes of ten units or more, developers should identify one parking space per 50 units that would be designated for car club use only, if supported by a car-club operator (minimum of one space). Where parking is inaccessible to the public, the Council may secure contributions to fund on-street car club spaces. If no car-club spaces are proposed, this should be supported by evidence that there is a no demand from car-club operators for a space within the development. Developers may also be required to provide a financial contribution towards car club memberships for new residents.

### Powered two wheeler parking

For all schemes where parking is provided, one powered two wheeler parking space should be provided per 30 car parking spaces (minimum of two per site). All other schemes should

provide sufficient powered two wheeler parking for the potential demand for their sites, as assessed in the Transport Statement / Assessment.

## Managing the transport impacts of development

### *Transport Statements and Transport Assessments*

- 11.57 Transport Statements and Transport Assessments seek to assess and reduce the transport impact of a development, and allow the Council to evaluate the scheme's compliance with relevant policies and objectives. They identify the need for mitigation and describe interventions to reduce traffic generation, highway safety risk and environmental impacts, and maximise accessibility.
- 11.58 A Travel Plan is a long-term management strategy for the site that seeks to deliver sustainable transport objectives. This is regularly reviewed and monitored. It should identify a package of measures for the development to improve accessibility and encourage the use of sustainable modes of travel.
- 11.59 All Transport Assessments, Statements and Travel Plans should follow the Transport User Hierarchy, as outlined in the Hertfordshire Local Transport Plan.
- 11.60 Planning applications for developments that will generate significant impact on the transport network must be supported by a Transport Assessment. A Transport Statement may be sufficient instead of a full Transport Assessment, where the development will have relatively low transport implications. Applicants should determine whether a Transport Assessment or Transport Statement is required, based on the thresholds provided in Roads In Hertfordshire: A Design Guide <sup>8</sup>.
- 11.61 Where negative impacts are identified within the Transport Assessment or Statement on the safety or operation of the transport network, mitigation measures should be developed to eliminate or significantly reduce these. Appropriate levels of financial contribution for mitigation measures will be sought from developers towards any interventions required to offset transport impacts via Section 106 planning obligations or planning conditions. Should Hertfordshire County Council's plans for a mass rapid transit system progress, it could be expected that the total value of contributions is agreed via the Transport Assessment process based upon interventions directly related to the site, but that some or all of this maybe ultimately delivered as a financial contribution to the development of the mass rapid transit system.

### *Travel Plans*

- 11.62 A Travel Plan is required in all cases where a Transport Assessment is needed, as well as other circumstances where local factors make one necessary as determined by the Council. For smaller developments, a Travel Plan Statement, with a reduced quantity of detail, may be sufficient to accompany the planning application. Travel

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<sup>8</sup> <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>



Plans should be produced with regard to Hertfordshire County Council's Travel Plan guidance<sup>9</sup>. Where the travel behaviour of the end user is unknown at the time of the planning application submission, applications will be expected to prepare draft Travel Plans with indicative modal shift targets for the planning application, before agreeing to update the Travel Plan with site-specific data upon occupation.

11.63 The Travel Plan should demonstrate how site users are being encouraged to travel in a sustainable manner, with a package of measures to support this. They should set targets or objectives, with accompanying monitoring, management and enforcement approaches. Monitoring of the Travel Plan's progress should take place on an annual basis for a minimum of five years following full occupation for residential developments, or first occupation for workplace or commercial developments. Travel Plans for educational establishments should be monitored for a minimum of seven years following first occupation. A Travel Plan Review document, covering results, implementation updates and recommended revisions, should be shared with [Hertfordshire County Council](#) within 30 days of data collection, and this will be assessed and recorded in Hertfordshire's Travel Plan monitoring system. The Council will secure a fee as part of the financial obligations of the planning permission to cover Travel Plan monitoring. Potential Travel Plan measures and objectives are provided within Hertfordshire County Council's guidance, measures that would support take up of the Council's sustainable transport schemes – bike share and on demand bus service – will be encouraged.

11.64 Alongside discussions with Watford Borough Council, applicants are encouraged to engage with the Highway Authority (Hertfordshire County Council) via the transport pre-application advice service to discuss and agree the appropriate level of assessment and the need for other supporting documents to be provided, such as Construction Management Plans and Delivery and Servicing Plans.

### Policy ST11.6: Managing the Transport Impacts of Development

A Transport Statement or Transport Assessment is required to support planning applications for all developments that will impact upon the transport network, in accordance with Hertfordshire County Council thresholds. They should set out:

- a) How the development has been designed in line with the Transport User Hierarchy;
- b) How the development will facilitate greater use of sustainable modes of transport;
- c) The impact of all development users on the transport network during and after construction; and
- d) Proposed mitigations for any adverse impacts identified.

A Travel Plan that encourages sustainable travel behaviour should be developed for all developments, meeting the requirements set out by Hertfordshire County Council and should be structured according to their guidance. This should have a clear set of objectives, measures to achieve these and an approach to monitoring and enforcement. Where

<sup>9</sup> [www.hertfordshire.gov.uk/travelplans](http://www.hertfordshire.gov.uk/travelplans)

required, a Construction Management Plan and / or a Delivery and Servicing Plan must also be provided.

Significant negative impacts on the transport network as a result of new development must be satisfactorily mitigated. Developers will be required to contribute to and deliver appropriate transport infrastructure or other mitigation measures, with financial contributions required through planning conditions. This could include an agreement with the Council during the planning process instead for a financial contribution to the proposed mass rapid transit system equivalent to part of all of that required for local mitigations.

# Chapter 12: A Healthy Community

## A Healthy Community

12.1 Good masterplanning and the high quality design of buildings, outdoor spaces and the relationship between them make an important contribution towards health and wellbeing. It can lift the spirits or have a negative impact on people both in terms of the physical health and their mental wellbeing. Internal living spaces, personal and shared, and access to open space are known to help people relax and counter the stress of modern urban life.

12.2 Considering health and wellbeing as an opportunity can help to improve the quality of a scheme for both its marketability for people occupying a building. Figure 12.1 shows factors that contribute towards health and wellbeing while the Health and Wellbeing Planning Guidance (Hertfordshire County Council, 2017) sets out seven themes that should be considered and incorporated into the planning of new developments to ensure they are promoting health and sustainability. These include; air quality, movement and access, open spaces, design, employment and education, and healthy food choices. The National Health Service published 'Putting Health into Place' to act as a signpost for developers and sets out 10 principles, along with guidance on building health into place shaping and development. The Coronavirus pandemic has further highlighted how important both public open space and quality internal living spaces within a home are to people.



Figure 12.1: Factors contributing towards health and wellbeing

12.3 The health of an individual and the wider community is often dependent of a variety of issues, and the way people go about their everyday living. While not limited

to the following, the Local Plan can help to positively influence the following contributors to health and wellbeing in Watford:

- **An active population:** taking steps to manage increasing child obesity and the location of unhealthy food outlets and providing better access to open spaces and community facilities. [Even small-scale proposals can support the provision of accessible open space, improving opportunities for outdoor physical activity.](#)
- **Community severance:** physical and mental barriers such as busy roads affect the perception of safety, and restrict individuals' mobility and social interaction. This can be improved through a more community orientated public realm that prioritises people and provides better access to services and facilities through improved infrastructure and public transport.
- **Poverty and deprivation:** historical economic, environmental and social patterns affect the quality of living but can be improved through better access to education, quality jobs, improving support for people with disabilities and providing high quality places to live.
- **Environmental quality:** poor air quality and other disturbances such as noise, light, odour and vibration are commonly associated with vehicle traffic and industrial emissions. These can be improved through higher better use of technology, prioritising non-vehicular travel such as walking and cycling and also locating new development where people will not be adversely affected by pollution. Ensuring that uses are located where they are compatible will benefit physical and mental health and reduce conflict.
- **Mental health:** high population densities have higher rates of mental health issues compared to rural areas, including almost 40% higher risk of depression (RTPI *Planning for 'well beings'* 2020). Well-designed internal and external spaces within new buildings and outdoor public spaces provide an opportunity to create healthy places to live and improve the neighbourhood.
- **An ageing population:** the changing age demographic will place increasing demand for new homes and facilities. Providing adaptable and specialist homes, improving access to community facilities and providing well designed spaces that enable people to interact and continue to feel part of their community are integral to sustainable development.

### Strategic Policy HC12.1: Healthy Communities

Creating a high quality environment encourages physical activity through easier movement for pedestrians and cyclists, and helps improve people's mental health by creating spaces (urban and green) that are welcoming, pleasant and encourage activity and social interaction between people of all ages.

New development will be supported where it will contribute towards an inclusive and healthier community through delivering these objectives:

### **An active population**

Tackling obesity in children by creating opportunities for active play in new development. Encouraging adults to become more active with a more pedestrian and cycle-friendly urban environment that is focused on quality safe spaces for people, not dominated by the car or suffering from community severance. Major developments should support the provision of accessible open space that offers appropriate opportunities for outdoor physical activity to meet local needs. This should be supplemented by new and enhanced greenspaces to support health and wellbeing. ~~Major d~~Developments are expected to promote active design by adhering to the 10 Principles of Active Design set out by Sport England.

### **Healthy eating**

Supporting healthy eating through the protection of community assets, such as allotments, community orchards and planting of fruit trees on open spaces. Opportunities for food growing should be maximised within new developments.

### **Pollution**

Improving air quality, noise and light pollution by locating compatible uses in the vicinity of each other, reducing the impact of vehicles through a modal shift and slowing average vehicle speeds.

### **Poverty**

Supporting initiatives to tackle poverty, such as back-to-work schemes, training and education and access to jobs using good public transport.

### **A healthy older population**

Providing homes and facilities to meet the needs of an ageing population such as adaptable and specialist homes and access to health facilities.

### **Community facilities**

It is important to ensure community facilities are of good quality and are located where they can be accessed by walking, cycling and public transport. Consideration should also be given to sensory gardens to provide a diversity of colour, patterns, smell, touch, taste and sounds to benefit physical and mental relaxation or in particular to benefit disabled members of the community.

## **Health Impact Assessments**

12.4 The Watford Local Plan seeks to ensure that positive opportunities from development are optimised and that any unintended consequences do not have a disproportionate impact upon the population, especially those more at risk from health inequalities. A Health Impact Assessment (HIA) is an essential assessment for any development proposal to demonstrate that it will not have negative implications for the physical health and mental wellbeing of both existing communities in the

vicinity, as well as the future residents of the new development. Health Impact Assessments are a tool through which development can:

- Understand the local community health needs and demonstrate how it can support these;
- Demonstrate how it has considered health inequalities;
- Meet the requirements of the Environmental Impact Assessment (EIA) Regulations (2017) for human health;
- Meets the policy requirements of the Watford Local Plan that major development proposals undertake a Health Impact Assessment;
- Demonstrate the opportunities of a proposal and how a development has been positively planned.

~~The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:~~

- ~~• Rapid Assessment for simpler proposals;~~
  - ~~• In-depth Health Impact Assessment for more complicated or larger proposals.~~
- ~~12.6 Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth Health Impact Assessments will be supported on large scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment, as a minimum, to support their planning application.~~

12.412.5 In November 2019, Hertfordshire County Council adopted a Health Impact Assessment Position Statement. This sets out when a Health Impact Assessment should be undertaken and frameworks to use for each stage of the Health Impact Assessment process. The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units. The Health Impact Assessment Position Statement sets out a threshold for different types of development, including a threshold for the development of 100 residential units or more to be subject to a Health Impact Assessment. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:

- Rapid Assessment for simpler proposals;
- In-depth Health Impact Assessment for more complicated or larger proposals.

[12-512.6](#) Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth Health Impact Assessments will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment, as a minimum, to support their planning application.

### Policy HC12.2: Health Impact Assessments

Health Impact Assessments are required for proposals that may have an adverse impact on the immediate area and affect people living in the development and close by. More specifically, Health Impacts Assessments should be provided as part of a planning application submitted for the following types of applications:

- a) Major residential proposals of 100 units or more;
- b) Major transport infrastructure improvements, including major new roads or major new junctions, existing rail networks, rail stations and transport interchange areas and the proposed Mass Transit System along the former Croxley Rail link; and
- c) Any other locally or nationally significant infrastructure project.

Where a Health Impact Assessment has identified an issue that may have a significant adverse impact, the applicant should set out how this has been addressed and mitigated as part of the proposal.

## Cultural and community facilities

[12-612.7](#) Facilities that provide opportunities for leisure, recreation, sport and tourism are vital to our physical and mental health, and can be a key element of the overall quality of life. Such facilities need to be close to where people live to reduce the need to travel, and be in the heart of the community, a social role often filled by uses such as public houses.

[12-712.8](#) Built cultural or community facilities can include education and health facilities, public houses, local places of worship, community centres, public halls, leisure and sports centres, or arts buildings. Other types of buildings might also function as community facilities where they meet the social, leisure, cultural and religious needs of Watford's diverse communities. Such facilities can be listed as 'assets of community value' where they are of particular significance to the local community and this will form a key consideration in determining an application.



12-812.9 This policy provides protection for existing community facilities that play an important role in delivering a place where people want to live. Where major new development is proposed, or where facilities are lost as part of redevelopment proposals, the Council will seek the provision of new or replacement facilities where there is an identified demand. New community uses will generally be supported where the use has a clear benefit to the local community. Where possible, these are encouraged, in or near to, Local Centres, in order to reduce trips.

12-912.10 Proposals that result in the loss of a community facility must demonstrate that the facility is no longer needed and that no other community uses could make use of the site or facility. This should include evidence of consultation with the local community and community infrastructure providers, marketing and an analysis of local provision.

### Policy HC12.3: Built Cultural and Community Facilities

Proposals for new, extended or improved cultural and community uses that address a demonstrated demand from the local community will be supported. Such uses should be located within sustainable, accessible locations close to the identified need and as a complementary use within, or close to, an identified Local Centre. Facilities that are proposed in isolated locations or that conflict with existing uses nearby will not be permitted.

The loss of existing community and cultural venues will only be permitted where it can be demonstrated that:

- a) The facility is no longer needed and there is no need for an alternative community or cultural use on that site; or
- b) The community or cultural uses can be re-provided of a higher quality in an alternative location or manner that is equally accessible to the community.

Development within the curtilage of existing community facilities should demonstrate that the continued operation of these facilities is not compromised.

# Chapter 13: Site Allocations and New Development

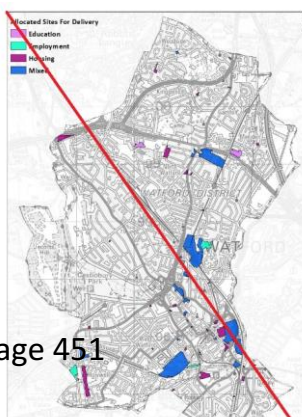
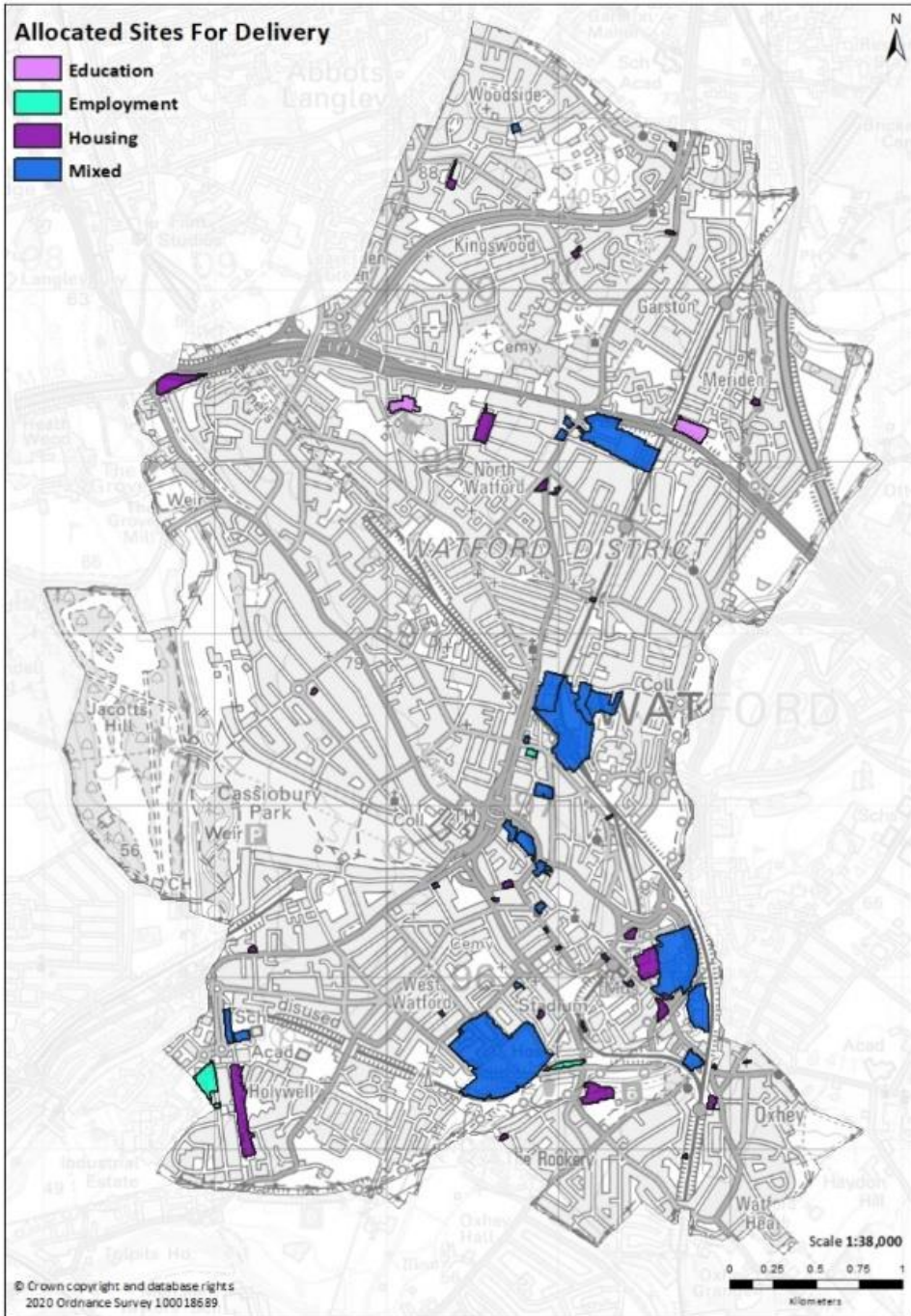
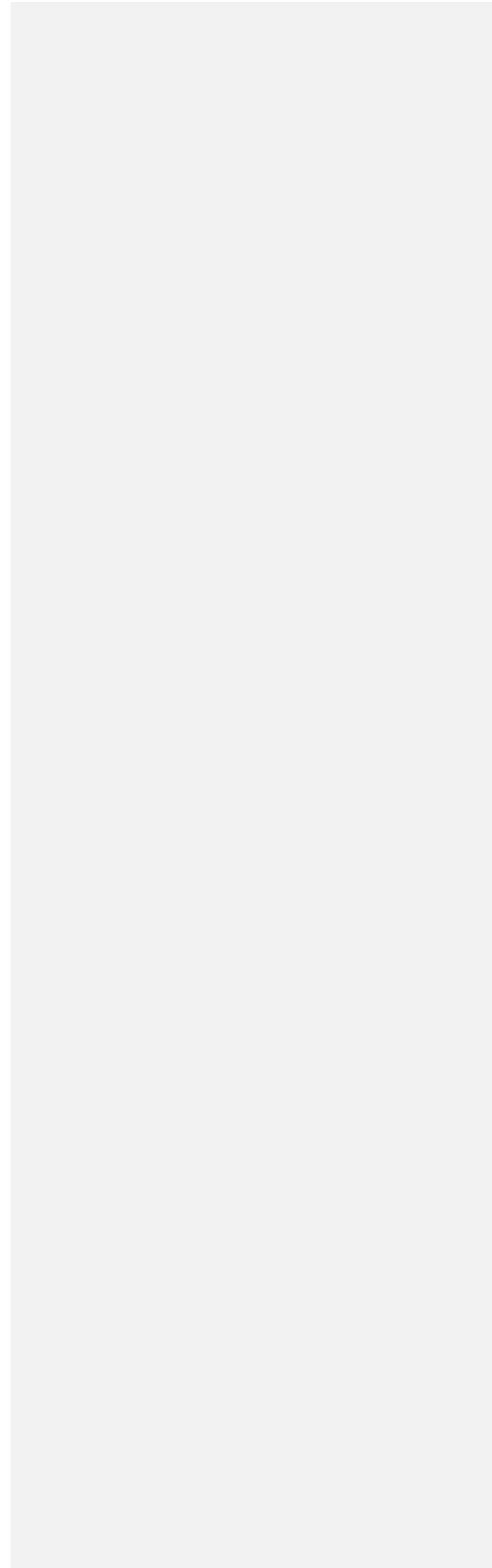


Figure 13.1 Allocated sites for delivery



## Site allocations and new development

13.1 Demographic pressures, a national housing shortage and unbalanced regional development on a national level creates significant demand for housing in Watford and the South East more generally. The borough's proximity to London (with high housing costs in the city pushing people out into the surrounding areas) has resulted in challenging housing targets over the plan period.

13.2 There is need to plan for these homes. The Watford Housing and Economic Land Availability Assessment (HELAA) (2021) involved an exhaustive search of the borough for land available for development and sought to assess the capacity of the urban area. The administrative area of Watford has a capacity for providing 14,988 units over the plan period, with current estimates indicating a 793 units per annum requirement.<sup>10</sup>

13.3 These sites are identified on the Policies Map. The policy is applicable to those sites identified in Tables 13.1, 13.2, 13.3 and 13.4 which include the following information:

- Site Name and Map
- The land use allocated for
- Site Size
- Whether the site is part of the Core Development Area
- Timescales
- Key development requirements and considerations
- Indicative yield (including net additional employment floorspace)

13.4 The process for calculating the indicative yields of the site has been set out in the [Housing and Economic Land Availability Assessment](#) HELAA, as has the wider process for site selection. It is important to emphasise that the indicative yields set out are purely baseline scenarios used to estimate the number of units to be provided within the plan period, based on site size and the sustainability of the surrounding area. Ultimately the scale of development should be guided by design quality, having regard to the full suite of policies in the Plan including Policies HO3.2: Housing Mix, Density and Optimising Use of Land and QD6.5: Building Height.

13.5 The development requirements and considerations detailed in Tables 13.1, 13.2, 13.3 and 13.4 are not exhaustive. They consist of a mix of requirements for on-site provision and considerations to aid scheme design by identifying key constraints and bespoke to specific sites. All allocated sites have a presumption in favour of development in principle. However, all proposals need to comply with the full suite of policies in the Local Plan. Absence of reference to a study or mitigation measure does not mean that it would not be required if a planning application was submitted.

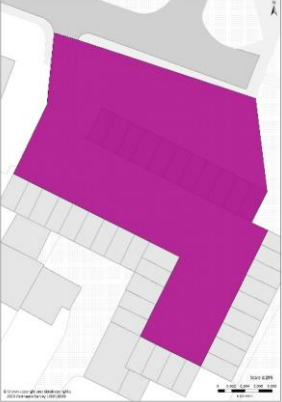
<sup>10</sup> See Chapter 3 for further breakdown of how the housing figures have been derived.

### Strategic Policy SA13.1: Allocated sites for delivery

The sites listed in Tables 13.1, 13.2, 13.3 and 13.4 as shown on the Policies Map, are allocated for residential (Use Class C3), mixed-use development (Sui Generis), employment uses (Use Classes B and E), education use (Use Class F1(a)) and any other uses specified. Planning permission will be granted for proposals that:


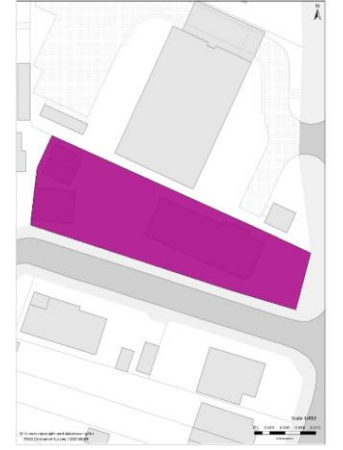
- a) Accord with the policies in the Local Plan;
- b) Accord with any Supplementary Planning Document, master plan or development brief that affects the site; and
- c) Address the key development considerations for each site; and
- d) Provide appropriate mitigation measures for issues identified where the development considerations set out the need for an assessment.

Table 13.1: Housing sites

Site	Size (ha)	Location	Timescale	Development requirements and considerations
<b>HS01 Land and garages at Lych Gate</b>				
	0.1	Outside of CDA	1-5 years	<p>The site is allocated for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>a) Retain access to the garages not allocated in the Plan;</li> <li>b) <u>Have regard to the Waterdale Recycling Centre and Waste Transfer, which is located approximately 850m from this site. Its operations should be taken into account;</u></li> <li>c) Take account of the potential risk of contamination on site; and</li> <li>d) Be accompanied by a parking survey to avoid any adverse impacts on parking in the area.</li> </ul> <p><b>Indicative yield = 5 units</b></p>

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HS02 Land and buildings at 275 Sheepcot Lane				
	0.35	Outside of CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>a) Have regard to the waste management facility currently included in the allocation. The County Council, as the Waste Planning Authority, should be consulted on any applications which come forward on this site and the adopted Waste Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</li> <li>b) Demonstrate that safe access has been provided to the site;</li> <li>c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site;</li> <li>d) Take account of the potential risk of contamination on site; and</li> <li>e) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 21 units</b></p>
HS03 Land and garages adjacent to 1 Lavinia Avenue				
	0.08	Outside of CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>a) Take account of the potential risk of contamination on site;</li> <li>b) Avoid any significant adverse impacts on the locally listed building, Garston Bus Garage, located directly opposite the site; and</li> <li>c) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 5 units</b></p>

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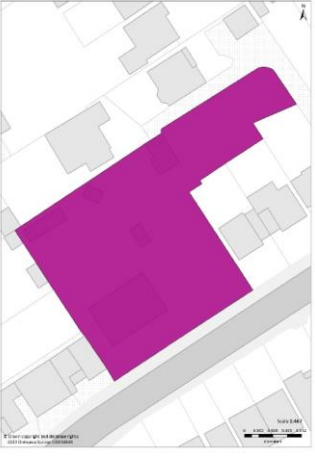
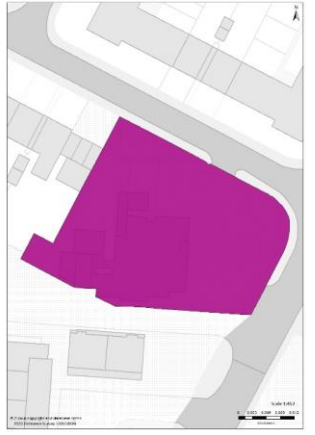
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HS04 Land and buildings at 5 Sheepcot Drive				
	0.17	Outside of CDA	6-15 Years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Be accompanied by a Preliminary Ecological Appraisal;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site.</li> </ul> <p><b>Indicative yield = 9 units</b></p>
HS05 Land at the Badger Public House				
	0.15	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Be accompanied by a Preliminary Roost Assessment; and</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the west of the site.</li> </ul> <p><b>Indicative yield = 9 units</b></p>

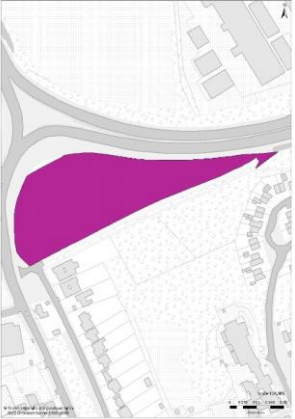
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HS06 Land at Russell Lane

	1.61	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Demonstrate that safe access has been provided to the site;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings and open space adjacent to the south of the site;</li> <li>•c) <del>Incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy</del> <u>A proportionate contribution for compensatory improvements to the environmental quality and accessibility of the remaining parts of Watford's Green Belt which include areas of existing open space and green infrastructure via a Section 106 agreement;</u> and</li> <li>•d) Be accompanied by a Noise Assessment and provide the appropriate mitigation for noise associated with the road network.</li> </ul> <p><b>Indicative yield = 93 units</b></p>
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HS07 Land at former Mothercare site



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	1.3	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Be accompanied by a Preliminary Ecological Appraisal;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site; and</li> <li>•c) Be informed by a Surface Water Drainage Strategy as the site is subject to surface water flood risk.</li> </ul> <p><b>Indicative yield = 98 units</b></p>
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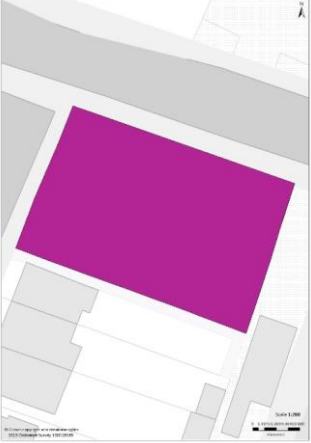
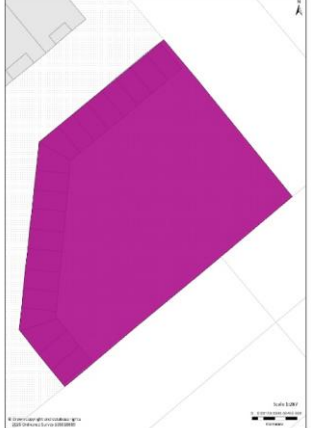
HS08 Land at the Longspring car park				
	0.27	Outside of CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Be accompanied by a parking survey to ensure that an appropriate level of car parking for the local shopping parade is retained;</li> <li>•b) Avoid any significant adverse impacts on the locally listed buildings, 91-111 Longspring, located directly opposite the site;</li> <li>•c) Be accompanied by a Noise Assessment and provide the appropriate mitigation for noise associated with the road network; and</li> <li>•d) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 17 units</b></p>
HS09 Land and buildings at 420-420a St Albans Road				
	0.12	Outside of CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Demonstrate that safe access has been provided to the site;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site;</li> <li>•c) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;</li> <li>•d) Take account of the potential risk of contamination on site; and</li> <li>•e) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 9 units</b></p>

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HS10 Land at Balmoral Road				
	0.06	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Be accompanied by a Preliminary Roost Assessment;</li> <li>•b) Be informed by a Surface Water Drainage Strategy as the site is subject to surface water flood risk;</li> <li>•c) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and</li> <li>•d) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 5 units</b></p>
HS11 Land to the rear of 53 Langley Way				
	0.09	Outside of CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Demonstrate that safe access has been provided to the site;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings and shopping parade adjacent to the site; and</li> <li>•c) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 7 units</b></p>

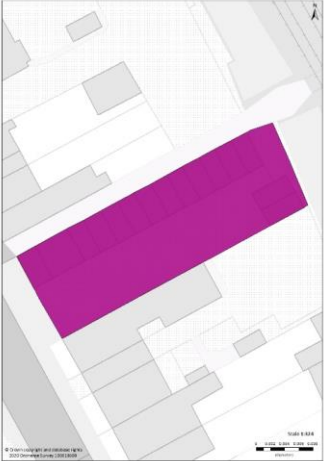
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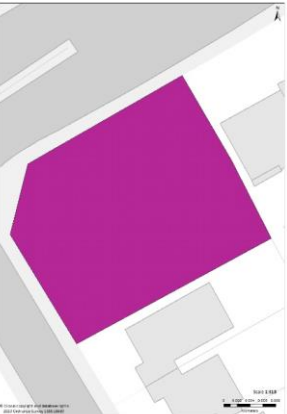
### HS12 Land and garages between 139 and 149 Queens Road

	0.05	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Avoid significant harm to the setting of the Estcourt Conservation Area;</li> <li>•b) Seek to enhance the setting and safety of the public footpath to the north west of the site;</li> <li>•c) Take account of the potential risk of contamination on site;</li> <li>•d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line directly adjacent to the site;</li> <li>•e) Be accompanied by a parking survey to avoid any adverse impacts on parking in the area; and</li> <li>•f) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 5 units</b></p>
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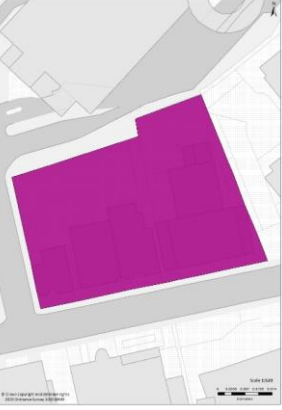
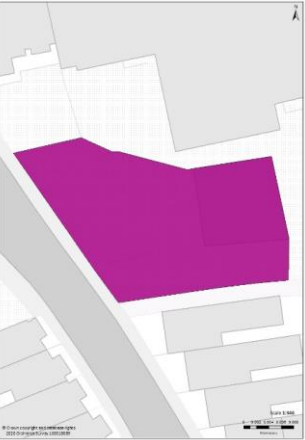
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### HS13 Corner of Park Avenue and Rickmansworth Road

	0.1	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Avoid significant harm to the setting of Cassiobury Registered Park, located north of the site; and</li> <li>•b) Avoid any significant adverse impacts on the locally listed buildings located in the vicinity of the site.</li> </ul> <p><b>Indicative yield = 9 units</b></p>
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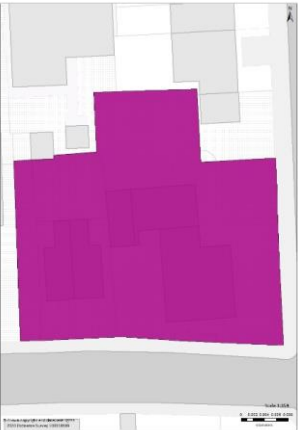
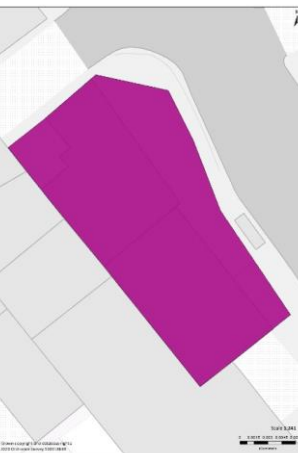
HS14 Land at 14-20 Upton Road				
	0.22	CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Avoid any significant adverse impacts on the locally listed building, Exchange House, located opposite the site;</li> <li>•b) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and</li> <li>•c) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 48 units</b></p>
HS15 Land at 80 Cassio Road				
	0.08	CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Support the wider objectives of the Town Centre Strategic Development Area;</li> <li>•b) Demonstrate that safe access has been provided to the site;</li> <li>•c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the south of the site; and</li> <li>•d) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 17 units</b></p>

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HS16 Land and buildings at 176-186 Rickmansworth Road				
	0.16	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Avoid any significant adverse impacts on the locally listed buildings, 195-199 Rickmansworth Road located directly opposite the site;</li> <li>•b) Demonstrate that safe access has been provided to the site via Queen Mary's Avenue;</li> <li>•c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the north and east of the site; and</li> <li>•d) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 12 units</b></p>
HS17 120-122 Exchange Road				
	0.05	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li> <li>•b) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and</li> <li>•c) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 5 units</b></p>

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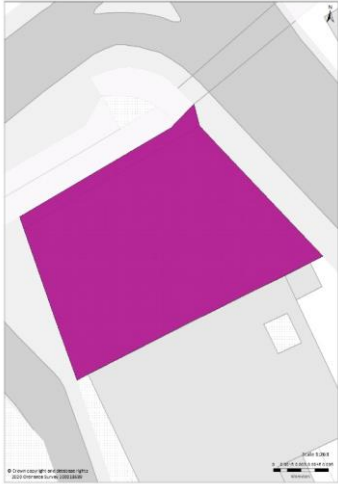
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HS18 Car park at Vicarage Road / Exchange Road



0.05

Outside of  
CDA

1-5 years

The site is considered suitable for residential development.

Development proposals should:

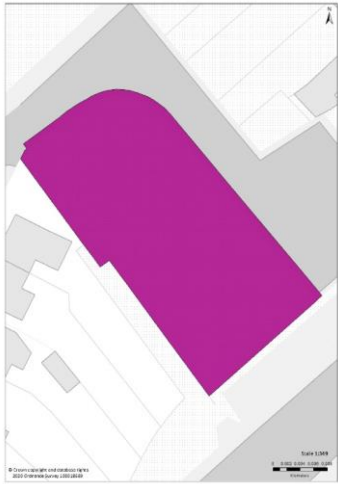
- a) Be designed to ensure safe pedestrian and cyclist access to and from the site;
- b) Avoid any adverse impacts on the locally and nationally listed buildings located in the vicinity of the site, including the Grade II listed Former Watford County Court House adjacent to the site. A Heritage Impact Assessment may be required;
- c) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- d) Take account of the potential risk of contamination on site; and
- e) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

**Indicative yield = 5 units**

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**HS19 Crown Passage car park**



0.1

CDA

1-5 years

The site is considered suitable for residential development.

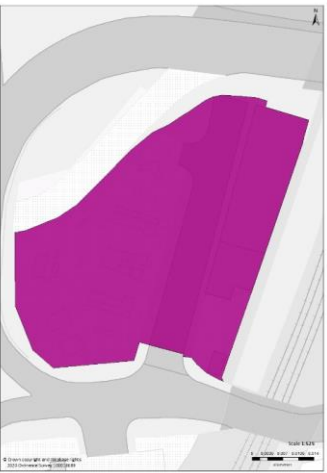
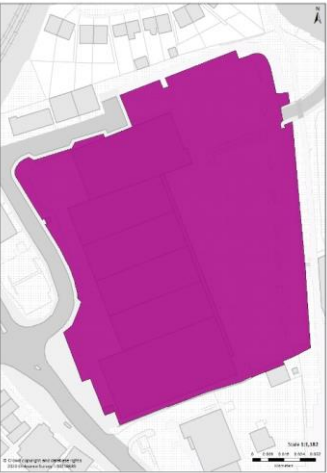
Development proposals should:

- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Avoid significant harm to the High Street and Kings Street conservation area;
- c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the west of the site;
- d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- e) Incorporate the trees to the south of the site into the design of the scheme to provide a buffer to the adjacent road network;
- f) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site. A Heritage Impact Assessment may be required; and
- g) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

**Indicative yield = 18 units**

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HS20 Land at Lower Derby Road				
	0.27	CDA	1-5 years	<p>The site is considered suitable for residential development. An improved replacement skate park has been completed at Oxhey Park North.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Support the wider objectives of the Colne Valley Strategic Development Area;</li> <li>•b) Retain the current access to the site from Lower Derby Road; and</li> <li>•c) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site.</li> </ul> <p><b>Indicative yield = 59 units</b></p>
HS21 Land at Waterfields Retail Park				
	1.89	CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Support the wider objectives of the Colne Valley Strategic Development Area;</li> <li>•b) Seek to engage with the landowners of sites MU16, located adjacent to the site, to maximise the benefits of development;</li> <li>•c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the north of the site;</li> <li>•d) Retain significant trees on site wherever possible, including those with a Tree Protection Order; and</li> <li>•e) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site. A Heritage Impact Assessment may be required.</li> </ul> <p><b>Indicative yield = 414 units</b></p>

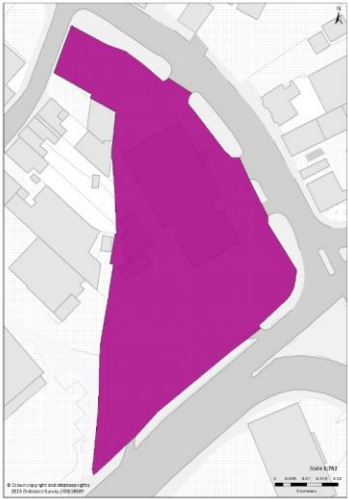
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HS22 Land and buildings at 252-272 Lower High Street



0.5

CDA

1-5 years

The site is considered suitable for residential development.

Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the west of the site;
- d) Demonstrate that safe access has been provided to the site;
- e) Consider how the scheme contributes to the pedestrian and cyclist experience in the area and retain the footpaths adjacent;
- f) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zone 2 and 3a, and is also subject to groundwater and surface water flood risk;
- g) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided; and
- h) Take account of the potential risk of contamination on site.

**Indicative yield = 110 units**

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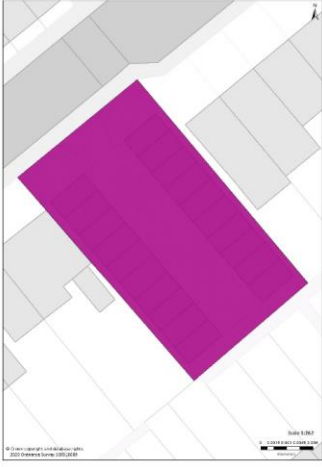
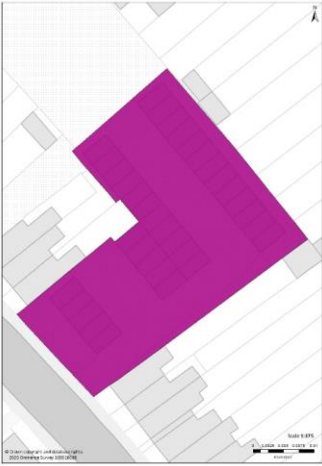
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**HS23 Land and buildings at 247 Lower High Street**

	0.14	CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Support the wider objectives of the Colne Valley Strategic Development Area;</li> <li>•b) Seek to engage with landowners of sites MU16, located adjacent to the site, to maximise the benefits of development;</li> <li>•c) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li> <li>•d) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zone 2 and 3a, and is also subject to groundwater and surface water flood risk;</li> <li>•e) Take account of the potential risk of contamination on site; and</li> <li>•f) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 31 units</b></p>
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HS24 Land and garages between 41 and 61 Brightwell Road				
	0.05	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Take account of the potential risk of contamination on site;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site; and</li> <li>•c) Be accompanied by a parking survey to avoid any adverse impacts on parking in the area.</li> </ul> <p><b>Indicative yield = 54 units</b></p>
HS25 Land and garages to the rear of 15-17 Liverpool Road				
	0.12	Outside of CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Take account of the potential risk of contamination on site;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site;</li> <li>•c) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area; and</li> <li>•d) Be accompanied by a Preliminary Ecological Appraisal.</li> </ul> <p><b>Indicative yield = 11 units</b></p>

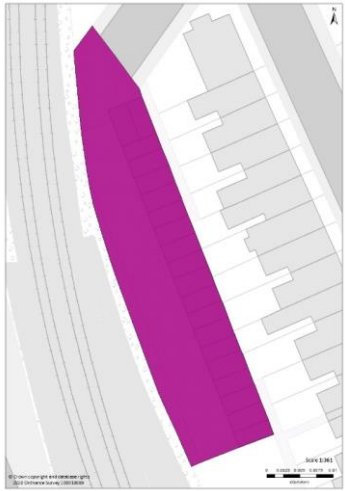
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HS26 Land and garages to the rear of 2-24 Elfrida Road



0.08

Outside of  
CDA

1-5 years

The site is considered suitable for residential development.

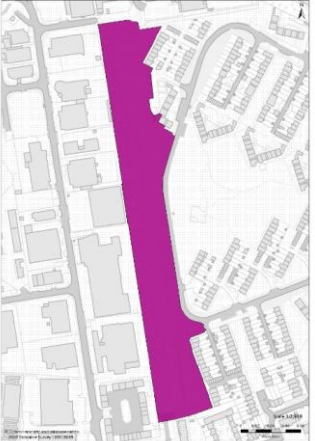
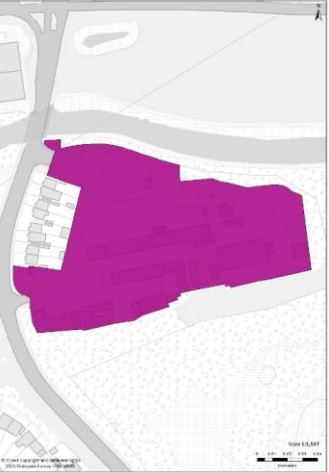
Development proposals should:

- a) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the east of the site;
- b) Demonstrate that safe access has been provided to the site;
- c) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;
- d) Take account of the potential risk of contamination on site;
- e) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line directly adjacent to the site; and
- f) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

**Indicative yield = 8 units**

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HS27 Land at Croxley View				
	3.2	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Enhance the green corridor and high quality cycle and walking route, which provides a key link between the Ebury Way and Cassiobury Park;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the east of the site; and</li> <li>•c) Be accompanied by a Preliminary Ecological Appraisal.</li> </ul> <p><b>Indicative yield = 240 units</b></p>
HS28 Wiggshall Depot				
	1.5	CDA	6-15 years	<p>The site is considered suitable for residential development. Re-provision of the depot and waste transfer station is required.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Enhance the setting of the River Colne and be designed to minimise impact on wildlife habitats;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the west of the site;</li> <li>•c) Retain the significant locally listed buildings on site where possible. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building;</li> <li>•d) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> </ul>

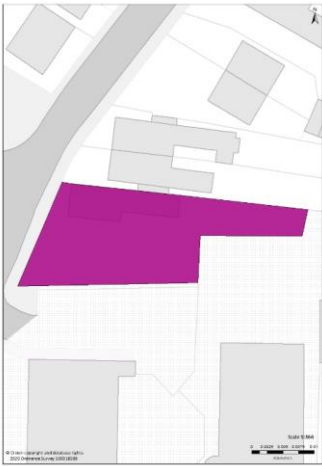
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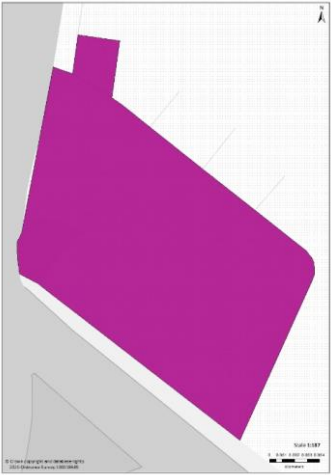


				<ul style="list-style-type: none"> <li>•e) Take account of the potential risk of contamination on site; and</li> <li>•f) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 330 units</b></p>
<b>HS29 41 Aldenham Road</b>				
	0.05	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Avoid any significant adverse impacts on the locally listed building, Bushey Baptist Church, adjacent to the site;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the north of the site; and</li> <li>•c) Take account of the Pinner Road Air Quality Management Area, located to the south of the site.</li> </ul> <p><b>Indicative yield = 5 units</b></p>

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HS30 Chalk Hill car park



0.04

CDA

6-15 years

The site is considered suitable for residential development.

Development proposals should:

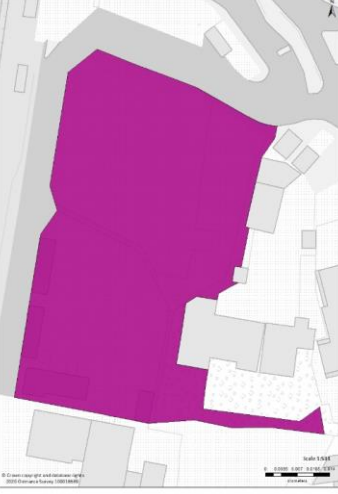
- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Demonstrate that safe access has been provided to the site;
- c) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site;
- d) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;
- e) Take account of the Pinner Road Air Quality Management Area, located to the east of the site;
- f) Take account of the potential risk of contamination on site;
- g) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site; and
- h) Be accompanied by a parking survey to ensure that an appropriate level of car parking for Bushey station is retained.

**Indicative yield = 9 units**

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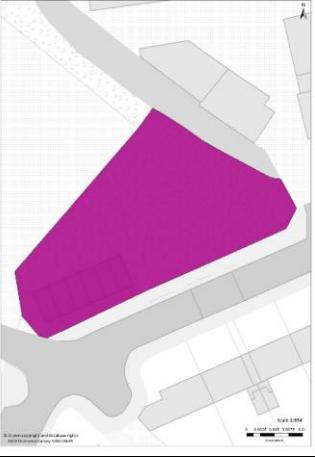
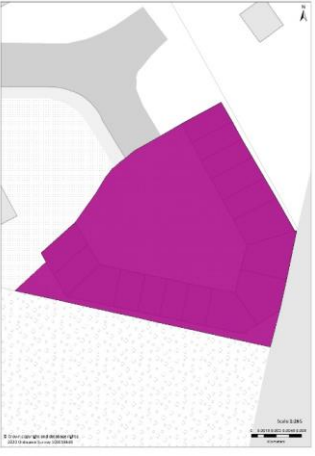
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### HS31 Land at Bushey Station

 <p>0.31</p> <p>CDA</p> <p>1-5 years</p>	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"><li>•a) Support the wider objectives of the Colne Valley Strategic Development Area;</li><li>•b) Ensure the scheme is designed to provide high quality connections to Bushey Station for pedestrians and cyclists;</li><li>•c) Take account of the Pinner Road Air Quality Management Area, located to the north east of the site;</li><li>•d) Avoid any adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li><li>•e) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site; and</li><li>•f) Be accompanied by a parking survey to ensure that an appropriate level of car parking for Bushey station is retained.</li></ul> <p><b>Indicative yield = 68 units</b></p>
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HS32 Riverside Road and garages				
	0.1	Outside of CDA	1-5 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Take account of the potential risk of contamination on site;</li> <li>•b) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> <li>•c) Be accompanied by a Preliminary Roost Assessment; and</li> <li>•d) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.</li> </ul> <p><b>Indicative yield = 5 units</b></p>
HS33 Land and garages at Kingsfield Court				
	0.06	Outside of CDA	6-15 years	<p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Take account of the potential risk of contamination on site;</li> <li>•b) Demonstrate that safe access has been provided to the site;</li> <li>•c) Incorporate the trees to the south of the site into the design of the scheme. A Tree Survey may be required;</li> <li>•d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site;</li> <li>•e) Be accompanied by a Preliminary Roost Assessment; and</li> <li>•f) Be accompanied by a parking survey.</li> </ul> <p><b>Indicative yield = 54 units</b></p>

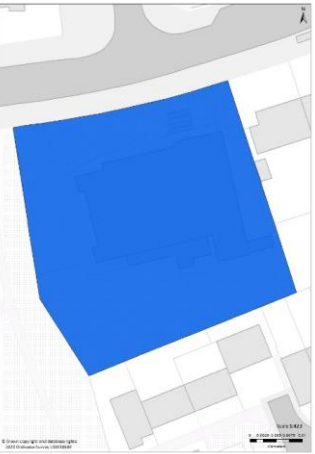
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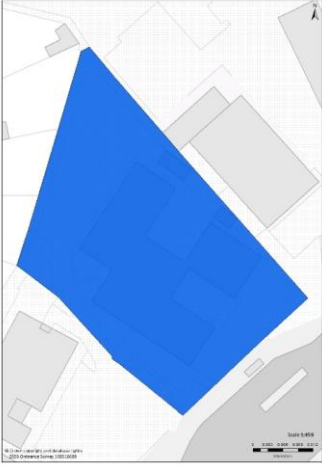
Table 13.2: Mixed use sites

Site	Size (ha)	Location	Timescale	Development requirements and considerations
<b>MU01 Land at Woodside Community Centre</b>				
	0.2	Outside of CDA	6-15 years	<p>This site is considered suitable for mixed use development, including residential and community uses. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• <b>a)</b> Take account of the significant ground level change to the south of the site; and</li> <li>• <b>b)</b> Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 12 units</b></p>

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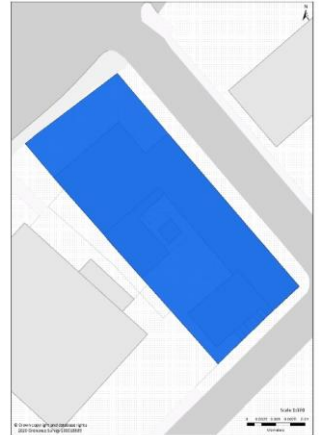
**MU02 Land at 501 St Albans Road**

	0.21	Outside of CDA	1-5 years	<p>This site is considered suitable for mixed use development, including residential and community uses. Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Avoid significant adverse impacts on the locally listed building, North Watford Library, located opposite the site;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the north west of the site;</li> <li>•c) Demonstrate that safe access has been provided to the site;</li> <li>•d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and</li> <li>•e) Be accompanied by a Preliminary Roost Assessment.</li> </ul> <p><b>Indicative yield = 13 units</b></p>
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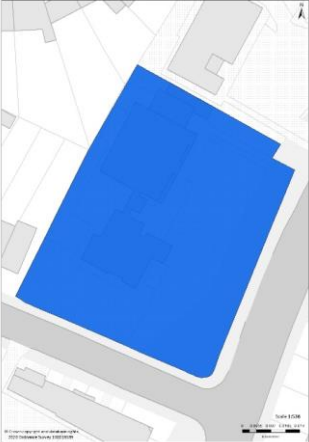
**MU03 Land at the Lemarie Centre**

	0.1	Outside of CDA	1-5 years	<p>This site is considered suitable for mixed use development, including residential and community uses. Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Seek to work collaboratively with the landowner of site MU23, which is located adjacent to the east, to maximise the benefits of development;</li> <li>•b) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and</li> <li>•c) Avoid significant adverse impacts on the locally listed building, North Watford Library, located adjacent to the site.</li> </ul> <p><b>Indicative yield = 7 units</b></p>
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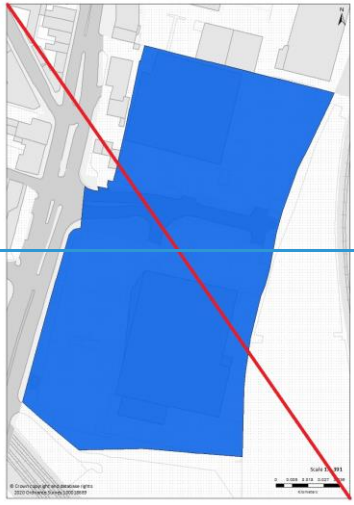

**MU04 453 St Albans Road**

	0.3	Outside of CDA	1-5 years	<p>This site is considered suitable for mixed use development, including residential uses. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"><li>•a) Avoid significant adverse impacts on the locally listed building, North Watford Library, located opposite the site;</li><li>•b) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site.</li></ul> <p><b>Indicative yield = 18 units</b></p>
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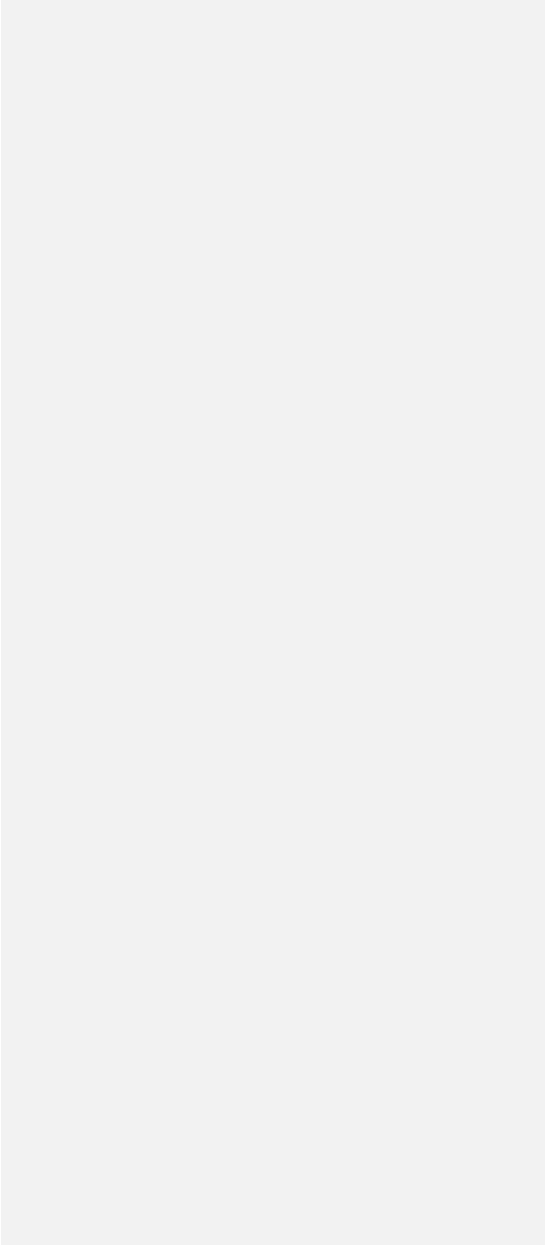
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**MU05 Land and buildings at 94-98 St Albans Road**

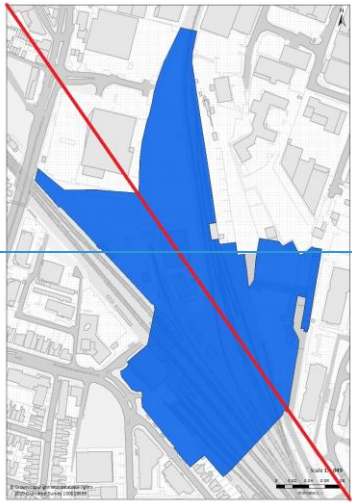
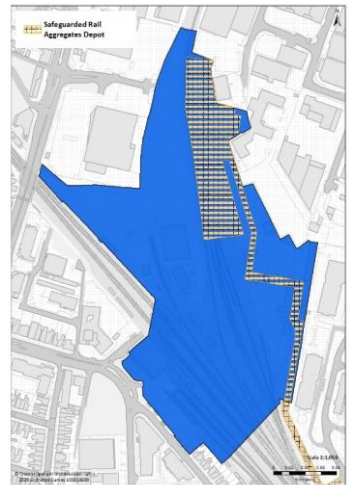
	2.47	CDA	1-5 years	<p>This site is considered suitable for mixed use development, including residential uses. A <a href="#">form entry</a> primary school is also required on site.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>a) Support the wider objectives of the Watford Gateway Strategic Development Area;</li> <li>b) Ensure that retail re-provision on site will not exceed the existing retail floorspace;</li> <li><del>b)c)</del> <a href="#">Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</a></li> <li><del>c)d)</del> Seek to work collaboratively with the landowner of site MU06, which is located adjacent to the east of the site, to maximise the benefits of development;</li> <li><del>d)e)</del> Avoid significant harm to the Nascot Conservation Area, located directly to the west of the site;</li> <li><del>e)f)</del> Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li> <li><del>f)g)</del> Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</li> <li><del>g)h)</del> Facilitate appropriately and proportionately towards the timely provision of required infrastructure identified in Watford's Infrastructure Delivery Plan, including measures to improve access to the station for cyclist, pedestrians and vulnerable users; and</li> <li><del>h)i)</del> Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.</li> </ul> <p><b>Indicative yield = 1,214 units</b>  <b>295sqm of office floorspace</b></p>
				



				<b>4,960,205</b> sqm of commercial <del>and educational</del> floorspace <u>2,910</u> sqm of educational floorspace
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## MU06 Land at Watford Junction

	7.46	CDA	1-15 years	<p>This site is considered suitable for mixed use development, including residential, employment and commercial uses. <u>A replacement childcare facility and a new 3 form entry primary school is required on site.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• <u>a) Support the wider objectives of the Watford Gateway Strategic Development Area, including the necessary improvements to the station and <u>its operations-it's functionality;</u></u></li> <li>• <u>b) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including measures to improve bus priority around the station;</u></li> <li>• <u>c) A new 3 form entry primary school;</u></li> <li>• <u>d) A replacement childcare facility;</u></li> <li>• <u>e) Seek to work collaboratively with the landowners of sites MU05 and- MU07 located adjacent to the site, -MU24 located north east of the site and the operator of the concrete batching plant and rail aggregates depot located almost entirely within -which are located adjacent to the site, to maximise the benefits of development.</u></li> <li>• <u>f) Development will not compromise the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;</u></li> <li>• <u>g) Development will not compromise Clive Way as a vehicle and safe, high quality active travel route to the Watford Junction Sustainable Transport Hub;</u></li> <li>• <u>h) Support the delivery of a new pedestrian and cycle bridge and the protection of a second crossing route from Penn Road across the railway line in the latter part of the plan period when comprehensive mixed-use redevelopment takes place to facilitate the delivery of a multi-storey car park and Watford Junction Sustainable Transport Hub;</u></li> </ul>
				

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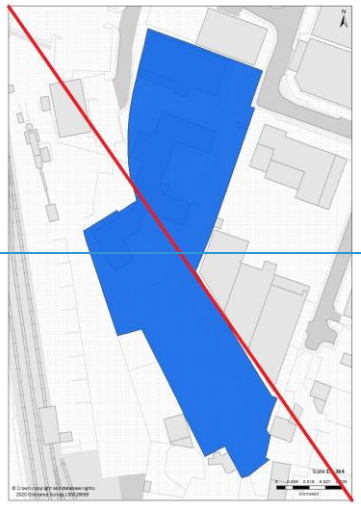

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|  |  |  |  | <ul style="list-style-type: none"> <li>◆i) <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></li> <li><del>— Demonstrate that safe access has been provided to the site;</del></li> <li>◆j) <u>Have regard to the safeguarded rail aggregates depot and concrete batching plant located <del>in and adjacent to</del> largely within the north east boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</u></li> <li>◆ <del>Ensure the layout of</del> the scheme has been <u>planned, laid out and</u> designed to minimise any potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot <u>and mitigation provided in line with the 'agent of change' principle. This may include locating non-residential floorspace in the lower storeys;</u></li> <li>◆ <del>Seek to work collaboratively with the landowners of sites MU05 and MU07, which are located adjacent to the site, to maximise the benefits of development;</del></li> <li>◆k) Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site;</li> <li>◆l) Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li> <li>◆m) <u>Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</u></li> <li>◆n) <u>Take account of the potential risk of contamination on site;</u></li> </ul> |
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- o) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and
- p) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, concrete batching plant and rail aggregates depot ~~and associated concrete batching plant~~ located ~~in and~~ adjacent to the site. Early engagement with the site operator will be required to ensure that ~~to ensure that~~ development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of noise sensitive receptors.

**Indicative yield = 1,232 units**  
**20,998sqm of office floorspace**

**MU07 Land and buildings at Astral House**

	<p>1.32</p>	<p>CDA</p>	<p>1-5 years <u>(industrial development)</u> 6-15 years <u>(long-term transitional mixed use development)</u></p>	<p>This site is considered suitable for <u>employment-led mixed-use development, including residential and employment uses.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Support the wider objectives of the Watford Gateway Strategic Development Area;</li> <li>•b) Result in no net loss of employment floorspace on site <u>unless the office use is replaced with industrial uses;</u></li> <li>c) Seek to work collaboratively with the landowners of sites MU06, <u>MU24 and the operator of the concrete batching plant and rail aggregates depot, which are located adjacent to the east of to the site,</u> to maximise the benefits of development;</li> <li>d) <u>Development will not compromise the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way/Imperial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;;</u></li> <li>•e) <u>Demonstrate that safe pedestrian and cyclist access to the site has been provided; Development will not compromise Clive Way as a vehicle and safe, high quality active travel route to the Watford Junction sustainable travel hub;</u></li> <li>•f) Facilitate the timely delivery of required -infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land required for <u>the a pedestrian and cycle bridge in the latter part of the plan period when comprehensive mixed-use redevelopment takes place to facilitate the delivery of a multi-storey car park and Watford Junction Sustainable Transport Hub);</u></li> <li>•g) Take account of the potential risk of contamination on site;</li> <li>h) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for</li> </ul>
				

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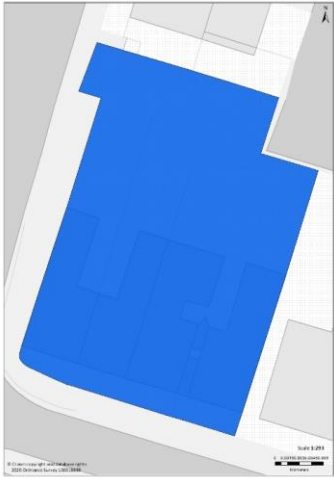
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upgrades where required ~~if due to the scale of the~~ new dwellings come forward to be provided;

- i) Have regard to the safeguarded concrete batching plant and rail aggregates depot located adjacent to the western boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;
- ♦j) Ensure the scheme has been planned, laid out and designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the 'agent of change' principle; and
- ♦k) In the case of residential development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, concrete batching plant and rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of noise sensitive receptors.

**Indicative yield = 6,600sqm of industrial floorspace 131 units**

**MU08 22-28 Station Road**



0.12

CDA

1-5 years

This site is considered suitable for mixed use development, including residential and office uses.

Development proposals should:

- ◆ **a)** Support the wider objectives of the Watford Gateway Strategic Development Area;
- ◆ **b)** Support the objectives of the Clarendon Road Primary Office Location;
- ◆ **c)** Facilitate improvements to cycle provision on St Albans Road, particularly the narrowing of the cycle lane approaching the junction from the west;
- ◆ **d)** Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- ◆ **e)** Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site.


**Indicative yield = 21 units**

**480sqm of office floorspace**

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**MU09 Land at Watford Police Station**


	0.68	CDA	1-5 years	<p>This site is considered suitable for mixed use development, including residential and office uses.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>◆ <b>a)</b> Support the wider objectives of the Watford Gateway Strategic Development Area and the Clarendon Road Primary Office Location;</li> <li>◆ <b>b)</b> Position the tallest elements of the scheme along the Clarendon Road frontage;</li> <li>◆ <b>c)</b> Ensure that the scheme is designed to minimise impacts on the low level residential dwellings south and to the west of the site and to create a strong relationship with the street edge;</li> <li>◆ <b>d)</b> Retain the trees on the Clarendon Road frontage;</li> <li>◆ <b>e)</b> Avoid significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site, including the locally listed building within the site boundary. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building;</li> <li>◆ <b>f)</b> Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and</li> <li>◆ <b>g)</b> Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided.</li> </ul> <p><b>Indicative yield = 120 units</b> <b>2,770sqm of office floorspace</b></p>
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**MU10 Land to the rear of 125-127 The Parade**

	0.51	CDA	1-5 years	<p>The site is considered suitable for mixed use development, including residential and commercial uses.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Support the wider objectives of the Town Centre Strategic Development Area;</li> <li>•b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings and shopping parade surrounding the site;</li> <li>•c) Provide a quality frontage and landscaping along the Parade and Albert Street South;</li> <li>•d) Seek to engage with the landowners of site MU13 located adjacent to the east to maximise the benefits of development;</li> <li>•e) Avoid significant harm to the setting of the Civic Core Conservation Area;</li> <li>•f) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.</li> </ul> <p><b>Indicative yield = 90 units</b></p>
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MU11 23-37 The Parade



0.41

CDA

1-5 years

The site is considered suitable for mixed use development, including residential uses and active commercial uses on the ground floor.

Development proposals should:

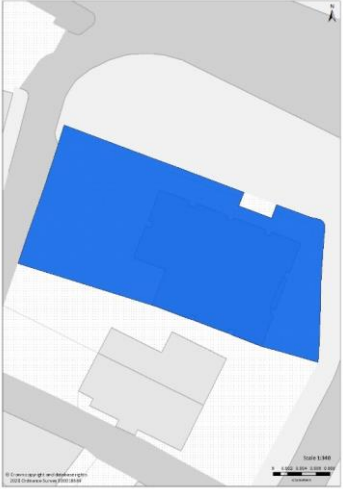
- ◆ a) Support the wider objectives of the Town Centre Strategic Development Area;
- ◆ b) Avoid significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site, including the locally listed shopfront within the site boundary. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building. A Heritage Impact Assessment may be required;
- ◆ c) Seek to engage with landowners of site MU12 located adjacent to the west to maximise the benefits of development;
- ◆ d) Comprehensive redevelopment should explore options for the provision of a high quality market which will capitalise on the increased residential occupancy of the Town Centre and an improved inter-relationship with Clarendon Road;
- ◆ e) Provide high quality pedestrian connections between Beechen Grove and the Parade; and
- ◆ f) Enhance the public realm along Beechen Grove.

**Indicative yield = 72 units**

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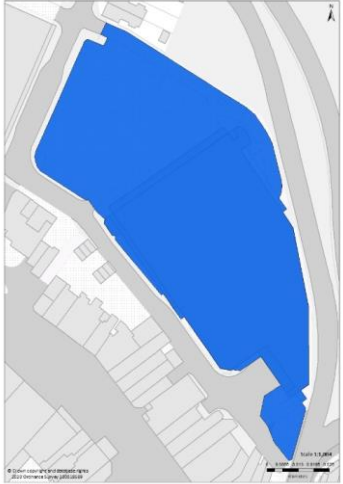
MU12 19-21 Clarendon Road

	0.08	CDA	1-5 years	<p>The site is suitable for mixed use development, including residential and commercial uses. Development proposals should:</p> <ul style="list-style-type: none"><li>◆a) Support the wider objectives of the Town Centre Strategic Development Area;</li><li>◆b) Seek to engage with landowners of site MU11 located adjacent to the west to maximise the benefits of development;</li><li>◆c) Avoid significant adverse impacts on the locally and nationally listed buildings and monuments located in the vicinity of the site. A Heritage Impact Assessment may be required; and</li><li>◆d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.</li></ul> <p><b>Indicative yield = 14 units</b></p>
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**MU13 Land at Sainsbury's, Town Centre**



1.0

CDA

6-15 years

The site is suitable for mixed use development, including residential and commercial uses.

Development proposals should:

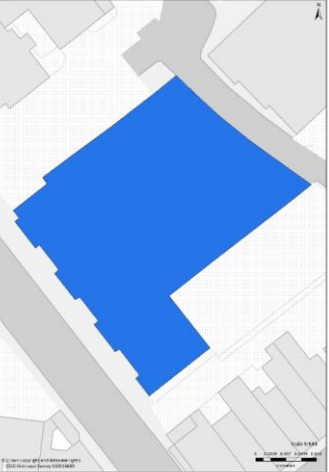
- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Improve the setting and public realm along Beechen Grove and Albert Street South, as well as Gaumont Approach;
- c) Seek to engage with landowners of site MU10 located adjacent to the west to maximise the benefits of development;
- d) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings to the north of the site;
- e) Avoid significant harm to the setting of the Civic Core Conservation Area which lies directly south of the site;
- f) Avoid any significant adverse impacts on the locally and nationally listed buildings and monuments located in the vicinity of the site. A Heritage Impact Assessment may be required;
- g) Provide no additional retail floorspace above the existing on site provision;
- h) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- i) Take account of the potential risk of contamination on site; and
- j) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided.

**Indicative yield = 220 units**

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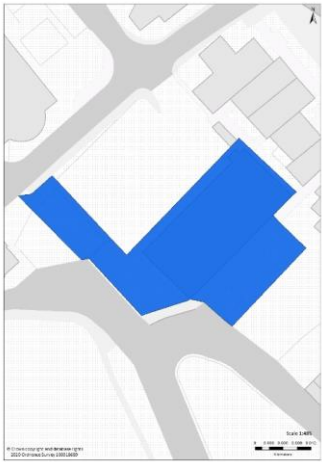
**MU14 Land at the car park, Wellstones**

	0.23	CDA	1-5 years	<p>The site is suitable for residential led, mixed use development. E and F class uses are possible on the ground floor to maintain an active frontage.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>◆a) Support the wider objectives of the Town Centre Strategic Development Area;</li> <li>◆b) Avoid significant adverse impacts on the locally and nationally listed buildings in the vicinity of the site. A Heritage Impact Assessment may be required;</li> <li>◆c) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;</li> <li>◆d) Take account of the potential risk of contamination on site; and</li> <li>◆e) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.</li> </ul> <p><b>Indicative yield = 40 units</b></p>
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**MU15 18 Watford Field Road**

	0.11	CDA	1-5 years	<p>The site is suitable for mixed use development, including residential and community uses. Development proposals should:</p> <ul style="list-style-type: none"><li>•a) Support the wider objectives of the Colne Valley Strategic Development Area;</li><li>•b) Be designed to maximise the outlook across Watford Field Recreation Ground; and</li><li>•c) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.</li></ul> <p><b>Indicative yield = 19 units</b></p>
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MU16 Land at Tesco, Lower High Street



7.6

CDA

6-15 years

The site is considered suitable for mixed use development, including residential, E and F class uses and a [3 form](#) entry primary school.

Development proposals should:

- [a](#)) Support the wider objectives of the Colne Valley Strategic Development Area, including the linear park;
- [b](#)) Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as part of the linear park proposal. Re-naturalisation of the culverted River Colne will also be supported;
- [c](#)) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;
- [d](#)) Seek to engage with landowners of site HS21, located adjacent to the west, and HS23, located adjacent to the south, to maximise the benefits of development;
- [e](#)) Provide no additional retail floorspace above the existing on site provision;
- [f](#)) Enhance the strategic view from the railway line to the town centre. Proposals should be supported with images that demonstrate how a proposal will contribute towards the Watford skyline;
- [g](#)) Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;
- [h](#)) Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site, including the locally listed coal duty marker on site. If it is demonstrated to be unfeasible to retain the listed monument on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the monument. A Heritage Impact Assessment may be required;
- [i](#)) Adequately address the level changes on site;
- [j](#)) Have regard to the high pressure pipeline that traverses the site;

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|  |  |  |  | <ul style="list-style-type: none"><li>◆k) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li><li>◆l) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;</li><li>◆m) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided;</li><li>◆n) Take account of the potential risk of contamination on site;</li><li>◆o) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including a revised junction layout, crossing improvements and provision of a cycle path along Lower High Street; and</li><li>◆p) Retain significant trees on site wherever possible, including those with a Tree Protection Order.</li></ul> |
|--|--|--|--|--|

**Indicative yield = 1,338 units**



**MU17 44-56 Vicarage Road**



0.13

Outside of  
CDA

6-15 years

The site is considered suitable for mixed use development, including residential. The retail uses on the ground floor should be reprovided to strengthen the offer of the designated local centre.

Development proposals should:

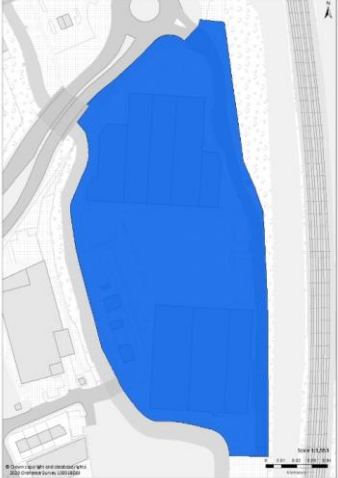
- a) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site;
- b) Maintain the active retail frontage to Vicarage Road;
- c) Avoid significant harm to the setting of the Square Conservation Area which lies opposite the site; and
- d) Take account of the Hornets / Vicarage Road Air Quality Management Area, which the site is located within.

**Indicative yield = 10 units**

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**MU18 Land at Colne Valley Retail Park**


	2.65	CDA	6-15 years	<p>The site is considered suitable for residential led, mixed use development. Re-provision of E class uses is possible on the ground floor.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>◆ <u>a)</u> Support the wider objectives of the Colne Valley Strategic Development Area including the linear park;</li> <li>◆ <u>b)</u> Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as part of the linear park proposal;</li> <li>◆ <u>c)</u> Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;</li> <li>◆ <u>d)</u> Provide no additional retail floorspace above the existing on site provision;</li> <li>◆ <u>e)</u> Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li> <li><u>f)</u> <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></li> <li>◆ <u>g)</u> Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</li> <li>◆ <u>h)</u> Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;</li> <li><u>i)</u> Have regard to the high pressure pipeline that traverses the site;</li> <li>◆ <u>j)</u> <u>Have regard to the overhead electricity transmission lines that traverses the site;</u></li> <li>◆ <u>k)</u> Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> </ul>
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				<ul style="list-style-type: none"> <li>•l) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including a revised junction layout, crossing improvements and provision of a cycle path along Lower High Street; and</li> <li>•m) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 466 units</b></p>
<b>MU19 Land to the west of and parallel to Ascot Road</b>				
	0.71	Outside of CDA	1-5 years	<p>The site is considered suitable for residential led, mixed use development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Demonstrate that an appropriate amount of land has been safeguarded for the future provision of a mass transit route and station;</li> <li>•b) Enable improvements to the contraflow cycle lane to provide a two way cycle lane;</li> <li>•c) Enhance the green infrastructure network by enhancing the link between the Ebury Way and Cassiobury Park;</li> <li>•d) Avoid any significant adverse impacts on the locally listed monument, the Former Sun Printer's Clock Tower, located adjacent to the site; and</li> <li>•e) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 43 units</b></p>

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**MU20 Land east of Ascot Road**



0.45

Outside of  
CDA

6-15 years

The site is considered suitable for residential led mixed-use development with E class uses suitable on the ground floor.

Development proposals should:



- a) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and
- b) Take account of the potential risk of contamination on site.

**Indicative yield = 27 units**

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**MU21 Land at Riverwell and Watford General Hospital**

	<p><u>12-018.</u> <u>1</u></p>	<p>CDA</p>	<p>1-15 years</p>	<p>The site is considered suitable for mixed-use development, including residential uses, commercial uses, <del>and</del> a primary school, <u>hospital and associated car park.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• <u>a) Support the wider objectives of the Colne Valley Strategic Development Area;</u></li> <li>• <u>b) Complete a review of transport impact and safety as part of a full Transport Assessment;</u></li> <li>• <u>c) A clearly legible, continuous pedestrian route, suitable for all users including those with mobility issues, should be provided from Vicarage Road to Tom Sawyer Way along the west side of the existing hospital;</u></li> <li>• <u>d) Cycle infrastructure to be provided along Tom Sawyer Way and Willow Lane;</u></li> <li>• <u>e) Pedestrian and cycle connections to the former Metropolitan Line Extension route adjacent to the south boundary of the site should be provided;</u></li> <li>• <u>f) Be designed to minimise and mitigate impact on the heritage of the former Watford Union Workhouse, a grade II listed building.</u></li> <li>• <u>g) Opportunities should be sought to improve the setting of the heritage asset. A Heritage Impact Assessment will be required;</u></li> <li>• <u>h) For any tall buildings proposed, these should be designed to enable a transition of building height to the residential area north of Vicarage Road;</u></li> <li>• <u>i) Enhance the public realm through the provision of a new public square;</u></li> <li>• <u>j) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan;</u></li> <li>• <u>k) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</u></li> <li>• <u>l) Take account of the potential risk of contamination on site; and</u></li> </ul>
				

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m) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan; and

- n) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided, including the sewerage pipe traversing the site near the existing hospital.

**Indicative yield = 1,383 units**

MU22 Land at Colne Bridge Retail Park



0.8

CDA

6-15 years

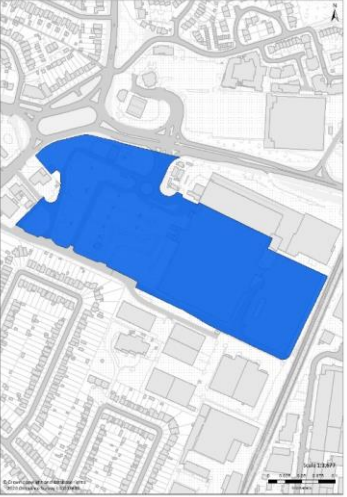
The site is considered suitable for residential led, mixed use development. Re-provision of the retail uses is possible on the ground floor.

Development proposals should:

- ◆ a) Support the wider objectives of the Colne Valley Strategic Development Area;
- ◆ b) Enhance connectivity to the River Colne;
- ◆ c) Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;
- ◆ d) Be designed to help facilitate provision of a potential pedestrian / cycle crossing over the River Colne in the future, as set out in the South West Hertfordshire Transport and Infrastructure Plan;
- ◆ e) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;
- ◆ f) Provide no additional retail floorspace above the existing on site provision;
- ◆ g) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk; and
- ◆ h) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;
- ◆ i) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;
- ◆ j) Take account of the potential risk of contamination on site; and
- ◆ k) Take account of the Pinner Road Air Quality Management Area, located to the north-west and south-east of the site.

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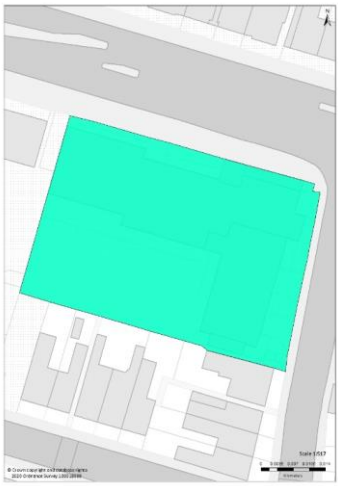
				Indicative yield = 141 units
<b>MU23 Land at Asda, Dome Roundabout</b>				
	7.03	Outside of CDA	6-15 years	<p>The site is considered suitable for mixed use development, including residential and retail. Development proposals should:</p> <ul style="list-style-type: none"> <li>• <u>a)</u> Avoid significant adverse impacts on the locally listed buildings, the North Watford Library and Former Odhams Press Hall, located adjacent to the site;</li> <li>• <u>b)</u> Provide no additional retail floorspace above the existing on site provision;</li> <li>• <u>c)</u> <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></li> <li>• <u>d)</u> Be informed by a Surface Water Drainage Strategy as the site is subject to surface water flood risk;</li> <li>• <u>e)</u> Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</li> <li>• <u>f)</u> Retain significant trees on site wherever possible, including those with a Tree Protection Order;</li> <li>• <u>g)</u> Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road and employment land adjacent to the site; and</li> <li>• <u>h)</u> Take account of the potential risk of contamination on site.</li> </ul> <p>Indicative yield = 422 units</p>

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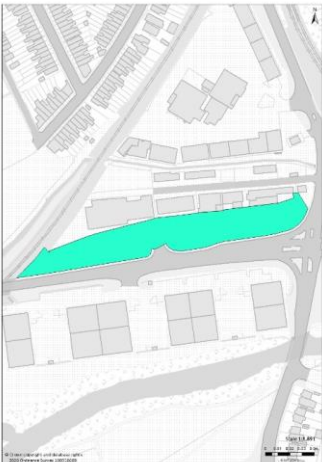
Table 13.3: Employment sites

Site	Size (ha)	Location	Timescale	Development requirements and considerations
<b>EM01 Cassiobury House, 11-19 Station Road</b>				
	0.24	CDA	1-5 years	<p>This site is considered suitable for office development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• <u>a)</u> Support the wider objectives of the Watford Gateway Strategic Development Area and the Clarendon Road Primary Office Location;</li> <li>• <del>Contribute towards the sustainability principles of the Plan while acknowledging that BREEAM 'Excellent' standards are not achievable;</del></li> <li>• <u>b)</u> Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required; and</li> <li>• <u>c)</u> Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the south of the site.</li> </ul> <p><b>Indicative yield = <del>5,153,530</del>sqm of office and commercial floorspace</b>  <b><u>6,165sqm of hotel floorspace</u></b></p>

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## EM02 Land to the South of Wiggenhall Industrial Estate


	0.58	Outside of CDA	6-15 years	<p>This site is considered suitable for office development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• <u>a)</u> Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> <li>• <u>b)</u> Ensure that a safe access to the site has been provided; and</li> <li>• <u>c)</u> Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 11,600sqm of office floorspace.</b></p>
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## EM03 Gateway Zone

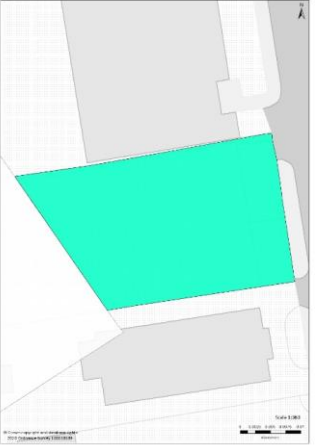
	1.7	Outside of CDA	1-5 years	<p>This site is considered suitable for industrial uses.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• <u>a)</u> Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk;</li> <li>• <u>b)</u> Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the 'agent of change' principle; and</li> <li>• <u>c)</u> Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 6,935sqm of industrial floorspace</b></p>
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## EM04 Land Between 14-18 Greenhill Crescent

	0.09	Outside of CDA	1-5 years	<p>This site is considered suitable for industrial uses.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the 'agent of change' principle; and</li> <li>•b) Take account of the potential risk of contamination on site.</li> </ul> <p><b>Indicative yield = 900sqm of industrial floorspace</b></p>
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## EM05MU24 Land at Colonial / Clive Way

	1.98	CDA	<u>1-5 years (short-term industrial redevelopment)</u> 6-15 years (long-term transitional mixed use development)	<p>This site is considered suitable for <u>employment-led mixed-use development</u> <del>industrial uses</del>.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Support the wider objectives of the Watford Gateway Strategic Development Area;</li> <li>• <del>Seek to work collaboratively with the landowner of site MU07, which is located adjacent to the west of the site, to maximise the benefits of development;</del></li> <li>b) Seek to work collaboratively with the landowners of sites MU067 and MU076 and the operator of the concrete batching plant and rail aggregates depot, <del>which is</del> located west of the site to maximise the benefits of development;-</li> <li>c) <u>Have regard to the safeguarded concrete batching plant and rail aggregates depot located west of the boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be</u></li> </ul>
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consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;

- ◆ d) -Development will not compromise the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;
- e) Development will not compromise Clive Way as a vehicle and safe, high quality active travel route to the Watford Junction Sustainable Transport Hub;
- ◆ In the case of residential development, provide mitigation for any adverse impact resulting from the industrial uses on site in line with the 'agent of change' principle;
- ◆ f) Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required;
- ◆ g) Take account of the potential risk of contamination on site;
- ◆ h) For residential development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, concrete batching plant and rail aggregates depot and associated concrete batching plant located in and adjacent to the west of the site. Early engagement with the site operator will be required to ensure that to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operation due to the introduction of sensitive noise receptors; and

Indicative yield = ~~8,000~~ 8,009,200 sqm of industrial floorspace

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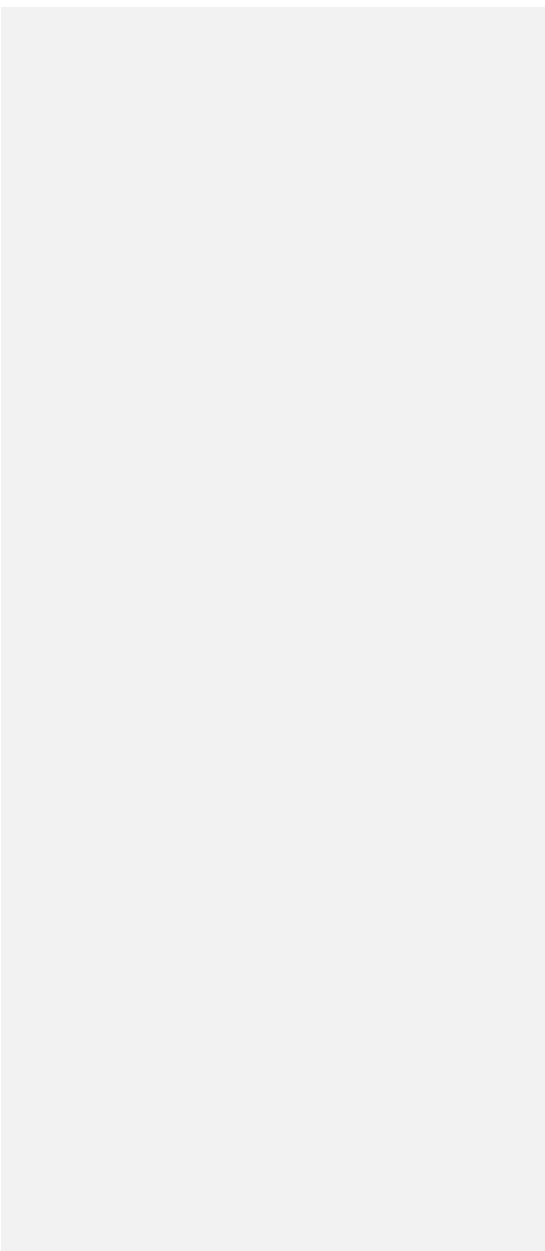
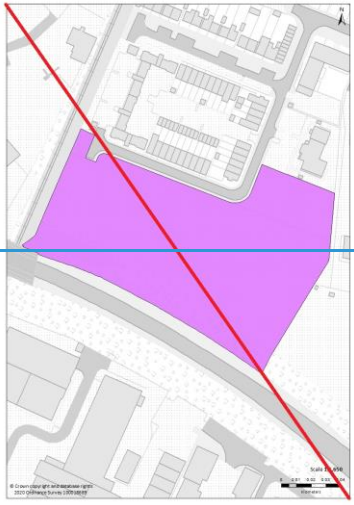
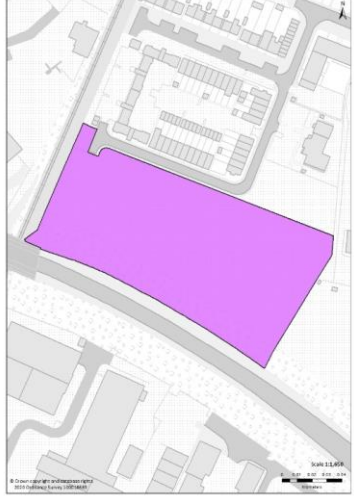


Table 13.4: Education facilities<sup>11</sup>

Site	Size (ha)	Location	Timescale	Development requirements and considerations
ED01 Former Meriden School Site				

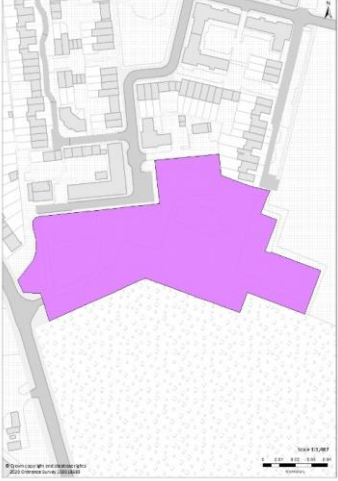
<sup>11</sup> Note that mixed use sites MU05, MU06, MU16 and MU21 are also required to provide a primary school on site as part of the wider scheme.

	1.7456	Outside of CDA	6-15 years	<p>The site is considered suitable for the development of an education facility.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Provide appropriate mitigation for the lapsed <u>detached</u> playing field <u>for the Park Gate Junior School</u> in line with the Playing Pitch Strategy (2020);</li> <li>•b) Have regard to the Colne Way Waste Transfer Station, which is located directly west of the site. Mitigation for any negative impacts arising from the site's proximity to the waste site should be provided in line with the 'agent of change' principle;</li> <li>•c) Complete a review of transport impact and safety as part of a full Transport Assessment which will include mitigation for pupils crossing the A41. Pedestrian and cycle access should be taken from The Meadows to the north;</li> <li>•d) Explore the potential for a pedestrian and cycle link across Meriden Park between the site and Garsmouth Way;</li> <li>•e) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and</li> <li>•f) Be accompanied by a Preliminary Ecological Appraisal.</li> </ul>
				

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ED02 Former Bill Everett Centre

	1.07	Outside of CDA	6-15 years	<p>The site is considered suitable for the development of an education facility.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>•a) Establish clear connections and desire lines with the residential areas to the north;</li> <li>•b) Complete a review of transport impact and safety as part of a full Transport Assessment. This will include consideration of the provision of a 'parent drop off' within the site to prevent parking and associated issues on the surrounding residential roads;</li> <li>•c) Pedestrian and cycle access should be taken from Leggatts Way with potential for an additional access via Broad Road;</li> <li>•d) Demonstrate suitable off-site playing field arrangements with consideration to safeguarding and land ownership and in consultation with Hertfordshire County Council;</li> <li>•e) Ensure appropriate separation or buffers between development and the Harebreaks Wood Local Nature Reserve directly south of the site; and</li> <li>•f) Be accompanied by a Preliminary Roost Assessment.</li> </ul>
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# Appendix A: ~~Draft~~ Monitoring Framework

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
Chapter 1: A Spatial Strategy for Watford	Policy SS1.1 Spatial Strategy	Percent of floorspace on previously developed land	90% employment, 80% residential	Planning applications
		Number of jobs	<del>10,700</del> <del>13,000</del> jobs provided <del>2021</del> <del>18</del> - <del>2037</del> <del>6</del>	Planning applications
		Completions data, for the Core Development Area Rest Of Town	N/A	Planning applications
Chapter 2: Core Development Area	Policy CDA2.1: Watford Gateway Strategic Development Area; Policy CDA2.2: Town Centre Strategic Development Area; Policy CDA2.3: Colne Valley Strategic Development Area	Net additional home completions within each Strategic Development Area	Number of allocated homes	Planning applications
		Net office and industrial floor space within each Strategic Development Area	Amount of allocated office / industrial floor space	Planning applications
Chapter 3: Homes for a Growing Community	Policy HO3.1 Housing Provision	Net completed dwellings and number of dwellings granted planning permission.	<del>12,544</del> <del>14,274</del> dwellings <del>2021</del> <del>18</del> - <del>2037</del> <del>6</del> , equivalent to <del>with</del> <del>78493</del> per year Maintain 5 year housing supply	Planning applications and site visits
	Policy HO3.2 Housing Mix, Density and Optimising Use of Land	Density of residential developments (dph)	95+ dph within the Core Development Area and 45+ dph elsewhere in the town	Planning applications
		Percentage of family sized units	20% of all new homes to be family sized (three bedrooms or more)	Planning applications
	Policy HO3.3 Affordable Housing	Percentage breakdown of affordable housing	35% of all residential units on sites of 10 or more dwellings to be affordable.	Planning applications
Policy HO3.4 Build to Rent	Number of discounted market rent units	35% of all residential units (on sites of 10 or more dwellings)	Planning applications	

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
			to be discounted market rent	
	Policy HO3.9 Residential Conversions	Number of conversions refused planning permission based on exceeding 10% exceeding threshold	N/A	Planning applications
		Number of conversions permitted	N/A	Planning applications
	Policy HO3.5 Specialist Housing and Care Homes	Number of specialist and care bed spaces completed	102 bed spaces	Planning applications
	Policy HO3.6 Student and Co-Living Housing	Number of student bed spaces completed	N/A	Planning applications
	Policy HO3.8 Gypsies and Travellers	Number of pitches granted planning permission	Fulfil the identified need for 2 pitches if required	Planning applications
	Policy HO3.7 Self-Build and Custom Housebuilding	Number of self-build plots provided and completed	Proposals for 20 houses or more to provide a plot to contribute towards meeting the needs of people on the self-build and customhouse building list	Planning applications
	Policy HO3.10 Building Standards for New Homes	Delivery of accessible homes.	All new homes to comply with M4(2) standard, 10% to comply with M4(3) standard and 2% of new homes on developments of 50 dwellings or more to be dementia friendly.	Planning applications
Chapter 4: A Strong Economy	Policy EM4.2 Designated Industrial Areas	Loss of B class floorspace	No net loss	Planning applications
	Policy EM4.3 Office Development	E class office floorspace	No net loss	Planning applications
	Policy EM4.4 Economic Development Outside Designated Employment Locations	Loss of B class floorspace (outside designated areas)	No net loss	Planning applications
Chapter 5: A Vibrant Town	Policy VT5.1 Supporting Vibrant Retail Centres	Percent of uses which are retail, office and leisure.	N/A	Planning applications

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
		Maintain active ground floor uses	N/A	Annual shop survey
	Policy VT5.3 Local Centres	Maintain level of active ground floor uses	N/A	Annual shop survey
	Policy HC12.3 Built Cultural and Community Facilities	Number of community facilities	N/A	Annual shop survey
<b>Chapter 6: An Attractive Town</b>	Policy QD6.2 Design Principles; Policy QD6.3 Public Realm; Policy QD6.4 Building Design	Number of planning applications refusals based on design grounds	N/A	Planning applications
	Policy QD6.5 Building Height	Number of buildings granted and refused planning permission that exceed the base building height	N/A	Planning applications
<b>Chapter 7: The Historic Environment</b>	Policy HE7.2 Designated Heritage Assets; Heritage and The Historic Environment;	Number of buildings on the at Risk Register	Reduce number on the risk register	Risk register
	Policy HE7.3 Non-Designated Heritage Assets; Policy HE7.4 Archaeology	Number of applications granted planning permission contrary to advice from Historic England	N/A	Planning applications
<b>Chapter 8: A Climate Emergency</b>	Policy CC8.1 Mitigating Climate Change and Reducing Carbon Emissions	Number of new residential developments which meet carbon emission reduction standards	19% energy efficiency above Part L of the Building Regulations (2013)	Planning applications and post completion certificates
		Percentage of carbon reduction since 2008	40% reduction by 2030	UK local authority and regional carbon dioxide emissions national statistics
	Policy CC8.2 Sustainable Construction Standards for Non-Residential Development	Percentage of non-residential developments which meet BREEAM standards	100% of developments meeting either excellent of very good	Planning applications
	Policy CC8.3 Sustainable Construction and Resource Management	New homes achieving 110 litres per person per day	100% of new homes	Planning applications
	Policy CC8.4 Managing Air Quality	Number of Air Quality Monitoring Areas	Reduction in number of Air Quality Management Areas	Planning applications
	Policy CC8.5 Managing the	Number of planning permissions refused on pollution grounds	Zero refusals	Planning applications

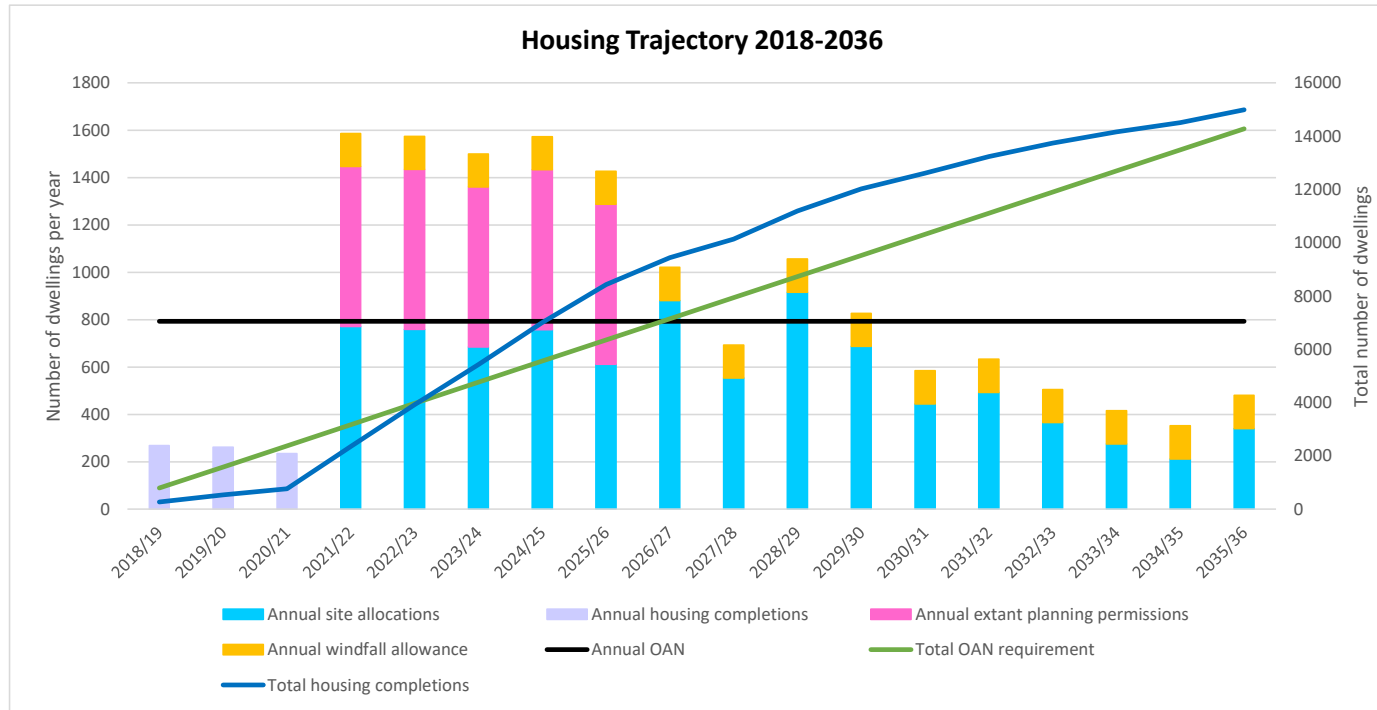
Chapter	Relevant Policies	Monitoring Indicator	Target	Source
	Impacts of Development			
Chapter 9: Improving the Natural Environment	Policy NE9.3 Blue Infrastructure Network; Policy NE9.4 Flood Risk and Mitigation; Policy NE9.5 Surface Water Management	Number of Environment Agency objections to planning applications	No planning permissions granted contrary to the advice of the Environment Agency on flooding and water quality grounds	Planning applications
	Policy NE9.2 Green Infrastructure Network; Policy NE9.6 Protecting Open Space; Policy NE9.7 Providing New Open Space	Area of designated green infrastructure	No net loss of green infrastructure	Planning applications
Chapter 10: Infrastructure	Policy IN10.1 Integrated Infrastructure Delivery	Delivery of infrastructure set out in the Infrastructure Delivery Plan	N/A	Planning applications and infrastructure funding statements
	Policy IN10.2 Providing Infrastructure to Support New Development	Delivery of infrastructure set out in the Infrastructure Delivery Plan	N/A	Planning applications and infrastructure funding statements
	Policy IN10.3 Development Contributions	Contributions paid on new developments	N/A	Section 106 agreements, planning applications and infrastructure funding statements
Chapter 11: A Sustainable Travel Town	Policy ST11.1 Sustainable Travel Town	Percentage of new housing within 400m of a bus stop or rail station	100%	Planning applications
	Policy ST11.2 Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub	Percentage of new developments granted planning permission with policy-compliant cycle parking provision.	100%	Planning applications
	Policy ST11.4 A Walking and Cycling Infrastructure Improvement Town	Percentage of people walking and cycling for transport	Increase on baseline levels	HCC travel survey
	Policy ST11.5 Electric Vehicles, Car Parking and Car Clubs	Percentage of electric vehicles within the borough's total car ownership mix	Increase on baseline levels	Department for Transport

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
		Level of car ownership		
	Policy ST11.6 Managing the Transport Impacts of Development	Percentage of developments which have an active Travel Plan	Increase on baseline levels	Planning applications
<b>Chapter 12: A Healthy Community</b>	Policy HC12.2 Health Impact Assessments	Number of Health Impact Assessments completed	All schemes over 100 dwellings	Planning applications

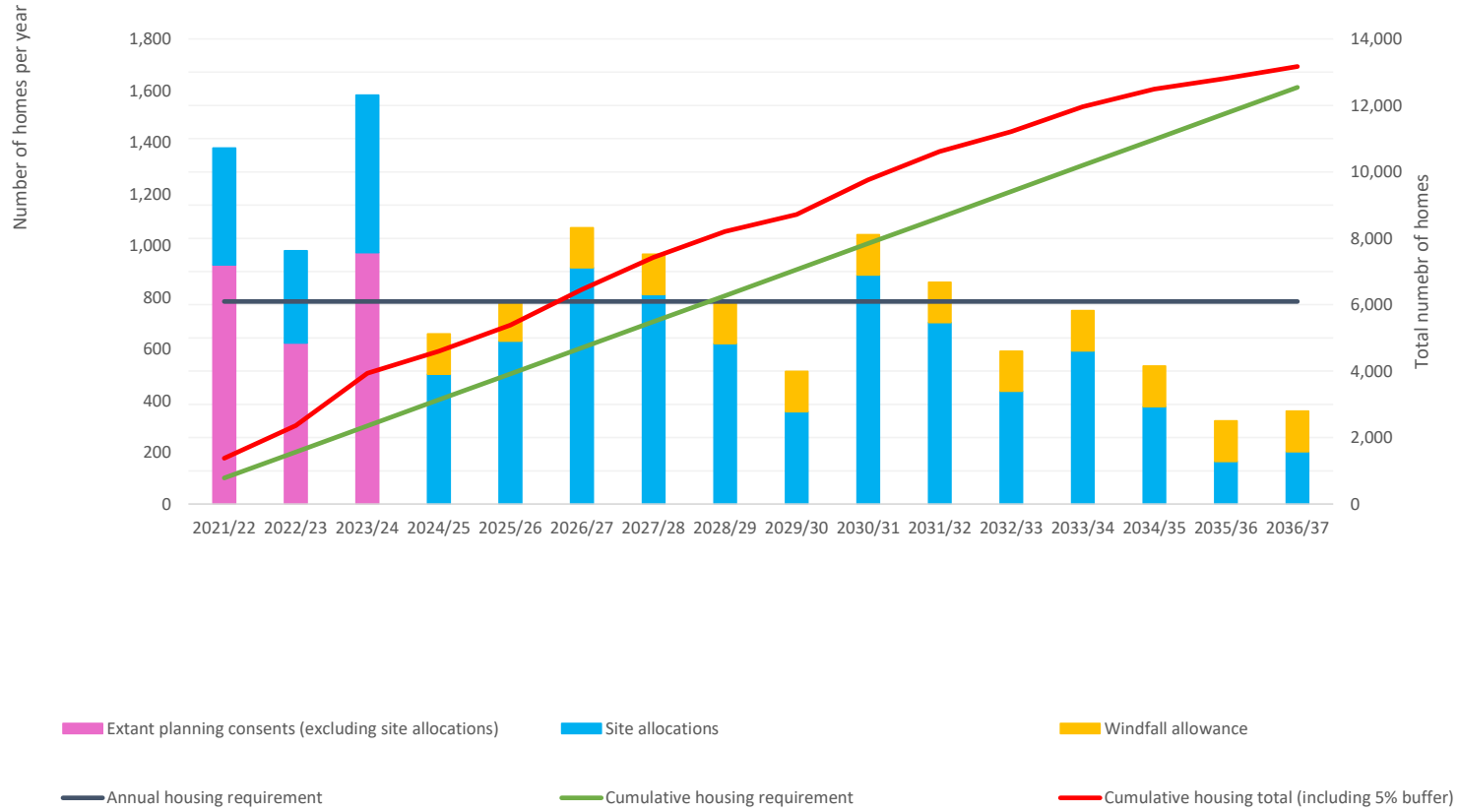
## Appendix B: Housing Trajectory

Year	Commitments ( <del>completions and</del> Extant planning permissions)	Housing Completions from site allocations	Windfall allowance	Annual housing completions	Cumulative housing completions
<del>2018/19</del>	<del>268</del>	0	0	268	268
<del>2019/20</del>	<del>262</del>	0	0	262	530
<del>2020/21</del>	<del>235</del>	0	0	235	765
2021/22	<del>925676</del>	<del>453771</del>	<del>156139</del>	<del>1,3781,586</del>	<del>1,0902,351</del>
2022/23	<del>623676</del>	<del>357759</del>	<del>156139</del>	<del>9801,574</del>	<del>2,5123,925</del>
2023/24	<del>793676</del>	<del>610684</del>	<del>156139</del>	<del>1,5831,499</del>	<del>4,0135,424</del>
2024/25	<del>0676</del>	<del>502757</del>	<del>156139</del>	<del>6581,572</del>	<del>4,6856,996</del>
2025/26	<del>0676</del>	<del>631611</del>	<del>156139</del>	<del>7871,426</del>	<del>5,4658,422</del>
2026/27	0	<del>914881</del>	<del>156140</del>	<del>1,0701,0221</del>	<del>6,5289,443</del>
2027/28	0	<del>811553</del>	<del>156140</del>	<del>967693</del>	<del>7,48810,136</del>
2028/29	0	<del>621916</del>	<del>156140</del>	<del>7771,056</del>	<del>8,25811,192</del>
2029/30	0	<del>357687</del>	<del>156140</del>	<del>513827</del>	<del>8,76412,019</del>
2030/31	0	<del>886444</del>	<del>156140</del>	<del>1,042584</del>	<del>9,79912,603</del>
2031/32	0	<del>703493</del>	<del>156140</del>	<del>859633</del>	<del>10,65113,236</del>
2032/33	0	<del>436365</del>	<del>156140</del>	<del>592505</del>	<del>11,23613,741</del>
2033/34	0	<del>593275</del>	<del>156140</del>	<del>749415</del>	<del>11,97814,156</del>
2034/35	0	<del>377212</del>	<del>157140</del>	<del>534352</del>	<del>12,50414,508</del>
2035/36	0	<del>165340</del>	<del>157140</del>	<del>322480</del>	<del>12,81814,988</del>

<u>2036/37</u>	<u>0</u>	<u>203</u>	<u>157</u>	<u>203</u>	<u>13,171</u>
<b>Total</b>	<b>2,5214,145</b>	<b>8,6198,745</b>	<b>2,1312,095</b>	<b>13,1714,988</b>	<b>13,1714,988</b>



Housing Trajectory 2021-2037





# Appendix C: Transport Infrastructure Requirements

Infrastructure	Description
Colne Valley Strategic Development Area	
20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Internal Walking and Cycling Links	Linking town centre, Bushey Arches, Oxhey, Vicarage Road, Watford General Hospital and Riverwell.
High Street Sustainable Transport Hub	At junction of High Street / Water Lane to provide interchange for multiple modes.
Junction Improvement	Revised layout of Waterfields Way / Lower High Street junction to improve visibility of signals and safety of all road users.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
Bus Prioritisation	Bus priority along the length of Lower High Street, extending around Exchange Road / Beechen Grove Gyratory.
Cycle and Walking Access	Enhanced cycle infrastructure along length of Lower High Street.
Enhanced Public Realm	At Lower High Street / Exchange Road junction.
Bushey Arches	
Cycle and Walking Access	To Bushey Station through Oxhey Park and linking to enhanced provision on Lower High Street, reducing severance of Bushey Arches Gyratory.
Bus Prioritisation	Bus priority along the length of Lower High Street.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.

St Albans Road	
Cycle and Walking Access	Enhanced cycle infrastructure along St Albans Road. Crossing improvements for both walking and cycling at Langley Road / St Albans Road junction.
Bus Prioritisation	Along length of St Albans Road from, and including, Dome Roundabout to town centre.
Riverwell	
20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Internal Walking and Cycling Links	Linking Watford General Hospital, Stripling Way, Thomas Sawyer Way and Ebury Way.
Cycle and Walking Access	Cycling infrastructure improvements along Vicarage Road between Hagden Lane and Fearnley Street. Cycling infrastructure improvements along Harwoods Road, Chester Road, Queens Avenue and Whippendell Road linking Watford General Hospital and Ascot Road.
Bus Prioritisation	Along Vicarage road between Hagden Lane and Fearnley Street.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
Ascot Road	
Internal Walking and Cycling Links	Connecting Croxley View, Greenhill Crescent, Tolpits Lane, Watford Station, and all weather access to the Ebury Way from Tolpits Lane and King George V Playing Field.
Cycle and Walking Access	Re-surfacing of the Ebury Way. Cycling infrastructure improvements along Vicarage Road between Hagden Lane and Fearnley Street. Cycling infrastructure improvements along Harwoods Road, Chester Road, Queens Avenue and Whippendell Road linking Watford General Hospital and Ascot Road.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
Town Centre Strategic Development Area	

20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Internal Walking and Cycling Links	Across town centre both north / south and east / west.
Cycle and Walking Access	Overcome ring road severance via pedestrian and cycle crossing improvements at gateways to the town centre: Derby Road, Water Lane, Lower High Street, Vicarage Rd and Market Street.  Enhanced cycle infrastructure along Hempstead Road.  Enhanced cycle infrastructure along St Albans Road and Rickmansworth Road.
Junction Improvement	Full signalisation of Beechen Grove / Rickmansworth Rd roundabout and improved lane guidance and signage.
Bus Prioritisation	Bus prioritisation on the Exchange Road / Beechen Grove Gyratory.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
Watford Gateway Strategic Development Area	
20mph Speed Limit	On all internal roads, with design appropriate to low speeds.
Eastern <u>Sustainable Transport Mobility</u> -Hub and Station Bridge	Eastern <u>sustainable transport mobility</u> -hub at Watford Junction station with a new multi-storey car park, a new station bridge connecting the two platforms and infrastructure provision for vulnerable road users <u>via an extended link from Clive Way through to Orphanage Road</u> . Improved access to the <u>sustainable transport new-hub through upgrade works along the existing route of <del>along</del></u> Imperial Way, Clive Way and Reeds Crescent/ Orphanage Road.
Western Station Access Priority Reallocation and bus station upgrade	Prioritise pedestrian, cycle and bus movements whilst limiting through traffic at the western station entrance. Improvements to bus priority around the bus station.
Penn Road Connectivity and Station Access Improvements	New pedestrian <u>bridge</u> and cycle bridge over the Abbey Line to connect <u>Penn Road and Colonial Way, and east of the railway line</u> , improvements to <u>the</u>

	station access for vulnerable users, <u>and</u> improvements to the station car park access.
Bradshaw Road Quietway	Link for vulnerable road users from Watford Junction Station through the new Station Quarter West development and Bradshaw Road to Balmoral Road.
Mass Rapid Transit	To support route as developed by Hertfordshire County Council.
Cycle and Walking Access	Crossing improvements at Langley Road / St Albans Road and Hempstead Road / Stratford Way junctions to improve connectivity for cyclists. Enhanced cycle infrastructure along St Albans Road.

# Appendix D: Cycle Parking Standards

Use Class	High Sustainability Area		Other Areas	
	Minimums			
Residential	Long-Term (employee / resident)	Short-Term (visitor)	Long-Term (employee / resident)	Short-Term (visitor)
C2 Residential Institutions	1 space per 5 staff	1 space per 20 units	1 space per 8 staff	1 space per 20 units
C3 Dwelling House 1 Bed	1.25 spaces per unit	1 space per 20 units	1.25 spaces per unit	1 space per 20 units
C3 Dwelling House 2 Bed	2.00 spaces per unit		1.75 spaces per unit	
C3 Dwelling House 3+ Bed	2.50 space per unit		2.25 spaces per unit	
C4 Houses and Multiple Occupation	1 space per 2 bedrooms	1 space per 20 units	1 space per 2 bedrooms	1 space per 20 units
Non-Residential	Long-Term (employee)	Short-Term (student / visitor)	Long-Term (employee)	Short-Term (student / visitor)
B2 General Industrial	1 space per 150 sqm	1 space per 1000 sqm	1 space per 250 sqm	1 space per 1000 sqm
B8 Storage and Distribution	1 space per 250 sqm	1 space per 1000 sqm	1 space per 500 sqm	1 space per 1000 sqm
C1 Hotels	1 space per 20 bedrooms	1 space per 50 bedrooms	1 space per 20 bedrooms	1 space per 50 bedrooms
E Shops, Financial Professional Services, Restaurants and Cafes	1 space per 150 sqm	1 space per 20 sqm	1 space per 175 sqm	1 space per 40 sqm
E Office, R&D, Light Industry in Residential Area	1 space per 100 sqm	1 space per 500 sqm	1 space per 125 sqm	1 space per 500 sqm
E Clinic, Health Centre, Crèche, day nursery or centre	1 space per 5 staff	1 space per 3 staff	1 space per 8 staff	1 space per 5 staff
E Sports facilities, gymnasiums etc.	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
F Schools and Nurseries	1 space per 5 staff	1 space per 8 students	1 space per 8 staff	1 space per 10 students

F Universities and Colleges	1 space per 5 staff	1 space per 8 students	1 space per 8 staff	1 space per 10 students
F1 Other uses (including non-residential education and training, libraries, museums, religious institutions etc.)	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
F2 Community Halls	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
F2 Swimming Baths, Ice Rinks, Outdoor Sport or Recreation	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
Drinking Establishments and Takeaways	1 space per 175 sqm	1 space per 20 sqm	1 space per 175 sqm	1 space per 40 sqm
Cinemas, concert halls etc	1 space per 5 staff	1 space per 100 sqm	1 space per 8 staff	1 space per 125 sqm
Sui generis	As per most relevant other standard			
Transport Hubs	To be considered on a case by case basis in discussion with the Council			
<p>Developments requiring ten or more visitor parking spaces may be required to include within this provision bike share bays, either on the site or at a suitable location within the vicinity that would serve the development if agreed with the Council and appropriate stakeholders. The volume of bays and positioning for these will be determined on a case by case basis, but no more than half of visitor parking provision should be formed of bike share bays as opposed to regular cycle parking.</p>				

# Appendix E: Car Parking Standards

Use Class	Core Development Area	Other Areas
<b>Maximums</b>		
<b>Residential</b>		
C2 Residential Institutions	n/a	n/a
C3 Dwelling House 1 Bed	0.3	
C3 Dwelling House 2 Bed	0.3	1
C3 Dwelling House 3+ Bed (spaces per unit)	0.3	
C4 Houses of Multiple Occupation (spaces per unit)	0.5	1
<b>Non-Residential</b>		
B2 General Industrial (spaces per 1500sqm)	0.5	1
B8 Storage and Distribution (spaces per 1500sqm)	0.5	1
C1 Hotels (spaces per bedroom)	0.5	1
E Shops (spaces per 100sqm)	Car free	1
E Financial / Professional Services (spaces per 100sqm)	Car free	0.5
E Restaurants and Cafes	Car free	n/a
E Office (spaces per 100 sqm)	0.5	1
E R&D, Light Industry in Residential Area (spaces per 150sqm)	0.5	1
E Clinic, Health Centre, Crèche, day nursery or centre	Car free	n/a
E Sports facilities, gymnasiums etc.	Car free	n/a
F.1 Schools and Nurseries	Car free	n/a
F.1 Universities and Colleges	Car free	n/a
F.1 Other uses (including non- residential education and training, libraries, museums, religious institutions etc.)	Car free	n/a
F.2 Community Halls	Car free	n/a
F.2 Swimming Baths, Ice Rinks, Outdoor Sport or Recreation	Car free	n/a

F.2 Shops smaller than 280 sqm mostly selling essential goods, at least 1km from another similar shop	Car free	n/a
Drinking Establishments and Takeaways	Car free	n/a
Cinemas, concert halls etc.	Car free	n/a
Sui generis	As per most relevant other standard	
Transport Hubs	To be considered on a case by case basis in discussion with the Council	
Where no standard is indicated car parking provision to be considered on a case by case basis in discussion with the Council, with car parking requirements to be evaluated within the Transport Assessment / Statement and will be expected to align with sustainable travel ambitions set out within the Local Plan Chapter 11 'A Sustainable Travel Town'.		



# Appendix F: Marketing Requirements

A number of policies in the Local Plan require evidence of marketing prior to allowing the redevelopment of change of use of a building or land. This appendix sets out the detailed requirements for marketing to justify that there is no longer a demand for the existing use and therefore to justify a change of use.

Vacant or under-used premises should be continuously marketed under their existing use. Where the premises are in poor condition or have been partially demolished, the exercise should be limited to marketing redevelopment of the site ~~as a potential redevelopment site~~ to reflect the its existing use.

## Length of Marketing

Prior to applying to change the use of a building protected under the relevant policies of the Local Plan (retail, employment and community facilities) the property should be marketed for a period of at least 12 months.

## Marketing Strategy

Before marketing begins, a strategy should be prepared to demonstrate how the property will be marketed. The marketing strategy should contain:

- **Background** – why the property is being marketed.
- **Location** – including consideration of context and links to transport networks as well as general setting (i.e. employment area/local centre).
- **Descriptions** – including details on floorspace, layout, and car parking as relevant.
- **Planning** – a summary of the existing planning use, site history and any restrictions (i.e. Article 4).
- **Marketing Recommendations** – this should consider:
  - Basis of instruction – sole agent or joint agent etc.
  - Method of disposal – private treaty or formal/informal bids.
  - Advertisement options – sale boards, internet, PR, publications, mailing etc.
- **Expenditure** – the budget for the marketing campaign should be proportionate to the anticipated return from the property. As a guide the budget should be about 3% of the anticipated return from the property (for example, a property with a guide rent of £120,000 per annum should have a marketing budget of around £3,600).
- **Guide Price** – this should be commensurate with the current market price for comparable premises. It is expected that the value of the property will be

derived from an expert RICS registered value or accredited member of RICS (Royal Institute of Chartered Surveyors).

- **Guide terms** – these should be flexible and take into account prevailing market conditions. The length of leases should not be overly prescriptive.

The strategy should include a marketing matrix similar to the template below.

Marketing Initiative	Budget	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Marketing Board	£xx.xx												
Marketing Particulars	£xx.xx												
Local Newspaper	£xx.xx												

The extent of marketing initiatives will vary based on the type of premises being advertised. However, as a minimum the following initiatives should be employed for all premises:

- **Marketing Board** – this should be relative to the type and size of premises. A simple for sale board may be appropriate for small commercial premises and community facilities. For larger commercial units larger boards giving details of the property including the guide price should be employed. Boards should be clearly visible from main transport routes.
- **Marketing Particulars** – including the following:
  - Location
  - Internal and external photographs
  - Description of accommodation
  - Terms (leasehold, freehold, long lease etc.)
  - Guide Price/Rent
  - Current planning position
  - Services and Utilities
  - Energy Performance Certificate
  - Rateable value and business rates
  - VAT status
  - Legal and professional costs
  - Contact information for the agent
  - For larger commercial units and tourist accommodation sites, which are more likely to have a regional or national audience, the particulars (including layouts and photos) should be set out in a bespoke brochure.
- **Press Advertisement** – for small commercial units and community facilities an advert should be placed and maintained in the local newspaper, and specialist publications as appropriate. For larger commercial units specialist publications should always be used. In

addition, for large commercial units a press release should be given to local and regional press.

- **Online Advertisement** – the premises should be published on the agent’s website as well as at least one national commercial property search engine. For very large or significant commercial units a bespoke website for the property could be created.
- **Targeted Advertisement** – where appropriate other providers should be informed directly that the premises is being marketed. This is likely to be particularly relevant for community facilities where there may be a requirement for alternative provision.

### Marketing Report

If, following the 12 months of marketing, there has been no success in selling or letting a unit then a report detailing the marketing undertaken and demonstrating compliance with these requirements should be prepared and submitted alongside any planning application for redevelopment or change of use. The marketing period must have ended no more than nine months before the date of submission of a planning application.

The Marketing Report must demonstrate:

- The original marketing strategy (in accordance with the above requirements).
- The duration and dates of the marketing campaign (minimum 12 months).
- Evidence that the marketing strategy was delivered – photos of marketing boards, copies of particulars, screenshots of online adverts, copies of press articles and adverts.
- A full log of relevant correspondence throughout the marketing campaign. This should include, where relevant, details of reasons why the prospective occupier(s) deemed the premises unsuitable. If any offers were rejected the grounds for rejection must be provided.
- If the record of enquiries indicated a lack of interest the report should demonstrate measures taken to alter the strategy to increase interest.

In summary, the marketing statement should include all details and evidence of the steps taken to market premises as detailed above. If the Authority is not satisfied that these requirements have been met then additional marketing may be required before the proposal can be considered acceptable.

# Appendix G: Glossary

## **Active travel**

Non-motorised travel, such as walking and cycling.

## **Active frontage**

Ground floors where windows and doors face onto the street, avoiding blank walls and which enable people to see into and out of buildings.

## **Adaptation (Climate Change)**

Modifications necessary to maintain life in response to climate change effects and expected negative impacts.

## **Adaptations (Housing)**

Changes made to a home allowing safer, easier access.

## **Affordable Housing**

Housing for sale or for rent for those whose needs are not being met by the market. This includes social rented housing, affordable rented housing and intermediate housing.

## **Air Quality Management Areas**

Identified areas where air quality objectives are not being met.

## **Agent of Change Principle**

The new use is responsible for mitigating any future impacts on existing surrounding uses. Seeks to prevent development creating a negative impact on the local area (for example noise pollution)

## **Authority Monitoring Report (AMR)**

A report that summarises the performance of planning policies and is used to identify how effectively the Local Plan is implemented.

**Base**

The lower section of a taller building which is seen and experienced from street level.

**Bike Share Scheme**

A pool of bikes owned by a local authority or private company available for individual use on a short term basis by members.

**Biodiversity**

The amount of variety in plants, animals and insects within a specific area. Higher amounts of biodiversity are important for sustaining ecosystems and habitats.

**Bioswales**

Channels which move and hold storm water and run off through vegetation and rock to remove debris and pollutants.

**Blue Infrastructure**

Networks of water including (but not limited to) rivers, ponds, lakes and canals.

**BREEAM (Building Research Establishment Environmental Assessment Method)**

An assessment that measures the sustainability of a new building including issues related to energy, health and well-being, innovation, land use, materials, management, pollution, transport, waste and water.

**Brownfield Land**

Land that was previously developed with any type of fixed infrastructure.

**Building Regulations**

Government standards set for design and construction which apply to most new buildings and alterations to existing buildings in England and Wales.

**Car Club**

A pool of cars owned by a local authority or private company available for individual use on a short term basis by members.

**Carbon Neutral**

A combination of reducing and offsetting emissions of the greenhouse gas carbon resulting in no net release.

**Carbon Offset**

A method to reduce emissions by compensating elsewhere. These offsets are measures in tonnes of carbon dioxide-equivalent.

**Car-lite development**

Residential development with minimal or no car parking, where travel is mainly via walking, cycling and public transport.

**Community Infrastructure Levy (CIL)**

A charge levied on new developments to support infrastructure delivery. Introduced by the Planning Act (2008).

**Comparison Retail**

Retail items not bought on a frequent basis, for example televisions and white goods (fridges, dishwashers etc).

**Conservation Area**

An area designated under the Planning Act 1990 (Listed Buildings and Conservation) as being of special historic or architectural interest the character of which should be preserved and enhanced.

**Construction Management Plan**

A plan to address procedures and methods of construction prior to commencement.

**Controlled Parking Zones**

An area where all on street parking is controlled and restricted by the local council.

**Culvert**

An artificial, impermeable channel, tunnel or similar structure which enables water to flow under or through a built up area.

**Combined Heat and Power**

A power system that generates both heat and electricity.

**Curtilage**

The boundary of a development site or property.

**Delivery and Servicing Plan**

A plan to manage logistics of how to provide services such as waste collection and freight delivery to a development.

**Demand Responsive Transport (DRT)**

Flexible form of bus services that vary routes and timetables according to demand, passengers' book spaces to join at an agreed time and place.

**Design and Access Statement**

A report statement submitted as part of a planning application which should explain how a proposed development is a suitable response to the site and its setting and how it will be accessed by future users.

**Development Contributions**

Contribution in the form of money, land or other means collected from developers to deliver infrastructure. This could be through the Community Infrastructure Levy (CIL) or a Section 106 Agreement as well as onsite contributions.

**Endemic**

Something that is native and regularly found in a certain area.

**Exception Test (Flooding)**

A test applied to sites with flood risk, when there are not enough suitable sites with lower or no risk of flooding available for use. The test is required to show that the sites with flood risk will be safe to develop and that any sustainability benefits of developing the site will outweigh the risk of flooding.

**Evidence Base**

Data collected by a local authority to support and justify policies.

**Flexible workspace**

Shared working space in new developments, used by residents to work from home.

**Flood Risk Assessment**

A way to determine the likelihood of flooding in specific areas.

**Flood Zones**

Areas of land which are mapped by the Environment Agency into flood zones. Flood Zone 1 is least likely to experience a flooding event and Flood Zone 3 has the highest risk.

**Green Infrastructure**

Networks of green space which are multifunctional and offer environmental and social benefits for the surrounding area. This can include parks and gardens, green corridors, natural areas, amenity spaces and allotments.

**Greenhouse Gases**

Gases which occur naturally but due to human activity are intensifying climate change effects.

**Health Impact Assessment**

An assessment of how a proposal may potentially affect health and wellbeing of a population.



**Habitable rooms**

Any room which is used (or intended to be used) for sleeping, cooking, eating or living. Rooms which are not included would be hallways, service rooms, laundry rooms and bathrooms.

**Hardstanding**

An area of hard surfacing which is often used for parking.

**Hectare (ha)**

A unit of measurement commonly used to measure land. 1 hectare = 10,000 square metres = 2.5 acres.

**Housing mix**

The range of unit sizes (E.G. 1-bed, 2-bed, 3-bed units) and different types of homes (e.g. traditional houses, apartments)

**Infill Development**

When small areas of vacant land in urban areas are developed.

**Intensification**

Further development within the existing urban area.

**Land Assembly Powers**

An organisation that has legal powers to buy property at a fair price to combine land parcels from different ownerships.

**Local Centres**

An area including shops and facilities for local people.

**Locally Listed Building**

Buildings, structures or monuments of local interest that contribute to the heritage, identity and streetscape of Watford. Locally listed buildings do not merit statutory listing under the Planning Act (1990), but are considered to be of local architectural or historic value.

**Major Development**

In terms of residential development, greater than 10 dwellings or 0.5 hectares. In terms of other development, a floorspace increase of greater than 1000 square meters is considered to be major development.

**Mansard**

In relation to taller buildings this is the middle section of the buildings and is sometimes set in or narrower than the base section.

**Mass Rapid Transit (MRT)**

Urban transport system capable of carrying large numbers of passengers quickly. Encompasses transport modes that run on roads, rails or a combination of these.

**The Metropolitan Green Belt**

A statutory designation around London that exists to restrict urban sprawl, protect the countryside from encroachment, stop the merging of towns and encourage the recycling of brownfield land.

**Ministry of Housing, Communities and Local Government (MHCLG)**

The Government department responsible for planning and local government.

**Minor Development**

In terms of residential development, less than 10 dwellings or 0.5 hectares. In terms of other development, a floorspace lower than 1000 square meters would be considered to be minor development.

**Mixed Use Development**

A development that is comprised of different land uses, such as employment and residential uses.

**Nationally Listed Building**

A building or monument that is protected because of its national historical or architectural interest under the Planning Act (1990).

**National Planning Policy Framework (NPPF)**

The national policy document which provides the framework to Government policies to guide local planning authorities, particularly when preparing a Local Plan.

**Natural Surveillance**

When building design encourages people to overlook a space with windows, balconies, front gardens or entrances.

**Objectively Assessed Need (OAN)**

Using a standardised methodology, the number of new homes required to meet the future needs of the population

**Overheating**

Discomfort to occupants from high temperatures caused by highly insulated and airtight buildings with inadequate natural or mechanical ventilation systems.

**Permeability**

Is a measure of the number of alternative routes which are available for movement through an area; areas with a high number of choices are considered to have good permeability.

**Place Making**

The process of creating high quality accessible places that people want to live, work, play and learn in.

**Planning Condition**

These can be attached to a planning permission which require a developer to address specific issues

**Plot Ratio**

The ratio of the floor area of a building to the land on which it sits. It is often used to measure how intensively land is being used.

### **Policies Map**

Areas covered by Local Plan policies and proposals identified on an Ordnance Survey Map.

### **Pop-up**

This is the top section of the building and is the section which is most visible in the skyline and panoramic views across a place.

### **Positive frontage**

An edge or side of a building or a boundary wall/fence with an interesting and well-designed elevation or boundary treatment which provides an engaging and attractive edge to the public space.

### **Public Realm**

Parts of the town that are available for everyone to use, including streets, public squares and open spaces.

### **Renewable Energy**

Energy from renewable sources such as sunlight, wind, rain and geothermal heat. The use of these resources to create energy is sustainable for human consumption.

### **Retail <sup>H</sup>ierarchy**

Classifies and ranks retail areas based upon the role, range of choice, distance people will travel and popularity from outside the town.

### **Retail impact assessment**

An assessment undertaken for an application for retail use (normally on developments over 2,500 square metres gross floorspace, but they may occasionally be necessary for smaller developments, such as those likely to have a significant impact on smaller centres) on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

### **Riparian**

Area adjacent to a river or similar body of water.

### **Section 106 Agreement**

A reference to Section 106 of the Town and Country Planning Act (1990) allows a local planning authority to enter a legally-binding agreement or planning obligation with a landowner in association with the granting of planning permission. These agreements are a way of delivering or addressing matters that are necessary to make a development acceptable in planning terms. They are used to support the provision of services and infrastructure.

### **Self-Build and Custom Build Housing**

When an individual, or a group of individuals, organises the design and construction of their own home.

### **Severance Effect**

The dividing effects of busy roads on the movement of people and communities.

### **Single and Dual Aspect**

A single aspect dwelling only has windows and openings to the exterior on one side and a dual aspect dwelling has openings and windows to the exterior on at least two sides.

### **Sequential Test (Flooding)**

A test that aims to steer new development to the areas with the lowest probability of flooding.

### **Sequential Test (Retail)**

A test that aims to steer main town centre uses towards town centre locations first. If no town centre locations are available, the test steers the uses towards edge of centre locations next, then out of centre locations

### **Street Canyon**

A street which has tall buildings along both sides which results in the ground level experience being similar to a natural canyon.

### **Soakaways**

A ditch or pit which is filled with loose rock or rubble used to manage water.

**Statutory**

Something that is required by law.

**Sui Generis**

A type of land use that is not defined by other land use classifications.

**Supplementary Planning Document**

A document which supports the Local Plan by providing more detail and guidance on a topic or an area. These are non-statutory documents.

**Surface Water Flooding**

Flooding caused by rainwater that cannot be absorbed into the ground or is caused by poor drainage systems.

**Sustainable Development**

Defined by the United Nations General Assembly as *'meeting the needs of the present without compromising the ability of future generations to meet their own needs'*. In terms of planning, the National Planning Policy Framework states that sustainable development should be viewed in a social, economic and environmental context.

**Sustainable Drainage Systems (SuDS)**

An approach to drainage which seeks to control the flow of water and reduce the risk of sewer discharge and/or flooding.

**Target Emission Rate (TER)**

A standard for energy efficiency of a building expressed as kilograms of CO<sup>2</sup> per square metre.

**Tenure**

The ownership or rental of a property.

**Tenure Blind**

Homes designed to make types of housing indistinguishable.

**Topography**

The shape and relief of the land resulting in a particular and distinctive landscape or town scape, often relating to height above sea level.

**Town Centre Uses**

Defined by the National Planning Policy Framework as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Transport Assessment**

A comprehensive review that sets out transport issues, and proposed mitigations for these, relating to a proposed development. The assessment also identifies measures to improve accessibility and safety for different travel modes, including walking and cycling.

**Travel Plan**

A long term management strategy for a site that seeks to encourage sustainable travel.

**Urban Grain**

The size, shape and pattern of plots, buildings and streets in an area or neighbourhood that are a constituent part of the character of the places.

**Use Classes**

The Town and Country Planning Order (1987) places different land uses into categories. In practice, changes between use classes are likely to require planning permission. A list of the planning use classes can be found in Appendix B.

**Viability**

Ensuring that developer costs and policy obligations do not compromise the deliverability of a development.

**Water Stress**

When the amount of water being consumed exceeds the amount that is readily available for use it leads to water stress. Areas of water stress are determined by the Environment Agency.

**Windfall Development**

Development sites that are not specifically identified in the Local Plan.



# Appendix H: Planning Policies to be Superseded by the Watford Local Plan 2021-2037

Watford District Plan 2000 Policies Retained in the Core Strategy 2006-2031	
Policy No.	Title
SE7	Waste Storage, Recovery and Recycling in New Development
SE20	Air Quality
SE21	Air Quality Management Areas
SE22	Noise
SE23	Light Pollution
SE24	Unstable and Contaminated Land
SE25	Potentially Hazardous or Polluting Development
SE26	Watercourses
SE27	Flood Prevention
SE28	Groundwater Quality
SE36	Replacement Trees and Hedgerows
SE37	Protection of Trees, Woodlands and Hedgerows
SE39	Tree and Hedgerow Protection in New Development
SE40	Landscape Character Assessment
T10	Cycle Parking Standards
T21	Access and Servicing
T22	Car Parking Standards
T24	Residential Development
T26	Car Free Residential Development
H9	Back Garden Development
H10	Planning Agreements for Educational and Community Facilities
H13	Conversions
H14	Conversions: Provision of Family Sized Units
H15	Non-Residential Proposals in Residential Areas
H16	Retention of Affordable Housing
E1	Employment Areas
E2	Employment Use Outside Identified Employment Areas
E5	Environmental Considerations
S5	Non-Retail Uses in Prime Retail Frontage

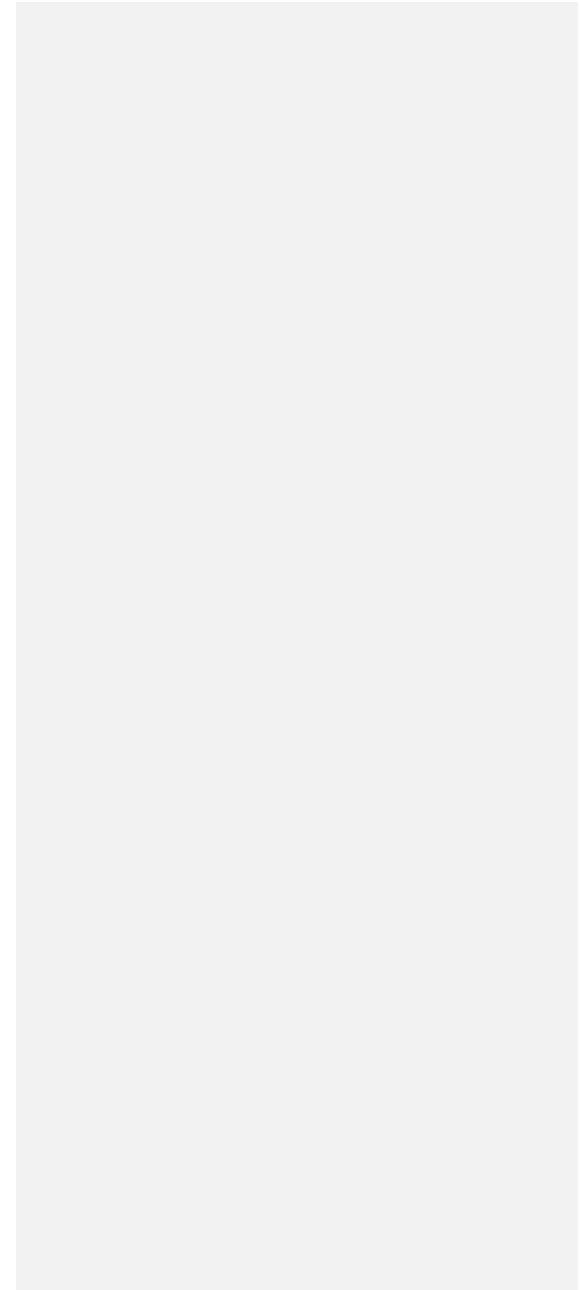
S6	Non-Retail Uses within the Harlequin Shopping Centre
S7	Secondary Retail Frontage
S9	Non-Retail Uses in North Watford Shopping Centre/Local Shopping Frontages
S11	Use Class A3 Food and Drink
S12	Planning Conditions for Use Class A3 Food and Drink
E2	Employment Use Outside Identified Employment Areas
E5	Environmental Considerations
S5	Non-Retail Uses in Prime Retail Frontage
S6	Non-Retail Uses within the Harlequin Shopping Centre
S7	Secondary Retail Frontage
S9	Non-Retail Uses in North Watford Shopping Centre/Local Shopping Frontages
S11	Use Class A3 Food and Drink
S12	Planning Conditions for Use Class A3 Food and Drink
U15	Buildings of Local Interest
U17	Setting of Conservation Areas
U18	Design in Conservation Areas
U19	Small Scale Developments in Conservation Areas
U20	Demolition in Conservation Areas
U24	Shopfronts
U25	Advertisements and Signs

<b>Core Strategy 2006-2031 Policies</b>	
<b>Policy No</b>	<b>Title</b>
Vision	Vision of Watford in 2031
SO1	A Family Friendly Town Centre
SO2	Sustainable Neighbourhoods
SO3	Enhance Watford's regional, economic and transportation role
SO4	Enhance Watford's regional health, recreational, educational, cultural and social role.
SO5	Enhance Watford's environment, green infrastructure and heritage assets.
SS1	Spatial Strategy
SPA1	Town Centre
SPA2	Watford Junction
SPA3	Health Campus
SPA4	Lower High Street
SPA5	Dome Roundabout
SPA6	Western Gateway
IP1	Croxley Rail Link
IP2	Abbey Flyer
IP3	Watford Junction Interchange
SD1	Water
SD2	Climate Change
TLC1	Town Centre Development
TLC2	Neighbourhood Centres
HS1	Housing Supply and Site Selection
HS2	Housing Mix
HS3	Affordable Housing
HS4	Gypsies and Travellers
EMP1	Economic Development
EMP2	Employment Land
T1	Regional Transport Node
T2	Location of New Development
T3	Improving Accessibility
T4	Transport Assessments
T5	Providing New Infrastructure
INF1	Infrastructure Delivery and Planning Obligations
UD1	Delivering High Quality Design
UD2	Built Heritage Conservation
GI1	Green Infrastructure
GI2	Green Belt
GI3	Biodiversity
GI4	Sports and Recreation

Appendix Aa:

Final Draft Watford Local Plan:

Schedule of Proposed Main Modifications



## Schedule of Proposed Main Modifications

### Watford Final Draft Local Plan

This Schedule of the proposed main text modifications includes changes since the Regulation 19 version of the Local Plan aimed at resolving any potential soundness and/or legal compliance issues identified during the Regulation 19 Consultation.

Reasons for modification can include:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

The schedule is ordered by chapter and modification number and contains the policy reference/paragraph number and page number for each modification. Deleted text, maps or other figures are shown with a ~~red strike through~~; additions and replacements are underlined in green. Dots denote where the paragraph / policy continues before/after the text shown in the modification.

The proposed modifications will subsequently change the document numbering. The policy, paragraph and bullets referenced in this schedule are those found in the Regulation 19 Publication version of the Local Plan.

Major Modification Reference	Page, Local Plan paragraph, policy (in Final Draft Watford Local Plan Regulation 19 consultation document)	Modification (deleted text shown as <del>strike through</del> and additional text shown <u>underlined</u> )	Reason for modification (incl. Rep number where appropriate)
<b>CHAPTER 1: A SPATIAL STRATEGY FOR WATFORD</b>			
MM1	Front cover and then throughout the document (all other instances are shown in the Minor Modifications Schedule)	<del>2018</del> <u>2021-2036</u> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 & 2064, 2068 Glyn Hopkins Holdings Limited

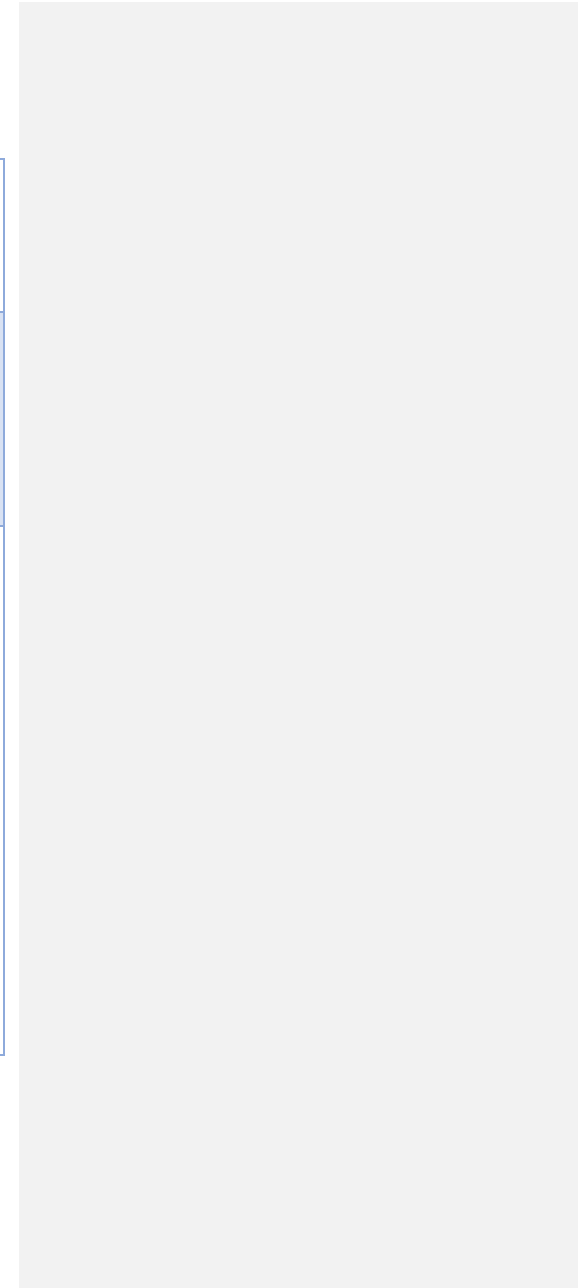
			ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council ID 1947 WSP ID 2058 Home Builders Federation ID 2091 & 2092 North Western Avenue Watford Ltd
MM2	Page 21, Strategic Policy SS1.1 paragraph 1	The Local Plan makes provision for <del>14,988</del> <u>13,171</u> additional homes and <u>10,700</u> <del>11,500</del> additional jobs between <del>2018</del> <u>2021</u> and <del>2036</del> <u>2037</u> .	ID 2002 Drax Investments Limited ID 2063 & 2064, 2068 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council ID 1947 WSP ID 2058 Home Builders Federation ID 2091 & 2092 North Western Avenue Watford Ltd
MM3	Page 21, Strategic Policy SS1.1 paragraph 4	Proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian <u>cycling and passenger transport</u> <del>and cycle</del> travel will be prioritised.	ID 2100 HCC
MM4	Page 24, Figure 2.2:	Amendments to diagram: Key: <del>SDA</del> <u>Strategic Development Area</u> Boundary	Officer change

	<p>Figure 2.2: Watford Gateway Strategic Development Area</p> <p>Key</p> <ul style="list-style-type: none"> <li>SDA Boundary</li> <li>Public Transport Priority</li> <li>Walking and Cycling</li> <li>Mixed-Use Development</li> <li>Active and Positive Frontages</li> <li>Primary Office Location</li> <li>Indicative New Pedestrian/Cycle Crossing</li> <li>Concrete Batching Plant and Rail Aggregates Depot</li> <li>West Coast Main Line</li> <li>Abbey Line</li> <li>Watford Junction Railway Station</li> <li>Major Bus Interchange</li> </ul>	<p>Key: Walking and Cycling Route <b>Priority</b></p> <p>Key: Indicative <b>New</b> Pedestrian/Cycle Crossing</p> <p>Key: <b>Major</b> Bus Interchange</p> <p>Concept Map: <b>New</b> Residential</p> <p>Concept Map: <b>Railway line extended to the concrete batching plant</b></p> <p>Concept Map: <b>Symbols for active and positive frontages extended the full length of Clarendon Road</b></p> <p>Figure 2.2: Watford Gateway Strategic Development Area</p> <p>Key</p> <ul style="list-style-type: none"> <li>Strategic Development Area Boundary</li> <li>Public Transport Priority</li> <li>Walking and Cycling Priority</li> <li>Mixed-Use Development</li> <li>Active and Positive Frontages</li> <li>Primary Office Location</li> <li>Indicative Pedestrian/Cycle Crossing</li> <li>Concrete Batching Plant and Rail Aggregates Depot</li> <li>West Coast Main Line</li> <li>Abbey Line</li> <li>Watford Junction Railway Station</li> <li>Bus Interchange</li> </ul>	
<p>MM5</p>	<p>Page 28, Figure 2.3:</p>	<p>Amendments to diagram:</p> <p>Key: <b>SDA</b> <b>Strategic Development Area</b> Boundary</p> <p>Key: Walking and Cycling <b>Priority</b></p> <p>Key: Conservation Areas</p>	<p>Officer change</p>

	<p>Key:</p> <ul style="list-style-type: none"> <li>Strategic Development Area</li> <li>Public Transport Priority</li> <li>Walking and Cycling Priority</li> <li>Conservation Area</li> <li>Mixed-Use Development</li> <li>Active Frontages</li> <li>Indoor Shopping Centre</li> <li>St Marys Church</li> <li>Town Hall</li> <li>Public Transport Improvements</li> <li>Transport for London</li> <li>Watford High Street Station</li> <li>Watford Junction Station</li> <li>Major Bus Interchange</li> <li>Watford General Hospital</li> </ul>	<p>Key: Active <b>and Positive</b> Frontages Key: <del>Major</del> Bus Interchange</p> <p>Figure 2.3: Town Centre Strategic Development Area</p> <p>Key:</p> <ul style="list-style-type: none"> <li>Strategic Development Area</li> <li>Public Transport Priority</li> <li>Walking and Cycling Priority</li> <li>Conservation Area</li> <li>Mixed-Use Development</li> <li>Active and Positive Frontages</li> <li>Indoor Shopping Centre</li> <li>St Marys Church</li> <li>Town Hall</li> <li>Public Transport Improvements</li> <li>Transport for London</li> <li>Watford High Street Station</li> <li>Watford Junction Station</li> <li>Bus Interchange</li> <li>Watford General Hospital</li> </ul>	
<b>CHAPTER 2: CORE DEVELOPMENT AREA</b>			
<p>MM6</p>	<p>Page 25, after paragraph 2.14, new paragraph</p>	<p><u>The transformation of the area from an under-utilised employment area to a mixed use area inclusive of new homes, employment space, community facilities and a new Watford Junction Sustainable Transport Hub will take place throughout the plan period and likely come forward in phases as infrastructure is delivered and development opportunities present themselves.</u></p> <p><u>In the first part of the plan period employment proposals will be supported where landowners wish to bring forward schemes which can be replaced at a later date by mixed-use development that may include residential units that will</u></p>	<p>ID 2009 Network Rail ID 1972 Canada Life ID 1986 Solum Regeneration ID 2015 Mineral Products Association</p>



		<p><u>contribute towards the long-term vision of the area.</u>  <del>However,</del> The compatibility of new <u>and existing</u> uses will need to be carefully considered, particularly <u>when</u> <del>where</del> residential uses are <u>also being</u> proposed <u>in the area the need to address the 'agent of change' principle.</u></p>	
MM7	Page 25, Paragraph 2.12 Final sentence	<p>Where possible, taller parts of a building should be designed to have a frontage on the main road while <u>new building heights on land which is next to existing buildings of lower heights should reflect the existing lower building heights.</u> <del>the lower areas of a scheme should be located closer to areas characterised by lower building height.</del></p>	ID 1860 Watford central Residents Association
MM8	Page 25, Paragraph 2.14, after fourth sentence	<p><u>The transformation of the area from an under-utilised employment area to a mixed-use area inclusive of new homes, employment space, community facilities and a new Watford Junction Sustainable Transport Hub will take place throughout the plan period and likely come forward in phases as infrastructure is delivered and development opportunities present themselves.</u></p> <p><u>In the first part of the plan period employment proposals will be supported where landowners wish to bring forward schemes which can be redeveloped at a later date by mixed-use development that may include residential units that will contribute towards the long-term vision of the area.</u> <del>However,</del> The compatibility of new and existing uses will need to be carefully considered, particularly <del>when</del> <u>re</u> residential uses are <u>also being</u> proposed <u>in the area as the 'agent of change' principle will need to be addressed.</u></p>	



MM9	Page 25, Paragraph 2.15	<p>The concrete batching plant and rail aggregates depot (<u>including road access from Orphanage Road and rail sidings running parallel to the Abbey Line</u>) is safeguarded by the Hertfordshire Minerals Local Plan <u>and subject to a 250m Minerals Infrastructure Consultation Area.</u> <del>It</del> <u>Re-</u> <u>location of the facility will be challenging to achieve and</u> will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria.</p> <p><u>New development coming forward in the surrounding area should assume that the facility will remain for the long-term. New development will be required to be designed and mitigated to ensure that it will not prejudice existing or future use of the safeguarded site and associated operations in accordance with the 'agent of change' principle. Appropriate mitigation provided by new development may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and providing buffer development or screening between the sensitive uses and the safeguarded facility.</u></p>	IDs 2071, 2073, 2076 & 2077, – Aggregate Industries ID 2015 Mineral Products Association
MM10	Page 25, paragraph 2.16, after fifth sentence	<p><u>When the area comes forward more comprehensive mixed-use development in the second part of the plan period and longer-term,</u> <del>a</del> <u>A</u> route for a second bridge that connects Penn Road with Watford Junction is to be protected so that new development does not compromise potential access to the area in the future.</p>	
MM11	Page 27, Strategic Policy CDA2.1, Part c)	<p>c) A <u>site for a new 3 form entry primary school</u> <del>site</del> <u>within Site MU05: Land and Buildings at 94-98 St</u></p>	Clarity to reflect existing permission. ID 2103

		<u>Albans Road and a site for a new form entry primary school within Site MU06: Land at Watford Junction.</u> to meet demands generated by development;	Hertfordshire County Council and ID 1938 Berkeley Homes
MM12	Page 27, Strategic Policy CDA2.1, Part e)	A high quality <del>transport interchange hub</del> <u>Sustainable Transport Hub</u> located at Watford Junction connecting rail, bus, taxi, cycle and pedestrian facilities;	
MM13	Page 27, Strategic Policy CDA2.1, Part g)	g) <u>Prior to the grant of planning permission for development proposals which include residential use</u> on land east of the <u>Abbey Line railway line</u> , a pedestrian and cycle bridge for commuters and residents across the Abbey Line must be agreed <del>before planning permission is granted;</del>	ID 1972 Canada Life
MM14	Page 27, Strategic Policy CDA2.1, Part h)	A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded <u>for delivery in the second part of the plan period as part of a comprehensive mixed-use redevelopment of the area;</u>	
MM15	Page 27, Strategic Policy CDA2.1, Part j)	j) Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace <u>unless the office use is replaced with industrial uses</u> and the proposed use will not undermine existing uses through the <u>'Agent of Change' principle. If a proposal is to include the loss of the child care facility, a replacement facility should be provided as part of the commercial floorspace.</u> <del>As part of the commercial floorspace a replacement childcare facility should be provided."</del>	ID 1972 Canada Life ID 1986 Solum Regeneration ID 2103 HCC

MM16	Page 27, Strategic Policy CDA2.1, new bullet after Part j)	<u>k) In the first part of the plan period, employment redevelopment proposals will be supported, as will further redevelopment that will enable a transition towards increased mixed-use schemes and supporting infrastructure in the second part of the plan period.</u>	Officer change
MM17	Page 27, Strategic Policy CDA2.1, Part l)	New development will not compromise vehicle access from <del>Colonial Way</del> via Clive Way via Colonial Way into the site area and access to the <u>Watford Junction Sustainable Transport Hub station</u> ;	ID 1972 Canada Life
MM18	Page 27, Strategic Policy CDA2.1, Part m)	m) The concrete batching plant and rail aggregates <u>depot including its rail sidings and road access</u> will be safeguarded as significant mineral infrastructure, <u>as shown on the Policies Map. Proposals for development will be required to demonstrate that the proposed use will not undermine the existing safeguarded uses through the 'agent of change' principle</u> ;	ID 2072 – Aggregate Industries
MM19	Page 29, Paragraph 2.32, Second sentence	In this context, proposals will be expected to contribute towards the vision for Watford to <del>2036</del> <u>2037</u> .	ID 2002 Drax Investments Limited ID 2063, 2068 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MM20	Page 31, Paragraph 2.46. third sentence	This area acts as a gateway to the Town Centre from the Watford High Street Overground Station and opportunities to improve local transport with <u>improved cycle, pedestrian and bus connections which could potentially be developed</u>	ID 2107 HCC



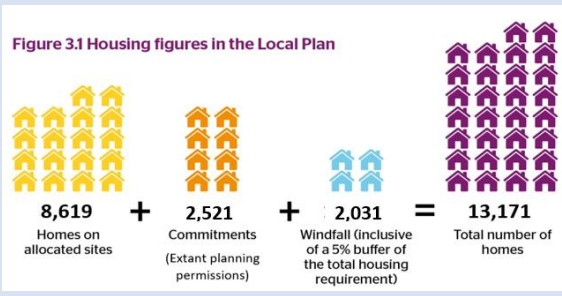
		<p>Further as part of <del>connections to a future</del> a Mass Rapid Transit <del>port</del> System <del>will be supported</del>.</p>	
MM21	Page 32, Paragraph 2.48, second sentence	<p>Of particular importance are improvements to key junctions that should prioritise non-vehicle users (<u>except for buses</u>), including the junctions at the High Street / Rickmansworth Road, Albert Road South / Beechen Grove, Clarendon Road / Beechen Grove, south part of the High Street / Beechen Grove and Market Street / Exchange Road.</p>	ID 2108 HCC
MM22	Page 32, Paragraph 2.52, third sentence	<p>Informed by the <u>Tall Building Heights Study</u>, the future base height in the Town Centre is considered to be <u>up to five storeys on the High Street, stepping up to 8 storeys to the rear</u>.</p>	ID 1945 WSP
MM23	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, Part f)	<p>f) Opportunities should be taken to reduce the vehicle dominance of the ring road, proposals that provide active frontages to the ring road will be supported, transforming the environment into a street that is a positive experience to use for pedestrians and cyclists <u>that will support the use of the new transport hub at the southern end of the High Street</u>, as well as vehicle users, will be a priority;</p>	ID 2111 Hertfordshire County Council
MM24	Page 34, Strategic Policy CDA2.2: Town Centre Strategic Development Area, new bullet after Part i)	<p><u>i) A site for a new 3 form entry primary school should be located within the strategic development area that is BB103 compliant, including external areas. Applicants are encouraged to identify where a new primary school can be provided.</u></p>	ID 2109, 2110 Hertfordshire County Council
MM25	Page 34, Figure 2.3:	<p>Amendments to diagram: Key: <u>SDA Strategic Development Area</u> Boundary Key: Walking and Cycling <u>Priority</u> Key: <del>Major</del> Bus Interchange</p>	Officer change

<p>MM26</p>	<p>Page 36, after paragraph 2.67, new paragraph</p>	<p><u>Redevelopment of the hospital is likely to consist of multiple phases; delivery of the multi-storey car park, redevelopment of the hospital and land between the new hospital and Vicarage Road. Development of Riverwell and Watford General Hospital area should be considered in the context of the wider Strategic Development Area and existing built-up area adjacent and ensure opportunities to connect people with local destinations are optimised such as creating easily legible routes through the site that are enhanced through each phase. The layout of buildings and their access points should ensure there is good accessibility for people using sustainable transport such as walking,</u></p>	<p>ID 1897 West Hertfordshire Hospitals NHS Trust</p>

		<p><u>cycling, public bus services and those with mobility issues.</u></p> <p><u>The existing hospital located in the north part of the site is adjacent to existing the residential area of Vicarage. Redevelopment schemes will need to take into account how new development may affect existing residents and implement design measures to mitigate any possible negative impacts. The area is capable of supporting a base building height of up to six storeys, however, buildings of significant scale are likely to have an impact on the character of the residential area and listed buildings in the vicinity. If proposed, an approach to taller buildings that demonstrates a transition from higher elements in more central parts of the site transitioning to lower lying buildings closer to the boundary of the Strategic Development Area, such as Vicarage Road, will need to be set out.</u></p>	
MM27	Page 36, Paragraph 2.68, second sentence	<p>This route <u>offers the potential to provide a high quality sustainable transport link between West Watford and the High Street area which could potentially be ultimately used for a new public transport system such as a Mass Rapid Transit</u> <del>will form part of a Mass Rapid Transport system linking Watford High Street and Ascot Road to the west (on the boundary with Three Rivers District).</del></p>	ID 2112, 2181 Hertfordshire County Council
MM28	Page 37, paragraph 2.72, first sentence	<p>Informed by the Taller Buildings Study', the base future building height in the area is <del>six</del> <b>five</b> storeys.</p>	ID 1899 La Salle Investment Management
MM29	Page 38, Strategic Policy CDA2.3, first paragraph	<p>The Colne Valley Strategic Development Area is designated to facilitate transformative and co-ordinated change around the River Colne, <del>and</del> Lower High Street <u>and the area</u></p>	Officer change

		<u>of Watford General Hospital area</u> , producing a sustainable and mixed-use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses.	
MM30	Page 38, Strategic Policy CDA2.3, after a), two new bullets	<ul style="list-style-type: none"> <li>• <u>Redevelopment of the existing Watford General Hospital will provide modern facilities that are well integrated and co-ordinated with other developments, designed to minimise impacts on nearby residential areas and are well connected to support sustainable transport options including walking, cycling and bus services;</u></li> <li>• <u>A car multi-storey car park with a capacity of approximately 1,450 car parking spaces located east of the existing Watford General Hospital car park;</u></li> </ul>	ID 1897 West Hertfordshire Hospitals NHS Trust
MM31	Page 38, Strategic Policy CDA2.3: Colne Valley Strategic Development Area, Part f)	<u>f) A site for a new primary school within Site MU21: Land at Riverwell and a site for a new form entry primary school within Site MU16: Land at Tesco, Lower High Street</u> <u>New primary school sites to meet demand generated by new development.</u>	ID 2114 Hertfordshire County Council
MM32	Page 38, Strategic Policy CDA2.3: Colne Valley Strategic Development Area, Part h)	h) The Lower High Street should be prioritised for improved public transport ( <u>including bus priority measures</u> ) and the creation of <u>an improved walking and cycling route. a shared surface route;</u>	ID 2115 Hertfordshire County Council
<b>CHAPTER 3: HOMES FOR A GROWING COMMUNITY</b>			
MM33	Page 40, paragraph 3.1, first sentence	The Spatial Strategy to <del>2036</del> <u>2037</u> seeks to deliver at least <del>14,988</del> <u>13,171</u> new homes. This figure includes the amount of housing required to meet local need as determined using the government's standard method ( <del>14,274</del> <u>12,544</u> homes) and an additional 5% allowance ( <del>714</del> <u>647</u> homes) to reduce the risk of sites identified in the plan not coming forward as anticipated. The figures that make up this housing target are set out in Figure 3.1.	ID 2002 Drax Investments Limited ID 2063, 2068 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council



			<p>ID 1947 WSP ID 2058 Home Builders Federation</p>
<p>MM34</p>	<p>Page 40, figure 3.1</p> 	<p>Revised housing figures in diagram (Commitments revised to reflect removal of completions from 2018 to 2021 and remove duplication of planning consents on sites put forward as site allocations.)</p>  	<p>ID 2002 Drax Investments Limited ID 2063, 2068 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City &amp; District Council ID 1947 WSP ID 2058 Home Builders Federation</p> <p>Officer change</p>
<p>MM35</p>	<p>Page 41, paragraph 3.3, first sentence</p>	<p>As part of the housing to be provided to <del>2036</del> 2037, a windfall allowance of <del>2,132</del> 2,031 units is included. This is based on a combination of three factors including the</p>	<p>ID 2002 Drax Investments Limited</p>

		historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall development will contribute, on average, <del>116</del> 156 new homes per year <u>over the plan period with the windfall contribution as part of the housing trajectory from 2024/25.</u>	ID 2063, 2068 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council ID 1947 WSP ID 2058 Home Builders Federation
MM36	Page 41, Strategic Policy HO3.1, first paragraph	Provision will be made for <del>14,988</del> <u>13,171</u> new homes, inclusive of a 5% buffer of <del>714</del> <u>647</u> homes, in Watford Borough for the period <del>2018</del> <u>2021</u> to <del>2036</del> <u>2037</u> .	ID 2002 Drax Investments Limited ID 2063, 2068 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council ID 1947 WSP ID 2058 Home Builders Federation
MM37	Page 43, paragraph 3.14, second sentence	The level of <u>affordable housing</u> provision required, <u>35%</u> , has been determined through a viability assessment of the Local Plan to ensure sites are deliverable.	Officer change
MM38	Page 43, paragraph 3.17, Before the first sentence	New sentence added: <u>In exceptional circumstances, a viability assessment may be acceptable to demonstrate that the affordable housing requirement is not achievable. Viability assessments submitted as part of a planning application will be made publically available.</u>	ID 1949 WSP ID 1990 The Retirement Housing Consortium ID 2067 Glyn Hopkin Holdings Ltd
MM39	Page 44, paragraph 3.20, second sentence	It identified that for a person or family to afford a home in Watford, a discount of between 26-34% would need to be applied to market <del>rent</del> <u>sales</u> , with the variation reflecting	ID 1950 WSP

		different sizes of homes, <u>and 33% to market rented properties.</u>	
MM40	Page 45, paragraph 3.22, second sentence	The allocation of the Discounted Market Rent properties that are not offered as affordable housing should be allocated <u>in a manner agreed between the operator and to people in a manner agreed with</u> the Local Authority.	ID 1998 JLL
MM41	Page 46, new paragraph after 3.27	<u>New extra care housing should be situated in close proximity to good public transport links, be a short walk to local amenities, local shops and health care facilities, have private outdoor space as well as shared private gardens, a communal lounge plus a range of staff facilities. Supplementary facilities including a communal café, activity/health/fitness spaces will create higher quality places to live.</u>	ID 2121 Hertfordshire County Council
MM42	Page 54 Policy HO3.11, last paragraph	<del>The provision of c</del> <u>Communal outdoor amenity space, including roof and terrace areas should</u> <del>space, will</del> <u>be provided for all flatted schemes, which are more than 400 metres walking distance (260 metres straight line) from a public green space of 0.1 hectares in size. The space should be for the exclusive use of residents of the development and should be a minimum area of 50 square meters. supported.</u> <del>Communal outdoor</del> <u>The amenity space should</u> <del>will need</del> <u>to be designed to be usable by all residents.</u>	ID 1863  Officer change to ensure provision of shared private amenity areas in schemes which are further away from existing public green spaces.
<b>CHAPTER 4: A STRONG ECONOMY</b>			
MM43	Page 56, paragraph 4.4, third sentence	To contribute towards this requirement, Watford has planned for <del>111,175</del> <u>113,789</u> sqm of office floorspace and <del>40,759</del> <u>44,159</u> sqm of industrial floorspace.	Floorspace modification: Officer change in discussion with Canada Life (MU07) and Coal Pensions Properties (EM05)

MM44	Page 57, Strategic Policy EM4.1, second paragraph	Over the plan period, the Council will seek to plan for the creation of <del>11,500</del> <u>10,700</u> new jobs.		Floorspace modification: Officer change following on from modifications made to site allocation MU05 and EM05.
MM45	Page 58, Table 4.1, heading and floorspace figures	<b>Industrial potential supply 2018-21-2036</b> <del>37</del>	<b>Floorspace (sqm)</b>	Plan period modification: ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council ID 1947 WSP ID 2058 Home Builders Federation  Floorspace modification: Officer change following on from modifications made to site allocation MU05 and EM05.
		Site allocations	<del>17,035</del> <u>20,435</u>	
		Sites with planning permission	23,724	
		Total	<del>40,759</del> <u>44,159</u>	
MM46	Page 58, Table 4.2, heading and floorspace figures	<b>Office potential supply 2018-21-2036</b> <del>37</del>	<b>Floorspace (sqm)</b>	Plan period modification: ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council ID 1947 WSP
		Site allocations	<del>38,672</del> <u>41,286</u>	
		Sites with planning permission	72,503	
		Total	<del>111,175</del> <u>113,789</u>	

			ID 2058 Home Builders Federation  Floorspace modification: Office change to reflect planning consent
MM47	Page 60, Policy EM4.3: Office Development, fourth paragraph	Proposals for development of new office uses outside the Clarendon Road Primary Office Location must support the Office Development Hierarchy. Where these are <del>250</del> <u>2,500</u> sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no significant adverse impact on the office function of Clarendon Road, and that good accessibility by walking, cycling and public transport is provided or available.	ID 1951 – WSP
<b>CHAPTER 5: A VIBRANT TOWN</b>			
MM48	Page 66, Para 5.9, first sentence	There are a number of out-of-centre retail <u>and leisure</u> parks in Watford.	ID 2030 and 2029 and 2031 Legal & General Investment Management
MM49	Page 66, Policy VT5.1, heading Outside the Town Centre, fifth paragraph	Where appropriate, a limited amount of retail development will be supported on strategic sites to provide for the new community, subject to: compliance with the Sequential Test; proposals being of an appropriate scale; provision of good accessibility by walking, cycling or public transport; and there being no significant adverse impact on the vitality and viability of the Town Centre or Local	Clarity, conformity with NPPF. ID 1952 - WSP

		Centres in the vicinity. <u>Any additional town centre floorspace of over 2,500 sqm should be assessed against the impact tests.</u>	
MM50	Page 71, Policy VT5.3: Local Centres, bullet f)	f) Are <del>located more than 400m walking distance from the entrance of an existing or permitted primary school.</del> <u>not likely to have an adverse health effect on people living close by. Where proposals for new hot food takeaway shops will likely to have significant health effects, especially among adolescents of the nearby existing and newly proposed schools, colleges, and youth centres, a Rapid Health Impact Assessment (HIA) will be required.</u>	ID 2019 McDonald's Restaurants Ltd  ID 2220 Kentucky Fried Chicken (Great Britain) Limited  (wording suggested by HCC Public Health)
<b>CHAPTER 6: AN ATTRACTIVE TOWN</b>			
MM51	Page 76 Paragraph 6.7 after last sentence	<u>Further more detailed guidance on creating safer places is provided through the Secured by Design set of guidance documents. The use of this guidance and direct liaison with crime prevention teams is supported.</u>	ID 2050 Hertfordshire Constabulary
MM52	Page 77, Policy QD6.2: Design Principles, Movement and connectivity, fifth paragraph	Streets are to be designed so they are efficient, convenient, legible, <del>and</del> permeable, <del>to support all users</del> and prioritise non-vehicular travel. <u>They should encourage people to be more active, support healthy lifestyles and be designed to be used by everyone.</u> Routes need to be designed for their anticipated level of use and be clearly defined, to make it easy for different users to interpret using appropriate wayfinding measures, including sightlines.	ID 1807 – Sport England
MM53	Page 77, Policy QD6.2: Design Principles, new paragraph	<u>Sustainable design New developments will need to be designed to minimise their impact on the environment and embrace sustainability principles. This should include measures to</u>	ID 2133 - HCC

		<u>reduce the use of resources including energy, water and waste and incorporate soft measures to improve the environment such as green roofs, green walls and multifunctional green spaces.</u>	
MM54	Page 80 Para 6.19	<p><b>Paragraph 6.19</b></p> <p>To assist with delivering active frontages and improving social interaction within larger residential developments, buildings should be designed to have multiple cores that access directly onto the street at the front of the building. Reducing the number of units served by a core area will provide better opportunities for residents to meet and get to know their neighbours and to develop stronger local communities. Shared internal areas should be light and airy and provide sufficient circulation space for residents to pass each other easily and for informal social interaction; <u>this is particularly important where the number of people using a single core is high (this is a factor of both the number of units and their size. Where it is not possible to deliver an internal layout where the units per floor sharing a core is eight or less; measures to ensure that the circulation space and living environment is of high quality should be used; these include increasing the corridor widths so that it is easy to pass and providing good levels of natural daylight and ventilation to these spaces.</u></p>	Officer change
MM55	Page 81 QD6.4 Building Design amended bullet e)	e)All ground floor units <u>facing the street or public realm should <del>to</del> be designed so that the primary access for each individual unit is directly onto <u>that street or public realm; deviation from this (by exception) will need to demonstrate that individual ground floor access is not feasible due to the constraints of the site.</u></u>	<b>ID 1941 Berkeley Homes</b>
MM56	Page 81 QD6.4 Building Design amended bullet h)	“h) internal cores are to serve no more than eight units <u>per floor; deviation from this (by exception) will need to be</u>	Officer change

		<u>justified and mitigated through design measures that demonstrate internal living standards will not be adversely affected.</u>	
MM57	Page 81, Policy QD6.4: Building Design, new bullet after Part h)	<u>i) Buildings should be designed to promote the use of stairs and provide secure cycle parking in easily accessible locations</u>	ID 1809 Sport England
<b>CHAPTER 7: THE HISTORIC ENVIRONMENT</b>			
MM58	Page 91, Policy HE7.2 Designated Heritage Assets, first paragraph.	<del>Proposals will be supported where they will not result in the loss of, or substantial harm to an asset unless this will provide substantial public benefits that outweigh the harm or loss caused; where any harm caused to the significance of an asset is deemed to be less than substantial the public benefits from the scheme should convincingly outweigh the harm caused.</del> <u>There is a presumption in favour of the preservation and enhancement of designated heritage assets and therefore substantial harm to or loss of an asset will be strongly resisted. Where appropriate proposals will be supported which enhance or better reveal the significance of designated heritage assets.</u>	ID 2042 Historic England
MM59	Page 92, Paragraph 7.16, second sentence	The <del>NPPF</del> <u>National Planning Policy Framework</u> identifies these as non-designated assets <u>which includes buildings, monuments, sites, places, areas or landscapes that have a degree of significance and merits consideration in planning decisions.</u>	ID 2139 HCC
MM60	Page 92, Paragraph 7.20, add to end of paragraph.	<u>Arrangements should be made to store a copy of any reports and other materials which arise from archaeological investigations in relation to development proposals to be stored in a location agreed with local planning authority which is publicly available.</u>	ID 2137 HCC
<b>CHAPTER 8: A CLIMATE EMERGENCY</b>			
MM61	Page 98, Policy CC8.3, Water Efficiency, second paragraph	In new, non-residential developments <u>that are unable to achieve BREEAM 'excellent' standard,</u> water conservation	ID 2079 – The Environment Agency



		measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM 'very good' for the appropriate building typology.	ID 2024 - Lidl Great Britain Limited Objection
MM62	Page 100, Policy CC8.4, first paragraph	Development will be supported where it does not contribute towards a worsening of existing air quality and, where possible, seeks to improve existing air quality. Appropriate mitigation measures will be required to address any potential impact on air quality, <u>along with encouraging the provision of electric vehicle charging points where parking is provided.</u>	ID 2144 and 2146 Hertfordshire County Council
MM63	Page 101, Policy CC8.5, first paragraph, second sentence	In accordance with the 'Agent of Change' principle, <u>new development must ensure it does not cause existing uses in the vicinity to curtail their activities.</u> New development will be required to assess its potential impacts on neighbouring land uses, including the cumulative effects, and set out mitigation measures where appropriate.	ID 2074 – Aggregate Industries  ID 2016 – Mineral Products Association  ID 2080 – The Environment Agency
MM64	Page 101, Policy CC8.5, Noise pollution and vibration, first sentence	Where development is <u>noise sensitive</u> , noise-generating, or the surrounding area is sensitive to noise and vibration, applicants must undertake a noise assessment to identify potential issues and the required attenuation measures to achieve acceptable noise levels, as defined in national guidance.	ID 2074 – Aggregate Industries  ID 2016 – Mineral Products Association  ID 2080 – The Environment Agency
MM65	Page 101, Policy CC8.5, Contamination, including contamination of groundwater, after second paragraph	<u>Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the</u>	ID 2074 – Aggregate Industries  ID 2016 – Mineral Products Association

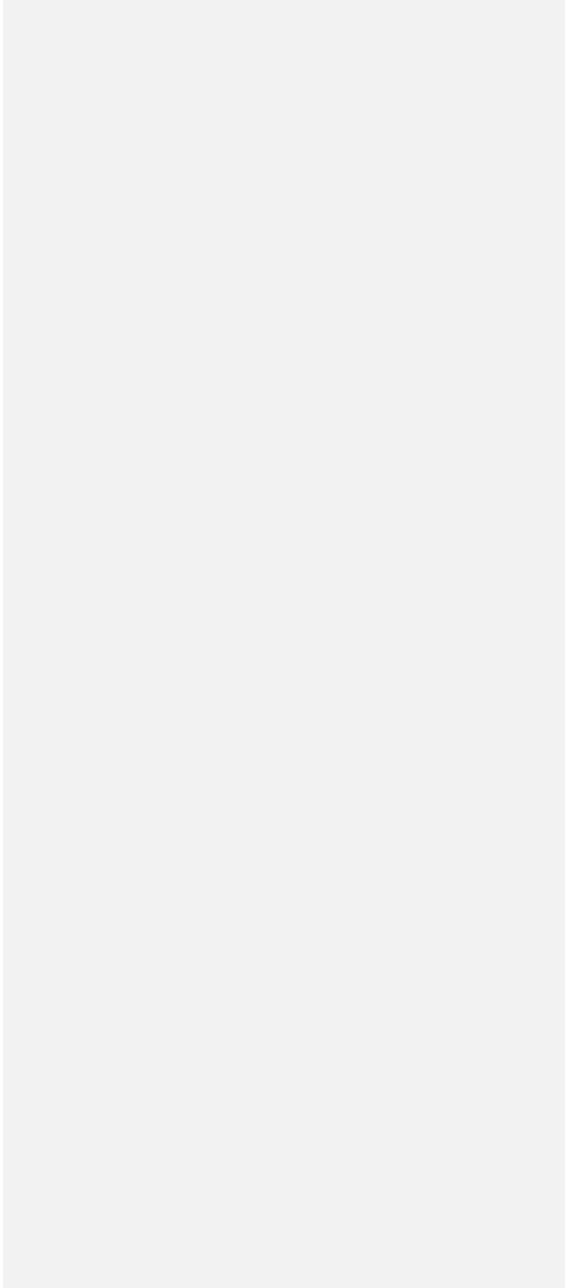
		<p><u>scheme. Within Source Protection Zone 1 (SPZ1), infiltration via deep borehole soakaways will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated. Certain discharges into the ground may require an Environmental Permit.</u></p>	ID 2080 – The Environment Agency
<b>CHAPTER 9: CONSERVING AND ENHANCING THE ENVIRONMENT</b>			
MM66	Strategic Policy NE9.1, Part c) onwards	<p>e) Ensuring all <b>new</b> development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, <u>following the ‘mitigation hierarchy’ of avoidance, mitigation or compensation locally where possible;</u></p> <p><del>d) Following the ‘mitigation hierarchy’ of avoidance, mitigation or compensation as appropriate;</del></p> <p>e) <u>d)</u> Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, <u>as required under the Water Framework Directive;</u></p> <p>f) <del>e)</del> <u>Minimising Reducing</u> the risk of flooding, including surface water flood risk;</p> <p>g) <u>f)</u> Bettering access to open space across the borough where there is an identified need and delivering new green spaces as part of new development;</p> <p>h) <u>g)</u> Delivering non-traditional forms of urban greening as part of high density development, as well as traditional open space, including green roofs and walls;</p>	ID 2081 – Environment Agency

		<ul style="list-style-type: none"> <li>h) Improving the quality of Watford’s existing open spaces through development contributions;</li> <li>i) <del>Where necessary</del>, Ensuring that protected species and their habitats are a material consideration when determining planning applications; and</li> <li>j) Protecting trees and encouraging native planting on new development; and</li> <li>k) Considering the cumulative impacts of development on green and blue infrastructure. <u>Where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.</u></li> </ul>	
MM67	Page 106, Policy NE9.2, second paragraph	<p>A proposed loss or damage <del>of non-protected to</del> trees, woodland or hedgerows <del>should be avoided</del> <u>will be refused</u>. If demonstrated as being unavoidable, <u>a measurable net gain assessment will be required to provide appropriate</u> adequate replacement or compensation. Native planting should be <del>prioritised</del> <u>used in any proposed new open spaces or habitat creation. Non-native species planting should be kept to a minimum and should be carefully assessed to ensure no impact to native flora and fauna. Where invasive non- native species are found on site, prior to site enabling and clearing works, developers should create a long-term management plan to stop the spread, and where feasible, eradicate the species.</u></p>	<p>ID 2082 – The Environment Agency</p> <p><b>ID 2151 - HCC</b></p>
MM68	Page 108, Policy NE9.3, paragraph 1 onwards	<p>Development proposals in close proximity to watercourses must support the strategic importance of Watford’s blue infrastructure network and seek to</p>	<p>ID 2083 – The Environment Agency</p>

		<p>maximise its multifunctional environmental, social and economic benefits. <u>Where development is adjacent to a watercourse, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives.</u> Development proposals in close proximity to, or that include a watercourse must:</p> <p>c) Maintain an undeveloped and unobstructed buffer strip of eight metres from the top of the bank <del>of all watercourses</del> <u>of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Buffer zones should be natural in character, distinct from the built environment, with no light pollution greater than 2 lux, and with native species.</u> <del>Where this enables public access,</del> Proposals should be accompanied by a management plan;</p> <p>d) Conserve and enhance the biodiversity value of the watercourse and its corridor <u>by including WFD action measures within the proposal. Action measures could include but are not limited to</u> <del>through the inclusion of</del> in-channel enhancements, the creation of priority wetland habitats, <del>prioritising native planting schemes and by</del> addressing misconceptions <u>and the eradication and management of Invasive Non-Native Species;</u></p> <p>e) Enhance the role of <del>the</del> watercourse <u>corridors</u> as an accessible active travel and leisure route for pedestrians, cyclists and boaters, and increase connectivity along the length of the watercourse. This includes connectivity and</p>	ID 2151 - HCC
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		<p>access, where appropriate, to the green infrastructure network;</p> <p>f) Integrate the watercourse into the scheme as a vital part of the public realm; and</p> <p>g) Open and re-naturalise modified watercourses, including culverted and piped waterways. <u>New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A WFD assessment should be submitted as part of proposals and should include an assessment of the works to preventing future improvement, in addition to how the proposal will impact WFD status.</u></p> <p>The provision of crossings and bridges will be supported where they improve connectivity for pedestrians and cyclists, are in keeping with the setting of the area, and are designed to avoid obstructing flood flows <u>and damage to a watercourse.</u></p>	
MM69	Page 109, Paragraph 9.15, second sentence	Applicants are expected to consider how their proposals affect, or could potentially impact other sites in the vicinity and the cumulative impact on flood risk, <u>taking into account climate change.</u>	ID 2084 – Environment Agency
MM70	Page 110, Policy NE9.4, Fluvial Flooding, second paragraph onwards	Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. <u>Only water compatible and essential infrastructure are will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within Flood Zone 3b. Developers should seek to increase the extent of Flood Zone 3b</u>	1913 – Three Rivers and ID 2084 – Environment Agency and 1781 - Ms. Sarah Baxter

		<p><u>where possible and appropriate.</u> To demonstrate compliance with the Exception Test, a flood resilient design and emergency planning considerations will need to be accounted for, over the lifetime of the development including:</p> <ul style="list-style-type: none"><li>a) The development to remain safe and operational under flood events;</li><li>b) Safe evacuation and/or safely remaining in the building under flood conditions;</li><li>c) Key services must continue to be provided under flood conditions; and</li><li>d) Buildings are to be designed for quick recovery following a flood.</li></ul> <p>Any development within Flood Zones 2 and 3, and those over one hectare in Flood Zone 1, should use a Flood Risk Assessment to show how they have considered flood risk beyond the site boundaries, including cumulative impacts arising from other developments. <u>It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the SFRA) and that where possible, development will reduce flood risk overall.</u> Proposals <u>for development in the floodplain must-should</u> demonstrate that suitable flood compensation storage <u>will be provided is available</u> to avoid any net loss in floodplain. <u>Additionally, all new development within flood zones require an assessment of the impact of climate change on flood risk on site and elsewhere.</u></p>	
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		<p><u>Developers should seek to provide an undeveloped buffer zone of 8 metres between the top of the bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing).</u></p> <p>Proposals located in areas where waterways have been culverted or altered should seek to re-naturalise the river and surroundings, improve water storage and enhance riparian habitats, in line with requirements to meet Water Framework Directive objectives and the Thames River Basin Management Plan. <u>There is a presumption against the use of hard engineering, including gabions. For any development within 8 metres of a culvert, the developer must demonstrate that they have sought to de-culvert, as well as undertake a survey of the culvert to assess its exact location, condition and whether it is commensurate with the lifetime of the development or demonstrate how it will be repaired/upgraded.</u> Flood defences <u>and Main Rivers within the site boundary adjacent to development sites</u> must be maintained, repaired or replaced by the developer for the lifetime of the development. <u>For any development within 8 metres of a main river, the developer must demonstrate that access to the river and banks will still be possible for maintenance and emergency works.</u></p>	
MM71	Page 109, paragraph 9.16	The River Colne basin is designated as Groundwater Source Protection Zone 1, most sensitive with an area buffering the waterway covering much of east Watford identified as Groundwater Source Protection Zone 2 and sensitive to contamination. This means several land uses including	ID 2085 – Environment Agency

		industrial, petrol stations and waste management may not be suitable in certain areas of Watford due to the high risk of contamination to the aquifer and drinking water. Developers are expected to implement measures to 'minimise <u>avoid</u> these potential negative impacts on the ground source'. Where these are required these should be prepared in collaboration with the Environment Agency and the Lead Local Flood Authority.	
MM72	Page 110, Policy NE9.4, Groundwater, first paragraph	Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts <u>or risks to controlled waters</u> . If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), <del>deep</del> -infiltration <u>via deep borehole</u> soakaways <del>should be the last resort</del> <u>will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated</u> . Certain discharges into the ground may require an Environmental Permit.	ID 2085 – Environment Agency
MM73	Page 112, Policy NE9.5, second paragraph	Sustainable Drainage Systems should be designed and integrated into the proposal to effectively manage the existing surface water flow paths on the site, <u>protect and enhance water quality</u> , and help to mitigate other flood risks	ID 2086 – The Environment Agency
MM74	Page 112, Paragraph 9.27, after last sentence	Everyone living, working in and visiting Watford should have access to high quality open space and sports and recreation facilities. The types of open spaces provided and protected through new development should reflect a locally identified need. This can help to avoid deficiencies in different types of	ID 1810 - Sport England



		open space, and to ensure that open spaces are being effectively used. Watford's open spaces are not evenly distributed across the borough. Some communities are deficient in open space and require improved access to these recreational areas, whereas in some neighbourhoods there may be opportunities where alternative open space and ancillary uses could be considered if there is a demonstrated need. <a href="#">This should be informed by the evidence base, which includes the Playing Pitch Strategy (2020), the Green Spaces Strategy (2013), and subsequent updates.</a>	
MM75	Page 113, Policy NE9.6, first and second paragraphs	<p>Open space and ancillary facilities used for leisure and recreation will be protected, unless an up to date assessment <a href="#">of needs</a> demonstrates the space is surplus to need. For an open space or an ancillary facility to be considered surplus to requirements, the following must be demonstrated:</p> <ul style="list-style-type: none"> <li>a) An assessment <a href="#">of needs</a> has been undertaken that has clearly shown the open space, buildings or land to be surplus to requirements, having regard to the Council's most recent evidence base; and</li> <li>b) The open space is not needed for alternative open space uses; or</li> <li>c) An equivalent or better facility in terms of quality and quantity is to be provided in a more suitable location that meets the needs of the local community.</li> </ul> <p>Development proposals for alternative open space uses will be supported where an up-to-date assessment <a href="#">of needs</a> clearly shows the benefits outweigh <del>the loss</del> <a href="#">any adverse impacts on the community and the environment.</a></p>	ID 1810 - Sport England  ID 2087 –The Environment Agency

		The absence of identification of an open space on the Policies Map does not imply that development is appropriate.	
MM76	Page 114, Policy NE9.7, first paragraph	New developments proposals will be supported where they contribute to the provision, enhancement and maintenance of open space, either by means of on-site provision or through developer <del>contributions</del> obligations.	ID 1811 - Sport England
MM77	Page 114, Paragraph 9.33, after last sentence	<u>There are no Special Areas of Conservation (SAC) or Special Protection Areas (SPA) within Watford, however, there are designations in the wider area. For large-scale developments, applicants are encouraged to liaise with Natural England to determine if a Habitats Regulations Assessment may be required as part of a planning application.</u>	ID 2149 - Hertfordshire County Council
MM78	Page 115, Policy NE9.8	<del>Development proposals should apply the mitigation hierarchy to avoid or mitigate harmful effects on biodiversity. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.</del> New development should seek to achieve an overall net gain in biodiversity. This must be measured through the use of the latest <del>Natural England</del> <u>Defra Biodiversity</u> metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.  Development should apply the mitigation hierarchy to <del>avoid</del> <u>minimise</u> or mitigate harmful effects on biodiversity. Mitigation and compensation measures must offset any losses to achieve a measurable net gain for biodiversity. Where it is not possible to avoid or mitigate all impacts on site, an offsite Biodiversity Offset Agreement <u>should be submitted to demonstrate that any off-site measures</u>	ID 2088 – The Environment Agency

		<p><u>proposed seek to enhance locally and nationally important priorities.</u></p> <p><u>To ensure the long-term net gain, all development proposals should prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on- and off-site measures.</u></p> <p><u>All development proposals will be required to prepare a proportionate ecological survey and assessment report.</u></p> <p>Where <del>there is a reasonable likelihood of the presence of</del> a protected species or <del>its</del> habitat is found to be present, <del>applications must be supported by an ecological survey. If present,</del> the proposal must mitigate or compensate appropriately in accordance with the legislation that protects them. <u>Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.</u></p>	
<b>CHAPTER 10: INFRASTRUCTURE</b>			
<b>MM79</b>	Page 117, Paragraph 10.2, second bullet	<ul style="list-style-type: none"> <li>Physical infrastructure: roads, footpaths, cycleways, water provision and treatment, sewerage, <del>flood prevention</del> <u>the management of flood risk and drainage</u>, waste disposal, electricity, gas and electronic communications networks.</li> </ul>	ID 2163 Hertfordshire County Council
<b>MM80</b>	Page 118, Policy 10.1, second paragraph	Developers will be expected to <u>undergo</u> early <u>pre-application</u> engagement with the Council and infrastructure service providers to discuss their requirements and to <u>demonstrate that there is sufficient infrastructure capacity, both on and off site, to support the proposed development from commencement</u>	ID 2089 – Environment Agency
<b>MM81</b>	Page 119, Paragraph 10.14,	Watford Borough Council continues to	ID 2166 Hertfordshire County Council

		<p>support the Metropolitan Line Extension, or a comparable alternative, and <del>considers that</del> the route along the disused former Croxley Rail Line <u>is safeguarded and provides the opportunity for a walking and cycling link and a potential future route for a Mass Rapid Transit,</u><del>as well as an opportunity for a walking and cycling link.</del> As such, the route and access to it should be safeguarded to maintain the possibility of its use by these modes; details of the land to be preserved are set out within the Watford <del>Mass Rapid Transit Metropolitan Line Extension</del> Safeguarding <del>Technical</del> Report and reflected on the Policies Map.</p>	ID 2181, 2183 Hertfordshire County Council
<b>MM82</b>	Page 120, Paragraph 10.17, first sentence	<p>Future-proofed, high quality digital infrastructure is considered vital to support well-functioning <u>residential and</u> employment areas.</p>	ID 2175 Hertfordshire County Council
<b>MM83</b>	Page 121, paragraph 10.21, first sentence	<p>A substantial amount of the infrastructure required to deliver sustainable development, including (but not limited to) enabling works, public realm and open space improvements, <u>high-quality walking and cycling access</u>, and street greening, will be sought on site and it is expected that developers will directly fund these.</p>	ID 2176 Hertfordshire County Council
<b>MM84</b>	Page 120, Policy IN10.2, first paragraph	<p>Planning permission, except for householders, will be granted where it is demonstrated that there is, or will be,</p>	ID 1964 – Thames Water

		sufficient infrastructure capacity to support and meet all the requirements arising from proposed development. <u>Where necessary planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades.</u>	
MM85	Page 120, Policy IN10.2, new paragraph after third paragraph	<u>Water supply and provisions for wastewater must be taken into consideration, and development should improve and not cause harm or deterioration to the water environment. Where there is a capacity constraint, the Council will require a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.</u>	ID 2089 – Environment Agency
MM86	Page 120, Policy IN10.2, fourth paragraph	Proposals for employment uses <u>and new residential areas</u> should demonstrate that provision is made for high quality digital facilities as part of the application.	ID 2175 HCC
MM87	Page 121, Paragraph 10.21	A substantial amount of the infrastructure required to deliver sustainable development, including (but not limited to) enabling works, public realm and open space improvements, <u>high-quality walking and cycling access</u> , and street greening, will be sought on site and it is expected that developers will directly fund these.	ID 2176 HCC
MM88	Page 122, Policy IN10.3, Part d)	d) Securing off-site highway works, <u>including provision for cycling and walking</u> , where necessary;	ID 2178 - HCC
<b>CHAPTER 11: A SUSTAINABLE TRAVEL TOWN</b>			
MM89	Page 124, Paragraph 11.4, third sentence	Additional county-wide transport strategies, to which development should align, include the Intalink Bus Strategy (2019), draft Rail Strategy (2020), <u>the Speed Management Strategy (2020)</u> and forthcoming Highways Network Management Strategy	ID 2180 Hertfordshire County Council

MM90	Page 126, Policy ST11.1, Part g)	g) Supporting a Sustainable Transport Hub within the town centre that serves as a focal point for multiple modes <u>and links to the High Street Station.</u>	2191 Hertfordshire County Council
MM91	Page 126, Policy ST11.1, new bullet after Part g)	h) <u>Enhancing pedestrian and cycle facilities at key junctions with the ring road</u>  Re-label remaining sub headings	2191 Hertfordshire County Council
MM92	Page 127, Paragraph 11.13, second sentence	This will bring significant benefits to Watford, and it is expected therefore that proposed routes for this system will not be prevented by new development <u>although a route has yet to be finalised. The introduction of the Enhanced Partnership measures and priority schemes in the feasibility study, forms the first step in moving towards a network with the Mass Rapid Transit.</u>	2181 Hertfordshire County Council
MM93	Page 124, Para 11.15, last sentence	Improvements to the road network <del>through an extension of Imperial Way</del> , to provide <del>a connection with the new access from Colonial Way via Clive Way with upgrades to the necessary road junction and road extension to provide a connection with the proposed Watford Junction Sustainable Transport Hub.</del> The <u>potential</u> re-routing of vehicle access to the concrete batching plant <u>and rail aggregates depot via Imperial Way</u> , should also be facilitated.	ID 1976 Canada Life Asset Management
MM94	Page 130, paragraph 121, after last sentence, add new sentence	<u>Land should also be safeguarded to provide access to the former Metropolitan Line Extension corridor (and a potential station area).</u>	ID 2189 Hertfordshire County Council
MM95	Page 128, Policy ST11.2, Part h)	<del>Extension of Pedestrian and cycling access from Imperial Way Colonial Way (or Imperial Way as part of a comprehensive redevelopment of the area) that will <del>to</del></del> provide a connection to the station and <del>the not</del> <u>compromise potential</u> re-routing of vehicle access to the	ID 1974, 1976 Canada Life Asset Management

		concrete batching plant <del>and rail aggregates depot via Imperial Way;</del>	
MM96	Page 129 after Paragraph 11.16, Colne Valley in the key needs changing to Lower High Street	<del>Colne Valley</del> <u>Lower High Street Area</u>	ID 2192 Hertfordshire County Council
MM97	Page 129, Figure 11.3, Key, Colne Valley title	<del>Colne Valley</del> <u>Lower High Street Area</u>	ID 2192 Hertfordshire County Council
MM98	Page 132, Policy ST11.3, Watford Riverwell, first sentence	Permeability for active travel should be substantially improved, linking to bus stops, Watford General Hospital, Vicarage Road, Stripling Way, Thomas Sawyer Way and Ebury Way, <u>along with the potential upgraded former Metropolitan Line Extension corridor.</u>	ID 2192 Hertfordshire County Council
MM99	Page 130, Paragraph 11.19, first paragraph	Lower High Street should be seen as a corridor primarily for sustainable transport, preserving the current high frequency bus service, as well as <del>accommodating helping to link the potential future Mass Rapid Transit system,</del> plus being a key walking and cycling route for the site	ID 2181, 2187 Hertfordshire County Council
MM100	Page 130, Paragraph 11.21, after final sentence	<u>Land should also be safeguarded to provide access to the former Metropolitan Line Extension corridor (and a potential station area).</u>	ID 2189 Hertfordshire County Council
MM101	Page 135, Policy ST11.4, Cycle parking, second sentence	Secure <u>and convenient</u> cycle parking facilities should be designed at the outset of the scheme.	ID 2196 Hertfordshire County Council
<b>CHAPTER 12: A HEALTHY COMMUNITY</b>			
MM102	Page 144, Paragraph 12.1, second sentence	It can lift the spirits or have a negative impact on people <u>both in terms of their physical health and their mental wellbeing.</u>	ID 2200 Hertfordshire County Council
MM103	Page 144, Paragraph 12.2, new sentence after third sentence	These include; air quality, movement and access, open spaces, design, employment and education, and healthy food choices. <u>The National Health Service published 'Putting Health into Place' to act as a signpost for developers and sets out 10 principles, along with guidance on building health into place shaping and development.</u>	ID 2201 Hertfordshire County Council

MM104	Page 146, Policy HC12.1, third paragraph, fifth sentence	<del>Major</del> Developments are expected to promote active design by adhering to the 10 Principles of Active Design set out by Sport England.	ID 1815 Sport England
MM105	Page 147, Paragraphs 12.4, 12.5, 12.6	<p><del>12.4 A Health Impact Assessment seeks to inform and influence decision making, ensuring that health impacts, and the distribution of those impacts, are considered as part of the planning policy process. They provide a mechanism to understand more broadly how a wider range of economic, environmental and social factors can combine to affect a development.</del></p> <p><u>The Watford Local Plan seeks to ensure that positive opportunities from development are optimised and that any unintended consequences do not have a disproportionate impact upon the population, especially those more at risk from health inequalities. A Health Impact Assessment (HIA) is an essential assessment for any development proposal to demonstrate that it will not have negative implications for the physical health and mental wellbeing of both existing communities in the vicinity, as well as the future residents of the new development. Health Impact Assessments are a tool through which development can:</u></p> <ul style="list-style-type: none"> <li><u>• Understand the local community health needs and demonstrate how it can support these;</u></li> <li><u>• Demonstrate how it has considered health inequalities;</u></li> <li><u>• Meet the requirements of the Environmental Impact Assessment (EIA) Regulations (2017) for human health;</u></li> <li><u>• Meets the policy requirements of the Watford Local Plan that major development proposals undertake an HIA;</u></li> <li><u>• Demonstrate the opportunities of a proposal and how a development has been positively planned</u></li> </ul>	ID 2204 Hertfordshire County Council



		<p>12.5 The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:</p> <ul style="list-style-type: none"><li>▲ Rapid Assessment for simpler proposals;</li><li>▲ In depth Health Impact Assessment for more complicated or larger proposals.</li></ul> <p>12.6 Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In depth Health Impact Assessments will be supported on large scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment, as a minimum, to support their planning application.</p> <p><u>In November 2019, Hertfordshire County Council adopted a Health Impact Assessment Position Statement. This sets out when a Health Impact Assessment should be undertaken and frameworks to use for each stage of the Health Impact Assessment process. The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out</u></p>	
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		<p><del>guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units.</del></p> <p><u>The Health Impact Assessment Position Statement sets out a threshold for different types of development, including a threshold for the development of 100 residential units or more to be subject to a Health Impact Assessment. This can be applied flexibly depending on the nature of a development proposal.</u> Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:</p> <ul style="list-style-type: none"> <li>• Rapid Assessment for simpler proposals;</li> <li>• In-depth (comprehensive) assessment for more complicated or larger proposals</li> </ul> <p>Large development proposals can benefit from undertaking a Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth, or comprehensive Health Impact Assessments will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment to support their planning application.</p>	
<b>CHAPTER 13: SITE ALLOCATIONS AND NEW DEVELOPMENT</b>			
MM106	Page 151, Paragraph 13.4	The process for calculating the indicative yields of the site has been set out in the <del>HELAA</del> <u>Housing and Economic Land</u>	ID: 1995 – Telereal Trillium

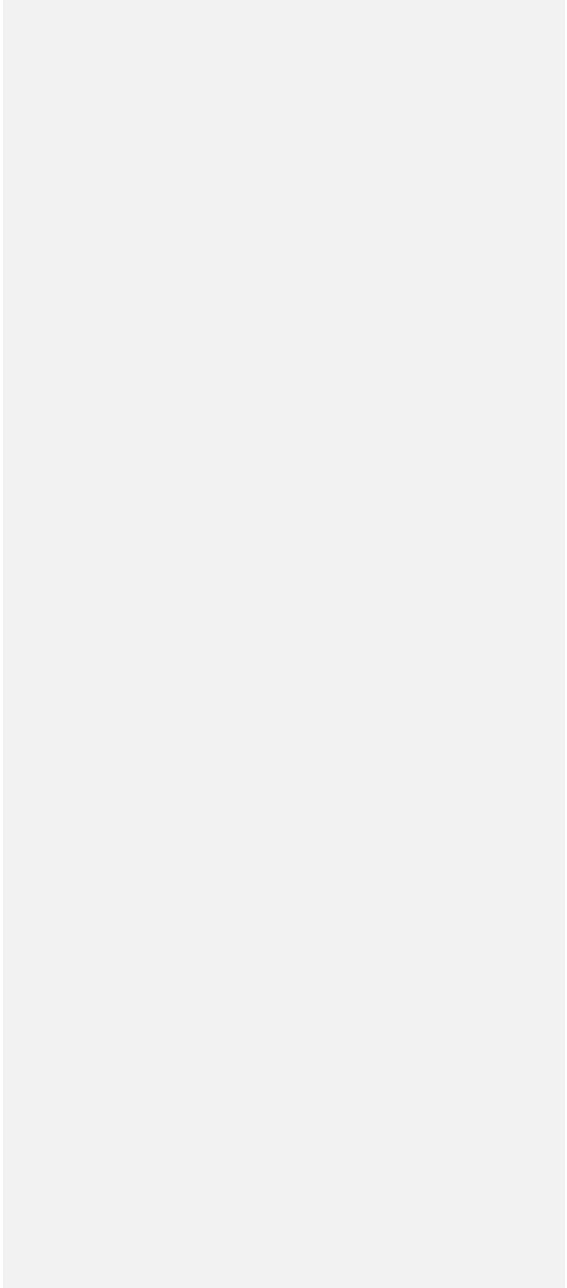
		<a href="#">Availability Assessment</a> , as has the wider process for site selection. <a href="#">It is important to emphasise that the indicative yields set out are purely baseline scenarios used to estimate the number of units to be provided within the plan period, based on site size and the sustainability of the surrounding area. Ultimately the scale of development should be guided by design quality, having regard to the full suite of policies in the Plan including Policies HO3.2: Housing Mix, Density and Optimising Use of Land and QD6.5: Building Height.</a>	2000 – JLL 2001 – Brasier Freeth 2005 – Asda 2035 – IDA Plymouth Holdings 2040 – IDA London Holdings Ltd. 2068 – Glyn Hopkin Holdings Ltd.
MM107	Page 152, Table 13.1: Housing sites HS01 Land and garages at Lych Gate	Development proposals should: <ul style="list-style-type: none"> <li>• Retain access to the garages not allocated in the Plan;</li> <li>• <a href="#">Have regard to the Waterdale Recycling Centre and Waste Transfer, which is located approximately 850m from this site. Its operations should be taken into account;</a></li> <li>• Take account of the potential risk of contamination on site; and</li> </ul>	ID 2207 – Hertfordshire County Council
MM108	Page 154, Table 13.1: housing sites HS06 Land at Russell Lane	<del>Incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy;</del> <a href="#">A proportionate contribution for compensatory improvements to the environmental quality and accessibility of remaining parts of Watford's Green Belt which include areas of existing open space and green infrastructure via a Section 106 agreement;</a>	ID 2095 North Western Avenue Watford Limited
MM109	Page 163, Table 13.1: Housing sites HS24 Land and garages between 41 and 61 Brightwell Road	<b>Indicative yield = 4 <u>5</u> units</b>	ID 1917 – Three Rivers District Council
MM110	Page 168, Table 13.1: Housing sites HS33 Land and garages at Kingsfield Court	<b>Indicative yield = 4 <u>5</u> units</b>	ID 1917 – Three Rivers District Council

MM111	Page 171, Table 13.2: Mixed use sites MU05 Land and buildings at 94-98 St Albans Road	<p>This site is considered suitable for mixed use development, including residential uses. A <a href="#">3 form entry</a> primary school is also required on site.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Support the wider objectives of the Watford Gateway Strategic Development Area;</li> <li>• Ensure that retail re-provision on site will not exceed the existing retail floorspace;</li> <li>• <a href="#">Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</a></li> <li>• Seek to work collaboratively with the landowner of site MU06, which is located adjacent to the east of the site, to maximise the benefits of development;</li> <li>• Avoid significant harm to the Nascot Conservation Area, located directly to the west of the site;</li> <li>• Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li> <li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</li> <li>• Facilitate appropriately and proportionately towards the timely provision of required infrastructure identified in Watford's Infrastructure Delivery Plan, including</li> </ul>	<p>ID 2044 – Highways England</p> <p>ID 1942 Berkeley Homes</p> <p>ID 2103 Hertfordshire County Council</p>
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		<p>measures to improve access to the station for cyclist, pedestrians and vulnerable users; and</p> <ul style="list-style-type: none"> <li>• Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.</li> </ul> <p>Indicative yield = 1,214 units                  295sqm of office floorspace  <del>4,960 2,050</del> sqm of commercial <del>and educational</del> floorspace  <u>2,910sqm of educational floorspace</u></p>	
MM112	Page 172, Table 13.2: Mixed use sites MU06 Land at Watford Junction	<p>This site is considered suitable for mixed use development, including residential, employment and commercial uses. <del>A replacement childcare facility and a new 3 form entry primary school is required on site.</del></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Support the wider objectives of the Watford Gateway Strategic Development Area, including the necessary improvements to the station and it's <u>operation functionality</u>;</li> <li>• Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including measures to improve bus priority around the station;</li> <li>• <u>A replacement childcare facility;</u></li> <li>• <u>A new 3 form entry primary school;</u></li> <li>• Seek to work collaboratively with the landowners of sites MU05 <u>and</u> MU07 located adjacent to the site, <u>MU24 located north east of the site and the operator of the</u></li> </ul>	<p>ID 2044 – Highways England</p> <p>ID 2017, 2076, 2077, 2078 – Aggregate Industries</p> <p>ID 2018 Mineral Products Association</p> <p>ID 1948 – Berkeley Homes</p> <p>ID 1974, 1976, 1977 Canada Life Asset Management</p> <p>ID 2103 Hertfordshire County Council</p>

		<p>concrete batching plant and rail aggregates depot <del>which are</del> located <u>almost entirely within adjacent to</u> the site, to maximise the benefits of development.</p> <ul style="list-style-type: none"><li>• <u>Development will not compromise the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;</u></li><li>• <u>Development will not compromise Clive Way as a vehicle and safe, high quality active travel route to the Watford Junction sustainable travel hub;</u></li><li>• Support the delivery of a new pedestrian and cycle bridge and the protection of a second crossing route from Penn Road across the railway line <u>in the latter part of the plan period when comprehensive mixed-use redevelopment takes place to facilitate the delivery of a multi-storey car park and Watford Junction Sustainable Transport Hub;</u></li><li>• <del>Demonstrate that safe access has been provided to the site;</del></li><li>• <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></li><li>• <u>Have regard to the safeguarded rail aggregates depot and concrete batching plant located largely within the north east boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be</u></li></ul>	
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		<p><u>taken into account in the consideration of any applications;</u></p> <ul style="list-style-type: none"><li>• Ensure <del>the layout of</del> the scheme has been <u>planned, laid out and</u> designed to minimise <del>any</del> potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot <u>and mitigation provided in line with the 'agent of change' principle; and</u> <del>This may include locating non-residential floorspace in the lower storeys;</del></li><li>• <u>Development should not compromise the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;</u></li><li>• Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site;</li><li>• Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</li><li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</li><li>• Take account of the potential risk of contamination on site;</li><li>• Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and</li></ul>	
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		<ul style="list-style-type: none"> <li>• <u>For residential development</u>, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, <del>rail aggregates depot and associated</del> concrete batching plant and <u>rail aggregates depot</u> located <del>in and</del> adjacent to the site. Early engagement with the site operator will be required to ensure that <del>to ensure that</del> development does not prejudice the existing or future use of the safeguarded site and associated <u>operations due to the introduction of sensitive noise receptors</u>.</li> </ul>	
MM113	Page 172, Table 13.2: Mixed-use sites MU06 Land at Watford Junction, site allocation map	Site extended to include land to the east and the area safeguarded to protect the concrete batching plant and rail aggregates depot, rail sidings and access road have been added. (see proposed modification M150)	ID 1984 Solum Regeneration
MM114	Page 173, Table 13.2: Mixed-use sites MU07 Land at Astral House	<p>Timescale: 1-5 years <u>(industrial development)</u> 6-15years <u>(long-term transitional mixed-use development)</u></p> <p>This site is considered suitable for <u>employment-led</u> mixed-use development, <del>including residential and employment uses.</del></p> <ul style="list-style-type: none"> <li>• Support the wider objectives of the Watford Gateway Strategic Development Area;</li> <li>• Result in no net loss of employment floorspace on site <u>unless the office use is replaced with industrial uses;</u></li> <li>• Seek to work collaboratively with the landowners of sites MU06, <del>and MU24 EM05</del> <u>and the operator of the concrete batching plant and rail aggregates depot</u>, <del>which are</del> located adjacent <del>to the east of to</del> the site, to maximise the benefits of development;</li> </ul>	<p>ID 2017, 2076, 2077, 2078 – Aggregate Industries</p> <p>ID 2044 – Highways England</p> <p>ID 2018 Mineral Products Association</p> <p>ID 1974, 1976, 1977 Canada Life Asset Management</p> <p>ID 1986 Solum Regeneration</p>



		<ul style="list-style-type: none"><li>• <u>Development will not compromise the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;</u></li><li>• <del>Demonstrate that high quality, safe pedestrian and cyclist access to the site has been provided;</del></li><li>• <u>Development will not compromise Clive Way as a vehicle and safe, high quality active travel route to the Watford Junction Sustainable Transport Hub;</u></li><li>• Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land required for <u>a the pedestrian and cycle bridge in the latter part of the plan period when comprehensive mixed-use redevelopment takes place to facilitate the delivery of a multi-storey car park and Watford Junction Sustainable Transport Hub;</u></li><li>• Take account of the potential risk of contamination on site;</li><li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required <del>if new residential dwellings come forward; due to the scale of the new dwellings to be provided; and</del></li><li>• <u>Have regard to the safeguarded concrete batching plant and rail aggregates depot adjacent to the western boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the</u></li></ul>	
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		<p><u>adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</u></p> <ul style="list-style-type: none"> <li>• <u>Ensure the scheme has been planned, laid out and designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the 'agent of change' principle; and</u></li> <li>• <u>In the case of residential development</u>, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, <u>concrete batching plant and rail aggregates depot</u> <del>and associated concrete batching plant</del> located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations <u>due to the introduction of sensitive noise receptors.</u></li> </ul> <p>Indicative yield = <u>6,600sqm of industrial floorspace</u> <del>131 residential units</del></p>	
MM115	Page 181, Table 13.2: Mixed-use sites MU16 Land at Tesco	<p>The site is considered suitable for mixed use development, including residential, E and F class uses and a <u>3 form entry</u> primary school.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Support the wider objectives of the Colne Valley Strategic Development Area, including the linear park;</li> <li>• Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as</li> </ul>	<p>ID 2044 Highways England</p> <p>ID 2103, 2211 Hertfordshire County Council</p>

		<p>part of the linear park proposal. Re-naturalisation of the culverted River Colne will also be supported;</p> <ul style="list-style-type: none"><li>• <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></li><li>• Seek to engage with landowners of site HS21, located adjacent to the west, and HS23, located adjacent to the south, to maximise the benefits of development;</li><li>• Provide no additional retail floorspace above the existing on site provision;</li><li>• Enhance the strategic view from the railway line to the town centre. Proposals should be supported with images that demonstrate how a proposal will contribute towards the Watford skyline;</li><li>• Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;</li><li>• Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site, including the locally listed coal duty marker on site. If it is demonstrated to be unfeasible to retain the listed monument on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the monument. A Heritage Impact Assessment may be required;</li><li>• Adequately address the level changes on site;</li><li>• Have regard to the high pressure pipeline that traverses the site;</li></ul>	
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		<ul style="list-style-type: none"> <li>• Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> <li>• Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;</li> <li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided;</li> <li>• Take account of the potential risk of contamination on site;</li> <li>• Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including a revised junction layout, crossing improvements and provision of a cycle path along Lower High Street; and</li> <li>• Retain significant trees on site wherever possible, including those with a Tree Protection Order.</li> </ul> <p><b>Indicative yield = 1,338 units</b></p>	
MM116	Page 183, Table 13.2: Mixed-use sites MU18, Land at Colne Valley Retail Park,	<p>After fifth bullet, add new bullet</p> <p><a href="#">Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</a></p> <p>After eighth bullet, add new bullet</p>	<p>ID 2044 Highways England</p> <p>ID 2219 National Grid</p>

		<a href="#">Have regard to the overhead electricity transmission lines that traverse the site;</a>	
MM117	Page 185, Site allocation MU21, Site map	Amended to include Watford General hospital to the north of the existing allocation (see proposed modification M166)	ID 1897 West Hertfordshire Hospitals NHS Trust
MM118	Page 185, Site allocation MU21, title	Site: MU21 Land at Riverwell <a href="#">and Watford General Hospital</a>	ID 1897 West Hertfordshire Hospitals NHS Trust
MM119	Page 185, Site allocation MU21, site area	Size (ha): <del>12.0</del> <a href="#">18.1</a> Location: CDA Timescale: 1-15 years Indicative yield = 1,383 units	ID 1897 West Hertfordshire Hospitals NHS Trust
MM120	Page 185, Site allocation MU21, Development requirements and considerations	<p>The site is considered suitable for mixed-use development, including residential <a href="#">uses</a>, commercial uses, <del>and</del> a primary school, <a href="#">hospital and associated car park</a>.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Support the wider objectives of the Colne Valley Strategic Development Area;</li> <li>• <a href="#">Complete a review of transport impact and safety as part of a full Transport Assessment;</a></li> <li>• <a href="#">A clearly legible, continuous pedestrian route, suitable for all users including those with mobility issues, should be provided from Vicarage Road to Tom Sawyer Way along the west side of the existing hospital;</a></li> <li>• <a href="#">Cycle infrastructure to be provided along Tom Sawyer Way and Willow Lane;</a></li> </ul>	ID 1897 West Hertfordshire Hospitals NHS Trust

		<ul style="list-style-type: none"><li>• <u>Pedestrian and cycle connections to the former Metropolitan Line Extension route adjacent to the south boundary of the site should be provided;</u></li><li>• Enhance the public realm through the provision of a new public square;</li><li>• <u>Be designed to minimise and mitigate impact on the heritage of the former Watford Union Workhouse, a grade II listed building.</u></li><li>• <u>Opportunities should be sought to improve the setting of the heritage asset. A Heritage Impact Assessment will be required;</u></li><li>• <u>For any tall buildings proposed, these should be designed to enable a transition of building height to the residential area north of Vicarage Road;</u></li><li>• <u>Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan;</u></li><li>• Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li><li>• Take account of the potential risk of contamination on site; and</li><li>• Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided, <u>including the sewerage pipe traversing the site near the existing hospital.</u></li></ul>	
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MM121	Page 187, Table 3.2: Mixed Use Site Allocations, MU23, Land at Asda, Dome Roundabout	New bullet after second bullet <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u>	
MM122	Page 188, Table 13.3, Employment Site Allocations, EM01 Cassiobury House 11-19 Station Road	<b>Indicative yield = <del>2,530</del> 5,153sqm of office and commercial floorspace</b> <b>6,165sqm of hotel floorspace</b>	Officer change to reflect planning consent
MM123	Page 190, Table 13.3: Employment sites Site allocation <del>EM05</del> MU24 Land at Colonial Way/Clive Way, renumbered and relocated to Table 13.2	Timescale: <u>1-5 years (short-term industrial redevelopment)</u> <u>6-15 years (long-term transitional mixed-use development)</u> This site is considered suitable for industrial uses. Development proposals should: <ul style="list-style-type: none"> <li>• Support the wider objectives of the Watford Gateway Strategic Development Area;</li> <li>• Seek to work collaboratively with the landowners of sites <u>MU06 and MU07 and the operator of the concrete batching plant and aggregates facility</u> <del>is</del> located <del>to the</del> west of the site <u>to maximise the benefits of development;</u></li> <li>• <u>Have regard to the safeguarded concrete batching plant and rail aggregates depot located west of the boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</u></li> <li>• <u>Development should not compromise the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way. Until that is provided, appropriate</u></li> </ul>	ID 2017, 2077, 2078 – Aggregate Industries UK Limited  ID 1974, 1976, 1977 Canada Life Asset Management  ID 1928 Gerald Eve LLP  ID 1986 Solum Regeneration

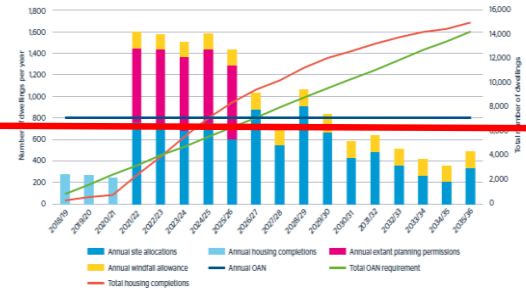
		<p><u>vehicle access will be required to be maintained at all times from Orphanage Road;</u></p> <ul style="list-style-type: none"> <li>• <u>New development will not compromise Clive Way as a vehicle and safe, high quality active travel route to the Watford Junction Sustainable Transport Hub;</u></li> <li>• <u>In the case of residential development, p</u>Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the ‘agent of change’ principle;</li> <li>• Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required;</li> <li>• Take account of the potential risk of contamination on site.</li> <li>• <u>In the case of residential development, B</u>be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, <u>concrete batching plant and</u> rail aggregates depot <del>and associated concrete batching plant</del> located <u>west of in and adjacent to</u> the site. Early engagement with the site operator will be required to ensure that to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operation <u>due to the introduction of noise receptors;</u><del>and</del></li> </ul> <p>Indicative yield = <u>8,000</u> <del>9,200</del> sqm of industrial floorspace</p>	
MM124	Page 191, Table 13.4: Education facilities, Site: ED01 Former Meriden School Site, first bullet.	Development proposals should:	ID 2055 Hertfordshire County Council



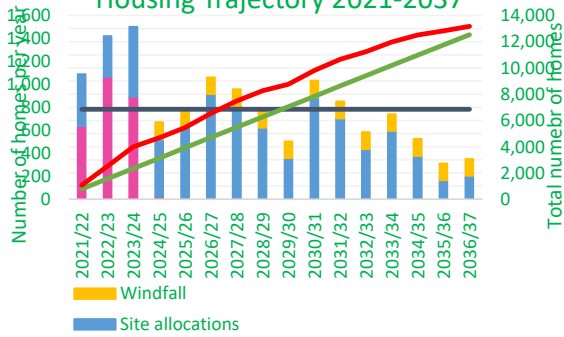
		<ul style="list-style-type: none"> <li>Provide appropriate mitigation for the lapsed <a href="#">detached</a> playing field <a href="#">for Park Gate Junior School</a> in line with the Playing Pitch Strategy (2020);</li> </ul>	
MM125	Page 191, Table 13.4: Education facilities11, Site: ED01 Former Meriden School Site	Site area <del>1.74</del> <u>1.56</u>	ID 2055 Hertfordshire County Council
MM126	Page 191, Table 13.4: Education facilities11, Site: ED01 Former Meriden School Site, site map	Revised site allocation map (see proposed modification M154)	ID 2055 Hertfordshire County Council
<b>Appendix A: Draft Monitoring Framework</b>			
MM127	Page 193, Chapter 1 row	<del>13,000</del> <u>11,500</u> jobs provided <del>2018 2021</del> - <del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MM128	Page 193, Chapter 3 row	<del>14,274</del> <u>13,171</u> dwellings <del>2018 2021</del> - <del>2036</del> <u>2037, equivalent to with 793</u> <u>784</u> per year.	ID 2002 Drax Investments Limited ID 2063, 2068 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City & District Council ID 1947 WSP ID 2058 Home Builders Federation
<b>Appendix B: Housing Trajectory</b>			

<p>MM129</p>	<p>Page 198, Housing Trajectory table 2018-2036</p>	<p>Revised Housing Trajectory table added</p> <p>Appendix B: Housing Trajectory</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Commitments (completions and extant permissions)</th> <th>Housing Completions from allocations</th> <th>Windfall allowance</th> <th>Annual housing completions</th> <th>Cumulative housing completions</th> </tr> </thead> <tbody> <tr><td>2018/19</td><td>268</td><td>0</td><td>0</td><td>268</td><td>268</td></tr> <tr><td>2019/20</td><td>262</td><td>0</td><td>0</td><td>262</td><td>530</td></tr> <tr><td>2020/21</td><td>235</td><td>0</td><td>0</td><td>235</td><td>765</td></tr> <tr><td>2021/22</td><td>676</td><td>771</td><td>139</td><td>1586</td><td>2,351</td></tr> <tr><td>2022/23</td><td>676</td><td>759</td><td>139</td><td>1,574</td><td>3,925</td></tr> <tr><td>2023/24</td><td>676</td><td>684</td><td>139</td><td>1,499</td><td>5,424</td></tr> <tr><td>2024/25</td><td>676</td><td>757</td><td>139</td><td>1,572</td><td>6,996</td></tr> <tr><td>2025/26</td><td>676</td><td>681</td><td>139</td><td>1,426</td><td>8,422</td></tr> <tr><td>2026/27</td><td>0</td><td>888</td><td>140</td><td>1,028</td><td>9,450</td></tr> <tr><td>2027/28</td><td>0</td><td>553</td><td>140</td><td>693</td><td>10,143</td></tr> <tr><td>2028/29</td><td>0</td><td>996</td><td>140</td><td>1,056</td><td>11,199</td></tr> <tr><td>2029/30</td><td>0</td><td>687</td><td>140</td><td>827</td><td>12,026</td></tr> <tr><td>2030/31</td><td>0</td><td>444</td><td>140</td><td>584</td><td>12,610</td></tr> <tr><td>2031/32</td><td>0</td><td>493</td><td>140</td><td>633</td><td>13,243</td></tr> <tr><td>2032/33</td><td>0</td><td>365</td><td>140</td><td>505</td><td>13,748</td></tr> <tr><td>2033/34</td><td>0</td><td>275</td><td>140</td><td>415</td><td>14,163</td></tr> <tr><td>2034/35</td><td>0</td><td>232</td><td>140</td><td>372</td><td>14,535</td></tr> <tr><td>2035/36</td><td>0</td><td>340</td><td>140</td><td>480</td><td>14,988</td></tr> <tr><td><b>Total</b></td><td><b>4,145</b></td><td><b>8,245</b></td><td><b>2,095</b></td><td><b>14,988</b></td><td><b>14,988</b></td></tr> </tbody> </table>	Year	Commitments (completions and extant permissions)	Housing Completions from allocations	Windfall allowance	Annual housing completions	Cumulative housing completions	2018/19	268	0	0	268	268	2019/20	262	0	0	262	530	2020/21	235	0	0	235	765	2021/22	676	771	139	1586	2,351	2022/23	676	759	139	1,574	3,925	2023/24	676	684	139	1,499	5,424	2024/25	676	757	139	1,572	6,996	2025/26	676	681	139	1,426	8,422	2026/27	0	888	140	1,028	9,450	2027/28	0	553	140	693	10,143	2028/29	0	996	140	1,056	11,199	2029/30	0	687	140	827	12,026	2030/31	0	444	140	584	12,610	2031/32	0	493	140	633	13,243	2032/33	0	365	140	505	13,748	2033/34	0	275	140	415	14,163	2034/35	0	232	140	372	14,535	2035/36	0	340	140	480	14,988	<b>Total</b>	<b>4,145</b>	<b>8,245</b>	<b>2,095</b>	<b>14,988</b>	<b>14,988</b>	<p>ID 2002 Drax Investments Limited                  ID 2063, 2068 Glyn Hopkins Holdings Limited                  ID 2090, 2093 North Western Avenue Watford Ltd                  ID 1947 WSP                  ID 2058 Home Builders Federation                  ID 1973 Canada Life Asset Management</p>
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<p>MM130</p>	<p>Page 199, Housing Trajectory chart 2021-2037</p>	<p>Revised housing trajectory chart added</p>	<p>ID 2002 Drax Investments Limited                  ID 2063, 2068 Glyn Hopkins Holdings Limited                  ID 2090, 2093 North Western Avenue Watford Ltd                  ID 1947 WSP                  ID 2058 Home Builders Federation                  ID 1973 Canada Life Asset Management</p>																																																																																																																								

Housing Trajectory 2018-2036

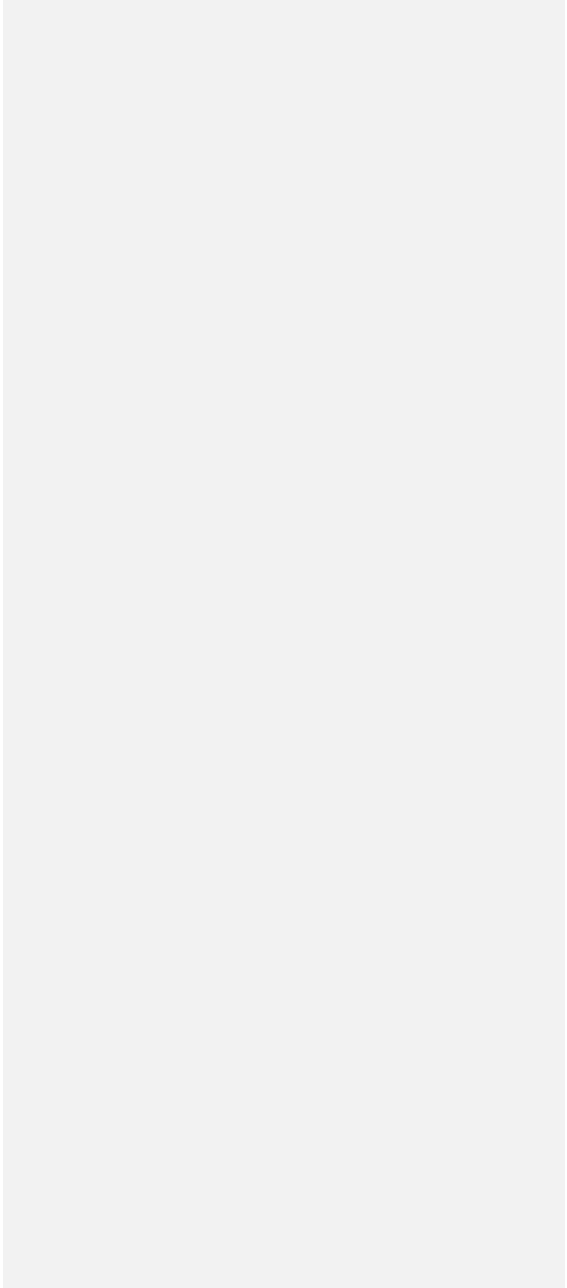


Housing Trajectory 2021-2037



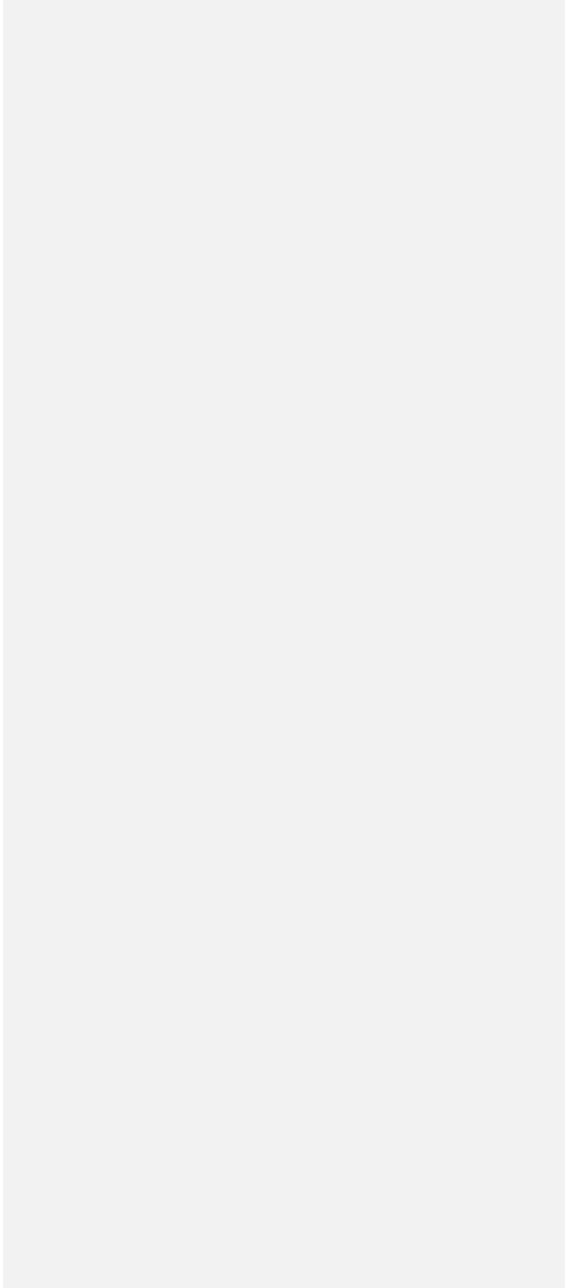
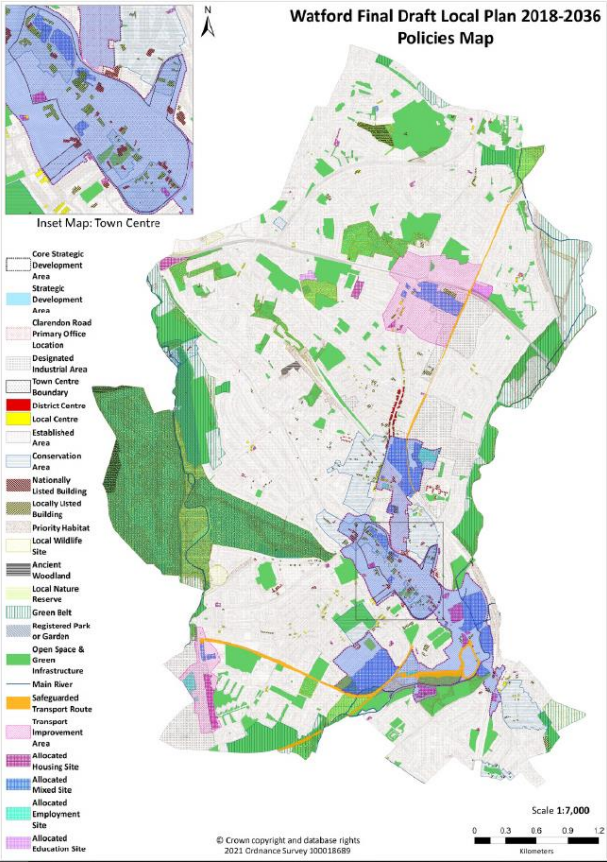
MM131	Page 202, Watford Gateway Strategic Development Area, second row, second column	Eastern <u>sustainable transport mobility</u> hub at Watford Junction station with a new multi storey car park, a new station bridge connecting the two platforms and infrastructure provision for vulnerable road users <u>via an extended link from Clive Way and through to Orphanage Road</u> . Improved access to the <u>sustainable transport mobility</u> hub <u>through upgrade works along the existing route of along</u> Imperial Way, Clive Way and Reeds Crescent/Orphanage Road.	ID 1976 Canada Life Asset Management
MM132	Page 202, Watford Gateway Strategic Development Area, fourth row	New pedestrian <u>bridge</u> and cycle bridge over the Abbey Line to connect <del>Penn Road and Colonial Way Imperial Park,</del> <u>land to the east of the Abbey Line</u> , improvements to <u>the</u> station access for vulnerable users, <u>and</u> improvements to the station car park access.	ID 1976 Canada Life Asset Management
<b>Appendix F: MARKETING REQUIREMENTS</b>			
MM133	Paragraph 2, second sentence	Where the premises are in poor condition or have been partially demolished, the exercise should be limited to marketing <u>redevelopment</u> of the site <del>as a potential redevelopment site to reflect the</del> <u>to retain its</u> existing use.	ID:1856 CAMRA
MM134	Marketing Strategy, Bullet 11: Press Advertisements	Press Advertisement – for small commercial units and community facilities an advert should be placed and maintained in the local newspaper, <u>and specialist publications as appropriate</u> . For larger commercial units specialist publications should <del>always</del> <u>se</u> be used. In addition, for large commercial	ID:1857, 1857 CAMRA

		units a press release should be given to local and regional press.	
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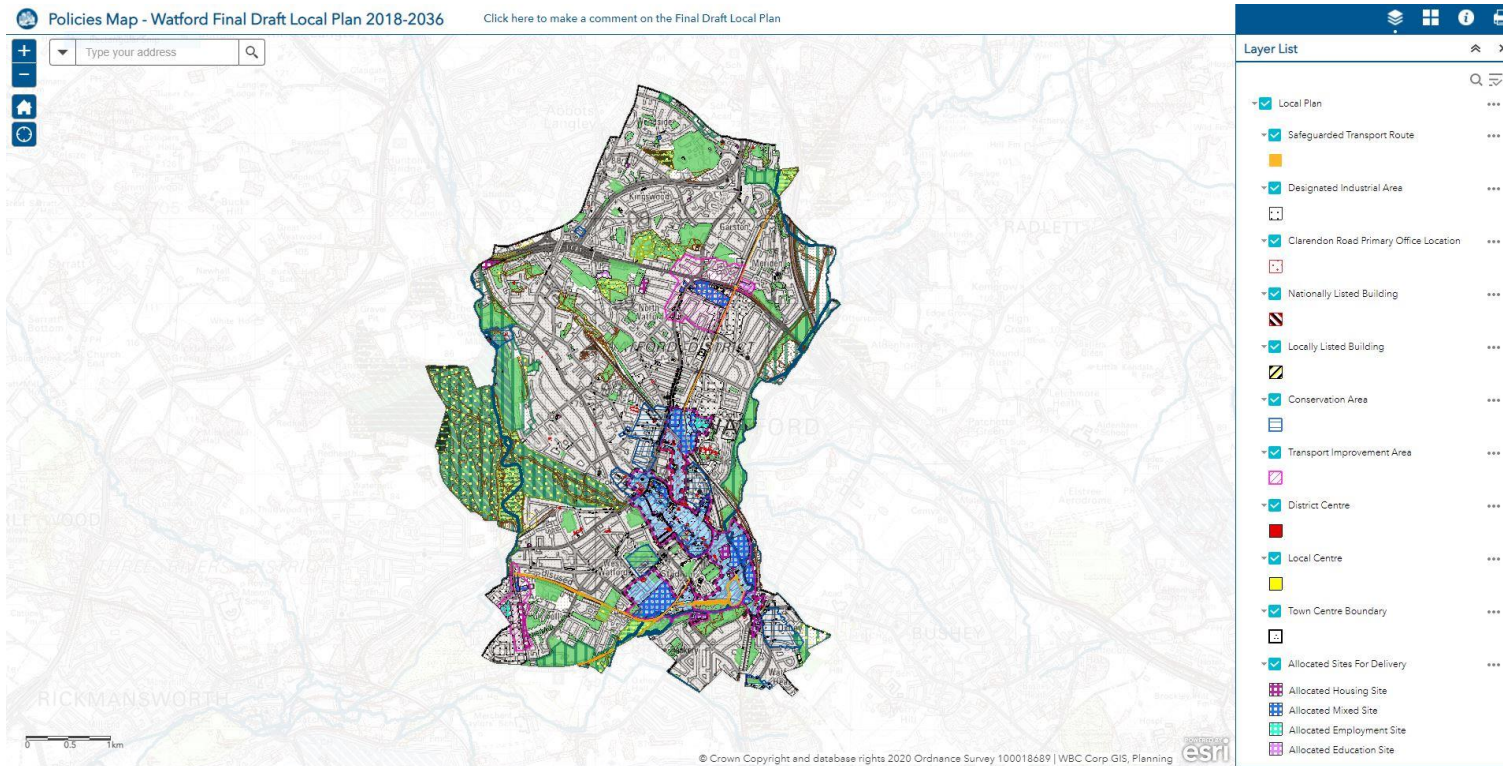


# Appendix I MAPPING CHANGES

The Policies Map as consulted on at the Regulation 19 Publication version of the Local Plan is copied below.



An interactive version of the Policies Map as consulted on at the Regulation 19 Publication version of the Local Plan was also available at: <https://wbc.maps.arcgis.com/apps/webappviewer/index.html?id=2fd1fd3671c347a4bffeac110bc9bba> and copied below.



Policies Map Modifications

MM135

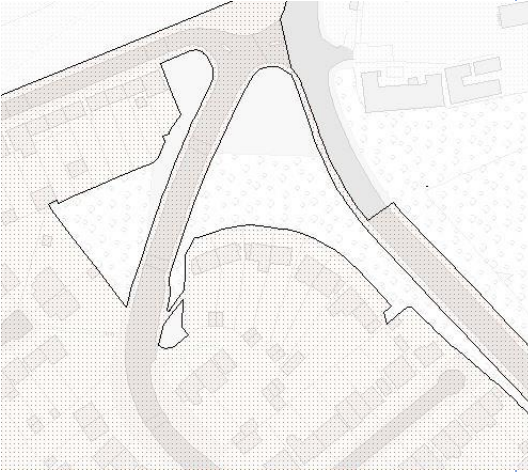
Policies Map

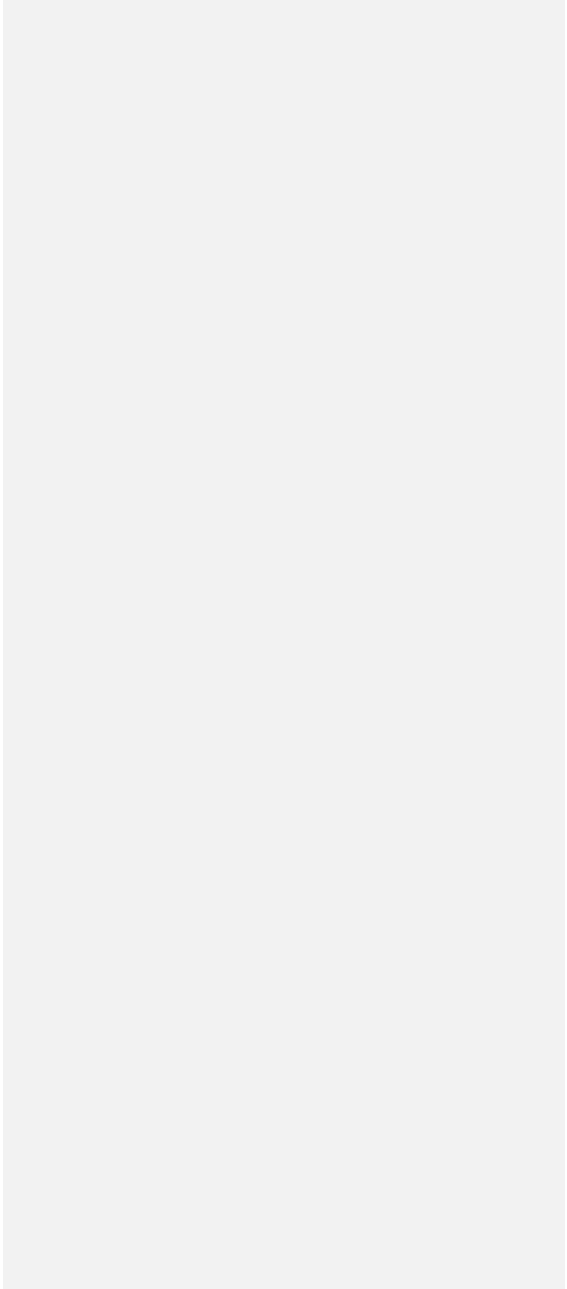
Areas at Blackwell Drive added to Open Space & Green Infrastructure layer



ID 1852, 1853, 1854 & 1855 – Planning & Development Associates Ltd




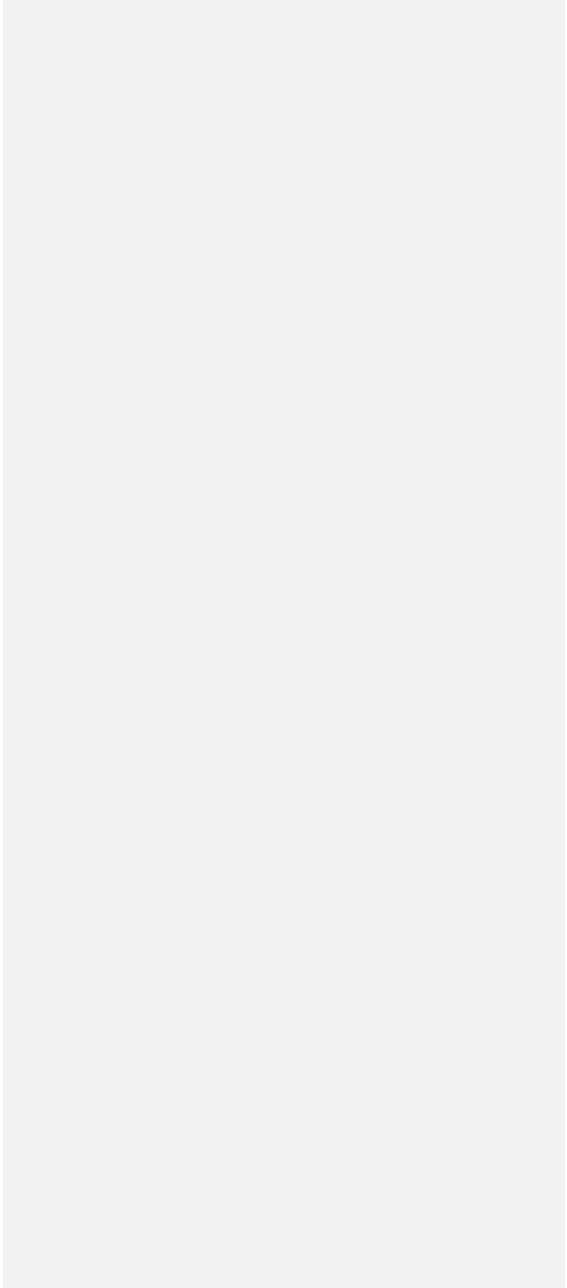
MM136	Policies Map	<p>Areas at Blackwell Drive removed from Established Area</p>  A map showing a street layout with a specific area highlighted in a light gray, stippled pattern. The highlighted area is irregularly shaped and follows the path of a street, likely Blackwell Drive. The surrounding areas are shown in a lighter, less detailed pattern.	Officer change due to Modification MM135
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MM137	Policies Map	Open Space & Green Infrastructure layer amended at areas around Kytes Drive	ID 1936 – Anchor Hanover Group
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MM138	Policies Map	Established Area layer amended at areas around Kytes Drive 	Officer change due to Modification MM137
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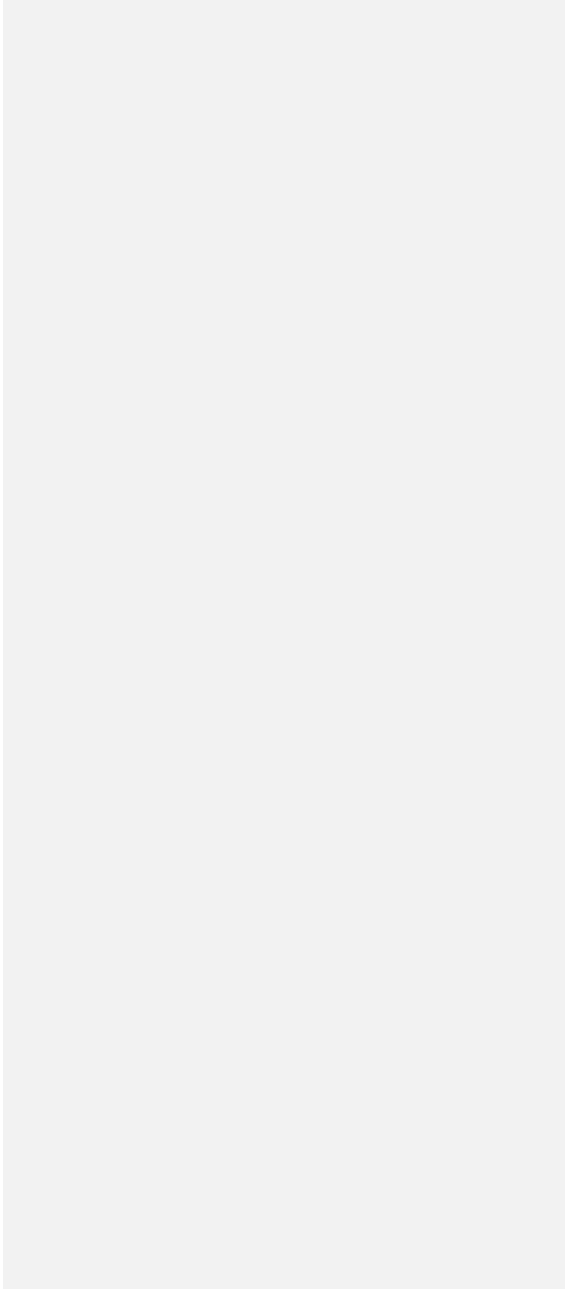
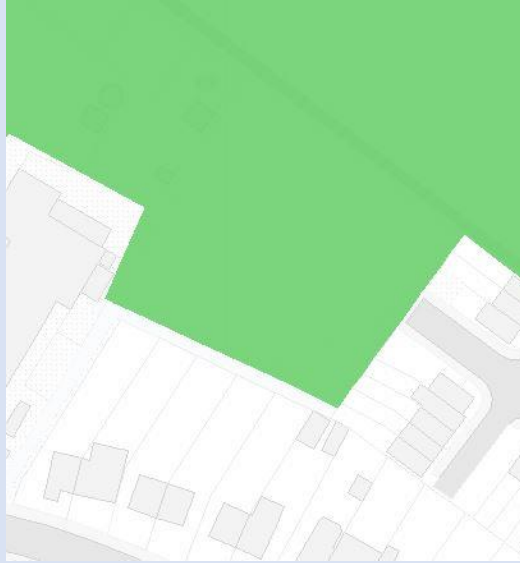


MM139

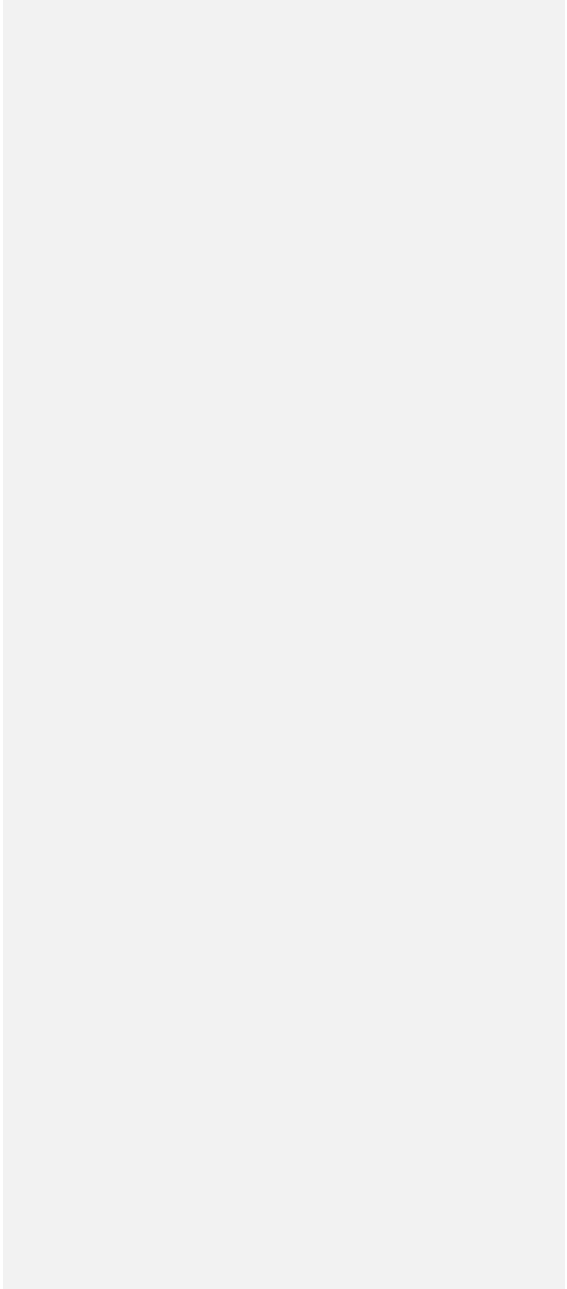
Policies Map

Open Space & Green Infrastructure layer amended  
at Callowland Allotments

Officer change



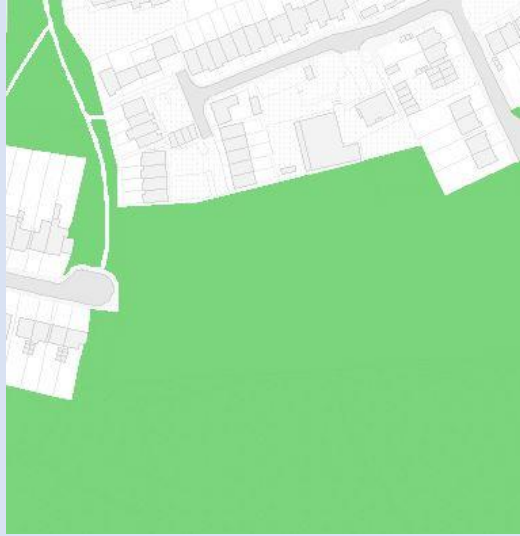
MM140	Policies Map	Established Area layer amended at Callowland Allotments 	Officer change due to modification MM139
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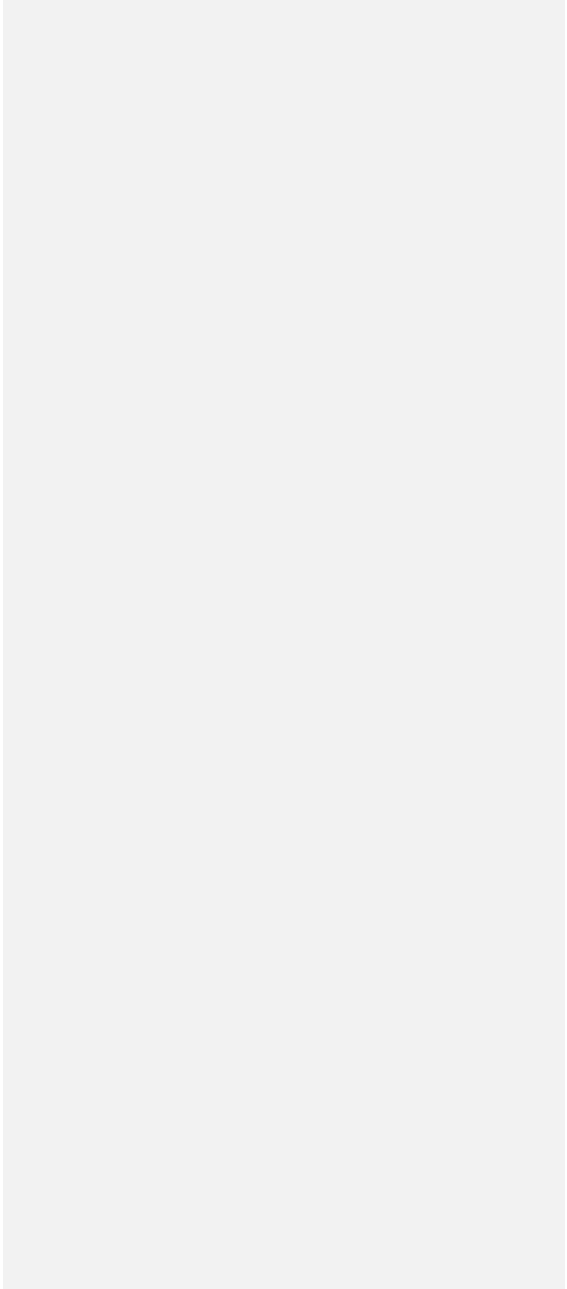
MM141

Policies Map

Open Space & Green Infrastructure layer amended  
at Alban Wood School



Officer change



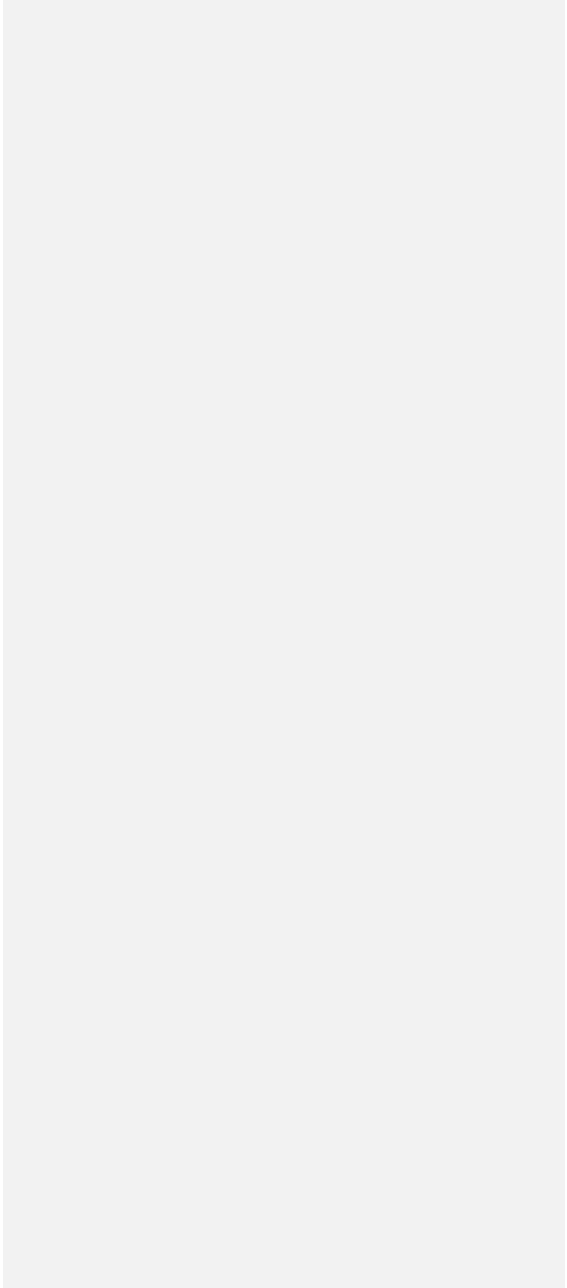
MM142

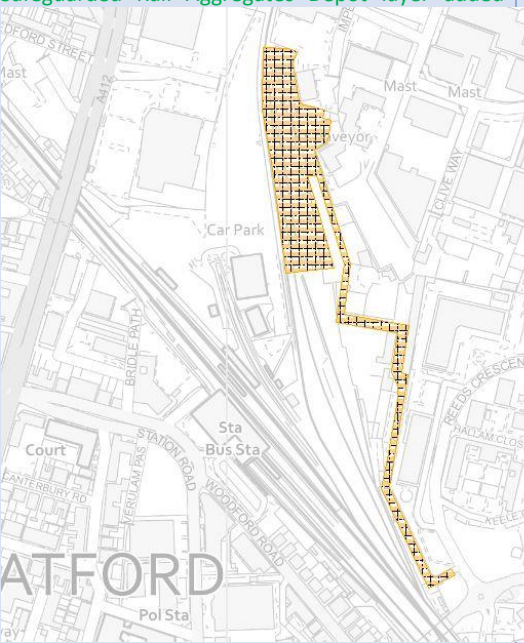
Policies Map

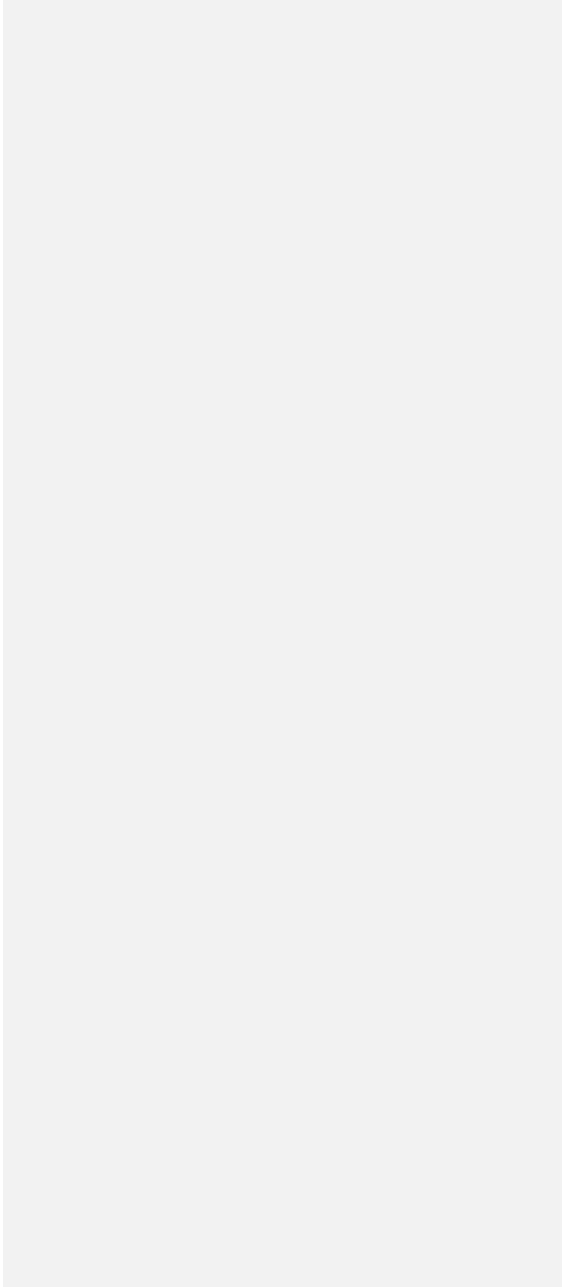
Established Area layer amended at Alban Wood School



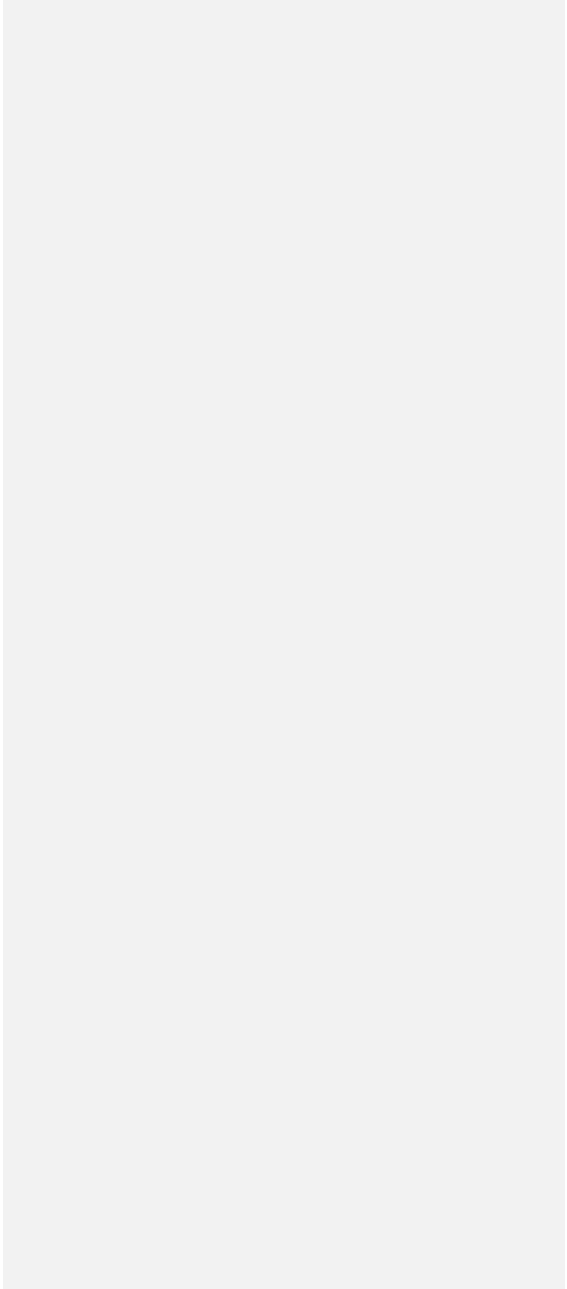
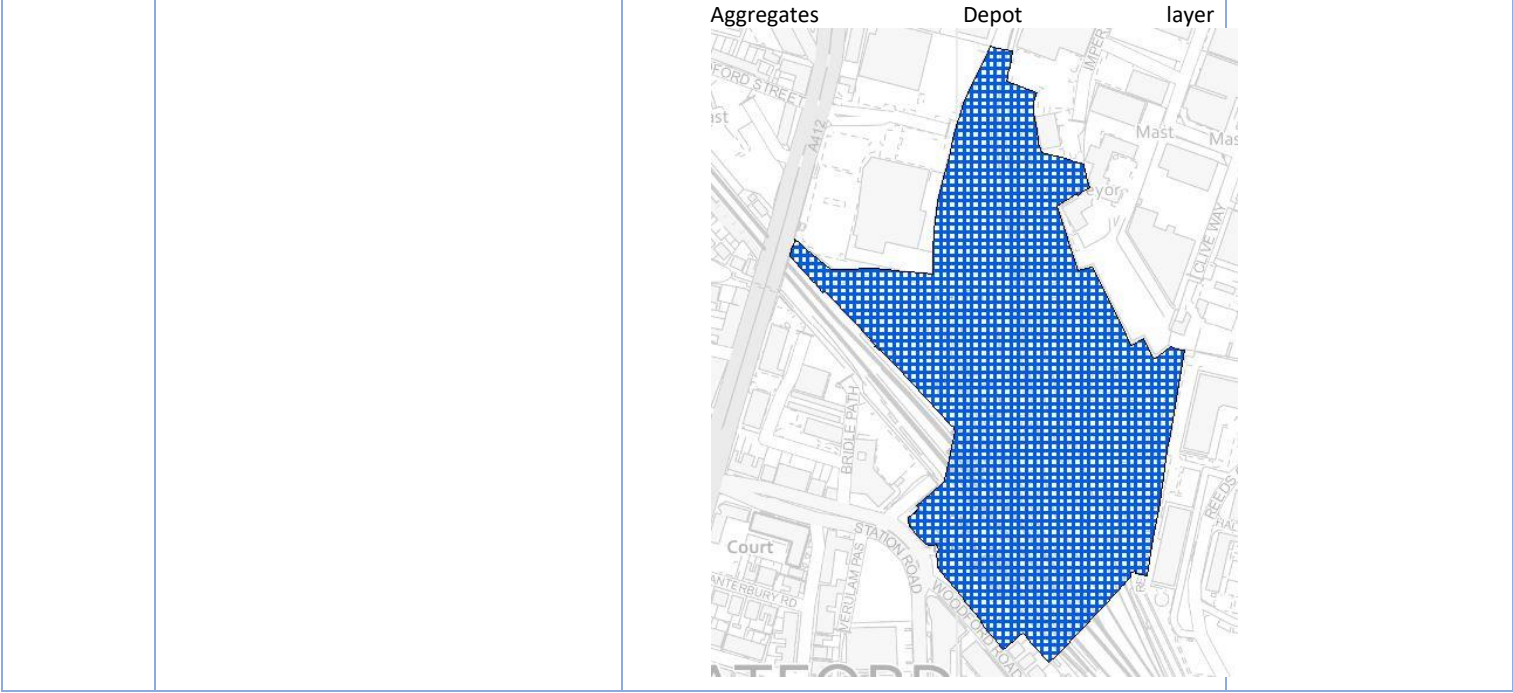
Officer change due to modification MM141



<p>MM143</p>	<p>Policies Map</p>	<p>Safeguarded Rail Aggregates Depot layer added</p> 	<p>ID 2015 – Mineral Products Association          ID 2018 – Mineral Products Association          ID 2071 – Aggregate Industries UK Ltd          ID 2104 – Hertfordshire County Council          ID 2217 – Aggregate Industries UK Ltd</p>
<p>MM144</p>	<p>Policies Map</p>	<p>Allocated Sites For Delivery Layer site MU06 amended to reflect addition of Safeguarded Rail</p>	<p>ID 1984 – Solum Regeneration</p>







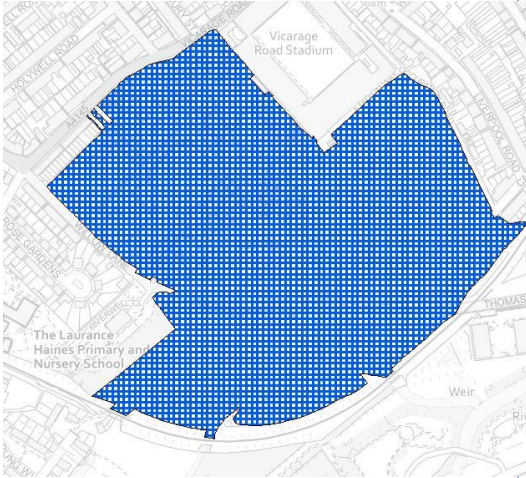
MM145

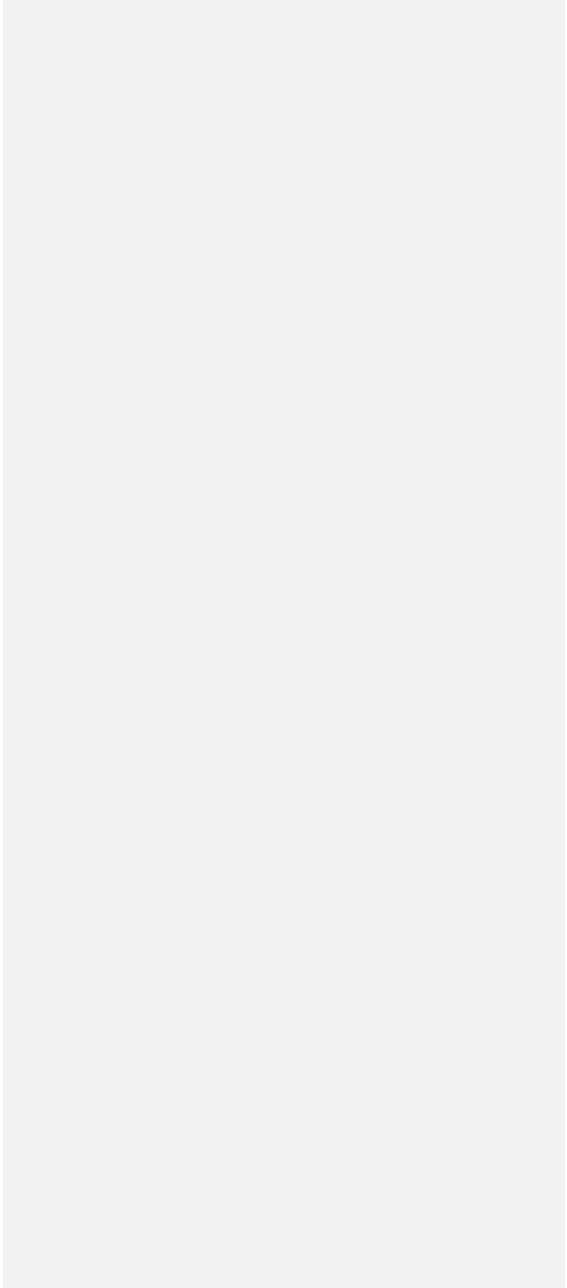
Policies Map

Designated Industrial Area layer amended to include the area of the Safeguarded Rail Aggregates Depot

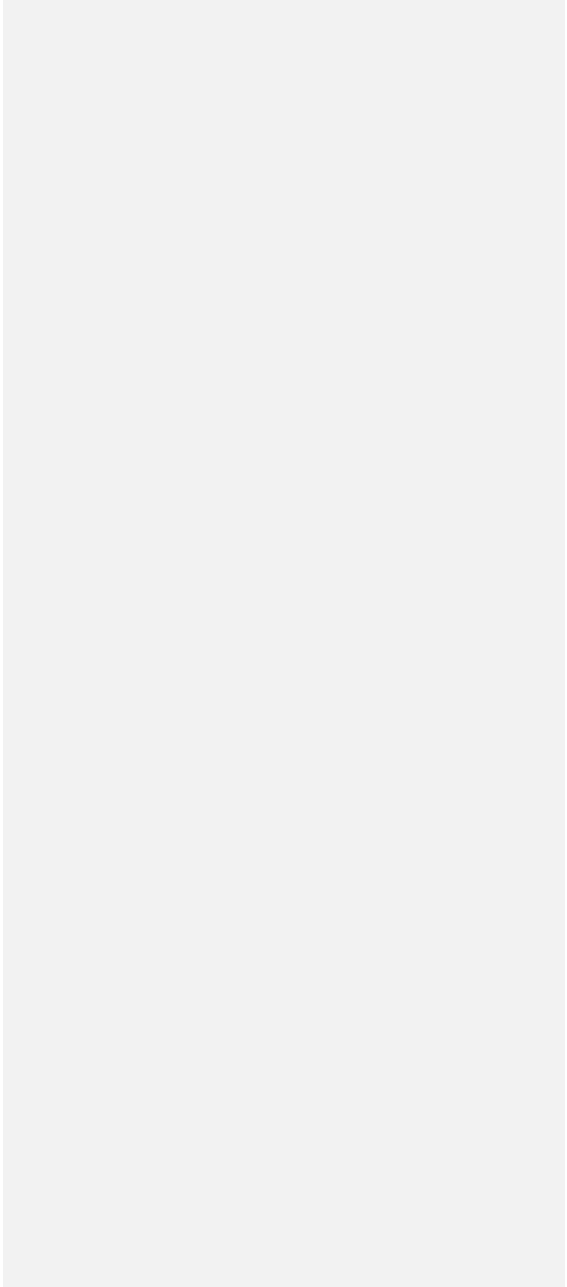
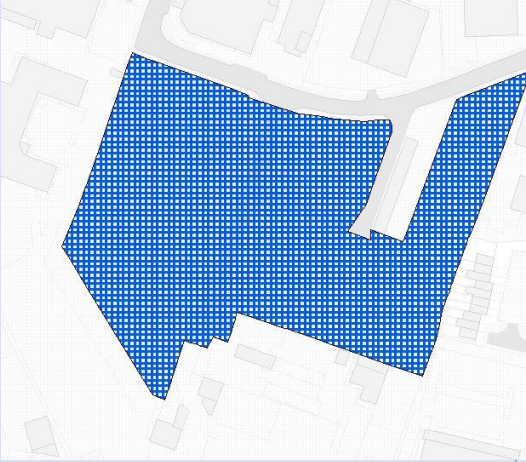
ID 2217 – Aggregate Industries UK Ltd




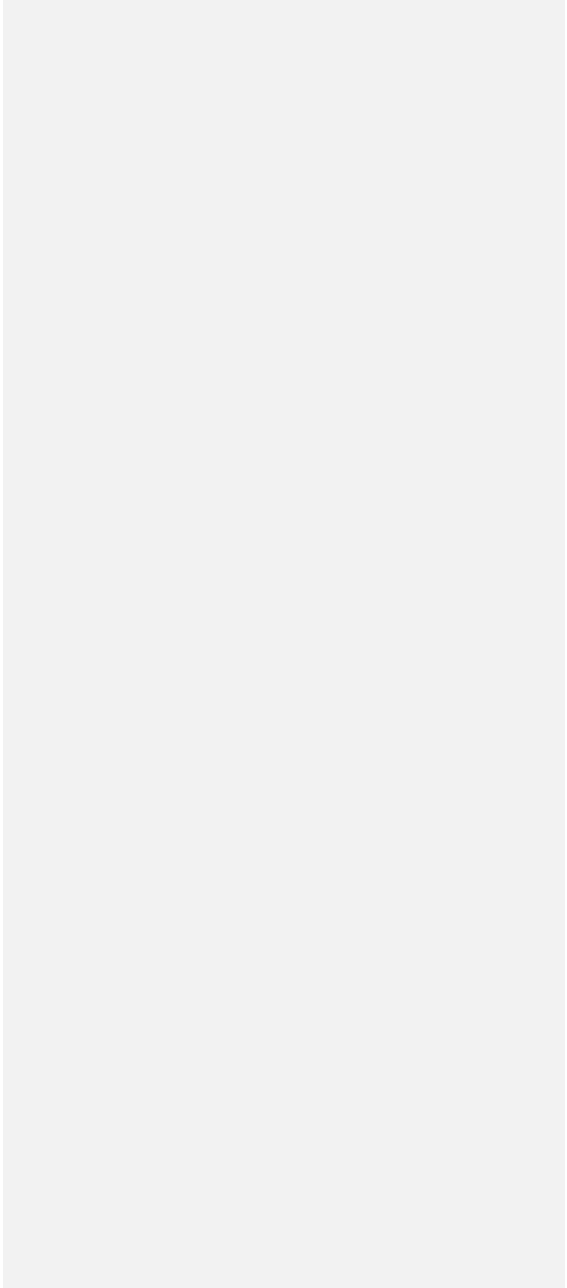
MM146	Policies Map	<p>Allocated Sites For Delivery Layer site MU21 amended to include Watford General Hospital</p>  <p>The map displays a central area shaded with a blue grid pattern, representing allocated sites for Delivery Layer site MU21. This area includes Watford General Hospital, Vicarage Road Stadium, and The Laurance Haines Primary and Nursery School. Surrounding streets and landmarks are labeled, including Vicarage Road, The Vicarage, and Weir.</p>	Officer change due to Modification MM173
MM147	Policies Map	<p>Allocated Sites For Delivery Layer amended - existing site Land at Colonial Way/Clive Way, EM05, changed</p>	Officer change due to Modification MM174

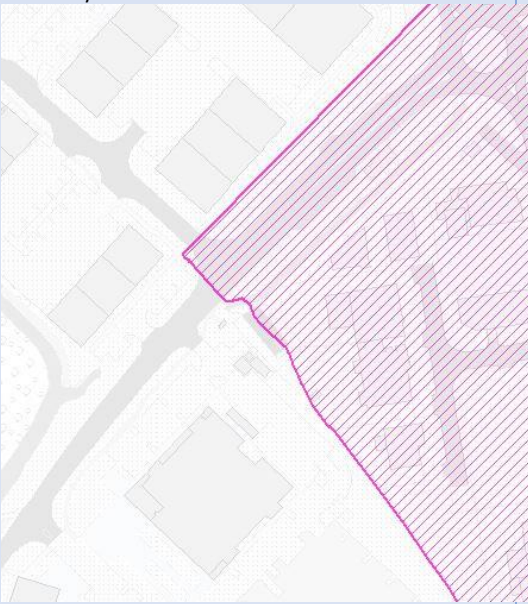


to a mixed use site, reference MU24.



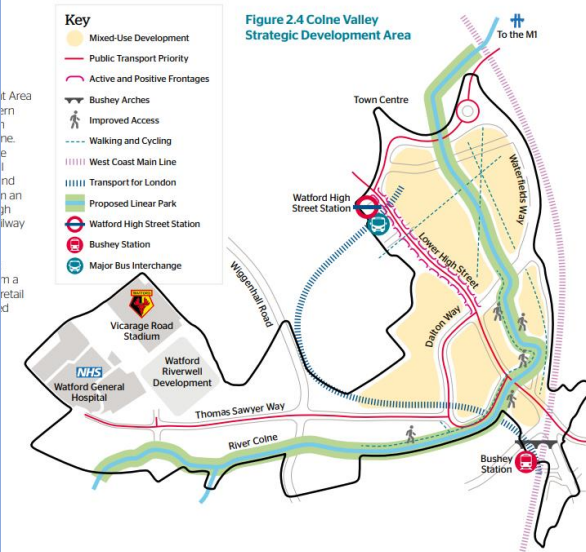
MM148	Policies Map	Allocated Sites For Delivery Layer site ED01 boundary 	ID 2055 Hertfordshire County Council
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MM149	Policies Map	<p>Correction of a drafting error to align with borough boundary west of Watford Business Park</p> 	Officer change due to Modification MM165
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Maps for change			
CHAPTER 2: CORE DEVELOPMENT AREA			
MM150	Figure 2.4 Colne Valley Strategic Development Area	<a href="#">Added safeguarded transport route</a> (green dashed line)	

### Add Transport for London blue line down towards London from Bushey

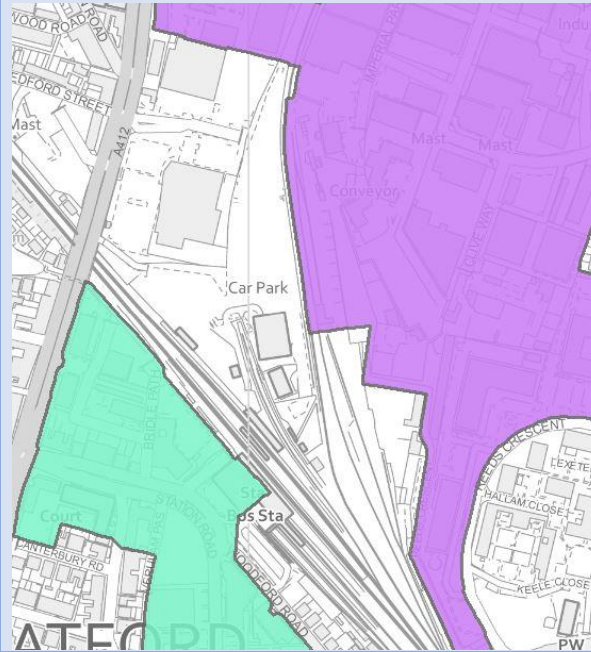


MM151


Page 56, Figure 4.1: Areas designated for office and industrial uses

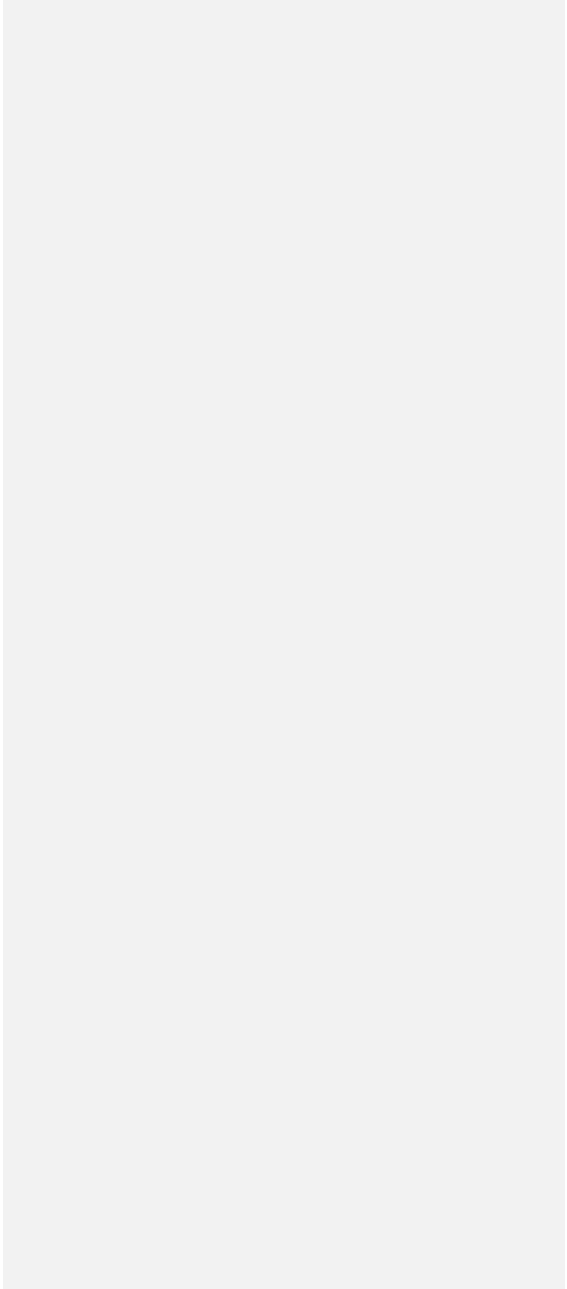
Designated Industrial Area layer amended to include the area of the Safeguarded Rail Aggregates Depot

Officer change due to Modification MM145





MM152	Page 74, Figure 6.2: Established, Protected and Core Development Areas	<p>Areas at Blackwell Drive added to Protected Areas layer and removed from Established Area layer</p> 	Officer change due to modification MM135
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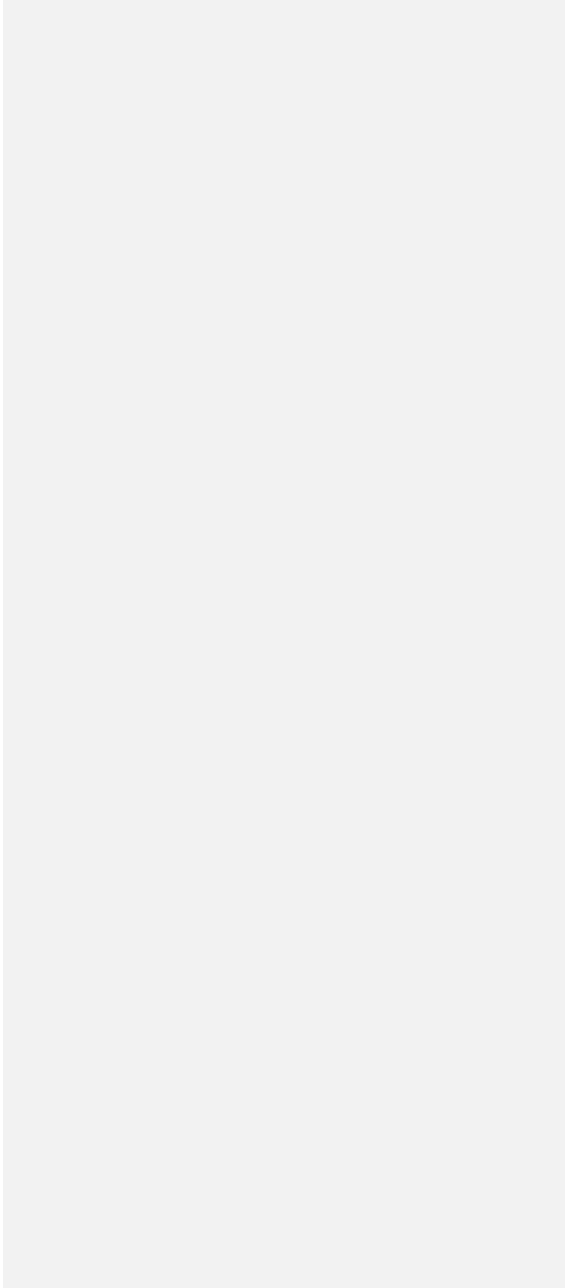
MM153

Page 74, Figure 6.2: Established, Protected and Core Development Areas

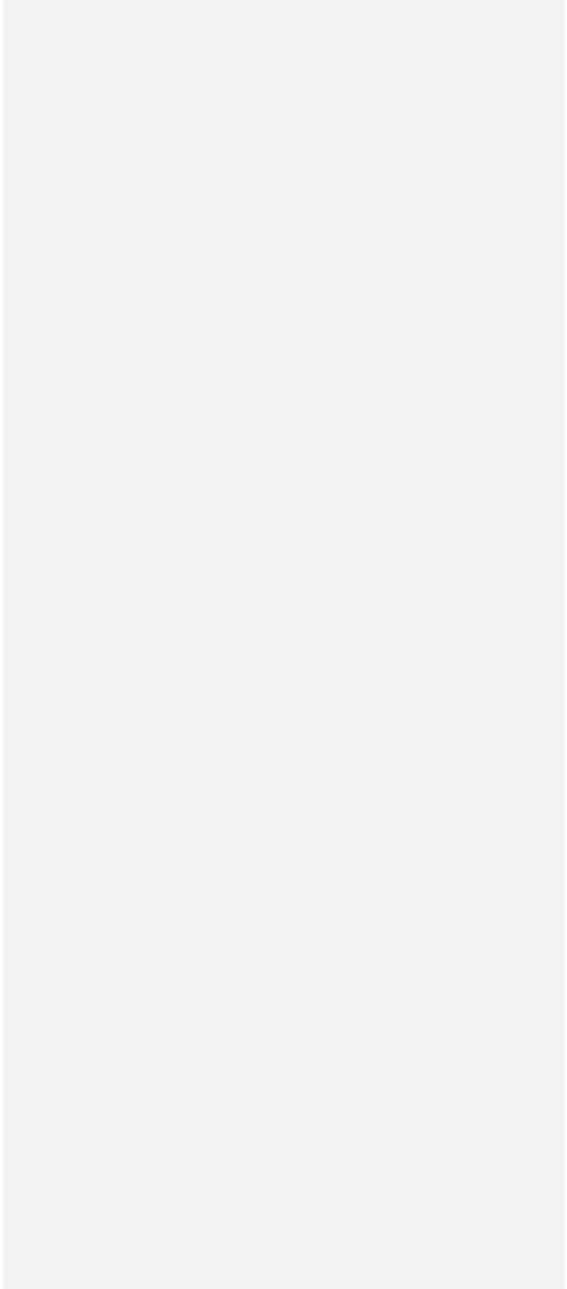
Protected Areas layer amended at areas around Kytes Drive




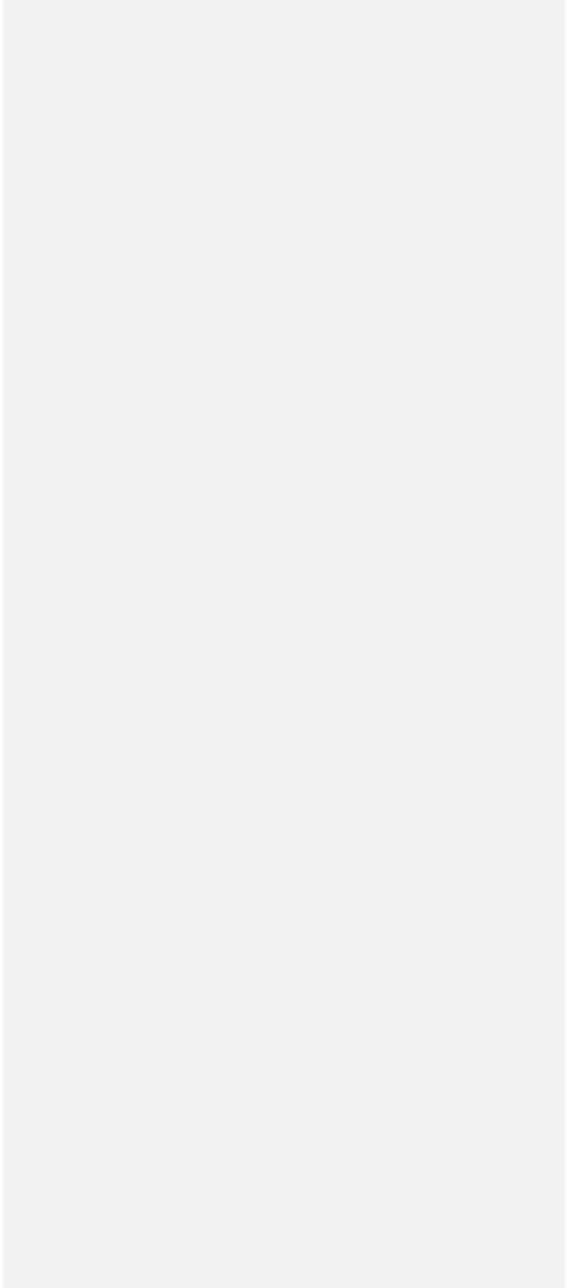
Officer change due to modification MM137



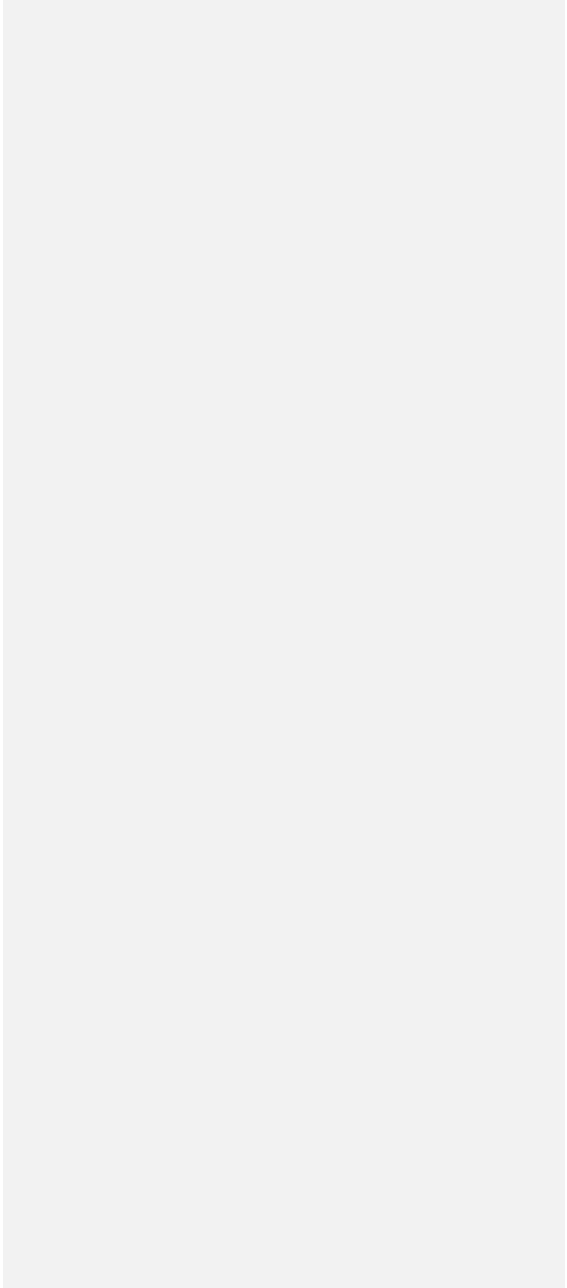
<p>MM154</p>	<p>Page 74, Figure 6.2: Established, Protected and Core Development Areas</p>	<p>Established Area layer amended at areas around Kytes Drive</p> 	<p>Officer change due to modification MM137</p>
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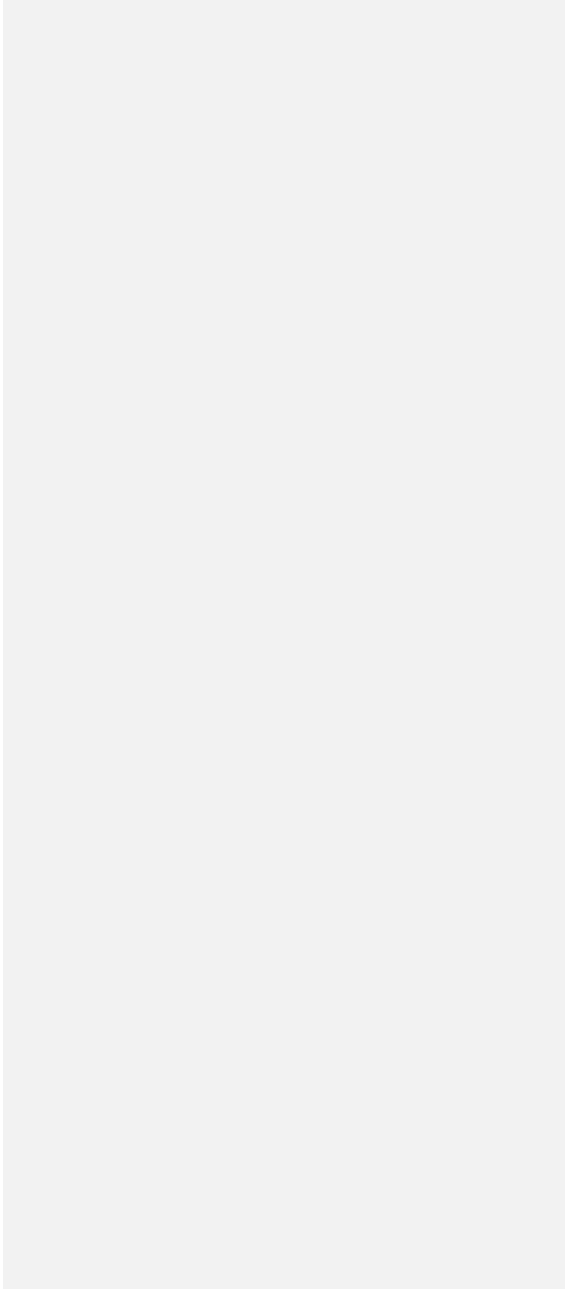
MM155	Page 74, Figure 6.2: Established, Protected and Core Development Areas	Protected Areas layer amended at Callowland Allotments 	Officer change due to modification MM139
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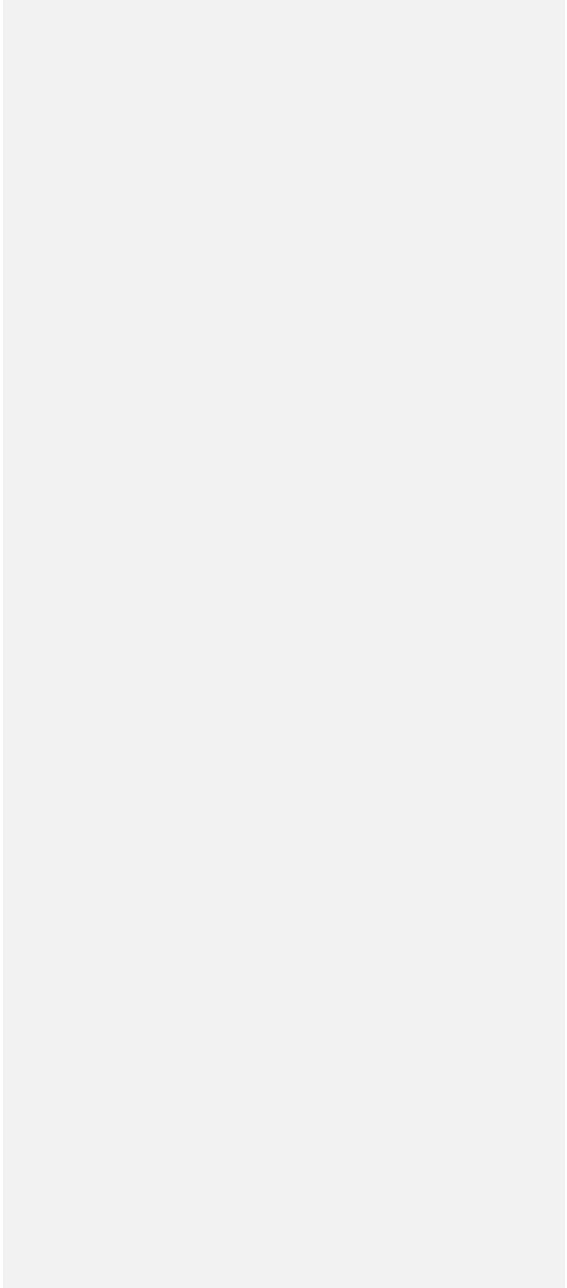
MM156	Page 74, Figure 6.2: Established, Protected and Core Development Areas	Established Area layer amended at Callowland Allotments 	Officer change due to modification MM139
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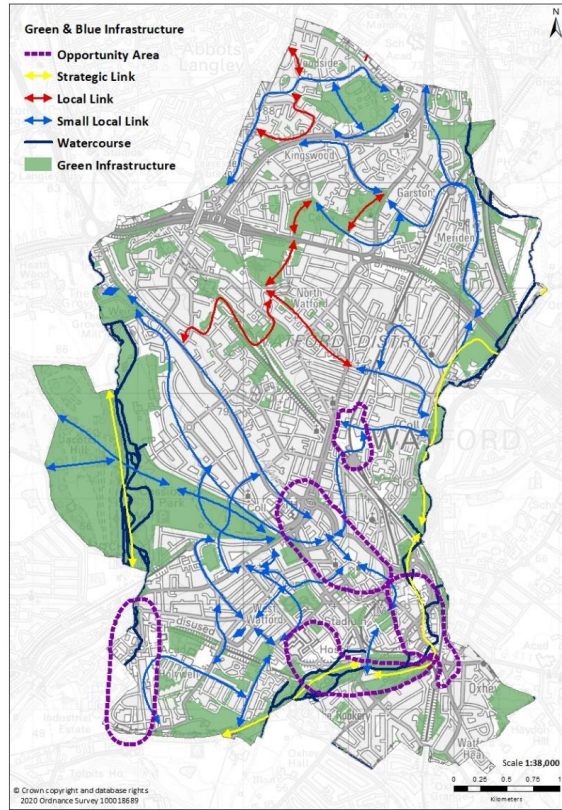
MM157	Page 74, Figure 6.2: Established, Protected and Core Development Areas	Protected Areas layer amended at Alban Wood School 	Officer change due to modification MM141
MM158	Page 74, Figure 6.2: Established, Protected and Core Development Areas	Established Area layer amended at Alban Wood School 	Officer change due to modification MM141



<p>MM159</p>	<p>Page 103, Figure 9.1: Green infrastructure in Watford</p>	<p>Areas at Blackwell Drive added to Green Infrastructure layer</p> 	<p>Officer change due to modification MM135</p> <p>ID 1849 Planning &amp; Development Associates Ltd</p>
<p>MM160</p>	<p>Page 103, Figure 9.1: Green infrastructure in Watford</p>	<p>Amended to include watercourses. Adjusted legend for Title changed to 'Green and blue infrastructure in</p>	<p>ID 1876 – Canal &amp; River Trust</p> <p>ID 1850 Planning &amp; Development Associates Ltd</p>



### Watford'.






MM161

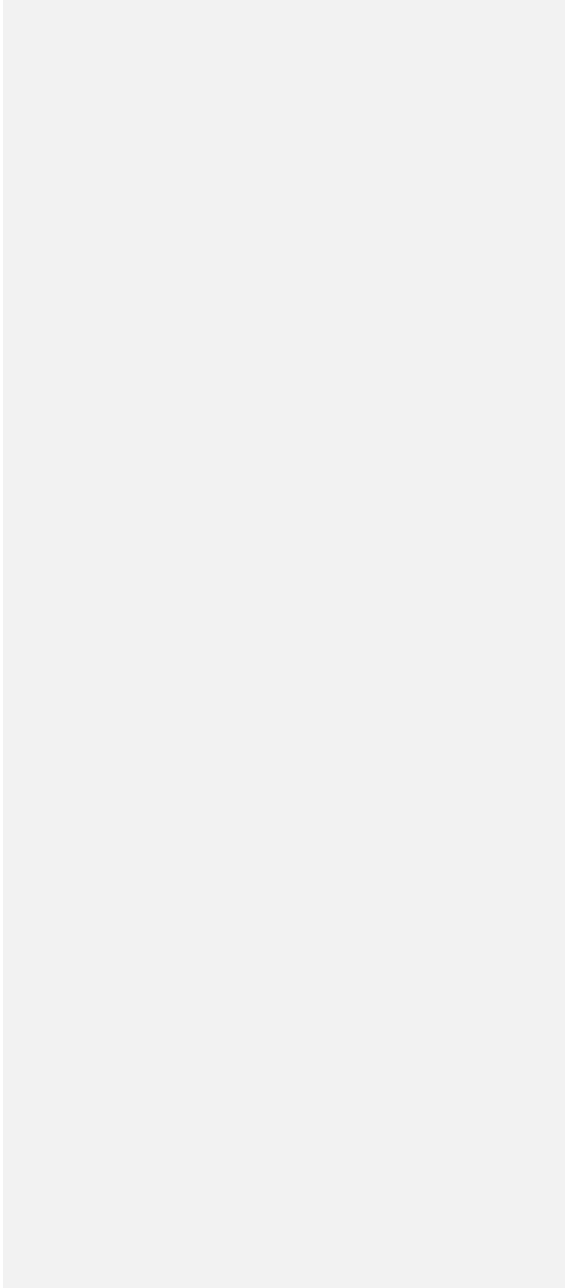
Page 103, Figure 9.1: Green infrastructure in Watford

Green Infrastructure layer amended at areas around Kytes Drive

Officer change due to modification MM137



<p>MM162</p>	<p>Page 103, Figure 2115: Green infrastructure in Watford</p>	<p>Green Infrastructure layer amended at Alban Wood School</p>  A map showing a residential area with buildings and roads. A large area of the map is shaded in green, representing green infrastructure. The green area is located to the south and east of the residential buildings. The buildings are shown in grey and white, with some roads and paths visible.	<p>Officer change due to modification MM141</p>
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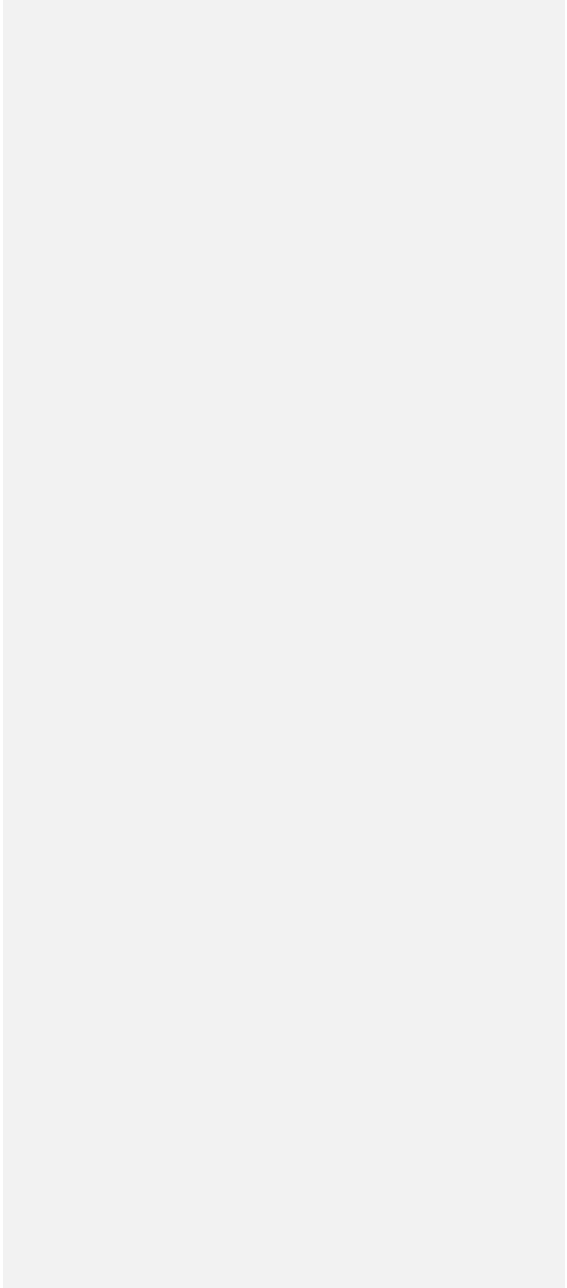
MM163

Page 103, Figure 9.1: Green infrastructure in Watford

Green Infrastructure layer amended at Callowland Allotments



Officer change due to modification MM139

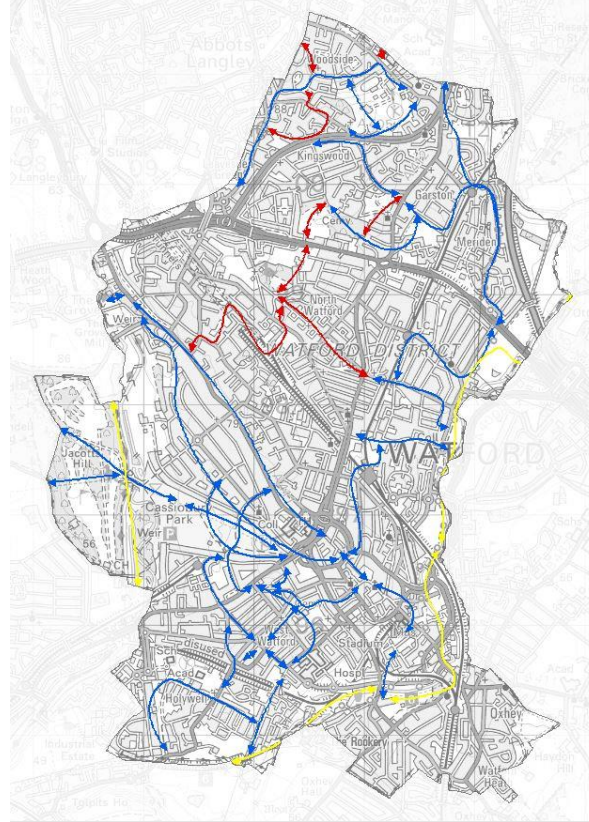



MM164

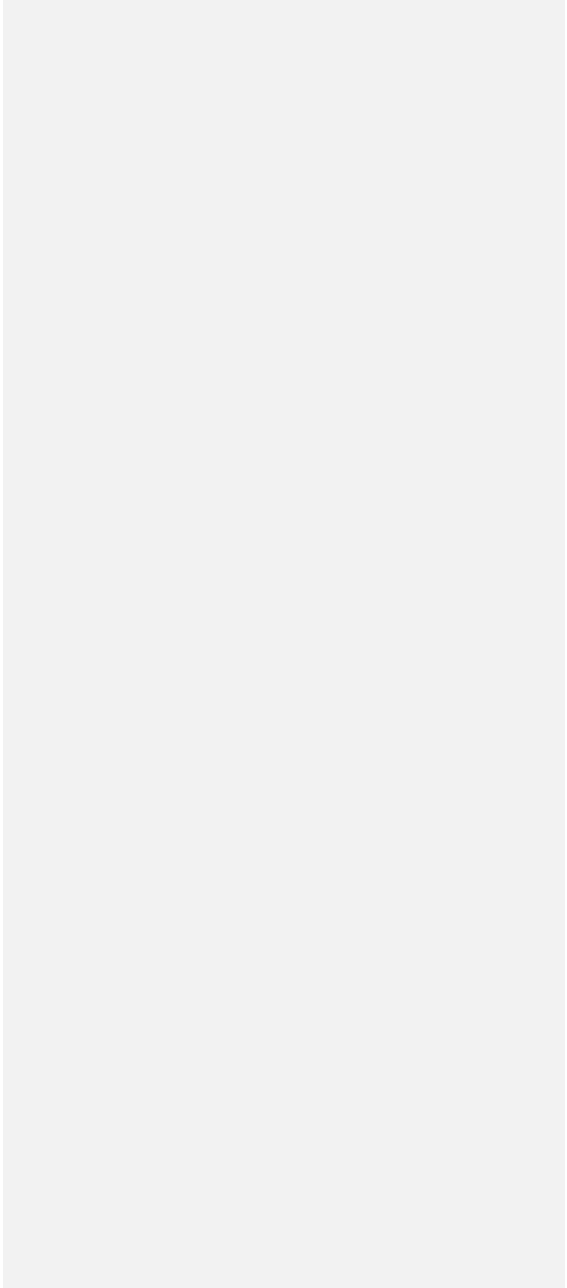
Page 103, Figure 9.1: Green infrastructure in Watford

Link arrows cropped to borough boundary.

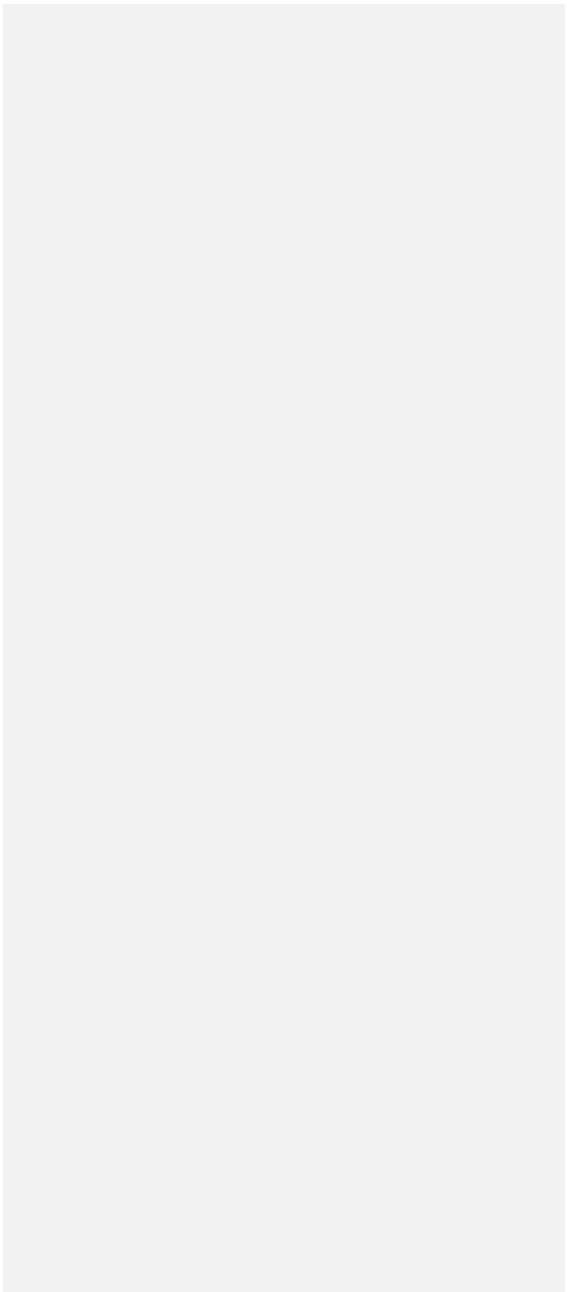
Officer Change




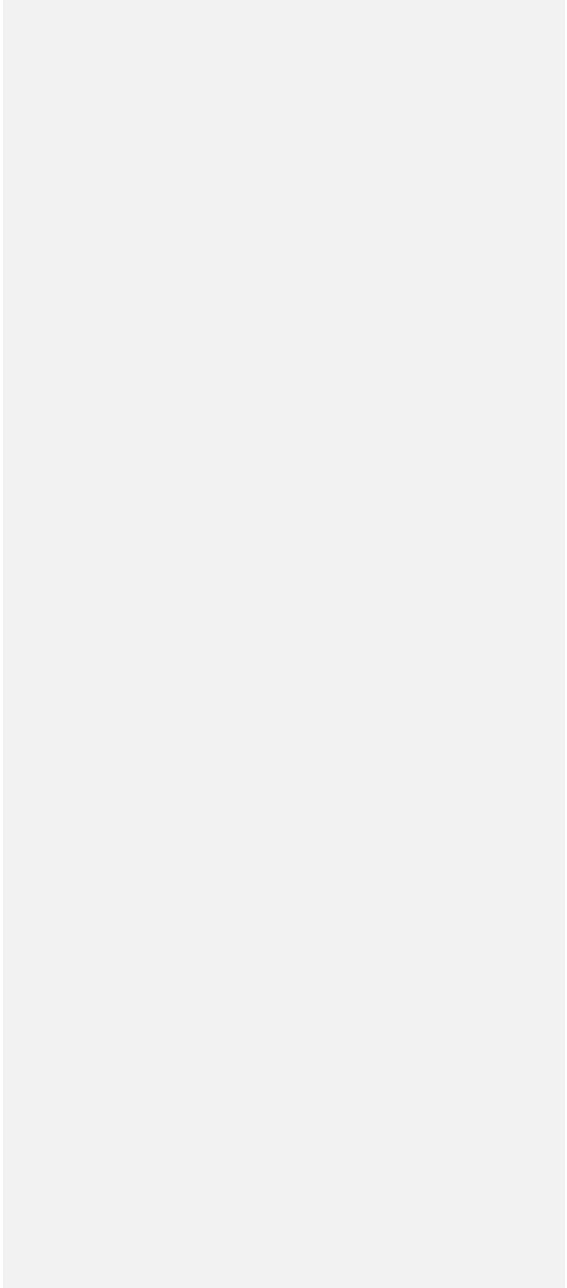
MM165	Page 129, Figure 11.3: Areas for transport improvements in Watford, and routes to be safeguarded	Correction of a drafting error to align with borough boundary west of Watford Business Park 	Officer Change
MM166	Page 150, Figure 13.1: Allocated sites for delivery	Allocated Sites For Delivery Layer site MU06 amended to reflect addition of Safeguarded Rail Aggregates Depot	Officer change due to Modification MM171



layer



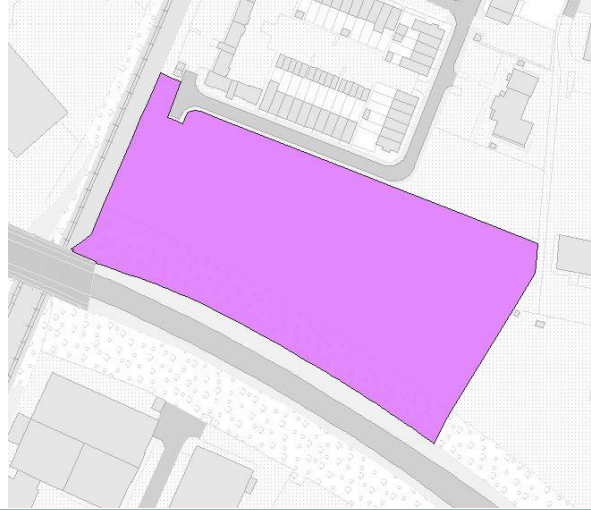
MM167	Page 150, Figure 13.1: Allocated sites for delivery	Allocated Sites For Delivery Layer site MU21 amended to include Watford      General      Hospital 	Officer change due to Modification MM173
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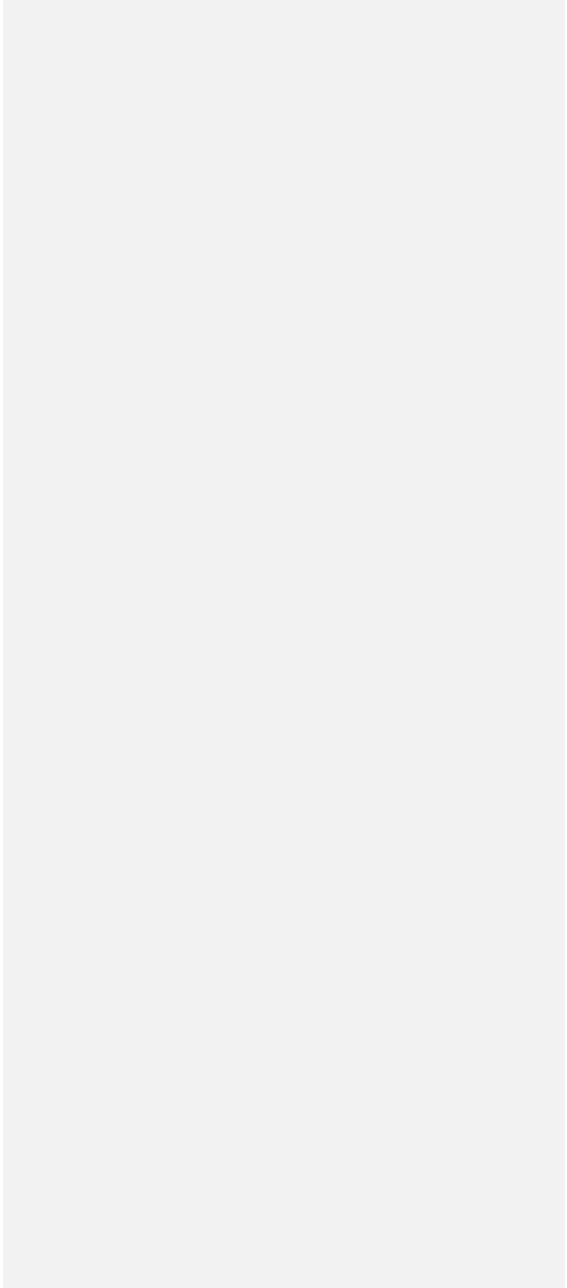
MM168

Page 150, Figure 13.1: Allocated sites for delivery

Allocated Sites For Delivery Layer site ED01 boundary amended



Officer change due to Modification MM175





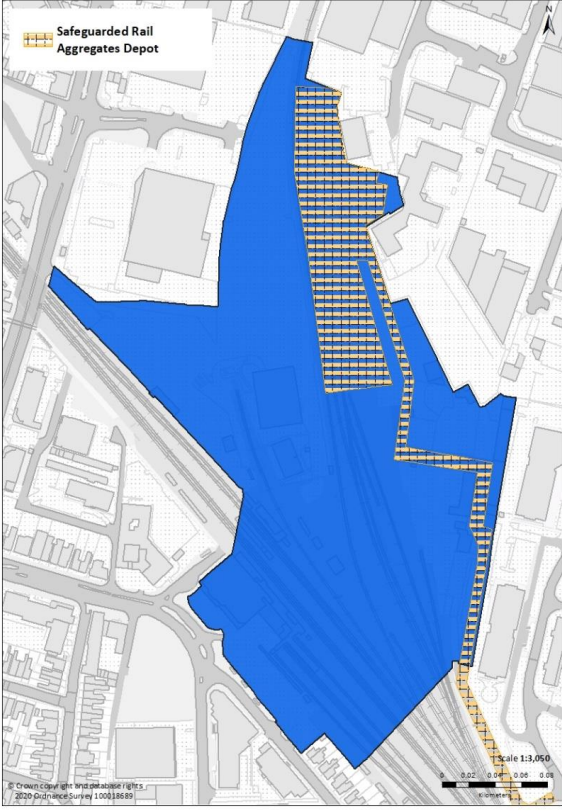
MM169

Page 171, Table 13.2: Mixed-use sites – Site MU05

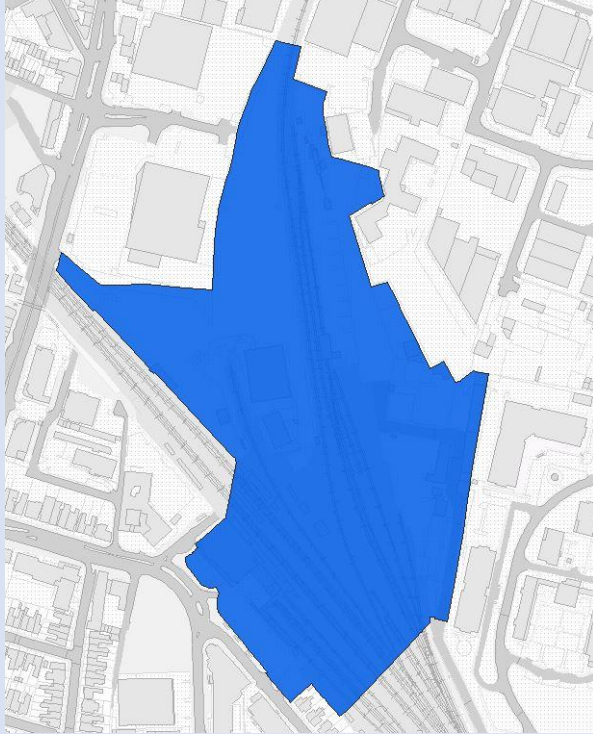
Safeguarded Rail Aggregates Depot layer added

Officer change due to Modification MM143



<p>MM170</p>	<p>Page 172, Table 13.2: Mixed-use sites – Site MU06</p>	<p>Safeguarded Rail Aggregates Depot layer added</p> 	<p>Officer change due to Modification MM143</p>
<p>MM171</p>	<p>Page 172, Table 13.2: Mixed-use sites – Site MU06</p>	<p>Allocated Sites For Delivery Layer site MU06 amended to reflect addition of Safeguarded Rail Aggregates Depot</p>	<p>Reason for change:</p>

layer and detail on mitigation moved to Para 2.15



ID 1984 – Solum  
Regeneration

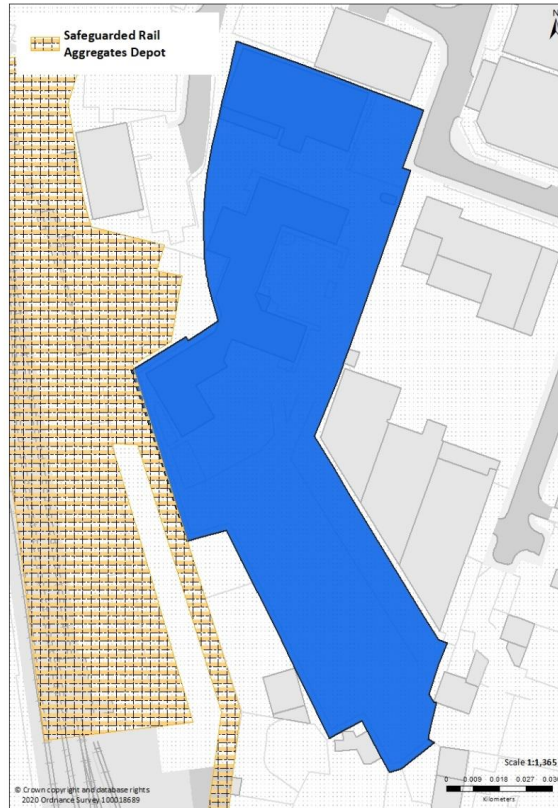
ID 2076 – Aggregate  
Industries UK Ltd

MM172

Page 173, Table 13.2: Mixed-use sites – Site MU07

Safeguarded Rail Aggregates Depot layer added

Officer change due to Modification MM143

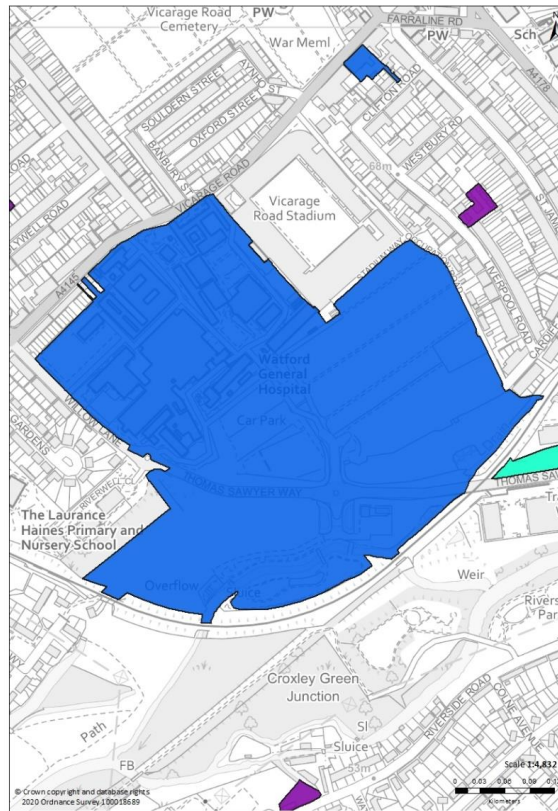


MM173

Page 185, Table 13.2: Mixed-use sites – Site MU21

Allocated Sites For Delivery Layer site MU21 amended to include **Watford General Hospital**

ID 1897 – West Hertfordshire Hospitals NHS Trust

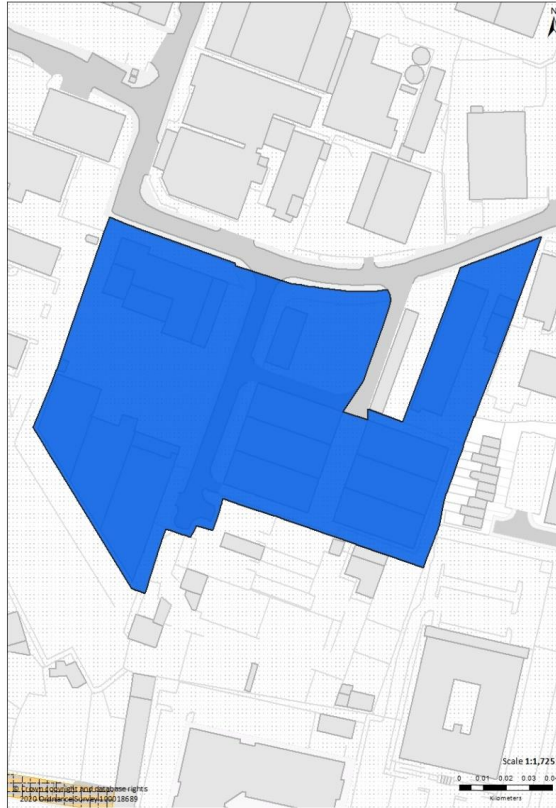


MM174

Page 190, Table 13.3: Employment sites  
– Site EM05

Allocated Sites For Delivery Layer amended - existing site  
Land at Colonial Way/Clive Way, EM05, changed to a  
mixed use site, reference MU24.

Officer change &  
ID 1976 – Canada Life  
Asset Management

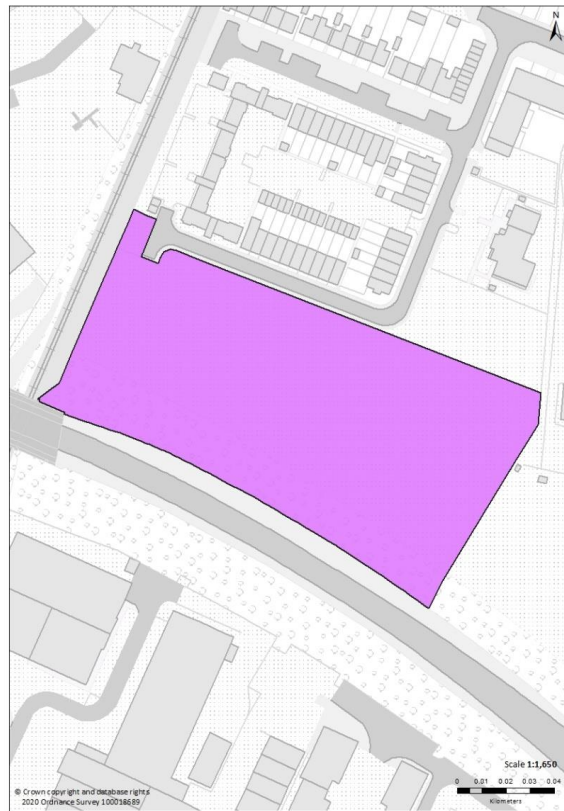


MM175

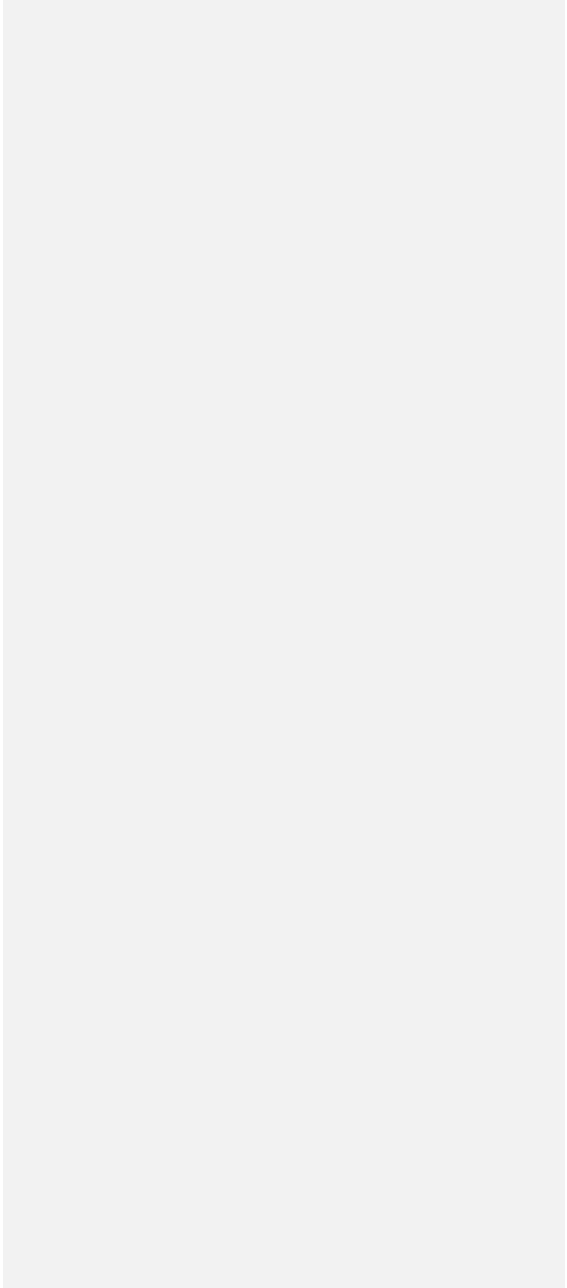
Page 191, Table 13.4: Education facilities  
– Site ED01

Allocated Sites For Delivery Layer site ED01 boundary  
amended

ID 2055 – Hertfordshire  
County Council



Appendix Ab:  
Final Draft Watford Local Plan:  
Schedule of Proposed Minor Modifications





## Schedule of Minor Modifications

### Watford Final Draft Local Plan

This Schedule of the proposed minor text modifications includes changes since the Regulation 19 version of the Local Plan, minor modifications do not change the interpretation of the Local Plan but are limited to updating references, clarification and minor grammar and spelling corrections.

The schedule is ordered by chapter and modification number and contains the policy reference and paragraph number for each modification. Deleted text, maps or other figures are shown with a ~~red strike-through~~; additions and replacements are underlined in green. Dots denote where the paragraph / policy continues before/after the text shown in the modification.

The proposed modifications will subsequently change the document numbering. The policy, paragraph and bullets referenced in this schedule are those found in the Regulation 19 Publication version of the Local Plan.

Minor Modification Reference	Page, Local Plan paragraph, policy (in Final Draft Watford Local Plan Regulation 19 consultation document)	Modification (deleted text shown as <del>strike-through</del> and additional text shown <u>underlined</u> )	Reason for modification
<b>GENERAL</b>			
MINOR1	Table of Contents	Reformatting of the Table of Contents to include policies under each chapter heading	Officer change
MINOR2	Table of Contents	Updated	Officer change
MINOR3	Table of Contents	Updated	Officer change

MINOR4	Key diagram	Underground symbols in maps changed to train symbols except Cassiobury	Officer change
MINOR5	Paragraph numbering	Paragraphs to be renumbered following consideration of proposed modifications	Officer change
MINOR6	Policy numbers (list of requirements in individual policies)	Policy requirements to be renumbered following consideration of proposed modifications	Officer change
MINOR7	Page 8, paragraph 1.2	<del>2018</del> <u>2021</u> to <del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MINOR8	Page 11, paragraph 1.22	<del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited

			ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MINOR9	Page 11, paragraph 1.23	<del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MINOR10	Page 12, green text box, title	<del>2036</del> <u>2037</u>	ID 2002 Drax

			Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 1981 St Albans City & District Council ID 1947 WSP ID 2058 Home Builders Federation
MINOR11	Page 13, green text box, title	<del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home

			Builders Federation
MINOR12	Page 14, green text box, title	<del>2036</del> 2037	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MINOR13	Page 14, paragraph 1.26	<del>2036</del> 2037	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western

			Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MINOR14	Page 14, red text box, para 11	<del>2036</del> 2037	
MINOR15	Page 15, red text box, title	<del>2036</del> 2037	
MINOR16	Page 21, Strategic Policy SS1.1, Paragraph 2	<del>2036</del> 2037	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MINOR17	Page 21, Strategic Policy SS1.1, paragraph 4	Proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian, <a href="#">cycling and passenger transport travel</a> will be prioritised.	ID 2100 Hertfordshire County Council

MINOR18	Page 29, paragraph 2.32	<del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP ID 2058 Home Builders Federation
MINOR19	Page 41, paragraph 3.5, second sentence	<del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd

			ID 1947 WSP ID 2058 Home Builders Federation
MINOR20			
MINOR21			
<b>POLICIES MAP</b>			
MINOR22	In the key	Core <del>Strategic</del> Development Area	
MINOR23	Entire map	All layers cropped to extent of borough to allow visibility of surrounding base map	Comment ID 1801 – Hertsmere Borough Council
MINOR24	<a href="https://wbc.maps.arcgis.com/apps/webappviewer/index.html?id=2fd1fd3671c347a4bffeaec110bc9bba">https://wbc.maps.arcgis.com/apps/webappviewer/index.html?id=2fd1fd3671c347a4bffeaec110bc9bba</a>	All layers cropped to extent of borough to allow visibility of surrounding base map	Comment ID 1801 – Hertsmere Borough Council
MINOR25	<a href="https://wbc.maps.arcgis.com/apps/webappviewer/index.html?id=2fd1fd3671c347a4bffeaec110bc9bba">https://wbc.maps.arcgis.com/apps/webappviewer/index.html?id=2fd1fd3671c347a4bffeaec110bc9bba</a>	All modified layers of policies map to be amended on interactive policies map	Due to multiple alterations in the Schedule of Proposed Modifications



INDEX			
MINOR26	Page 4 Index Ch 3	<del>Provides a framework to deliver the housing needed in the borough, including types and sizes of homes for people with different needs from single people, to families, to those with disabilities. Introduces the Local Plan and provides an overview of key planning themes through the document. Sets out the approach. This section sets out the design standards new development will be expected to achieve in order gain planning permission.</del>	
MINOR27	Page 15, Helping to create a better Watford in 2037: our Vision, first paragraph	At the edge of London, and also a part of the County of Hertfordshire, Watford will embrace its role as a major urban centre that acts as a focus for employment, homes, leisure, caring for its town centre and green spaces <del>and</del> while making the most of its excellent connections to the capital and surrounding areas.	
MINOR28	Page 16, para 1.29	Housing and Economic Land Availability Assessment (2020 <del>1</del> )	
CHAPTER 1			
MINOR29	Page 18, paragraph 1.33	The Spatial Strategy <u>underlying Chapter 1</u> sets out an approach for development to contribute towards the Council Plan and long-term vision for Watford as an inclusive place for everyone and the aim to be a town that has embraced sustainability	

MINOR30	Page 18, paragraph 134, second sentence	One of the <del>key aspects</del> <u>most important</u> is climate change.	
MINOR31	Page 18, paragraph 135, second sentence	Key elements of the declaration included integrating climate change into planning policy and the Local Plan. <u>This is to place greater</u> <del>having</del> a focus on greener homes and buildings, taking into account climate impacts within Council decision making processes with the overall objective to be carbon neutral by 2030.	
MINOR32	Page 18, paragraph 136, fourth sentence	The design of buildings and the spaces around them is integral to encouraging people to be more active, have a greater sense of belonging in their community through more social interaction, and <u>improving</u> <del>increasing</del> the perception of a place and in turn health and wellbeing.	
MINOR33	Page 18, before paragraph 1.37	Insert sub heading: <u>The Spatial Strategy</u>	

MINOR34	Page 18. Paragraph 1.38, first sentence	This <del>approach increases the</del> <del>will enable a greater</del> number of people <del>to</del> <del>live</del> <del>ing</del> in locations where there is good access to services and facilities, reducing the need to travel by car and making investment in public transport, walking and cycling infrastructure more viable and attractive by responding to demand.	
MINOR35	Page 18, paragraph 1.38, last sentence	Delete <del>This will create space to support walking, cycling and public transport and encourage people to be more active and have healthier lifestyles, while improving the quality of the built environment.</del>	
MINOR36	Page 19, paragraph 1.39	Split paragraph  Creating sustainable neighbourhoods in this way has multiple benefits. New development can attract investment to the area as <del>a</del> <del>businesses</del> cluster, creating local jobs and providing opportunities for new skills and training through apprenticeships. <del>New e</del> Employment opportunities bring workers into Watford, which, in turn, increases demand for ancillary goods and services supporting local businesses, particularly in the town centre.  Delivering a mix of new homes to meet the needs of local people and those wanting to move here supports a more inclusive, equitable and balanced community. <del>Alongside this growth, t</del> he inclusion of measures, such as improvements to the green infrastructure network, benefits people and biodiversity, while making better use of resources and helps to create high quality places and habitats.	

MINOR37	Page 20, before paragraph 1.42	Add sub title: <u>South West Hertfordshire Joint Strategic Plan</u>	
MINOR38	Page 13, green text box, first bullet	<del>97,080</del> <u>97,156</u> people in <del>2036</del> <u>2037</u>	Officer change To be consistent with proposed local plan period revision
<b>CHAPTER 2</b>			
MINOR39	2.23 (Town Centre)	Watford high street station is still the underground symbol, Change to Overground or Train symbol	
MINOR40	Page 23, para 2.1	...new investment <u>into</u> the town	
MINOR41	Page 24	Heading Watford Junction Station <del>Area</del> <u>area</u>	
MINOR42	Page 24, Paragraph 2.7, second sentence	<del>This area</del> <u>Watford Junction</u> is recognised by the Hertfordshire Growth Board as one of the key locations for redevelopment in the county.	Officer change

MINOR43	Page 25, paragraph 2.9, first sentence	The <u>rail station and bus interchange</u> , including the public realm...	
MINOR44	Page 25, paragraph 2.15, first sentence	Land east of Watford Junction Station and the <u>Abbey Line railway lines</u> consists primarily of industrial, storage and distribution uses including a concrete batching plant and rail aggregates depot.	
MINOR45	Page 25, paragraph 2.16,	Re-provision of car parking, including access, will need to be considered at a strategic level across the area to avoid fragmentation and inefficient use of land, <u>with particular focus being placed on the Watford Junction sustainable transport hub.</u>	
MINOR46	Page 25, paragraph 2.17, first sentence	The area is presently severed by the railway lines <u>from other parts of the Strategic Development Area, including the station and Clarendon Road</u> , and improved access is needed to mitigate the impact of this.	
MINOR47	Page 26 para 2.21	2.21 The Taller Buildings Study (2021)	
MINOR48	Page 29, paragraph 2.25, first sentence	The Town Centre has existing residential areas alongside a wide range of facilities with large amounts of comparison retail alongside a variety of leisure, cultural and entertainment <u>provision facilities</u> .	
MINOR49	Page 2.27, first sentence	The Strategic Development Area contains three distinct character areas: the North High Street from the Exchange Road flyover north to Rickmansworth Road; the central part of the High Street from the flyover, south to <u>Queens Road King Street</u> ; and the south part of the High Street, which extends south of King Street to the Colne Valley Strategic Development Area.	
MINOR50	Page 29, Paragraph 2.28, first sentence	The Town Centre provides opportunities for <u>further</u> residential development as part of a wider mix of uses.	Officer change

MINOR51	Page 30, paragraph 2.37, first sentence	<del>Allocations</del> <del>Development</del> around Albert Road South <del>will</del> provide an opportunity for comprehensive redevelopment of this area to create a distinct identity with improved public realm.	
MINOR52	Page 31, paragraph 2.37, first sentence	The Local Plan <del>also</del> encourages increasing accessibility for people using public transport, walking and cycling, however, private vehicles will still be the choice for some.	
MINOR53	Page 32, paragraph 2.48, second sentence	Of particular importance are improvements to key junctions that should prioritise non-vehicle users ( <del>except for buses</del> ), including the junctions at the High Street / Rickmansworth Road, Albert Road South / Beechen Grove, Clarendon Road / Beechen Grove, south part of the High Street / Beechen Grove and Market Street / Exchange Road.	
MINOR54	Page 34, paragraph 2.53	The Colne Valley Strategic Development Area encompasses 83 hectares in the southern part of the Core Development Area. <del>with</del> <del>£</del> The defining feature is <del>being</del> the River Colne. It includes destinations such as Vicarage Road Football Stadium; Watford General Hospital; Trade City employment area and a distribution of retail parks that perform an out-of-town shopping role in the borough and Bushey and Watford High Street railway stations (Figure 2.4).	
MINOR55	Page 35, paragraph 2.55	Located in an area of high sustainability, <del>there are new development</del> <del>provides</del> opportunities for people to have excellent access to public transport, services and facilities including the town centre. New development is envisaged to transform this part of the town and create a built and natural environment that is increasingly focussed on people and high quality place making. <del>Proposals</del> <del>New</del> <del>development</del> should be designed to reinstate an urban grain that creates a legible network of streets and public spaces and a quality public realm.	

MINOR56	Page 35, paragraph 2.58, second sentence	The high volumes of traffic have resulted in the designation of an Air Quality Management Area <del>at</del> Bushey Arches and another at Pinner Road just outside the Strategic Development Area boundary.	
MINOR57	Page 35, Paragraph 2.58, fourth sentence	Informed by the Local Transport Plan and the <del>forthcoming</del> Local Cycling and Walking Infrastructure Plan, proposals...	Officer change
MINOR58	Page 36, Paragraph 2.64, second sentence	The River Colne is an important asset in the area as part of the network of green and blue infrastructure, and a connection from the Ebury Way and Oxhey Park to Waterfields Recreation Ground and further north along the valley. The area lies to the north of the Colne River Regional Park and shares many of the same characteristics <del>as part of the green and blue infrastructure network.</del>	Officer change, unnecessary repetition
MINOR59	Page 36, paragraph 2.65, fourth sentence	As part of the linear park, proposals should be designed to facilitate continuous access to adjacent greenspaces, play areas, allotments and playing fields. <del>It</del> This may require measures to address road crossings in the vicinity.	

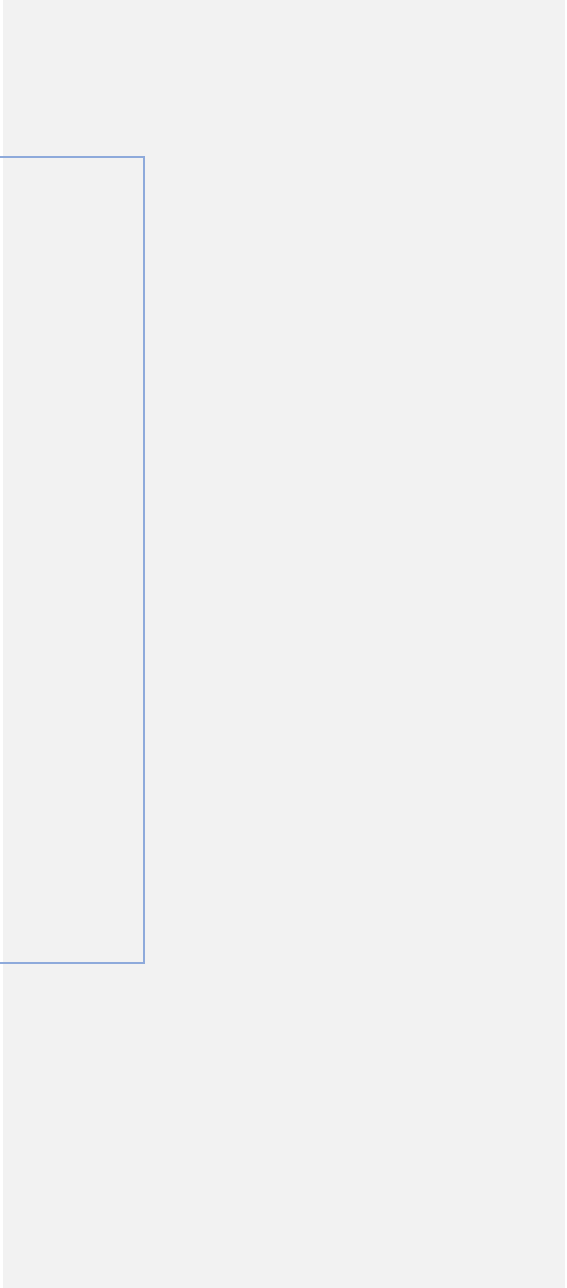
MINOR60	Page 36, paragraph 2.66, second sentence	The <u>surrounding</u> area has an overarching residential character and development schemes will need to be designed to reflect and integrate with this <del>character</del> .	
MINOR61	Page 36, paragraph 2.67, third sentence	Any future development proposals in this area should <u>also</u> positively contribute towards the existing residential character and enhance community facilities.	
MINOR62	Page 37, Paragraph 2.72, third sentence	Informed by the <del>Taller</del> Buildings Study the base future building height in the area is <u>up to six</u> storeys. New development should be designed to reflect this character and where proposals exceed this height, they will need to comply with the requirements set out in Policy QD6.5 'Building <del>height</del> <u>Height</u> '.	ID 4081 La Salle Investment Management



MINOR63

Page 40, paragraph 3.2, fourth sentence

This includes identified sites and also how many homes will come forward on sites that are either ~~r~~-not identified as a site allocation, or come forward with a housing density that is different from the indicative capacities calculated in the Housing and Economic Land Availability Assessment.

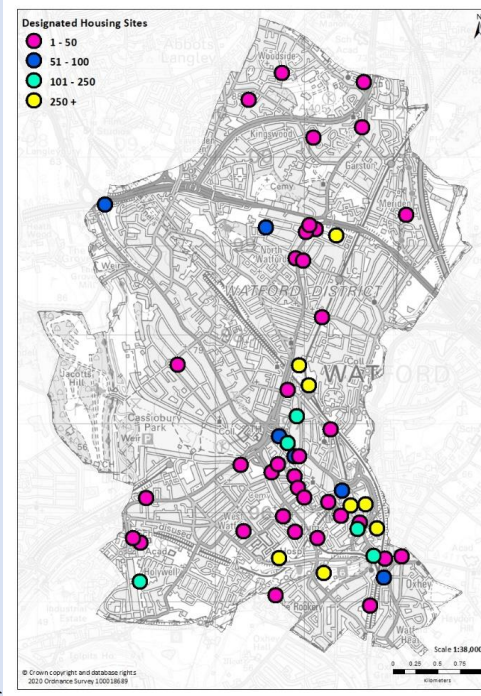


MINOR64

Page 40, Figure 3.2: Housing sites in the Local Plan

Designated Housing Sites layer amended to reflect altered housing

Officer change



numbers

CHAPTER 3

MINOR65	Page 44, Policy HO3.3: Affordable Housing Second paragraph, second sentence	The homes for social rent should seek to prioritise family-sized (three+ bedrooms) accommodation and reflect the most up-to-date <del>housing strategy</del> <u>Housing Strategy</u> .	
MINOR66	Page 47, Policy HO3.5: Specialist Housing and Care Homes, third paragraph	Proposals for new specialist housing should be located within 400m of a district or local centre and public transport, be designed to include pick-up and drop-off facilities close to the <del>principle</del> <u>principal</u> entrance that are able to accommodate specialist transport vehicles.	
MINOR67	Page 50, Policy HO3.9, first paragraph	Proposals to sub-divide existing residential accommodation in-to self-contained flats or large scale Houses in Multiple Occupation will be supported where:	
MINOR68	Page 52, Figure 3.3, title	Dementia <del>F</del> riendly design principles	
MINOR69	Page 52, paragraph 3.46, second sentence	<del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1981 St Albans City

			& District Council ID 1947 WSP ID 2058 Home Builders Federation
MINOR70			
<b>CHAPTER 4</b>			
MINOR71	Page 60, 4.19 (line 6 and line 11)	<del>e-Office</del> <del>d-Development</del> <del>h-Hierarchy</del>	Officer change
MINOR72	Page 60 - Heading Figure 4.3 Caps	Office development <del>h-Hierarchy</del>	Officer change
MINOR73	Page 68	Heading Retail <del>h-Hierarchy</del>	Officer change
<b>CHAPTER 5</b>			
MINOR74	Table 5.1 Retail Hierarchy	Para 5.1 Retail Hierarchy:  Watford Town Centre performs a role as a <u>sub</u> -regional centre	Officer change
<b>CHAPTER 6</b>			
MINOR75	Page 73, Paragraph 6.2, final sentence	Development proposals should take account of guidance provided in the Council's supporting planning documents and guidance <u>which includes the Residential Design Guide (2016) and Character of the Area Study (2011) and any future revised versions of these which are adopted.</u>	Clarity. Comment ID 1862 and ID 1864, both Watford Central Town Residents Association

MINOR76	Table 5.1	Heading in table Retail <del>h</del> <u>H</u> ierarchy	Officer change
MINOR77	Page 82 para 6	The Tal <del>er</del> Buildings Study (2021)	Officer change
MINOR78	Page 83 para 6.26	Tal <del>er</del> Buildings Study	Officer change
MINOR79	Page 83, Paragraph 6.27, second sentence	Relevant plan policies include: housing and amenity space (Chapter 3 'Homes for a Growing Community'); design (Chapter 6 'An Attractive Town'); and heritage (Chapter 7 'The Historic Environment'); sustainability and climate change (Chapter 8 'A Climate Emergency'); open space (Chapter 9 'The Environment') and sustainable transport (Chapter 11 'Sustainable <del>T</del> ransport <u>T</u> ravel Town').	Correction
MINOR80	Page 83 para 6.29	Tal <del>er</del> Buildings Study	Officer change
MINOR81	Page 84 para 6.31	The Tal <del>er</del> Buildings Study	Officer change
<b>CHAPTER 7</b>			
MINOR82	Page 92, Policy HE7.4: Archaeology, second paragraph	To protect the significance of archaeological assets, measures will need to be taken that are proportional to their importance to ensure the physical preservation of the assets and their setting. These measures should be prepared in collaboration with the county <del>archaeologist</del> <u>council's Historic Environment team</u> and secured through planning conditions.	Updated reference. Comment ID 2141 HCC
<b>CHAPTER 8</b>			
MINOR83	Page 94 para 8.1	delete footnote at the end of the last sentence	Officer change
MINOR84	Page 94 title Figure 8.1		Officer change
MINOR85	Page 94, para 8.3	<del>o</del> <u>O</u> pportunities map	Officer change
MINOR86	Page 94 title Figure 8.1	<del>o</del> <u>O</u> pportunities map	Officer change

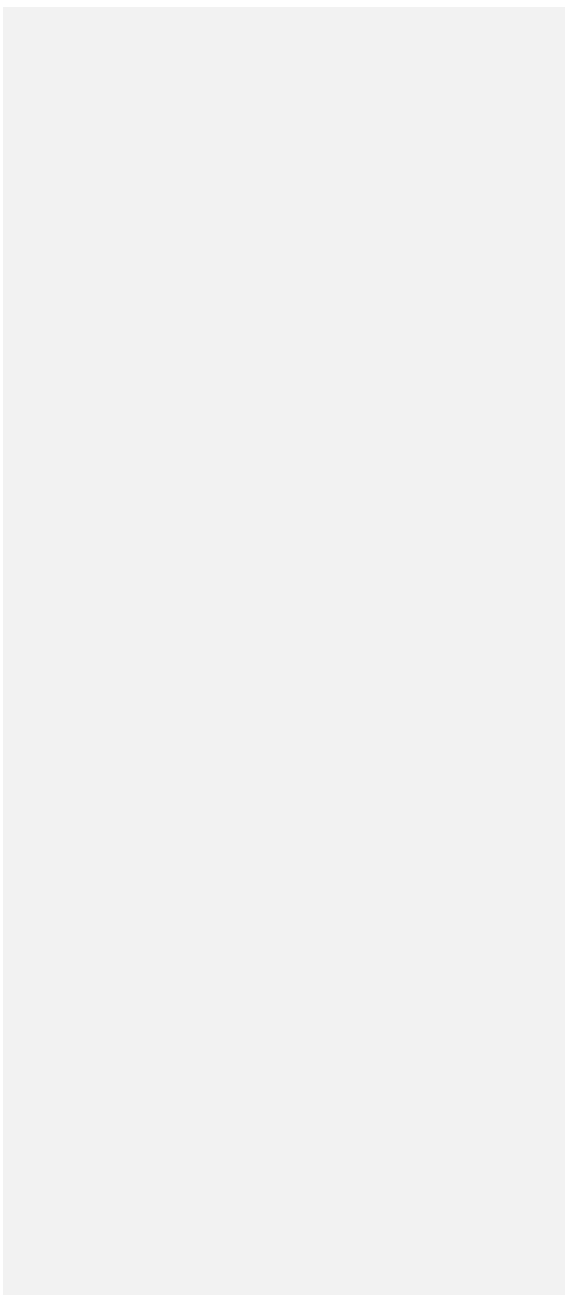
MINOR87	Page 96 Heading Figure 8.2	Energy <del>h</del> <u>H</u> ierarchy	Officer change
MINOR88	Page 94, Paragraph 8.1, last sentence	Delete footnote in c): <a href="https://www.watford.gov.uk/downloads/file/3229/sustainability_strategy_part_1_2020_to_2023">https://www.watford.gov.uk/downloads/file/3229/sustainability_strategy_part_1_2020_to_2023</a>	Officer change
MINOR89	Page 98, Policy CC8.3, Energy Efficiency part (c)	<del>2018</del> <u>2021</u> - 2025	ID 1981 St Albans City & District Council
MINOR90	Page 100 Policy CC8.3	the list a,b,c needs to be amended to include all points (the first is not bulleted)	Officer change
<b>CHAPTER 9</b>			
MINOR91	Figure 9.3 Heading	Flood Zones with climate change allowances in Watford (remove with CC?)	Officer change
MINOR92	Page 104, policy requirement	<del>m</del> <u>M</u> itigation <del>h</del> <u>H</u> ierarchy	Officer change
MINOR93	<b>Policy NE9.5: Surface Water Management</b>	Measures should be agreed with the <del>lead flood risk authority</del> <u>Lead Local Flood Authority</u> and be consistent with the Hertfordshire Local Flood Risk Management Strategy	Officer change
MINOR94	Page 111, Para 9.3	Delete footnote	Officer change
MINOR95	Page 111 Heading	Surface <del>W</del> <u>w</u> ater <del>M</del> <u>m</u> anagement	Officer change
MINOR96	Page 114, para 9.36 (line 6)	Biodiversity <del>m</del> <u>M</u> itigation <del>h</del> <u>H</u> ierarchy	Officer change
MINOR97	Page 114 Caps - Heading Figure 9.4	Biodiversity <del>m</del> <u>M</u> itigation <del>h</del> <u>H</u> ierarchy	Officer change

MINOR98	Page 115 (1 para and 3 <sup>rd</sup> para)	<del>m</del> Mitigation <del>h</del> Hierarchy	Officer change
MINOR99	Throughout	<del>FZ</del> Flood Zone	Officer change
MINOR100	Throughout	<del>SFRA</del> Strategic Flood Risk Assessment	Officer change
MINOR101	Throughout	<del>SuDS</del> Sustainable Drainage Systems	Officer change
<b>CHAPTER 11</b>			
MINOR102	Page 118, Paragraph 10.12, first sentence	... in line with Chapter 11 'A Sustainable <del>Transport</del> <u>Travel</u> Town'.	Officer change
MINOR103	Page 124	A Sustainable <del>Transport</del> <u>Travel</u> Town	Officer change
MINOR104	Page 124, paragraph 11.1, second sentence, delete footnote	<del>*2018 UK Greenhouse Gas Emissions, Final Figures, ONS, <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/862887/2018_Final_greenhouse_gas_emissions_statistical_release.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/862887/2018_Final_greenhouse_gas_emissions_statistical_release.pdf</a> (ONS, UK Greenhouse Gases, 2018)</del>	Officer change
MINOR105	Page 125, paragraph 11.7, third sentence	<del>2036</del> <u>2037</u>	ID 2002 Drax Investments Limited ID 2063 Glyn Hopkins Holdings Limited ID 2090 North Western Avenue Watford Ltd ID 1947 WSP

			ID 2058 Home Builders Federation
MINOR106	Page 127, paragraph 11.15, third sentence	A further element to the re-development of the area is a new <u>sustainable transport</u> <del>multi-mobility</del> hub, containing a sustainable transport multi-storey car park as well as facilities for a range of other modes, to be located immediately east of the station, space for which should be preserved.	Officer change
MINOR107	Page 130, Paragraph 11.20, first sentence	Whilst the scale of expected development is relatively limited, Bushey Arches is a known congestion hotspot, and an Air Quality Management Area has previously been declared for Pinner Road and Chalk Hill. <u>It is therefore of crucial importance that vehicle movements from new development are minimised through restrictive car parking standards.</u> <del>so the traffic impacts of any development will need to be carefully considered.</del>	2188 Hertfordshir e County Council
MINOR108	Page 131, Paragraph 11.27, first sentence	This would should include bus priority interventions along and in the vicinity of the ring road <u>which in the future could develop to potentially support the provision,</u> <del>as well as preserving its ability to become part</del> of a mass rapid transit route <u>system.</u>	2190 Hertfordshir e County Council



<b>CHAPTER 12</b>			
MINOR109	Page 145, Paragraph 12.3, first bullet	An active population: taking steps to manage increasing child obesity and the location of unhealthy food outlets and providing better access to open spaces and community facilities. <a href="#">Even small-scale proposals can support the provision of accessible open space, improving opportunities for outdoor physical activity.</a>	Clarity. Comment ID 1815 Sport England
<b>CHAPTER 13</b>			
MINOR110	Page 181, Site allocation MU16, second bullet	Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as part of the linear park proposal. Re_naturalisation of the culverted River Colne will also be supported;	Officer change
<b>APPENDICIES</b>			
MINOR111	Page 193, Title	Appendix A: <del>Draft</del> Monitoring Framework	Officer change
MINOR112	Page 202, Watford Gateway Strategic Development Area, second row, first column	Eastern <a href="#">Sustainable Transport</a> <del>Multi-Mobility</del> Hub and Station Bridge	Officer change
MINOR113	Page 209, Glossary: Self Build	Change custom and self-build to two separate definitions	Officer change
MINOR114	Page 214, Table title	Planning <del>p</del> <a href="#">Policies</a> to be Superseded by the Watford Local Plan <del>2018</del> <a href="#">2021 – 2036</a> <del>2037</del>	Officer change



Regulation 22(1)(c) Statement of Watford Borough Council in support of the Final Draft Watford Local Plan 2018-2036

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## 1 Introduction

### 1.1 Purpose

This Consultation Statement sets out how Watford Borough Council has involved residents and key stakeholders in preparing the draft Local Plan 2018 – 2036 in accordance with Regulations 18 and 19 in the Town and Country Planning (Local Planning) (England) Regulations (2012). This statement meets Regulation (1)(c) and demonstrates that consultation on the preparation of the draft Local Plan has been undertaken in accordance with the relevant regulations and the adopted Statement of Community Involvement (SCI) (2020). The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. [The current SCI can be found here.](#)

### 1.2 Background

This Consultation Statement demonstrates how the Council has used community participation and stakeholder involvement in the production of the new draft Local Plan. It shows how much efforts have shaped the Local Plan and the main issues raised through representation in response to multiple consultations. Watford Borough Council began preparation for a new Local Plan in 2016. This Plan sets out the new strategic vision, objectives, spatial strategy and planning policies to guide future development up until 2036 when the plan period ends. This plan will establish areas for growth, put in place policies and guidance to ensure development is in accordance with National Planning Policy Framework (NPPF) and with other principles set locally. This Local Plan will replace the Core Strategy (2013).

### 1.2 Structure

The structure of this document is set out in sections.

Section 1: This is an introduction and provides background and purpose for the document.

Section 2: The timetable which demonstrates the Local Plan preparation in accordance with [Watford's Local Development Scheme \(2020\)](#).

Section 3: This section provides detail on the key issues brought up in consultation and how the responses have been considered and incorporated.

There is an additional table of issues which remain outstanding and will be brought to examination. This section is supported by the Appendices which detail the consultation processes, the responses and how comments have been reviewed.

Appendix 1: Explains who was invited to make representations and how. (In accordance with Regulation 22 (1)(c)(i) and (ii)). Summarises the main issues raised (Regulation 22 (1)(c)(iii)) in Plan order and how the issues were addressed (Regulation 22 (1)(c)(iv)).

Appendix 2: Explains how the regulation 19 Local Plan consultation was completed and how many representations were received. It includes a summary of issues (Regulation 22 (1)(c)(v) and a council response to issues raised.

## 2. Timeline

The timeline set out below indicates the main stages of the Local Plan consultation. This shows early and ongoing engagement with the local community, businesses, organisations and stakeholders to develop a comprehensive Plan specific to Watford's needs. The examination period is expected to run from summer Autumn 2021 to Spring 2022 and adoption is be anticipated for Summer 2022. This plan sets out the strategy for growth and supersedes Core Strategy 2013. It includes changes in national policy and guidance, new evidence and more ambitious targets reflective of current circumstance.

### 2.1 Key Local Plan Stages Undertaken

- Notification (December 2016)
- Issues and Options Consultation (September – October 2018)
- First Draft Local Plan Consultation, Preferred options (September – October 2019)
- Publication of the Local Plan, Final Draft Local Plan (January 2021)
- Submission to the Secretary of State (July 2021)
- Examination (Autumn 2021 to Spring 2022)
- Adoption (Summer 2022)

## 3. Narrative summary

Watford Borough Council consulted in three stages prior to submission which included Issues and Options, Regulation 18 and Regulation 19 consultation. The plan evolved and improved by responding to and incorporating responses at each stage. Below are the details of issues brought up through each regulation phase.

### 3.1 Regulation 18 Overview

In accordance with Regulation 18 of the Town and Country Planning Regulations (2012) took place in two stages. Firstly was an Issues and Options consultation which took place from 7 September to 19 October 2018. Secondly was a consultation on the first draft Plan which took place from 27 September 2019 and 8 November 2019.

Appendix 1 shows more detail on how the requirements of Regulation 18 were met. This includes respondents, representations and officer responses showing how this was taken into account. The main issues raised in the consultation related to the policies map, climate emergency, clarity on the growth strategy, infrastructure delivery, viability concerns, the green spaces evidence and the housing trajectory.

After receiving the responses and considering the issues and concerns mentioned, the Council has worked to improve the draft Local Plan and incorporate relevant suggestions into the plan. Policies have been further developed and progressed. Once these developments and improvements were completed the plan was ready to publish for Regulation 19 consultation.

### 3.2 Main Issues from Regulation 19 and 20

In accordance with Regulation 19 of the Town and Country Planning Act (2012) the final draft Local Plan consultation ran for 8 weeks from 18 January to 18 March 2021. From this came 438 comments from 82 different individuals or organisations. 32% of comments pertained directly to soundness and 68% did not. In addition, two comments were submitted after the deadline and 12 comments were not duly made responses. These have not been included in the list of formal consultation responses. Respondents were directly contacted with advice to make their responses compliant. Appendix 2 shows more detail on how the requirements were met. This includes respondents, representation and responses to demonstrate how comments were taken into account.

#### 3.2.1 Introduction

Concern raised from residents on the scale of growth and development. General concern from multiple respondents that the plan should be delayed until after the effects of the Covid-19 pandemic are known. There were no changes made in response to these comments.

Soundness objections made in several representations state that the plan period should be extended to cover a 15 year time period from adoption. A comment from SADC suggested the plan start in 2021 rather than 2018 to reflect guidance. Changes to the plan period would also affect the housing trajectory. This is a proposed modification which will be considered by the Planning Inspector at Examination in Public as it is a major change.

#### 3.2.2 Core Development Area: Issues and modifications

Comments requesting clarification on how the CDA will function and how it will deliver the scale of growth proposed.

##### *Watford Gateway*

Aggregate Industries and Mineral Products Association requested clarity to be provided on the Concrete Batching Plant being safeguarded and development in the area respecting the adverse effect associated with this.



Comments states stated that the Canada Life site and neighbouring Coal Pensions Properties site should not be used for residential purpose in the early part of the plan period but instead be reallocated to employment. Both sought clarity on the short-term employment redevelopment would be suitable in the first part of the plan with a transition towards mixed uses later in the plan period. Network stated that the rail line should be able to support high speed trains in the long term and measures needed to be in place to support this.

#### *Town Centre*

Developers commented that the site capacities were too low (currently proposed at 220dph, the mid-pint between 95-350dph) to adequately reflect the location and that building height of 5-6 stories is too restrictive to deliver sufficient housing and development.

Reference should be made for a 3FE primary school to be delivered in the area.

Reference to a transport hub at the southern end of the High Street should be included.

Proposed changes to include reference to the primary school and transport hub will be included. No changes with regards to building height and capacity.

#### *In the Colne Valley area:*

Suggestion that more detail about the size and location of the school in the area should be provided as the reference in the plan was seen as too vague, especially given the shortfall of school places.

Details related to school provision are dependent on an education strategy prepared by HCC. The other changes are to be addressed by additional text and amending the boundary of site MU21 to include the hospital site and support its redevelopment. A SoCG will be prepared with HCC and the NHS with regards to the hospital.

#### *3.2.3 Housing: Issues and modifications*

Objection to the timeline of the plan would affect the housing target and move the figure from 14,988 to 13,171 units.

Request for greater clarity on windfall development and how this will be achieved and that this would need to be reflected in the delivery of windfall sites as part of the housing trajectory.

Home Builders federation and other organisations consider that proposed housing figures are a minimum. This was raised as a soundness issue that the plan period should be extended to 2037 and the housing target increased accordingly. This is a soundness objection.

Concerns were raised that the discount on build to rent housing was too high and that operators should have nomination rights rather the local authority to be consistent with national guidance.

Several residents consider the number of additional homes too high, particularly in a post-COVID Watford. No change required, impacts of COVID will not be known for some time and when applicable updated evidence will be fed into a plan review. The Government have made it clear that Local Plans should not be delayed, the council is not able to amend housing targets.

Residents also query the scale of development and the impact on design, infrastructure and wellbeing of the community. Not a soundness issue. Design, infrastructure and wellbeing are covered by the Plan.

HBF do not consider the self-build requirement to be justified and lodged a soundness objection.

WBC should provide justification for the use of nationally described space standards as required by the NPPF.

WBC should provide justification for the accessible homes requirements.

#### 3.2.4 Viability

HBF consider the 35% affordable housing target too onerous in light of the Local Plan viability assessment. Suggest a tiered requirement to reflect lower value areas in the north of the borough and objected in soundness to this.

HCC send responses about infrastructure delivery and funding which were not sent as objections but comments. These comments will be addressed through a Statement of Common Ground with HCC.

#### 3.2.5 Employment

Request that retail should be permitted in designated employment areas to reflect job creation.

Request that office development should not be subject to an impact test.

A request was made for the Printworks site to be included as part of the Asda site and removed from the industrial designation.

#### 3.2.6 Town and Local Centres

Include leisure destinations (such as Woodside) as areas for potential mixed use redevelopment to make a better use of land.

Retail impact assessment threshold should be amended. Threshold amended to reflect national policy, Watford specific evidence is not strong enough to require a lower threshold.

The council's approach to medium to large convenience retail should be explicitly outlined.

Policy VT5.3 Point F, which imposes a blanket ban on restaurants that include an element of hot food takeaway within 400-metres walking distance of a primary school entrance was challenged. Modifications proposed that require a Health Impact Assessment rather than a blanket ban.

### 3.2.7 Design

Concerns were raised about requiring all ground floor residential properties to have direct access to a public facing frontage and that there should be provisions for having more than 8 units per single core where this can be justified.

Request to include a design principle about sustainable design which was added.

Suggestion that base building height of 3 storeys outside of the CDA is too high.

### 3.2.8 Heritage

Text about archaeology should be more locally specific.

### 3.2.9 Climate Change

BREEAM standards seen as too difficult to achieve by two respondents (developers) and too low by the Environment Agency.

### 3.2.10 Environment

Flood zone clarification was brought up by multiple respondents and further wording on FZ3 was requested (EA, HCC, Three Rivers)

Objections that the Green Spaces Strategy is out-of-date and so cannot support the Plan effectively.

Request that Attenborough Fields be identified as green space.

Green space on Policies Map should be amended to include land at Backwell Drive and the proposed extension of the area identified as green space near Kytes Drive should be reduced to what it was in the existing Plan.

On-site provision of green space should be more flexible and allow a financial contribution instead. Evidence base does not support financial contributions with minimal shortfall of open space demonstrated in the borough at present low quantity per person required. CIL funds should be expected to provide for improvements.

Where an open space is proposed to be developed greater clarity about how the community benefit will be determined. Text amended to clarify that a proposal will need to identify the types of community benefit a proposal will provide.

#### 3.2.11 Transport

The Sustainable Travel Town approach encouraging active and healthier lifestyles through increased walking and cycling received strong support. Significant existing parking issues around allocated garage sites raised concerns for residents.

Highways England, highlighted sites where Traffic Impact Assessments are required and the need to demonstrate that impacts on the strategic road network will be mitigated. Added to site considerations in table 13.2. Further work with HCC with regards to the COMET model to be discussed with results due at the end of May. SoCG to be progressed.

The safeguarded MLX route is supported but not reflected in neighbouring Three Rivers. Will be subject to SoCG/DtC discussions.

#### 3.2.12 Infrastructure

Thames Water are generally supportive but flag that planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed. WBC Agreed that planning conditions can be used.

EA suggest changes to strengthen wastewater infrastructure. Suggested text agreed and will feature in the proposed modifications presented to the Inspector.

Infrastructure funding, there is an anticipated gap between infrastructure funding and the infrastructure required. Residential development should also demonstrate high quality digital connections.

HCC provided up to date information regarding infrastructure costs (waste, libraries, and education) and quantum of nursery places which will be reflected in the IDP.

#### 3.2.13 Sites

School site – HCC Property object to the allocation of Former Meriden School as an education allocation (ED01) as they are progressing a housing scheme on the site. HCC Growth & Infrastructure Unit (with responsibility for education) support the allocation. This was raised as a soundness objection by HCC Property as landowner.

Challenging the indicative yield and the approach to capacities used for all allocated sites. Particularly in relation to sites MU23 Asda and MU14 Wellstones although the principle of allocation both sites is supported. (soundness objection)

Concern was raised by multiple residents at the number of supermarkets allocated for development.

Historic England have raised a soundness objection due to lack of heritage impact assessments on key site allocations which was a soundness objection.

Concrete batching plant at Watford Junction needs to be shown on map as a soundness objection and the map is going to be amended.

Riverwell allocation should include hospital site (WHHT) (soundness objection).

#### 3.2.14 Policies Map Changes

The policies map has received minor modifications to reflect the changes listed above where relevant.

#### Conclusion

The above main issues have been dealt with accordingly by Watford Borough Council to the best of abilities.

#### Outstanding Issues (In Progress)

The following issues are currently outstanding but are being resolved wherever possible through Statements of Common Ground, proposed modifications or other relevant avenues prior to the Examination.

Plan Topic/ Chapter	Policy (if applicable)	Main Issues raised	Council Response	Council Action	Respondents' unique ID	Respondent's name
Green Spaces Strategy	Chapter 9: the Natural Environment	Objection that the Green Spaces Strategy is out-of-date and so cannot support the Plan effectively	No change required. Green Infrastructure Plan is not considered to be out of date as limited changes have been made to green	There are ongoing updates to the evidence base and once this document is deemed out of date it will be updated	1853 1936	Planning & Development Associates Ltd (Mr Alan Gunne-Jones,

			<p>infrastructure and open space since it was adopted. However, a new strategy is being undertaken and it is considered the policy is written in such a way that is flexible for updated documents to supersede the existing. The Green Infrastructure Plan can be found online and will be published as part of the examination library</p> <p>Improvements to smaller amenity spaces is set out as a priority project in the Green Infrastructure Plan and the Local Plan.</p>	to reflect any future changes.		Managing Director) [4045] Anchor Hanover Group [4086]
Flooding	Policy NE9.4: Flood Risk and Mitigation	Clarification on Flood zones 3a and 3b was requested by multiple respondents and further wording was requested.	Addition: Only water compatible and essential infrastructure are will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within FZ3b. Developers should seek to increase the extent of FZ3b where possible and appropriate.	This is being determined through Statements of Common Ground and will be posed to the Planning Inspector.	1913 2084	Three Rivers District Council (Mr Marko Kalik, Senior Planning Officer) [4085]  Environment Agency (Hannah Malyon, Sustainable Places

						Planning Advisor) [4120]
Traffic Impact Assessments	Site allocations and new development	Highlighted sites where Traffic Impact Assessments are required and the need to demonstrate that impacts on the strategic road network will be mitigated.	Added to site considerations in table 13.2.	Further work with HCC with regards to the COMET model to be discussed with results due at the end of May. SoCG to be progressed.	2044	Highways England [3258]
Safeguarding	Metropolitan Line Extension	The safeguarded MLX route is supported by some respondents but not reflected in neighbouring Three Rivers		Subject to SoCG and DtC discussions and likely resolved at EiP.	1915	Three Rivers District Council (Mr Marko Kalik, Senior Planning Officer) [4085]
School Site	Site Allocations	HCC Property object to the allocation of Former Meriden School as an education allocation (ED01) as they are progressing a housing scheme on the site. HCC Growth & Infrastructure Unit (with responsibility for education) support the allocation. This was raised as a soundness objection by HCC Property as landowner.	It is seen that the need for a school outweighs the need for housing and this site is one of only two identified by HCC's school site search evidence base. Both have been allocated by the Local Plan but there is still a shortfall in school place capacity	A slight boundary amendment is proposed in the main modifications, it is hoped that an agreement can now be reached in a SoCG with HCC Property.	2055	Hertfordshire County Council [3751]
Watford Gateway Sites	MU07 & EM05	Concerns about future use east of Abbey Line and improving access to the area. Clarifying employment use in the short-term.	Requirement for landowners to work together.	Amend Policy CDA2.1 and site allocations MU07 and EM05 to state that there will not be a net loss of	1972 1976 2018 2076	Canada Life Asset Management

				<p>employment floorspace unless it is reprovided as industrial floorspace.</p> <p>Address issues though Statement of Common Ground.</p> <p>Safeguarded area, including the access road, to be added to the Policies Map and site allocation MU06. Agent of change principle to be referenced and identified. 250m consultation zone to be added to supporting text.</p>	2077 1928	<p>Aggregate Industries UK Ltd</p> <p>Gerald Eve LLP</p>
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### Conclusion

Watford Borough Council has met the requirements of Regulation 22(1)(c)(i) to (iv) as demonstrated in the appendices. Appendix 1 explains which bodies and persons were invited to make a representation under regulation 18 and how they were invited to do so. This is in accordance with the plan-making regulations and Watford Borough Council's SCI (2020). Summaries and full representation report are provided and include explanations of how they were taken into consideration with the summary in Appendix 1.



# Appendix 1: Regulation 18 Consultation Details

## Preferred Issues and Options Statement

### 1. INTRODUCTION

#### **1.1 The Local Plan**

Watford Borough Council is preparing a Local Plan, which will guide new development to 2036. The New Watford Local Plan 2020-2036 is a comprehensive process involving the preparation of a large evidence base. Public consultation and stakeholder engagement is a critical component of this.

Public consultation took place between 27 September 2019 and 8 November 2019 on the First Draft Local Plan, informally known as a Preferred Options consultation. The document consulted on was a full draft of the Local Plan, as well as an accompanying Policies Map and Sustainability Appraisal. Comments were invited on the content of the documents.

This version of the Plan was prepared under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was the second formal stage of consultation for the New Watford Local Plan. The council had previously consulted upon Issues and Options (Regulation 18) during September-October 2018. The Issues and Options document represented asked questions related to aspirations for the borough on a number of planning related issues, such as housing and employment. Comments received during this consultation were used to inform the Draft Local Plan.

The intended timetable for the Local Plan production process is set out in the Local Development Scheme (2020) and can be found below.

Figure 1: Provisional timetable for Local Plan

Preparation stage of the Watford Local Plan	Indicative Date
Notification	December 2016
Issues and Options Consultation	September - October 2018
First Draft Local Plan Consultation (Preferred Options)	September - October 2019
Publication of the Local Plan (Final Draft Local Plan)	January 2021
Submission of the Local Plan to the Secretary of State	June 2021
Examination Hearing	July 2021 - December 2021
Adoption	February 2022

## 1.2 Purpose of this Report

As noted, the Preferred Options consultation ran from Friday 27 September to Friday 8 November 2019. This report details the methods used to consult with key stakeholders, including statutory consultees and the wider community in Watford. It also seeks to provide a summary of the comments received during the consultation and the council's response to each representation made.

## 2. NOTIFICATION AND ADVERTISEMENT

### 2.1 Methods of Engagement

A comprehensive effort was undertaken in advertising the consultation and working to better engage the community in the Local Plan process. The council's approach to consultation far exceeded statutory requirement to attempt to broader participation with the Local Plan.

Methods used to consult include:

- Use of a bespoke [Local Plan website](#) (which received 2,410 unique views during the consultation period)
- A short summary leaflet which was made available on the Local Plan website, as well as being displayed for takeaway at the Town Hall, the two libraries and Watford Museum. Further copies were also given out at the public exhibitions.

- Six digital posters on Watford High Street, as well as 55 posters in bus shelters across the borough. Two posters were also placed in the underpass at the northern end of the High Street (The Parade)
- [An animation providing information about the consultation, which was uploaded onto YouTube, the council's social media pages and the Local Plan website](#)
- [Six vox pops](#) featuring different members of Watford's diverse community, which were uploaded onto YouTube and the council's social media pages
- Two promotional panels placed in the Town Hall customer service centre
- A notification letter sent to all on the consultee database (approximately 350 residents, local businesses and organisations and statutory consultees)
- Features in two resident e-newsletters (approximately 1500 subscribers), as well as features in two of the Mayor's e-newsletters (approximately 5000 subscribers)
- Leaflet drops to 12,000 residents within certain proximities of the event venues
- A Local Plan footer added to the end of all external emails sent by the council (approximately 1500 sent daily)
- Copies of the Draft Local Plan, Draft Policies Map and the Sustainability Appraisal made available for viewing at the Town Hall, Watford Central Library and the North Watford Library
- A Public Notice (as required by the Town and Country Planning (Local Planning) (England) Regulations 2012) published in the Watford Observer
- A press release sent to 15 media outlets

In addition, the council used social media to publicise the consultation. Eight Facebook statuses were posted that had a total reach of 12,602 users combined. Seven Tweets were also sent out that appeared on the feed of an average of 1454 users per Tweet.

The Local Plan was covered in a number of media pieces, including an article published in the [Watford Observer and an interview with the Mayor in Property Week \(25 October\)](#). The First Draft Local Plan was also covered in an article on [Planning Resource](#), although this website is only accessible to those with a subscription.

## 2.2 Exhibitions and events

Six staffed exhibitions were held on:

- Thursday 3<sup>rd</sup> October, 12-2pm at the Town Hall (internal staff event)
- Tuesday 8<sup>th</sup> October, 5:30pm-7:45pm at Oxhey Community Hall
- Saturday 12<sup>th</sup> October, 11am-2pm at Cassiobury Hub
- Wednesday 16<sup>th</sup> October, 4:45pm-6:45pm at Café West, West Watford Free Church
- Tuesday 22<sup>nd</sup> October, 5pm-7pm, at Meriden Community Centre
- Thursday 31<sup>st</sup> October, 4:30pm-6:45pm at Watford Central Library

Exhibitions were generally well attended with approximately 25-50 people at each event. A minimum of three Planning Officers attended each event. The council's Communications and Engagement Manager also attended the events at Meriden Community Centre and Central Library to explain how the Plan and consultation portal could be accessed online.

The Mayor also gave a presentation on the First Draft Local Plan at the Watford Chamber of Commerce, where representatives from over 30 local businesses were present.

The main issues discussed at the staffed exhibitions were:

- Concerns about the impacts of new development and higher densities
- The number of flats coming forward as opposed to houses
- Specific development sites including recent planning permissions
- The provision of infrastructure to support new development
- Loss of pubs, retail facilities and garages in the Plan
- The future of the town centre and how its vibrancy can be retained
- Parking and congestion
- Poor public transport in Watford (particularly in the north of the Borough)
- More adaptable and affordable housing required

- Development located in areas of flood risk
- Achievability of climate change targets
- Support for locating new development in sustainable locations

### **2.3 Comment Submissions**

Comments were invited on the First Draft Local Plan, Policies Map and Sustainability Appraisal using [JDI](#), a bespoke consultation software. However, the council recognises that some members of the community do not have access to the internet, or prefer to engage using different methods. Therefore, written responses including letter and email responses were also welcomed.

Physical copies of the documents were sent on request.

## **3. RESPONSE AND FEEDBACK**

### **3.1 The Level of Response**

This was considerably larger than historic Local Plan consultations, although lower than the previous Issues and Options consultation held in 2018. 842 individual comments from 223 respondents.

Those consulted on are listed in Appendix A. The consultation responses are summarised in Appendix B.

**Introduction**

- 1.1 This Consultation Statement sets out how Watford Borough Council has undertaken consultation on the new Local Plan. The report identifies those consulted, the issues raised and how the council has responded to those issues to prepare the Final Draft Local Plan. The Statement seeks to assist the Inspector at the Examination in determining whether Watford’s Local Plan complies with requirements for public participation.
- 1.2 The statement describes the consultation and engagement carried out by the Council and how it has complied with statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). It also demonstrates that public involvement is consistent with Watford’s Statement of Community Involvement (SCI) adopted in 2020.

**2. Background**

- 2.1 In preparing the new Watford Local Plan, regular meetings have been held with members through the Planning Policy Advisory Group (PPAG), a cross-party group set up to advise on the Plan. Presentations have been made to the Developers Forum and Town Centre Group. The Local Economic Partnership (LEP) and Local Strategic Partnership (LSP) have been kept informed of the Local Plan consultation process. Direct discussions held with statutory bodies have also helped inform the drafting of the plan.
- 2.2 In December 2016, consultees were informed that the Council intended to prepare a new Local Plan and were invited to comment. Feedback was received from 6 statutory organisations – Environment Agency, Greater London Authority, Hertfordshire County Council, Historic England, St Albans City and District Council and Transport for London.
- 2.3 An Issues and Options Consultation was then undertaken between 7 September and 19 October 2018. The consultation was on a concise document which focussed on the key issues for comment.
- 2.4 A summary of these previous consultations and responses received is available in the [Issues and Options Consultation Statement](#) on the council website.
- 2.5 A full First Draft Local Plan was then prepared for consultation in 2019 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report summarises this consultation and the responses received.

**3. First Draft Local Plan - September 2019**

- 3.1 Public consultation took place between 27 September 2019 and 8 November 2019 on the First Draft Local Plan, informally known as a Preferred Options consultation. The document consulted on was a full draft of the Local Plan, as well as an accompanying Policies Map and Sustainability Appraisal. Comments were invited on the content of all three documents.

## Engagement

- 3.2 A comprehensive effort was undertaken in advertising the consultation and working to better engage the community in the Local Plan process. The council's approach to consultation far exceeded statutory requirement to attempt to broader participation with the Local Plan.
- 3.3 Methods used to consult include:
- Use of a bespoke [Local Plan website](#) (which received 2,410 unique views during the consultation period)
  - A short summary leaflet which was made available on the Local Plan website, as well as being displayed for takeaway at the Town Hall, the two libraries and Watford Museum. Further copies were also given out at the public exhibitions
  - Six digital posters on Watford High Street, as well as 55 posters in bus shelters across the borough. Two posters were also placed in the underpass at the northern end of the High Street (The Parade)
  - An [animation](#) providing information about the consultation, which was uploaded onto YouTube, the council's social media pages and the Local Plan website
  - [Six vox pops](#) featuring different members of Watford's diverse community, which were uploaded onto YouTube and the council's social media pages
  - Two promotional panels placed in the Town Hall customer service centre
  - A notification letter sent to all on the consultee database (approximately 350 residents, local businesses and organisations and statutory consultees)
  - Features in two resident e-newsletters (approximately 1500 subscribers), as well as features in two of the Mayor's e-newsletters (approximately 5000 subscribers)
  - Leaflet drops to 12,000 residents within certain proximities of the event venues
  - A Local Plan footer added to the end of all external emails sent by the council (approximately 1500 sent daily)
  - Copies of the Draft Local Plan, Draft Policies Map and the Sustainability Appraisal made available for viewing at the Town Hall, Watford Central Library and the North Watford Library
  - A Public Notice (as required by the Town and Country Planning (Local Planning) (England) Regulations 2012) published in the Watford Observer
  - A press release sent to 15 media outlets
- 3.4 In addition, the council used social media to publicise the consultation. Eight Facebook statuses were posted that had a total reach of 12,602 users combined. Seven Tweets were also sent out that appeared on the feed of an average of 1,454 users per Tweet.
- 3.5 The Draft Local Plan was covered in a number of media pieces, including an article published in the [Watford Observer](#) and an interview with the Mayor in *Property Week* (25 October). The First Draft Local Plan was also covered in an article on [Planning Resource](#), a subscription magazine service.

## Exhibitions

- 3.6 Six staffed exhibitions were held:

- Thursday 3<sup>rd</sup> October, 12-2pm at the Town Hall (internal staff event)
- Tuesday 8<sup>th</sup> October, 5:30pm-7:45pm at Oxhey Community Hall
- Saturday 12<sup>th</sup> October, 11am-2pm at Cassiobury Hub
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- Tuesday 22<sup>nd</sup> October, 5pm-7pm, at Meriden Community Centre
- Thursday 31<sup>st</sup> October, 4:30pm-6:45pm at Watford Central Library

- 3.7 Exhibitions were generally well attended with approximately 25-50 people at each event. A minimum of three Planning Officers attended each event. The council's Communications and Engagement Manager also attended the events at Meriden Community Centre and Central Library to explain how the Plan and consultation portal could be accessed online.
- 3.8 A summary of the issues raised at the public events is set out in Appendix F.
- 3.9 The Mayor also gave a presentation on the First Draft Local Plan at the Watford Chamber of Commerce, where representatives from over 30 local businesses were present.

#### 4. Summary of Consultation Responses

- 4.1 Comments were invited on the First Draft Local Plan, Policies Map and Sustainability Appraisal online using [JDI](#), a bespoke consultation software. Written responses including letter and email responses were also welcomed.
- 4.2 Individuals and organisations registered on the Planning Policy mailing list, as at 27 September 2019, were sent an email notification about the First Draft Local Plan consultation inviting comments.

The following organisations were consulted, those who responded have an asterix\* after their name in Table 1:

<b>Statutory Bodies</b>	
Affinity Water*	Historic England*
Coal Authority	Homes and Communities Agency
Civil Aviation Authority	Marine Management Organisation
Dacorum Borough Council*	Natural England



Environment Agency*	Network Rail*
Greater London Authority*	Office of Rail Regulation
Hertfordshire County Council*	Thames Water Utilities Ltd*
Hertfordshire Local Enterprise Partnership	St. Albans City & District Council*
Hertfordshire Valleys Clinical Commissioning Group	Three Rivers District Council*
Hertsmere Borough Council*	Transport for London*
Highways England*	
<b>Local Bodies / Other Organisations</b>	
Abbots Langley Parish Council	London Borough of Hillingdon*
Aldenham Parish Council	London Midland
AMEC Environmental & Infrastructure UK	London Strategic Planning
Armstrong Rigg Planning	Luton and Leighton Area Quakers
Avison Young	Mercedes Benz Retail Group*
Barker Parry Town Planning	Ministry of Housing, Communities and Local Government
Boys and Girls Nursery	Mobile UK
Brasier Freeth	Montagu Evans
Broxbourne Borough Council	Nascot Grange Residents Association*
Cadent Gas	Nascot Wood Junior School
Campaign for Real Ale*	National Federation of Gypsy Liaison Groups*

Canal and River Trust*	Nexus Planning
Cassiobury Residents Association	NHS England
Castle Homes*	Obsidian Strategic
Centrica	One YMCA
Chiltern and South Bucks District Councils*	Pentagon Paint
Cordage Group*	Perry Holt & Co
Cornerstone Telecommunications	Pigeon Investment Management
Croxley Green Parish Council	Planware
Curtin&Co	PowerHaus Consultancy
Cushman and Wakefield	Royal Society for the Protection of Birds
DB Cargo UK Ltd	Rumball Sedgwick
DB Schenker Rail	Saint Gobain
Department for Education*	Savills
Dignity Funeral Directors	Sirius International Insurance Group
DLP Planning Ltd	Sport England*
EE	SSA Planning
Extinction Rebellion Watford*	Strutt and Parker
Farrington Care Homes	St Stephen's Parish Council
Firstplan	St William Property Developers

Friends of the Earth*	Stevenage Borough Council
GD Plant Hire	Tangent Trading Ltd
Gerald Eve*	Tannen Group
Gladman	Tellon Capital*
Goodman Logistics and Warehouses	Tesni
Heaton Planning	Tetlow King*
Hertfordshire Constabulary	Thakeham
Hertfordshire Local Enterprise Partnership	Thames Water Utilities*
Herts and Middlesex Wildlife Trust*	Theatres Trust
Herts Valleys CCG*	Three mobile
Hightown Housing Association	Troy Planning
Home Builders Federation*	UK Power Networks
Homes England	Wakelin Associates Architects
Inland Homes	Walker Morris LLP
Intouch Planning	Warner Bros Studios*
JLL*	Watford Community Housing Trust
John Wood Group*	Watford Field School Infants & Nursery
Just Plans	Watford Museum
LaSalle Investment Management*	Watford Rural Parish Council

Legal and General Investment Management*	Welwyn Hatfield Borough Council
Lichfields	Wenta*
London Borough of Barnet	West Herts Hospitals NHS Trust
London Borough of Harrow	West Watford Community Association

The following organisations were not contacted directly but did respond to the consultation:

<b>Table 2 – Additional organisations that responded to the First Draft Local Plan Consultation</b>	
Aggregate Industries UK Ltd	RDI REIT
APG Portfolio Management Ltd	Rentplus Ltd.
Berkeley Homes	S. Hille & Co Holdings
Cortland Partners	Solum
IDA London Holdings	Telereal Trillium
IDA Plymouth Holding	Watford Health Campus Partnership LLP
Indigo Planning	Watford Fields Resident Association
Newsteer	Woodland Trust
Nuveen Real Estate	Woolf Bond Planning
Punc Partners	

4.1 842 comments were received from 223 respondents. These are summarised alongside a Watford Borough Council summary response in Appendix G.

4.2 In response to the Regulation 18 First Draft Local Plan consultation various changes have been made to the document. Further alterations have also been made by officers ahead of the Regulation 19 consultation in order to present a clear and concise document and to avoid duplication of information available elsewhere.

## First Draft Watford Local Plan Summary of Consultation Responses

Topic	Responses	Summary	Plan Update
<p><b><u>POLICIES</u></b> <b><u>MAP</u></b></p>	<p>20 comments, of which 2 support and 18 object</p>	<p>Historic England have expressed that the Policies Map is hard to read and some information should be illustrated in the body of the document e.g. designated employment sites Clarity sought for boundaries of the Strategic Development Areas. Key transport interchanges should be shown on the map. Attenborough Fields should be designated as a priority habitat. Watford Health Campus Partnerships object to the Safeguarded Routes running through and adjacent to the Watford Riverwell site. They also object to the designated Open Space/Priority Habitat designation to the west of the site. LaSalle Investment Management seek a defined boundary to the Priority Habitat areas to the east of the Colne Valley Retail Park. Warner Bros. request that the studio land is removed from the Green Belt – representations have been submitted to Three Rivers requesting the same. Many of the objections are duplications of those made under the relevant policy including: Objection to the Mothercare Headquarters on Cherry Tree Road as a Designated Employment Site. Objection to the Liverpool Road garage site (H27) for redevelopment on parking grounds. Objection to building on Bushey station car park. Erroneous ‘priority habitat’ designation. Lack of parking. Evidence sought to clarify how the sustainability zones were decided. Orphanage Road Rail Aggregates Depot should be safeguarded.</p>	<p>Policies map improved to provide greater clarity on the points raised. ‘Key Diagram’ added to the document to illustrate employment areas, safeguarded routes and transport interchanges. Note, safeguarded route remains through the Watford Riverwell site in line with recommendations of the 2019 Metropolitan Line Extension Alternatives Study. Green belt amended to remove the Warner Bros. site reflecting the planning permission and future studio expansion.</p>

<p><b><u>CHAPTER 1: INTRODUCTI ON</u></b>  <b>General Comments</b></p>	<p>28 comments, of which 10 support and 1 object</p>	<p>General support for the vision and strategic objectives, in particular environmental objectives, intensification of land in sustainable locations and the delivery of housing to create balanced and mixed communities.</p> <p>Sport England support for the vision encouraging active and healthier lifestyles although consider that a standalone health and well-being policy should be added.</p> <p>Friends of the Earth consider that further references should be made to the pledge to make the borough carbon neutral by 2030 and further references to sustainability/environmental considerations.</p> <p>Warner Bros. would like explicit references made to the significant economic benefits the studios makes to the area.</p> <p>HCC Highways and Transport comment that improvements to public transport are necessary to support growth – it is not just about safeguarding existing infrastructure.</p> <p>Reference should be made to the Minerals and Waste Local Plans. The importance of safeguarding mineral infrastructure should be noted.</p> <p>Hertsmere BC seek clarification within the collaborative working section – Watford’s unmet need will not automatically be met by the other districts in the same Housing Market, the starting point is for authorities to meet their own needs in line with the NPPF.</p> <p>In addition minor wording changes are suggested by HCC to highlight Sustainable Drainage Systems, biodiversity and mitigation of transport impacts across South West Herts. These issues are dealt with in relevant chapters but HCC would like to see references in the Vision and Strategic Objectives.</p>	<p>This chapter has been significantly reworded to provide more clarity in response to comments. Vision for active and healthier lifestyles has been strengthen throughout the plan and the addition of ‘Chapter 12 – Healthy Community’.</p> <p>The significance of the studios is acknowledged, however virtually all of it lies outside the Borough in Three Rivers District aside from land at North Western Avenue and does not merit a standalone policy to protect it.</p> <p>Sustainable transport initiatives have been strengthened through the plan, as well as more explicitly in ‘Chapter 11 – Sustainable Travel Town’.</p> <p>Reference to the Minerals and Waste Local Plans added to the Introduction and Sustainable Construction sections.</p> <p>Engagement with neighbours continues as we progress ‘Statements of Common Ground’ with each district.</p>
<p><b><u>CHAPTER 2: SPATIAL STRATEGY FOR ACHIEVING SUSTAINABLE DEVELOPMENT</u></b>  <b>General Comments</b></p>	<p>2 comments,</p>	<p>HCC state an interest in the Dome Roundabout SDA. Highways &amp; Transport highlight the need for ongoing collaboration to understand the transport impacts of the Local Plan.</p> <p>Residents highlight the need for a modal transport shift and family housing.</p> <p>Comment 1211 suggest site.</p> <p>Wenta are supportive and would like to see office use encouraged in all areas not just designated employment areas.</p>	<p>This chapter has been significantly reworded to provide more clarity in response to comments. The significance of transport impacts and achieving modal shift have been strengthened throughout the plan.</p> <p>Suggested site was assessed through the HELAA but not considered suitable for allocation.</p>

<b><u>Policy SD2.1 Planning for Growth</u></b>	31 comments, of which 11 support and 2 object	<p>Residents highlight concern around over-development and impacts on local amenities and pollution levels.</p> <p>Wenta and Berkeley Homes amongst others are fully supportive of the policy.</p> <p>RDI REIT and Legal &amp; General Property Management consider policy SD2.1 should set out a framework to support retail growth.</p> <p>Neighbouring authorities (Dacorum and St Albans) and the Greater London Authority would like WBC to demonstrate a thorough approach to meeting its housing needs and understand alternative approaches considered.</p> <p>Home Builders Federation have concern over the amount (a fifth) of homes expected on windfall sites. It is considered that only small windfall sites will come forward and the 105 dwellings per annum figure should be reduced. In addition it is not considered a blanket requirement for school provision for large sites is appropriate – this should be set out in individual site allocations.</p>	
<b><u>Policy SD2.2 Achieving Sustainable Development</u></b>	13 comments, of which 5 support and 3 object	<p>There is general support for achieving sustainable development through good design, making efficient use of land, providing new homes and reducing car dominance as set out in the policy.</p> <p>It is considered that this policy should be strengthened in light of WBC declaring a Climate Emergency. HCC would also like reference to the historic environment.</p> <p>Home Builders Federation consider that the policy is unnecessary inserting ambiguity as to what sustainable development is.</p>	This policy has been strengthened, further detail also added to 'Chapter 8 Climate Emergency' and 'Chapter 7 – Historic Environment'
<b><u>Policy SD2.3 Making Effective Use of Land</u></b>	17 comments, of which 6 support and 3 object	<p>Support for greater density development that can make sustainable transport initiatives viable.</p> <p>Comments have asked for clarification for the sustainability and accessibility zones. The density ranges require justification to ensure correct interpretation. Berkeley Homes consider the density ranges in the medium and high sustainability zones could be more ambitious. This is backed by comments suggesting that density restrictions should be assessed on each proposal.</p>	The approach to sustainability zones has been simplified to sites with the 'Core Development Area' and those outside. Densities set out are a minimum but individual optimum site densities will be established through consideration of local character, context and access to amenities and public transport
<b><u>Policy SD2.4 Safeguarding Strategic Infrastructure</u></b>	13 comments, of which 6 support and 0 object	<p>HCC suggest that all transport interchanges be protected. The supporting text should refer not only to public transport use but also other more sustainable alternatives to single occupancy car travel. HCC also suggest clarification in defining the specific assets/land being safeguarded. Suggest the Ebury Way and Orphanage Road Rail Aggregates Depot also be safeguarded. Developers would like a flexible approach to the safeguarded land – exploring integration between infrastructure and new development.</p>	Transport interchanges are identified on the Key Diagram The Rail Aggregates Depot is identified as safeguarded.

		Generally there is considerable support for sustainable transport.	
<b><u>Policy SD2.5</u></b> <b><u>Protecting</u></b> <b><u>Green Belt</u></b> <b><u>Land</u></b>	5 comments, of which 2 support and 2 object	Support for the protection of the Green Belt and a call for the evidence base to be published.	Green Belt review will be published alongside the Local Plan consultation.
<b><u>Policy SD2.6</u></b> <b><u>Delivering</u></b> <b><u>the</u></b> <b><u>Strategy:</u></b> <b><u>Development</u></b> <b><u>Contributions</u></b>	12 comments, of which 4 support and 0 object	Watford Health Campus are seeking reassurance that the CIL charging schedule will not change. HCC are seeking contributions towards waste management infrastructure. Sports England request the inclusion of sports facilities as an example of where off site contributions may be acceptable. Department for Education suggest reference to securing developer contributions retrospectively where it is necessary to forward fund infrastructure projects.	Reference to how developer contributions will be collected and spent is strengthened in 'Chapter 10 – Infrastructure' CIL charging schedule will be reviewed in line with the regulations.
<b><u>Strategic</u></b> <b><u>Development</u></b> <b><u>Areas</u></b> <b><u>General</u></b> <b><u>Comments</u></b>	6 comments,	Cortland Partners consider the Western Gateway should be a Strategic Development Area. Clarification is sought around the level of development anticipated within the SDAs but outside in individual site allocations. Historic England would like Heritage Impact Assessments to inform redevelopment. HCC would like robust masterplans for the SDAs.	Further detail, including maps has been added to each of the SDAs. The strategy has been revised to place more focus on the Core Development Area and areas outside of this designation. This better reflect site allocations and provides an approach that is simpler to implement. As such, the Western Gateway will not be a designated Strategic Development Area.
<b><u>Watford</u></b> <b><u>Junction</u></b>	11 comments, of which 4 support and 1 object	General support for the intensification and redevelopment of this area as well as for the improved transport connection. HCC highlight the need for joint working in developing a masterplan. The safeguarded rail aggregates depot should be highlighted. Wenta support the provision of services for the surrounding employment and residential areas. Friends of the Earth seek requirement for no car parking and full cycle provision for the site. Provision of infrastructure is a key consideration on this site. Requirements should be flagged as a key development consideration as part of the site allocation.	Further detail, including maps, has been added to the SDA to address these comments. Development considerations as part of the site allocation have been strengthened.



<b><u>Bushey Station</u></b>	8 comments, of which 2 support and 1 object	<p>The site is crossed by high voltage overhead electricity lines – statutory clearance heights must be considered.</p> <p>Residents consider the character of this area is not suitable for high density development. RDI REIT object to consideration 6 and wish to see additional retail provision outside of the existing centre.</p> <p>TfL support development in this area.</p>	<p>Bushey Station falls into the revised Core Development Area, which is considered an area of high sustainability. Based on this, the area has been considered appropriate for higher density development.</p> <p>Retail provision will follow the sequential test taking a ‘town centre first’ approach to protect the High Street.</p> <p>Wording to ensure overhead lines are considered in proposals added to the policy on managing impacts of development.</p>
<b><u>Town Centre</u></b>	13 comments, of which 4 support and 2 object	<p>HCC consider the transport bullet could be worded more strongly with specific wording around bus services. This is backed by Friends of the Earth who also seek reference to cycle provision.</p> <p>General support for more efficient use of land in the town centre.</p> <p>Other comments relate to the North Hub proposals.</p>	<p>Additional detail on bus priority added to this SDA, with detail on schemes provided in the Infrastructure Delivery Plan.</p>
<b><u>Lower High Street</u></b>	9 comments, of which 1 support and 1 object	<p>General support for more efficient use of land in this area.</p> <p>Bus connectivity is a key consideration. The site is crossed by high voltage overhead electricity lines – statutory clearance heights must be considered.</p> <p>Nuveen Real Estate consider it unduly restrictive to seek only mixed-use development and would like reference to residential development added.</p>	<p>Additional detail on bus priority added to this SDA, with detail on schemes provided in the Infrastructure Delivery Plan.</p> <p>Wording to ensure overhead lines are considered in proposals added to the policy on managing impacts of development.</p> <p>Residential development is appropriate as part of mixed-use schemes.</p>
<b><u>Dome Roundabout</u></b>	4 comments, of which 1 support and 0 object	<p>Support for providing stronger transport links although this is a challenge if an incremental approach to development is taken.</p> <p>The existing waste site should be safeguarded.</p>	<p>This area falls outside of the Core Development Area and as such is not designated as an SDA. Transport issues in the area are recognised and have been discussed with the County Council who are the Highways Authority. Transport policies amended to reflect public transport priority routes and better provision for cyclists and pedestrians.</p>

<p><b>CHAPTER 3: SUPPORTING GENERAL SUSTAINABLE TRANSPORT</b></p> <p><b>General Comments</b></p>	<p>13 comments,</p>	<p>The GLA look forward to continue working with the council to work towards an alternative to the Metropolitan Line Extension. They also wish to see some of the Mayor’s Strategic transport policy objectives extended to Watford (promotion of Healthy Streets, improving air quality and rebalancing the transport system towards sustainable/active modes).</p> <p>The Canal and River Trust emphasises the importance of the tow path for active travel and welcome further engagement to better link the towpath to other strategic routes.</p> <p>HCC wish to see a section on bus and rail to include recent proposals e.g. A414 Strategy proposals, Watford Junction and Abbey Line upgrades, Pyramid site proposals. They would also like to see a policy to link new development to cycle/pedestrian routes. Some wording changes suggested.</p> <p>Comments from residents mainly related congestion and poor air quality worsened by traffic—solutions suggested include more flyovers and underpasses, reinstatement of a bus to Luton, a park and ride, providing residents who don’t own cars with discounted travel cards, improving cycle routes, promoting mixed use to reduce trips and banning diesel vehicles from the town centre.</p> <p>Concerns expressed from Friends of the Earth and some residents about safety when cycling in Watford and investment/improvement required.</p>	<p>Approach retained.</p>
<p><b>Policy ST3.1 Cycle Parking Storage</b></p>	<p>13 comments, of which 5 support and 4 object</p>	<p>Support from Sport England, Wenta, Friends of the Earth and Transport for London for the policy and the inclusion of minimum standards.</p> <p>HCC welcome the policy but note that it could go further to include other facilities needed by cyclists in workplaces such as showers and changing facilities. This was echoed by Extinction Rebellion Watford.</p> <p>Berkeley Homes and Castle Homes feel as though the standards are too high and the space requirement could compromise active ground floor uses. APG Portfolio Management Ltd. objects to the policy as they feel the standards are too high and have not been adequately justified.</p> <p>One comment of support and two objections to Figure 4 (table of cycle parking standards). Objections from a resident and Friends of the Earth as they do not consider the standards to be high enough.</p>	<p>Approach retained.</p>
<p><b>Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles</b></p>	<p>18 comments, of which 6 support and 5 object</p>	<p>General support for the policy. Transport for London and Telereal Trillium particularly support car free development in High Sustainability Zones. HCC support ongoing reviews of on street restrictions to support reduced car parking provision. Wenta also support the approach.</p> <p>Support for inclusion of car clubs in the policy from a resident, although Extinction Rebellion comment that the policy does not go far enough in supporting clean and green energy.</p>	<p>Approach retained.</p>

		<p>The Home Builders Federation query whether the policy is viable and technically feasible, and Berkeley Homes commented that requiring 10% of spaces to be dedicated to car clubs is too onerous.</p> <p>A number of comments received were from developers who queried the standards. It was raised the need for more parking spaces in High Sustainability Zones for commercial development and hotels, while it was also expressed that a minimum car parking standard of 0.3 in the medium zones is too high.</p> <p>3 objections related to the standards themselves in Figure 5. 2 objections are from residents who identify the standards as being too low. One of the respondents queries the Sustainability Zones and advocates future occupiers of new development being denied residents' permits should the development result in unacceptable pressure on the CPZ. Friends of the Earth also object to the standards and wishes maximum numbers to be included per square metre to make best use of land.</p>	
<b>Policy ST3.3 Access, Travel Plans and Transport Assessments</b>	8 comments, of which 2 support and 1 object	<p>General support for the policy, particularly from Wenta and Friends of the Earth.</p> <p>Comments from HCC consist of the need to refer to their Travel Plan and road design guide. Other comments were from residents, who felt that better public transport should be prioritised before travel plans. One resident wrote wishing to view an impact assessment of the new developments in the borough on traffic.</p> <p>The objection came from a resident based upon pedestrians and cyclists not being classed as vulnerable road users.</p>	
<b><u>CHAPTER 4:</u> <u>HOUSING</u> General Comments</b>	32 comments, of which 1 support and 6 object	<p>National Federation of Gypsy Liaison Groups state that the consultation was unsound as there was no opportunity to comment other than online. In addition there should be a policy to deal with the needs of gypsies.</p> <p>Friends of the Earth request a BREEAM excellent or outstanding standard requirement. They and Highways England note the impact of Watford declaring a Climate Emergency. Highways England also highlight the potential impact of the proposals on the Strategic Road Network and provide guidance.</p> <p>Home Builders Federation want to see clear evidence that housing completions will begin within five years to support the five-year housing supply.</p> <p>HCC Children's Services identify need for six new primary schools from the proposed allocations. Department for Education notes that these should be included in the allocations.</p> <p>1 x 2f.e primary school at Riverwell/Health Campus (2f.e total) 2f.e through expansion of existing schools (2f.e total) 1x 2f.e &amp; 1x 3f.e primary schools at Watford Junction (5f.e total)</p>	<p>The very small requirement for Travellers in Watford, as reflected in the evidence base, does not merit the need for a standalone policy. BREEAM Excellent is required in the sustainability policy.</p> <p>The housing trajectory has been updated to demonstrate those sites which will deliver housing within five years.</p> <p>Work is ongoing with HCC in order to provide school places to meet demand.</p> <p>Policy HE7.4 Archaeology is applicable to all site allocations.</p>

		<p>2 x 3f.e primary schools at Tesco/Waterfields Retail Park (6f.e total); or, 1 x 3f.e primary school at Tesco/Waterfields Retail Park in combination with an additional 3f.e site identified elsewhere (6f.e total). The county council will work with the borough council, in order to find a suitability located site.</p> <p>HCC Environment Resource Planning recommend archaeological assessments for the sites. Woolf Bond planning do not consider the HEELA to be robust without assessing sites in the Green Belt. They consider Green Belt sites necessary to accommodate growth and deliver 3 bed homes and seek a thorough Green Belt review - it is considered that land at North Western Avenue should be excluded. They also consider an uplift in the housing requirement necessary to reflect affordable housing needs in Watford.</p> <p>General comments state concerns of overdevelopment and a predominance of development proposed in areas already of high density and or more deprived. Ten comments recognise that Watford has insufficient land to meet its level of need.</p>	A thorough Green Belt Review has been undertaken and will be published alongside the Local Plan consultation.
<b>Policy H4.2 Housing Mix</b>	4 comments, of which 1 support and 1 object	<p>Support from neighbouring authorities that addressing housing need is not just about delivering numbers and acknowledgment of an oversupply of small units in recent years. Castle Homes object to the affordable housing target considering it unviable.</p> <p>There is significant number of comments from developers seeking more flexibility for housing mix and affordable housing provision on a site location basis but residents and Wenta supporting the amount of flexibility proposed. The requirements will need to be subject to viability testing.</p>	The policies have been subject to a robust viability assessment. The affordable housing mix has been adjusted to reflect this and the identified need in the borough.
<b>Policy H4.3 Affordable Housing</b>	10 comments, of which 1 support and 1 object	<p>Developers seek more evidence to justify the affordable housing target given that the existing 35% target is not considered viable.</p> <p>More flexibility sought to determine affordable housing provision on a case-by-case basis. Viability evidence sought to support requirement.</p>	The policies have been subject to a robust viability assessment which will be published alongside the Local Plan consultation.
<b>Policy H4.4 Garage Site Development</b>	3 comments, of which 0 support and 3 object	<p>Objections consider the significant parking and storage garages provide, particularly in Victorian terraced areas.</p>	The requirement to undertake a car parking survey has been added to the development considerations for these sites.
<b>Policy H4.5 Accessible and</b>	6 comments, of which 0 support and 0 object	<p>Extinction Rebellion consider requiring recognised design standard would provide clarity for 'good design'.</p> <p>The Home Builders Federation do not consider that the proposed policy complies with the NPPF and recommend reduced requirements.</p>	Policy amended do clarify requirements

<b>Adaptable Homes</b>		Clarification is sought regarding the relationship between sheltered/specialist housing and affordable housing.	
<b>Policy H4.8 Residential Conversions</b>	4 comments, of which 0 support and 0 object	Antisocial behaviour issues surrounding residential conversions raised as an issue and Article 4 suggested to overcome them.	Residential conversions form an important part of the housing market and are supported by Government. Antisocial behaviour is dealt with outside of the planning system.
<b>CHAPTER 5: EMPLOYMENT</b> <b>NT</b> Please note site comments are all compiled in the table at the end of the document. <b>Policy E5.1 Designated Employment Sites</b>	11 comments, of which 4 support and 3 object	Overall support for the policy and the no net loss of floor space approach from developers, HCC and Wenta. 3 objections from site owners/agents regarding their land being designated as an employment site (Hille Business Centre, Mothercare site, DDD site Rickmansworth Road) Concerns from a resident and Extinction Rebellion Watford about government policy and poor quality PDR conversions.	The Mothercare site has been removed as an employment allocation and allocated for residential development. The employment policies take a no net loss approach to stop any further losses employment floorspace, as such the remaining allocations are retained.
<b>Policy E5.2 Economic Development Outside of Designated Employment Locations</b>	3 comments, of which 3 support and 0 object	Support from developers and Wenta for the positive approach the policy takes towards encouraging economic development.	Approach retained.

<b>Policy E5.3 Mixed Use Development</b>	5 comments, of which 5 support and 0 object	Support from developers and Wenta for the wording of the policy and its regard to existing uses (agent of change principle). It also received support for making efficient use of land.	Approach retained.
<b>CHAPTER 6: TACKLING CLIMATE CHANGE, ADAPTATION AND RESILIENCE General Comments</b>	6 comments, of which 0 support and 3 object	Extinction Rebellion Watford object, they are seeking evidence relating to resilience to drought and combating water shortages as well as robust evidence based carbon targets. The Woodland Trust seek tree planting targets. The policy is supported by HCC. They suggest requiring Site Waste Management Plans or Circular Economy Statements to ensure effective management of construction, demolition and excavation of waste. This is supported by residents comments questioning materials used in construction. Three comments highlight that Watford has declared a Climate Emergency and support the aims of this policy but consider it could go further.	Policies have been strengthened with water and carbon based targets. Focussing development in the Core Development Area will ensure higher density is placed in appropriate areas with high accessibility.
<b>Policy CC6.1 Sustainable Construction and Design</b>	13 comments, of which 5 support and 1 object	Friends of the Earth support the policy but would like to see a sustainability statement required for every proposal. BREEAM excellent or outstanding is sought.	Policies have been amended to require sustainability statements. BREEAM Excellent is sought for non-residential development.
<b>Policy CC6.2 Flooding and Resilience</b>	8 comments, of which 1 support and 4 object	Sustainable drainage systems are supported but should be sought on all major developments. They should be multi-functional and could be innovative green spaces, trees could play a part. It is thought that the policy should also set out measures to mitigate the risk of flooding. HCC Environment Resource Planning Unit (Lead Local Flood Authority) have concerns that the policy focus is implicitly on flood risk associated with rivers and does not promote management of flooding from all sources and does not fulfil a long a term perspective adaptation strategy to take into consideration the impacts of climate change on flood risk. They also suggest wording for monitoring this policy.	Policies amended in consultation with the Lead Local Flood Authority to include: Points on all types of flood risk including surface flooding issues SFRA level 1 and level 2 recommendations where applicable More details SUDs policy
<b>CHAPTER 7: QUALITY DESIGN AND CONSERVATION</b>	3 comments	HCC request a clearer definition of what consists of a heritage asset and request a requirement to incorporate areas to store and collect waste in the design of new buildings. Dacorum Borough Council want further clarification on how the design objectives will interact with the aspired density approach.	Approach retained.

<b>G THE HISTORIC ENVIRONMENT</b> <b>General Comments</b>			
<b>Policy DC7.1 Strategic Principles for High Quality Design</b>	6 comments, of which 1 support and 1 object	<p>Support from Wenta, who note that high quality design should seek to use land efficiently and take into account the surrounding context.</p> <p>Cortland Partners and Berkeley Homes express concerns about the feasibility of including 3 bedroom units with direct ground floor access in high density schemes, noting that this could compromise active frontages.</p> <p>HCC comment that SuDS should be a consideration in the policy text.</p> <p>Hertsmere Borough Council have concerns that the 95dph minimum density standard for High Sustainability Zones is too low.</p> <p>Objection from Sport England, who comment that the design principles should be amended to include reference to their Active Design guidance to support healthy environments.</p>	Approach retained.
<b>Policy DC7.2 Quality of Place</b>	9 comments, of which 3 support and 1 object	<p>Wenta and the Canal and River Trust support the policy. Wenta add that the policy focuses on residential design, which may not be appropriate for designing other uses e.g. a warehouse.</p> <p>Support was also given from a resident for the policy, who also wishes the policy to go further and ban cheap render (brick and timber acceptable).</p> <p>Berkeley Homes and Cortland Partners agree with the importance of active frontages in achieving quality places, but add that this can be achieved through other means than residential frontages including retail and community uses. HCC note that ground floor residential frontages may not always be suitable due to flooding.</p> <p>Sport England objected to the policy and require an additional design objective to be added to the policy to cover design that promotes active and healthy lifestyles.</p>	Approach retained.
<b>Policy DC7.3 Building Design</b>	7 comments, of which 2 support and 2 object	<p>Policy fully supported from HCC and Wenta, who note the criteria are robust. HCC welcome the inclusion of the 'agent of change' principle.</p> <p>Berkeley Homes and Cortland Partners comment that the policy's requirement of a maximum of 6 units a floor sharing a core area is too restrictive and request that the unit number should be changed to 8.</p> <p>Extinction Rebellion Watford express the need to consider designing for waste minimisation and the embodied carbon of materials used in building design.</p>	Approach retained.

		Sport England object to the policy and request that an additional principle is included to support active and healthier lifestyles.	
<b>Policy DC7.4 Tall Buildings</b>	10 comments, of which 3 support and 1 object	<p>Mixed reactions to policy – broad support from the development industry, with concerns coming from residents.</p> <p>Objection from resident, who expresses support for low rise high density housing. Nascot Grange Residents Association voice similar concerns and advocate a return to the approach of the Skyline SPD, which clustered tall buildings in 3 locations (town centre, Watford Junction and Ascot Road). Historic England also feel that the plan should identify spatially areas where tall buildings may or may not be appropriate.</p> <p>IDA London Holdings and IDA Plymouth Holdings welcome the policy and would like the opportunity to comment on the revised design guide, a comment which is echoed by Telereal Trillium.</p> <p>Berkeley Homes and Cortland Partners support the policy and comment that it will have a positive effect on Watford’s skyline and work to cluster tall buildings in node locations near mass transit access. Wenta agree, although feel as though the blanket threshold of 10 storeys or 6 storeys higher than the surrounding buildings is too prescriptive.</p> <p>The Environment Agency request wording added to the policy to ensure there would be no overshadowing of the river, which could have an adverse impact on the ecology.</p>	Approach retained.
<b>Policy DC7.5 Heritage Assets and the Historic Environment</b>	4 comments, of which 1 support and 1 object	<p>IDA Plymouth Holdings support the policy as it balances protecting heritage assets and the public benefit regarding new development proposals.</p> <p>Historic England comment that the policy should be amended to clarify if it relates to all heritage assets (designated and non-designated) and to clarify the SPDs the policy refers to in the final sentence of the policy. HCC also request that it is clarified whether the policy refers to historic buildings or the historic environment.</p> <p>CAMRA object to the policy based upon there being no section on pub protection.</p>	Approach retained.
<b>Policy DC7.6 Nationally Listed Buildings and Registered</b>	2 comments,	2 comments received from Historic England, who ask that the policy is amended to reflect the hierarchy of taking measures to avoid harm before mitigating any negative impacts on nationally listed buildings. Historic England also request guidance about how applications that involve less than substantial harm would be treated.	Approach retained.



<b>Parks and Gardens</b>			
<b>Policy DC7.8 Locally Listed Buildings</b>	3 comments	Nascot Grange Residents Association express dissatisfaction with recent planning applications and the impact that this has had on locally listed buildings. Historic England ask that the local list is linked within the policy. They also recommend that the policy is amended to reflect the hierarchy of taking measures to avoid harm before mitigating any negative impacts on locally listed buildings.	Approach retained.
<b>DC7.9 Archaeology</b>	2 comments	Historic England recommend that the policy is amended to reflect the hierarchy of taking measures to avoid harm before mitigating any negative impacts on archaeological remains. HCC comment that the policy should convey that archaeological remains do not just refer to those below ground - archaeology can include historic buildings and landscapes.	Approach retained.
<b>CHAPTER 8: CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT General Comments</b>	2 comments, of which 0 support and 2 object	The Woodland Trust object to the chapter as they would like to see a target set in the Local Plan for tree cover in new development Extinction Rebellion Watford object to the chapter as there are no policies to improve green and blue infrastructure in existing dwellings.	The importance of trees is echoed throughout the document, particularly in Chapter 9. Increasing tree cover is considered to be factored into the biodiversity net gain approach (see Policy NE9.8 Biodiversity). Further guidance will also be provided in Supplementary Planning Guidance.
<b>Policy NE8.1 The Green and Blue Infrastructure Network</b>	4 comments, of which 1 support and 0 object	Slight wording changes/additions recommended by the Herts and Middlesex Badger Group and the Environment Agency to better incorporate biodiversity impacts e.g. native and appropriate planting to be expected. The Canal and River Trust support the inclusion of overshadowing in the policy and would welcome more emphasis on improving connections between the blue and green network HCC note that no word changes are required to the policy.	Policy amended to reflect minor wording changes proposed.
<b>Policy NE8.2 Protecting Open Space</b>	3 comments, of which 0 support and 1 object	Objection from a resident due to lack of clarification about the definition of open space typologies and how it will be determined if an area is deficient in open space.	Map from the Green Spaces Strategy added to the Draft Plan, further detail on typologies is available in the study which will be published alongside the Plan.

		HCC note that the policy should consider the importance of open space being safeguarded to minimise flood risk and further comment that an additional policy is required to encourage play areas being provided in new development.	Equipped play space is considered as open space under this policy - the policy refers to 'Open space and ancillary facilities used for leisure and recreation'. The role that open space and green infrastructure can play in managing flood risk and providing sustainable drainage has been included in the introduction as a strategic overview.
<b>Policy NE8.3 Providing New Open Space</b>	4 comments, of which 0 support and 2 object	2 comments received from Extinction Rebellion Watford that state that the policy doesn't go far enough in terms of ensuring that new open spaces have ecological value. 2 objections from Sport England as the first and third criteria do not fully accord with government policy. It is recommended that a fourth criterion should be added to align better with Paragraph 97 of the NPPF. Sport England also add that the policy should reference the Playing Pitch Strategy and Sport England design guidance.	The policy and supporting text have been amended to reflect these comments and in consultation with Sport England.
<b>NE8.4 Biodiversity Net Gain</b>	11 comments, of which 1 support and 1 object	General support for inclusion of a net gain policy to meet national guidance. The Environment Agency, Hertfordshire County Council and the Herts and Middlesex Badger Group request changes to the wording of the policy to better align with the contents of the Environment Bill. Extinction Rebellion Watford feel as though the 10% net gain requirement should be increased to 20%. The Home Builders Federation express concerns about the viability of the policy. The Woodland Trust object to the policy based on the lack of reference to ancient woodland.	The policy and supporting text have been amended to reflect these comments. The 10% gain figure has been retained to comply with emerging national policy. Reference to ancient woodland referred in the NPPF, not necessary to duplicate here.
<b>Policy NE8.5 Managing Air Quality</b>	4 comments, of which 1 support and 1 object	HCC support the policy, although recommend including further guidance to strengthen the policy. A resident queries what is meant by "acceptable levels" of air quality and that this should be defined in the policy. Extinction Rebellion Watford feel that the council could do more to address air pollution through taking action to reduce car use. The Woodland Trust object to the policy as it does not acknowledge the role of trees in managing air quality.	Acceptable levels are defined in national policy and referred to in the supporting text. The importance of trees is acknowledged throughout the document, further guidance will be through SPD.

<b>Policy NE8.6 Managing the Impacts of Development</b>	7 comments, of which 3 support and 0 object	HCC support the policy but request that flooding should be added to the list of impacts of development. The Environment Agency also feel that the vulnerability of groundwater should be reflected in the policy. Aggregates Industries support the policy but request the inclusion of an extra sentence to directly refer to the agent of change principle. The Woodland Trust emphasise the role that trees can lay in reducing pollution. Thames Water support the policy.	Policy CC8.5 Managing the Impacts of Development has been amended to reflect some of the proposed wording.
<b>CHAPTER 9: ENSURING THE VITALITY OF TOWN AND LOCAL CENTRES ...</b> General comments	1 comment,	General support for the provision of infrastructure alongside development.	Approach retained.
<b>Policy V9.1 Vitality of the Town and Local Centres</b>	6 comments, of which 1 support and 0 object	General support for the development of town centre uses within the defined centres, in accordance with the hierarchy. LaSalle Investment propose a revision to Policy to acknowledge the role of Strategic Development Sites delivering mixed use and not require a retail impact assessment on these. RDI REIT and Legal & General Property Management submitted the same comment. The threshold of 350 sq.m for 'town centre uses' outside of a centre is considered too low. They consider the national threshold of 2,500 sq. m appropriate given the health of Watford Town Centre making it resilient to out-of-centre retail parks. Public Health would like a policy to encourage healthy food choices in the town and local centres.	While the role of mixed use on Strategic sites is acknowledged, the priority is to protect the town centre by promoting town centre uses in line with the 'town centre first' approach of the sequential test. The section has undergone extensive redrafting in line with the changes to the Use Classes Order, the 350 sq.m threshold has been removed. No additional retail floorspace will be supported outside of the town centre – this is detailed in the development considerations for the mixed use sites. Wording has been added to restrict the clustering of take-away uses and prevent them opening close to school sites
<b>Policy V9.4 District and</b>	2 comments, of which 1 support and 0 object	S Hille & Co consider the threshold for A uses and proportion of A1 use overly prescriptive for the North Watford District Centre. Residents support the protection of local centres.	The section has undergone extensive redrafting in line with the changes to the Use Classes Order, the proportion of A uses is no longer applicable.

<b>Local Centres</b>			Local Centre protection remains.
<b>Policy V9.5 Infrastructure Provision</b>	16 comments, of which 3 support and 0 object	<p>General support for infrastructure provision and improvement to serve development. Particular support from Department for Education for the reference that developers ensure sufficient infrastructure capacity.</p> <p>Herts Valleys Clinical Commissioning Group highlight the shortfall of GP services and provide method to calculate the cost per dwelling for medical services. Developer contributions are sought.</p> <p>Home Builders Federation and IDA Plymouth Holdings Ltd highlight the importance of viability testing using the approach set out in PPG.</p> <p>Resident raising concerns over adequate provision of school and GP places in the Meriden area.</p> <p>Sport England wish to see reference to community outdoor sports facilities.</p> <p>Thames Water and HCC Highways &amp; Transport support policy.</p>	<p>The Infrastructure chapter has been substantially revised.</p> <p>Policy 'IN10.1 Integrated Infrastructure Delivery' requires a comprehensive and future-proofed approach to the delivery of infrastructure in line with the Infrastructure Delivery Plan. The IDP cover projects in all of the categories identified in the comments. The draft IDP will be subject to thorough consultation with stakeholders.</p> <p>Policy 'IN10.2 – Providing Infrastructure to Support New Development' requires developers to explore existing infrastructure capacity and ensure sufficient provision in collaboration with appropriate providers.</p> <p>Policy 'IN10.3 – Developer Contributions' highlights the means by which the council will secure contributions towards infrastructure provision.</p>
<b>Policy V9.6 Utilities and Digital Infrastructure</b>	1 comment	Thames Water suggest wording changes to make it clear that planning conditions will be used where necessary to ensure that development or a relevant stage of development is not occupied ahead of the delivery of any necessary infrastructure.	Policy 'IN10.3 – Developer Contributions' highlights the means by which the council will secure contributions towards timely infrastructure provision.
<b>Policy V9.7 Community Facilities</b>	6 comments, of which 1 support and 2 object	<p>Residents considers that pubs (The Badger, Royal Oak Bushey) should be a protected community facility.</p> <p>HCC would like to see improved cycle routes, particularly where community facilities are serving young people.</p> <p>The Theatre Trust support the policy but encourage a robust criteria to justify loss.</p>	<p>Given the clear links between community facilities and health this policy has been relocated to 'Chapter 12 – Healthy Community' Criteria justifying the loss of facilities has been added, Appendix F Marketing Requirements is also applicable.</p> <p>Improved cycle routes are supported in the transport chapter.</p>

Site Code	Site Name	Support/Comment/Object	Summary of Representations
H1	Land and Garages at Lych Gate	4 objections 3 comments	<p>4 objections from residents all related to the impact of development upon parking stress in the area. Concerns about access and pollution from construction also expressed.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p>
H2	Land and buildings at 275 Sheepcot Lane	1 support 5 comments	<p>Support from site owner for its inclusion in the Plan (although 0-5 year timescale no longer deliverable). Resident expresses redevelopment of the site is a good idea as long as adequate parking provided and no access through Campion Close.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. However, the Minerals and Waste Planning team add that the site is safeguarded under the Waste Core Strategy Policy 5: Safeguarding of sites. The council must therefore demonstrate that this policy has been applied before allocating this site for housing.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Affinity Water must be notified of any future development proposed on the site.</p>
H3	Land and Garages adjacent to 1 Lavinia Avenue	3 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.</p>
H4 <sup>1</sup>	Land and buildings at 5 Sheepcot Drive	3 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required.</p>

			Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H5	Land at the Badger Public House	1 support 3 comments	Site owner supports inclusion of the site in the Plan, although thinks the 45-70dph requirement is too low. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. Site in Source Protection Zone 1 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H6	Land and Garages adjacent to 1-7 Heronslea	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H7	Land at the Former Meriden School	4 comments 1 objection	Sport England object to the allocation of the site based on its former use as a playing field, unless a development consideration is included requiring the loss to be mitigated through a financial contribution to deliver priority playing field projects in the area. Thames Water note the wastewater network may be unable to support the demand anticipated from this development, and that local upgrades to the existing drainage infrastructure may be required. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. They also add that limited bus services serve the site and development is not of a scale to contribute to bus service improvements. Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H8	Land at the Former Bill Everett Community Centre	4 comments	HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. They also add that the site is within 400m of a bus stop with regular services and that the nearest railway station is 1.2 miles away. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. Affinity Water must be notified of any future development proposed on the site.

H10	Land at the Longspring Car Park	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H11	Land at 420 and 420a St Albans Road	3 comments	HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H12	Land to the rear of 53 Langley Way	3 comments	HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. Affinity Water must be notified of any future development proposed on the site.
H13	16-18 St Albans Road	4 comments 1 objection	1 objection to the site from a resident regarding overdevelopment in the area HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. The site also has good access to sustainable transport and so has potential to be a very sustainable site. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H14	Land and Garages between 139-149 Queens Road	3 comments	HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. The site also has good access to sustainable transport and so has potential to be a very sustainable site. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. Site in Source Protection Zone 2 of a public drinking water supply abstraction and close to Source Protection Zone 1. Affinity Water must be notified of any future development proposed on the site.

H15	Land to the rear of 125-127 The Parade	4 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site. Affinity Water must be notified of any future development proposed on the site.
H16	Land at the Corner of Park Avenue and Rickmansworth Road	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. Affinity Water must be notified of any future development proposed on the site.
H17	Land at 80 Cassio Road	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. Affinity Water must be notified of any future development proposed on the site.
H18	Land and Buildings at 87 Cassio Road	4 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site. Affinity Water must be notified of any future development proposed on the site.
H19	Land and buildings at 120-122 Exchange Road	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. Affinity Water must be notified of any future development proposed on the site.
H20	Land at Lower Derby Road	4 comments 1 objection	Sport England object to the policy as no provision is made in the development consideration for the re-provision of the skate park. Suggested wording provided. Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site.



H21	Land and buildings at 176-186 Rickmansworth Road	3 comments	<p>HCC note there are no fundamental ecological constraints on the site, although there is the potential for roosting bats.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and close to Source Protection Zone 1. Affinity Water must be notified of any future development proposed on the site.</p>
H22	Car Park at Junction of Vicarage Road and Exchange Road	4 comments	<p>The site is immediately adjacent to the Locally Listed Sikh community centre and across the street from a conservation area. Historic England require the preparation of further evidence regarding the potential impact on heritage assets. They expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and close to Source Protection Zone 1. Affinity Water must be notified of any future development proposed on the site.</p>
H23	Crown Passage Car Park	2 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p>
H24	Land at Waterfields Retail Park	1 support 6 comments 2 objections	<p>2 objections from residents. One of the objections relates to the loss of retail, while the other objector expresses concerns about the ability of the infrastructure to support the redevelopment of the site and raises the current lack of parking in the area.</p> <p>Site owner supports the allocation of the site and its potential to be a sustainable location for high density residential development.</p> <p>Historic England note the site is immediately adjacent to heritage assets. Historic England require the preparation of further evidence regarding the potential impact on heritage assets. They expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction and on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p>

			HCC note there are no fundamental ecological constraints on the site, although may be the potential for roosting bats. The site also has good access to sustainable transport and so has potential to be a very sustainable site.
H25	Land at 18 Watford Field Road	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction and near contaminated land. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Historic England note the site is immediately adjacent to heritage assets. Historic England require the preparation of further evidence regarding the potential impact on heritage assets. They expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
H26	Land between 41- 61 Brightwell Road	3 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats.</p>
H27	Land and garages to the rear of 5- 17 Liverpool Road	18 comments 87 objections	<p>87 objections and other comments from residents related to loss of parking, potential lack of access for emergency vehicles, overdevelopment in the area, potential impact of development on neighbouring properties (pollution and overshadowing), lack of infrastructure and potential loss of trees and habitats. One resident notes increased parking standards should be applied on this site as the IDP is out of date and the site performs poorly against objective SA3 in the Sustainability Appraisal.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although may be the potential for roosting bats. HCC also add that the site is 400km away from the nearest bus stop, but the site is only 0.6 miles away from the nearest train station and within walking/cycling distance from the town centre.</p>

H28	Land and Garages to the rear of 2-24 Elfrida Road	3 comments 25 objections	<p>25 objections from residents and the Watford Fields Residents Association who expressed concerns about potential loss of daylight and privacy, parking stress and traffic in the area, overdevelopment, effect on health, lack of affordable rental garage space nearby, potential disturbance from construction, access issues, effect on flood risk and the potential worsening of the subsidence issues of nearby Victorian properties.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats.</p>
H29	Land and Buildings at 247 Lower High Street	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats. HCC also add that the site is within walking/cycling distance from the town centre and is within 400m of a bus stop with high frequency services.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p>
H30	Land at Croxley View	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. HCC also add that there is a bus stop with frequent services within 400m of the site. Maintaining the existing cycle/pedestrian networks through the site is important.</p>
H31	Land at Wighenhall Road Depot	5 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. The Minerals and Waste Planning team add that the site is safeguarded under the Waste Core Strategy Policy 5: Safeguarding of sites. The council must therefore demonstrate</p>

			that this policy has been applied before allocating this site for housing. The Highways and Transport team comment that although the site is not well served by bus links, the site is 0.6 miles from Bushey Station.
H32	41 Aldenham Road	3 comments	Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats.
H33	Land at the Car Park, Chalk Hill	2 objections 4 comments	2 objections received from 1 resident. The respondent expressed concerns about overdevelopment and lack of infrastructure to support more housing/apartments. One resident supports the principle of bringing the vacant site back into use although expressed concerns about the ability to create a buffer between any development and the surrounding road network. The respondent adds that it will be challenging to mitigate the impacts from the A4008, including noise and air pollution. Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site.
H34	Land at Car Park adjacent to 1 Chalk Hill	2 objections 4 comments	One objection related to the overdevelopment in the area and lack of infrastructure to support new development. Another objection expressed concern that the loss of the car park would exacerbate parking issues in Oxhey village and that it would be challenging to mitigate impacts from the A4008 (noise and air pollution). Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. They add that the site is less than 100m from bus stops with high frequency services and less than 200m from Bushey Station.
H35	Land at Bushey Station	2 support 4 comments 3 objections	3 objections from residents, who raised issues such as loss of commuter car parking, the potential impact of the nearby GFL site, lack of infrastructure to support the new development, including the need for

			<p>more frequent services from Bushey Station. One of the objectors did express support for a car zero development at this location.</p> <p>2 comments of support received from Network Rail and Transport for London, who are the owner and leaseholder of the site respectively.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site.</p>
H36	Land at Kingsfield Court Garages	3 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
H37	Land and Garages at Riverside Road Garages	3 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required.</p>
MXD01	Land at Woodside Community Centre	3 comments	<p>Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
MXD02	Land at 453 St Albans Road	3 comments	<p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p>

			HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots.
MXD03	Land at the Lemaire Centre	3 comments	<p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots.</p>
MXD04	Land at 501 St Albans Road	3 comments	<p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
MXD05	Land at 94-114 St Albans Road	8 comments 1 objection	<p>Objection from a resident related to overdevelopment of the area and lack of parking. A further resident expressed concern that redevelopment of the site will increase traffic in the area.</p> <p>Berkeley Homes propose that the site should be in the High Sustainability Zone as the site is in close proximity to Watford Junction Station.</p> <p>Aggregate Industries comment that the site is within the Minerals Infrastructure Consultation Area for the Orphanage Road Rail Aggregates Depot and propose potential wording for a development consideration to be included to ensure that the agent of change principle is applied.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water comment that the scale of the proposed development is likely to require upgrades to the wastewater network and that the council should liaise with Thames Water to agree a housing and infrastructure phasing plan.</p> <p>Historic England note that the site falls into the Watford Junction Strategic Development Area and that further evidence regarding the potential impacts on heritage impacts is required. Historic England also expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p>

			HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots. They also add the need for a School Travel Plan to encourage sustainable transport access to the school.
MXD06	Land at Watford Junction	7 comments 1 objection	<p>Aggregate Industries object to the inclusion of the Concrete Batching Plant as a site allocation. The site also falls into the Minerals Infrastructure Consultation Area for the Orphanage Road Rail Aggregates Depot and Aggregate Industries propose potential wording for the inclusion of a development consideration to ensure that the agent of change principle is applied.</p> <p>Solum (owner) comment that the boundary of the proposed allocation doesn't fully align with their ownership, although they support the inclusion of the site in principle. They also include some suggestions for the rewording of the development considerations.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. Upgrades may be required ahead of the development. The developer should liaise with Thames Water to determine a drainage strategy.</p> <p>Historic England note that the site falls into the Watford Junction Strategic Development Area and that further evidence regarding the potential impacts on heritage impacts is required. Historic England also expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots. They also add that ongoing liaison will be required and that HCC would not support development proposals that reduce the capacity or quality of the interchange. The Minerals and Waste team wishes to see the development considerations make reference to the hoppers, conveyor, sidings and aggregates facilities at the good yards, which fall into the minerals safeguarding policy remit.</p>
MXD07	Land at Colonial Way/Clive Way	6 comments	<p>LaSalle Investment Management (land managers) query if the site is viable for medium to high density office led growth and the development considerations should be updated to reflect the diverse range of employment uses suitable at the site.</p> <p>Aggregate Industries comment that the site is within the Minerals Infrastructure Consultation Area for the Orphanage Road Rail Aggregates Depot and propose potential wording for a development consideration to be included to ensure that the agent of change principle is applied.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p>

			<p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. Upgrades may be required ahead of the development. The developer should liaise with Thames Water to determine a drainage strategy.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. They add that the nearest bus stop from the site is over 400m away and that developer contributions should be sought towards bus service improvements.</p>
MXD08	Land at Centre Point Community Centre	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. They add that there are infrequent bus services from a stop within 400m from the site, but that the site is 0.5 miles from Watford Junction and less than a mile from the town centre.</p>
MXD09	Land at the Telephone Exchange Car Park	5 comments	<p>Telereal Trillium (site owner) support the inclusion of the site in the plan but request clarification about the appropriate site density, as footnote 4 does not stipulate what is meant by access to a mainline mass transit connection. The respondent further emphasises the sustainability of the site.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p> <p>Historic England comment that the site falls into the Town Centre Strategic Development Area and that a heritage impact assessment should be prepared.</p>
MXD10	Land at Tesco Lower High Street	5 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. The developer should liaise with Thames Water to determine a housing and infrastructure phasing plan.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment and/or a Preliminary Ecological Assessment may be required. HCC add that the site is within</p>



			<p>400m of a bus stop with high frequency services and within walking/cycling distance of the town centre and High Street station.</p> <p>Historic England comment that the site falls into the Lower High Street Strategic Development Area and that a heritage impact assessment should be prepared.</p>
MXD11	44-56 Vicarage Road	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is potential for roosting bats. HCC add that the site is within 400m of a bus stop with good combined service frequency and within walking/cycling distance of the town centre and High Street station.</p>
MXD12	Land at Riverwell	5 comments	<p>The Watford Health Campus Partners LLP support the allocation but request that the allocation is extended to reflect the extent of ownership. They also query the flood risk on the site.</p> <p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. The developer should liaise with Thames Water to determine a housing and infrastructure phasing plan.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site and ecological surveys have been completed, although there are known to be badgers in the vicinity. HCC add that there is a bus stop within 400m of the site but is only served by one infrequent bus route.</p>
MXD13	23-37 The Parade	5 comments	<p>IDA Plymouth Holdings (site owner) query location of Table 4.1. They also add that retaining the locally listed frontage may be unviable.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is the potential for bat roosts. HCC add that several bus stops are available within 200m of the site with access to a variety of routes. The site is also in the town centre and is within walking/cycling distance to Watford Junction.</p>

<b>Table 3 – Policy numbering and Location from the First Draft Local Plan Consultation to the Revised Draft Local Plan Consultation.</b>				
<b>First Draft Local Plan (Reg. 18)</b>		<b>Amendment</b>	<b>Revised Draft Local Plan (Reg. 19)</b>	
<b>Ref.</b>	<b>Policy</b>		<b>Ref.</b>	<b>Policy</b>
Introduction				
SD2.1	Planning for Growth	Incorporated into Spatial Strategy Policy and figures set out in appropriate chapters	SS1.1	Spatial Strategy
SD2.2	Achieving Sustainable Development	Incorporated into new policy 'Spatial Strategy'	SS1.1	Spatial Strategy
SD2.3	Making Effective Use of Land	Merged with housing mix policy but principle remains the same	HO3.2	Housing Mix, Density and Optimising Use of Land
SD2.4	Safeguarding and Connecting to Strategic Transport Infrastructure	Revised text and further project areas identified	ST11.2	Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub
SD2.5	Protecting Green Belt Land	Incorporated into Spatial Strategy	SS1.1	Spatial Strategy
SD2.6	Development Contributions	Revised but intent remains the same	IN10.3	Development Contributions
SD2.7	Watford Junction Strategic Development Area	Principle remains the same but text revised	CDA2.1	Watford Gateway Strategic Development Area
SD2.8	Bushey Station Strategic Development Area	Incorporated into Colne Valley SDA with Lower High Street area	CDA2.3	Colne Valley Strategic Development Area

SD.2.9	Town Centre Strategic Development Area	Principle remains the same but text revised	CDA2.2	Town Centre Strategic Development Area
SD2.10	Lower High Street Strategic Development Area	Incorporated into Colne Valley SDA with Bushey area	CDA2.3	Colne Valley Strategic Development Area
SD2.11	Dome Roundabout Strategic Development Area	Removed as not part of the Core Development Area	N/A	N/A
ST3.1	Cycle Parking Storage	Revised but principle remains the same	ST11.4	A Walking and Cycling Infrastructure Improvement Town
ST3.2	Car Parking, Car Clubs and Electric Vehicles	Significantly revised but intent remains the same	ST11.5	Electric Vehicles, Car Parking and Car Clubs
ST3.3	Access, travel Plans and Transport Assessments	Principle remains the same but text revised	ST11.6	Managing the Transport Impacts of Development
H4.1	Allocated Housing Sites for Delivery	Sites added and removed	SA13.1	Allocated Sites for Delivery
H4.2	Housing Mix	Merged with housing density and intention remains the same	HO3.2	Housing Mix, Density and Optimising Use of Land
H4.3	Affordable housing	Revised requirement and tenure mix	HO3.3	Affordable Housing
H4.4	Garage Site Development	Deleted	N/A	N/A
H4.5	Accessible and Adaptable Homes	Carried forward with few changes except for wheelchair access requirements	HO3.10	Building Standards for New Homes

H4.6	Specialist Housing	Carried forward with few changes	HO3.5	Specialist Housing and Care Homes
H4.7	Self-Build and Custom Housebuilding	Carried forward with few changes	HO3.7	Self-build and Custom Housebuilding
H4.8	Residential Conversions	Principle remain the same but text revised	HO3.9	Residential Conversions
E5.1	Designated Employment Sites	Industrial uses and Office element split into separate policies	EM4.2 EM4.3	Designated Industrial Areas Office Development
E5.2	Economic Development Outside of Designated Employment Locations	Principle remains the same but text revised	EM4.4	Economic Development Outside Designated Employment Locations
E5.3	Mixed Use Development	Deleted	N/A	N/A
CC6.1	Sustainable Construction and Design	Revised so only includes non-residential developments	CC8.2	Sustainable Construction Standards for Non-Residential Development
CC6.2	Flooding and resilience	Split into two, includes fluvial flooding and groundwater protection separate to surface water management	NE9.4 NE9.5	Flood Risk and Mitigation Surface Water Management
DC7.1	Strategic Principles for High Quality Design	Revised but principle remains the same	QD6.2	Design Principles

DC7.2	Quality of Place	Revised into a public realm policy	QD6.3	Public Realm
DC7.3	Building Design	Revised but principle remains the same	QD6.4	Building Design
DC7.4	Taller Buildings	Significantly revised but intent remains the same	QD6.5	Building Height
DC7.5	Heritage Assets and the Historic Environment	Revised but principle remains the same	HE7.1	Enhancement and Protection of the Historic Environment
DC7.6	Nationally Listed Buildings and Registered Parks and Gardens	Revised but principle remains the same	HE7.2	Designated Heritage Assets
DC7.7	Conservation Areas	Included as part of designated assets policy	HE7.2	Designated Heritage Assets
DC7.8	Locally Listed Buildings	Included as part of non-designated assets policy	HE7.3	Non-Designated Heritage Assets
DC7.9	Archaeology	Carried forward	HE7.4	Archaeology
NE8.1	Green and Blue Infrastructure Networks	Split into green and blue infrastructure policies	NE9.2 NE9.3	Green Infrastructure Network Blue Infrastructure Network
NE8.2	Protecting Open Space	Text slightly revised but principle remains the same	NE9.6	Protecting Open Space
NE8.3	Providing New Open Space	Revised but principle remains the same	NE9.7	Providing New Open Space
NE8.4	Biodiversity Net Gain	Text slightly revised but principle remains the same	NE9.8	Biodiversity

NE8.5	Managing Air Quality	Slightly revised but principle remains the same	CC.8.4	Managing Air Quality
NE8.6	Managing the Impacts of New Development	Text revised but principle remains the same	CC.8.5	Managing the Impacts of New Development
V9.1	Vitality of the Town and Local Centres	Slightly revised but principle remains the same	VT5.1	Supporting Vibrant Retail Centres
V9.2	Retail Frontages	No longer applicable under use class changes, principle set out in new policy	VT5.2	Watford Town Centre
V9.3	Non-Retail Uses in the Shopping Centre	No longer applicable under use class changes, principle set out in new policy	VT5.2	Watford Town Centre
V9.4	District and Local centres	New approach to reflect use class changes	VT5.3	District and Local Centres
V9.5	Infrastructure Provision	Revised into a strategic policy	IN10.1	Integrated Infrastructure Delivery
V9.6	Utilities and Digital Infrastructure	Slightly revised but principle remains the same	IN10.2	Providing Infrastructure to Support New Development
V9.7	Community Facilities	Slightly revised but principle remains the same	HC12.3	Built Cultural and Community Facilities

<b>Table 4 – All Policies in the revised Final Draft Local Plan</b>	
<b>Revised Draft Local Plan All Policies</b>	
<b>Ref</b>	<b>Policy</b>
SS1.1	Spatial Strategy
CDA2.1	Watford Gateway Strategic Development Area
CDA2.2	Town Centre Strategic Development Area
CDA2.3	Colne Valley Strategic Development Area
HO3.1	Housing Provision
HO3.2	Housing Mix, Density and Optimising Use of Land
HO3.3	Affordable Housing
HO3.4	Build to Rent
HO3.5	Specialist Housing and Care Homes
HO3.6	Student, Co-Living and Non-Self-Contained Accommodation
HO3.7	Self-Build and Custom Housebuilding
HO3.8	Gypsies and Travellers
HO3.9	Residential Conversions
HO3.10	Building Standards for New Homes
HO3.11	Private and Communal Outdoor Amenity Space

EM4.1	Providing New Employment
EM4.2	Designated Industrial Areas
EM4.3	Office Development
EM4.4	Economic Development Outside Designated Employment Locations
EM4.5	Different Ways of Working
EM4.6	Training, Skills and Professional Development
VT5.1	Supporting Vibrant Retail Centres
VT5.2	Watford Town Centre
VT5.3	District and Local Centres
QD6.1	Design for an Attractive Town
QD6.2	Design Principles
QD6.3	Public Realm
QD6.4	Building Design
QD6.5	Building Height
HE7.1	Enhancement and Protection of the Historic Environment
HE7.2	Designated Heritage Assets
HE7.3	Non-Designated Heritage Assets
HE7.4	Archaeology
CC8.1	Mitigating Climate Change and Reducing Carbon Emissions



CC8.2	Sustainable Construction Standards for Non-Residential Development
CC8.3	Sustainable Construction and Resource Management
CC.8.4	Managing Air Quality
CC.8.5	Managing the Impacts of New Development
NE9.1	The Natural Environment
NE9.2	Green Infrastructure Network
NE9.3	Blue Infrastructure Network
NE9.4	Flood Risk and Mitigation
NE9.5	Surface Water Management
NE9.6	Protecting Open Space
NE9.7	Providing New Open Space
NE9.8	Biodiversity
IN10.1	Integrated Infrastructure Delivery
IN10.2	Providing Infrastructure to Support New Development
IN10.3	Development Contributions
ST11.1	Sustainable Travel Town
ST11.2	Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub
ST11.3	Providing Sustainable Transport Infrastructure for Major Development
ST11.4	A Walking and Cycling Infrastructure Improvement Town

ST11.5	Electric Vehicles, Car Parking and Car Clubs
ST11.6	Managing the Transport Impacts of Development
HC12.1	Healthy Communities
HC12.2	Health Impact Assessments
HC12.3	Built Cultural and Community Facilities
SA13.1	Allocated Sites for Delivery

## **5. Conclusions and Next Steps**

- 5.1 This consultation statement forms part of the supporting information for the publication of the Local Plan for Formal Consultation (under Regulation 19) of the Town and Country (Local Development) (England) Regulations 2012.
- 5.2 It demonstrates how the comments received on the First Draft Local Plan (Regulation 18 stage) have informed the preparation of the Final Draft Local Plan prior to Regulation 19 consultation.

## Appendix 2: Regulation 19 Consultation Details

### 1. INTRODUCTION

This consultation document sets out how Watford Borough Council has undertaken consultation under Regulation 19 on the new draft Local Plan. The report identifies those consulted, the issues raised and how the council has responded to those to prepare the Local Plan. This statement seeks to assist the inspector at examination to determine whether Watford's Local Plan complies with requirements for public participation. It also describes the consultation and engagement carried out by the Council and how this complies with statutory requirements set out in the Town and Country Planning (Local Government) (England) Regulations 2012 (Regulation 19). It demonstrates that public involvement is consistent with Watford's Statement of Community Involvement (SCI) adopted in 2020.

The draft plan was subject to 8 weeks of consultation from 18 January to 18 March 2021. Section 1 of this Appendix includes who was consulted and how this was undertaken.

There were 448 comments made from 82 respondents. Of these 73 comments were in support of the plan, 60 objected and the remaining 315 were comments. The majority of responses are not related to soundness. Section 2 of this Appendix includes the main issues raised with the responses from the council.

### 2. Who was consulted under Regulation 19 and how was that undertaken?

Schedule 1: Details of the consultation undertaken (letters, press releases, etc) and details of who was part of the consultation (statutory bodies, interest groups, members of the public etc).

A comprehensive effort was undertaken in advertising the consultation and working to better engage the community in the Local Plan process. The council's approach to consultation far exceeded statutory requirement to attempt to broader participation with the Local Plan. Upon publication online, a formal e-mail or letter was sent to everyone registered on the consultation database to invite them to make representations on the consultation document. In addition to this, mail outs were also sent to everyone on the Council's min contact list, which includes hard-to-reach groups, and the museum's contact database.

Due to the COVID19 pandemic we were unable to hold public events, instead a concerted online effort was made to reach people. A designated website was designed with an easy to remember web address, this was linked from all the online communications. Young people were target with communications across the council and mayor's facebook, Instagram and tiktok accounts. The mayor prepared a YouTube video promoting the consultation and took part in an interview on local radio.

Press releases were published resulting in a feature in the Watford Observer. Posters were also displayed throughout the town centre and in all council venues. Documents were available to the public on request as the usual display venues of libraries and the Town Hall were closed to the public.

### 2.1 Informal Consultation

An informal consultation by questionnaire was undertaken alongside the formal consultation to make issues in the Local plan accessible to those that did not wish to read the full document. Questions were based on the issues set out in the leaflet that was distributed to all households in the borough. Caveats were used to make clear that responses did not ask people about soundness or legal issues and if they wished to partake in the examination they would need to respond to the formal consultation. While not part of the formal consultation response, the comments made provide useful insight and were given full consideration by officers prior to submission.

The SurveyMonkey questionnaire had 160 responses. 94% of responders were residents of Watford. The largest response rate was from Nascot, Central and Park. The lowest response rate was Woodside, then Leggatts and Oxhey were the same, then Stanborough and Vicarage were the same.

- 1) The most popular supported issues were;
  - a) Protecting the historic environment and heritage of Watford,
  - b) Better quality design of buildings and places,
  - c) The creation of new jobs, and
  - d) Becoming a carbon neutral town
  
- 2) Issues with the lowest levels of support were;
  - a) Building more new homes, and
  - b) Building homes in the town centre

## 2.2 Consultation Events

### Young People (West Herts College)

Four consultation events were held with West Herts College. Feedback from students covered a variety of issues with the following being of interest (in no particular order):

- a) Housing in the High Street area was not particularly popular as it would change its character and be overly crowded, concerns about buildings being too tall, and the High Street should retain its retail focus
- b) Heritage in Watford compared to other areas is underwhelming and not a significant issue
- c) Support the need to address climate change and creative design
- d) People would cycle more if there was infrastructure in place that made them feel safe
- e) Support a wilder, more natural environment
- f) Access to well-maintained areas for recreational use and biodiversity supported

### Older People (Older Peoples Forum)

The initial intention was to have a workshop with elderly people who did not have access to the internet or digital technology. Working with the Communications Team this proved unfruitful as not everyone contacted had the technology available to use. One workshop was held with a number of volunteers across the borough. The event facilitated a response to the draft Plan that was generally defensive and negative. Issues raised included:

- a) The scale of development was too much
- b) The number of offices proposed may not be required because of increased working from home
- c) Aspirations to reduce car use were unrealistic and more people would rely on electric vehicles
- d) The Local Plan should be detailed to better understand the impact of Covid-19

#### Organisations consulted on the Final Draft Watford Local Plan, those that responded are marked with an asterix \*

Abbots Langley Parish Council

Hertfordshire Local Enterprise Partnership

Planware

Affinity Water	Hertfordshire Valleys Clinical Commissioning Group	PowerHaus Consultancy
Aggregate Industries UK Ltd*	Herts and Middlesex Wildlife Trust	Punc Partners
Aldenham Parish Council	Herts Valleys CCG	RDI REIT
AMEC Environmental & Infrastructure UK	Hertsmere Borough Council*	Rentplus Ltd.
APG Portfolio Management Ltd	Hightown Housing Association	Royal Society for the Protection of Birds
Armstrong Rigg Planning	Highways England*	Rumball Sedgwick
Asda*	Historic England*	S. Hille & Co Holdings
Avison Young	Home Builders Federation*	Saint Gobain
Barker Parry Town Planning	Homes and Communities Agency	Savills
Berkeley Homes*	Homes England	Sirius International Insurance Group
Boys and Girls Nursery	IDA London Holdings*	Solum Regeneration*
Brasier Freeth*	IDA Plymouth Holding*	Sport England*
Broxbourne Borough Council	Indigo Planning	SSA Planning
Cadent Gas	Inland Homes	St Stephen's Parish Council
Campaign for Real Ale*	Intouch Planning	St William Property Developers
Canal and River Trust*	JLL*	St. Albans City & District Council*
Cassiobury Residents Association*	John Wood Group	Stevenage Borough Council*
Castle Homes	Just Plans	Strutt and Parker
Centrica	LaSalle Investment Management*	Tangent Trading Ltd
Chiltern and South Bucks District Councils	Legal and General Investment Management*	Tannen Group
Civil Aviation Authority	Lichfields	Telereal Trillium*
Coal Authority	Local Bodies / Other Organisations	Tellon Capital
Cordage Group	London Borough of Barnet	Tesco*
Cornerstone Telecommunications	London Borough of Harrow	Tesni
Cortland Partners*	London Borough of Hillingdon*	Tetlow King
Croxley Green Parish Council	London Midland	Thakeham
Curtin&Co	London Strategic Planning	Thames Water Utilities Ltd*
Cushman and Wakefield	Luton and Leighton Area Quakers	Theatres Trust*
Dacorum Borough Council*	Marine Management Organisation	Three mobile

DB Cargo UK Ltd	Mercedes Benz Retail Group	Three Rivers District Council*
DB Schenker Rail	Ministry of Housing, Communities and Local Government	Transport for London*
Department for Education	Mobile UK	Troy Planning
Dignity Funeral Directors	Montagu Evans	UK Power Networks
DLP Planning Ltd	Nascot Grange Residents Association	Wakelin Associates Architects
EE	Nascot Wood Junior School	Walker Morris LLP
Environment Agency*	National Federation of Gypsy Liaison Groups	Warner Bros Studios
Extinction Rebellion Watford	Natural England	Watford Community Housing Trust
Farrington Care Homes	Network Rail*	Watford Field School Infants & Nursery
Firstplan	Newsteer	Watford Fields Resident Association
Friends of the Earth	Nexus Planning	Watford Health Campus Partnership LLP
GD Plant Hire	NHS England	Watford Museum
Gerald Eve*	Nuveen Real Estate	Watford Rural Parish Council
Gladman	Obsidian Strategic	Welwyn Hatfield Borough Council
Goodman Logistics and Warehouses	Office of Rail Regulation	Wenta
Greater London Authority*	One YMCA	West Herts Hospitals NHS Trust*
Heaton Planning	Pentagon Paint	West Watford Community Association
Hertfordshire Constabulary*	Perry Holt & Co	Woodland Trust
Hertfordshire County Council*	Pigeon Investment Management	

The following organisations were not contacted directly but did respond to the consultation:

Additional organisations that responded to the First Draft Local Plan Consultation	
Anchor Hanover Group [4086]	Planning & Development Associates Ltd [4045]
Canada Life Asset Management [4096]	Reach PLC [4069]
Drax Investments Ltd [4107]	Ridge Residents Association [4030]
Glyn Hopkin Holdings Ltd [4118]	tadpoles [4014]
Lidl Great Britain Limited [4112]	The Retirement Housing Consortium [4102]
McDonald's Restaurants Ltd [4111]	Watford Central Town Residents Association[4071]



Mineral Products Association [4058]	Watford Centre Limited [4088]
North Western Avenue Watford Ltd [4121]	

### 3. Main Issues raised in the Plan order including the Council response or action

Issue	Comment / Soundness	Officer Response
<b>General</b>		
Impact of COVID19 will affect the number of jobs and homes needed, therefore consider the homes and jobs targets in the plan to be unsound.	Although raised as a soundness issue by residents, it is not considered to be related to soundness.	No change required, impacts of COVID will not be known for some time and when applicable updated evidence will be fed into a plan review. The Government have made it clear that Local Plans should not be delayed.
Plan period - Several stakeholders consider the plan should start in 2021 (not 2018). NPPF requires strategic policies to look ahead over a minimum 15 year period from the date of adoption.	Soundness issue raised by Woolf Bond Planning and Home Builders Federation (HBF)	Plan period to be amended to 2021-2037 with discussion set out in topic paper.  Do not agree with suggested change for LP to finish in 2038 based on the anticipated Examination and Adoption dates.
Number of additional homes is undeliverable. Consider that the assumed delivery from the allocations and windfall sites is not justified.	Soundness objection	This will be addressed through the Topic Paper evidence.
Taller buildings wanted by developers (challenging density calculations)	Soundness objection	The Local Plan does not prohibit taller buildings, rather it sets a base building height. Where buildings taller than the base building height are proposed these are subject to additional criteria including exceptional design and sustainability benefits.
Comments supported the focus on good design but raised concerns about delivery. Monitoring will be key to ensure good development. Several comments raised that the draft policies are	Comment	This is a new plan not a reflection on what is happening at the moment. Adopted policies will be monitored, if they are not being delivered this will trigger a plan review.

significantly different from the current situation and therefore will need careful monitoring.		
<b>Housing 48 responses,</b>		
HBF consider that the proposed housing numbers are a minimum. This was raised as a soundness issue that the plan period should be extended to 2037 and the housing target increased accordingly.	Soundness objection	The final draft Local Plan places emphasis on a designed approach and sets out indicative densities that are to be treated as a starting point.
Several residents consider the number of additional homes too high, particularly in a post-COVID Watford.	Comment	No change required, impacts of COVID will not be known for some time and when applicable updated evidence will be fed into a plan review. The Government have made it clear that Local Plans should not be delayed, the council is not able to amend housing targets.
Residents also query the scale of development and the impact on design, infrastructure and wellbeing of the community.	Comment	Not a soundness issue. Design, infrastructure and wellbeing are covered by the Plan.
HBF do not consider the self-build requirement to be justified.	Soundness objection	Justification to be provided in topic paper.
WBC should provide justification for the use of nationally described space standards as required by the NPPF.	Soundness objection	Justification to be provided in topic paper.
WBC should provide justification for the accessible homes requirements.	Soundness objection	Justification to be provided in topic paper.
<b>Viability</b>		
HBF consider the 35% affordable housing target too onerous in light of the Local Plan viability assessment. Suggest a tiered requirement to reflect lower value areas in the north of the borough.	Soundness objection	The 35% target is in line with the viability evidence base that recommend the “35% target be retained and applied on a ‘maximum reasonable proportion’ basis, taking site-specific circumstances into account. Setting a lower proportion of affordable housing is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so if the requirement is lowered.”

The approach of using development contributions to deliver new or improved infrastructure is supported.	Support	Support welcomed.
HCC make various comments about infrastructure delivery and funding (although not an objection).	Comment	These comments will be addressed through a Statement of Common Ground with HCC. Suggested amendments will be proposed to the Inspector where appropriate.
<b>Employment</b>		
Support for the protection of Clarendon Road office area, comments also highlighted the importance of the protection of industrial uses.	Support	Support welcomed.
<b>Transport</b>		
The Sustainable Travel Town approach encouraging active and healthier lifestyles through increased walking and cycling received strong support.	Support	Support welcomed.
Significant existing parking issues around allocated garage sites raised concerns for residents.	Comment	Development considerations require a parking survey to be undertaken when sites come forward for development.
<b>Water</b>		
Thames Water are generally supportive but flag that planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed.	Soundness objection	Agreed that planning conditions can be used.
EA suggest changes to strengthen wastewater infrastructure.	Soundness objection	Suggested text agreed and will feature in the proposed modifications presented to the Inspector.
<b>Retail</b>		
Agents acting on behalf of MacDonalds and KFC object to policy VT5.3 f) which imposes a blanket ban on restaurants that include an element of hot food takeaway within 400-metres walking	Soundness objection	The suggested policy wording came from Public Health at HCC.

distance of a primary school entrance. Examination of other plans have found similar policy approaches to be unsound.		
<b>Sites</b>		
School site – HCC Property object to the allocation of Former Meriden School as an education allocation (ED01) as they are progressing a housing scheme on the site. HCC Growth & Infrastructure Unit (with responsibility for education) support the allocation.	Raised as a soundness objection by HCC Property as landowner	The need for a school outweighs the need for housing and this site is one of only two identified by HCC's school site search evidence base. Both have been allocated by the Local Plan and there is still a shortfall in school place capacity. We will try to resolve this through the Statement of Common Ground with HCC but it will ultimately be for the Inspector to decide.
Challenging the indicative yield and the approach to capacities used for all allocated sites. Particularly in relation to sites MU23 Asda and MU14 Wellstones although the principle of allocation both sites is supported.	Soundness objection	Officers to consider whether 'indicative yield' should be changed to 'baseline scenario' to clarify that it is not the capacity of the site but a baseline figure to support WBC's wider assessment of housing supply.
Concern was raised by residents at the number of supermarkets allocated for development.	Comment	Commercial use is to be reprovided as part of the allocations.
Historic England have raised a soundness objection due to lack of heritage impact assessments on key site allocations.	Soundness objection	WBC is investigating further work on this.
Concrete batching plant at Watford Junction needs to be shown on map	Soundness objection	Agreed, map to be amended.
Riverwell allocation should include hospital site (WHHT)	Soundness objection	Agreed, map to be amended.

#### 4. Conclusion

This consultation statement in conjunction with Appendix 2 Schedule 1 explains who was invited to make representations under Regulation 19 and how this was undertaken. It also shows how this is in accordance with the plan-making regulations and the Councils Statement of Community Involvement (2020). This demonstrates compliance with the Formal Consultation (under Regulation 19) of the Town and Country (Local Development) (England) Regulations 2012.

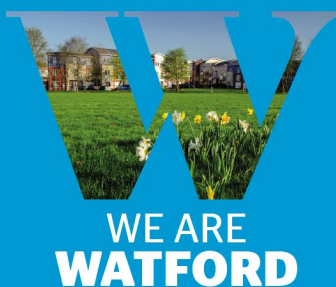


# Final Draft

## Watford Local Plan 2018-2036

### Consultation Responses

Monday 18 January 2021 – Thursday 18 March 2021



[watfordlocalplan.co.uk](http://watfordlocalplan.co.uk)



Record count: 439

**What is the Local Plan and what does it do?**

1836

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere understands that the limited space available within Watford presents challenges when addressing large scale growth; in particular the provision of new infrastructure. Hertsmere understands that the limited space available within Watford presents challenges when addressing large scale growth; in particular the provision of new infrastructure. The provision of new high quality infrastructure will be vital to ensuring that Watford meets its sustainable development objectives, and given Watford's key role within South West Herts it is important the suitable consideration is given to improving the connectivity between Watford and the neighbouring boroughs.

## Full text:

Hertsmere encourages collaborative working between neighbouring authorities, and acknowledges that both authorities form part of the Housing Market and Functional Economic Market Areas for South West Herts, and thereby share a responsibility for creating an environment that meets the demands for growth in the area.

Hertsmere understands that the limited space available within Watford presents challenges when addressing large scale growth; in particular the provision of new infrastructure. The provision of new high quality infrastructure will be vital to ensuring that Watford meets its sustainable development objectives, and given Watford's key role within South West Herts it is important the suitable consideration is given to improving the connectivity between Watford and the neighbouring boroughs. The South West Hertfordshire Joint Strategic Plan will help to address help to address cross-boundaries issues towards the later phases of the Local Plan period and as Local Plans are reviewed. However, it is important the current relationships between the different districts are fully considered at the beginning of this Local Plan period along with the potential implications of any planned growth.

Paragraph 1.6 relating to the JSP does require amending as it does not reflect intentions. Rather than referring to the JSP not being a 'statutory document,' it should refer to it not being a 'statutorily required' document.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jj>

2096

Comment

Respondent: Stevenage Borough Council

Agent: Stevenage Borough Council

## Summary:

We have no substantive comments to make on the Local Plan.

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Stevenage Borough Council\_Redacted - <https://watford.oc2.uk/a/nd>

2097

Comment

Respondent: London Borough of Hillingdon  
Agent: London Borough of Hillingdon

## Summary:

I can confirm that the London Borough of Hillingdon does not have any comments to make on the Final Draft Watford Local Plan. It is noted that no request has been sent to the London Borough of Hillingdon to accommodate any of the identified need for development at this stage. If you deem that a statement of common ground is necessary to establish a position on any strategic matters then please send officers a draft version for review.

## Full text:

Letter received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: LB Hillingdon Consultation Response\_Redacted - <https://watford.oc2.uk/a/mx>

## South West Hertfordshire Joint Strategic Plan

1904

Support

Respondent: Three Rivers District Council

## Summary:

Paragraph 1.5 refers to the SW Herts Joint Strategic Plan as "not a statutory document". It may be worth clarifying this as the JSP is expected to be a statutory planning document.

## Full text:

Paragraph 1.5 refers to the SW Herts Joint Strategic Plan as "not a statutory document". It may be worth clarifying this as the JSP is expected to be a statutory planning document.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Preparation of the Local Plan and stakeholder engagement

1771

Comment

Respondent: R Kowalewski

## Summary:

Will the plan be finalised before or after the 2021 census? Will the plan be adjusted based on the findings of the census?

## Full text:

Will the plan be finalised before or after the 2021 census? Will the plan be adjusted based on the findings of the census?

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None



**First Draft Local Plan 2019**

1772

Comment

Respondent: R Kowalewski

## Summary:

Public transport is not mentioned Why? This featured heavily in the first draft. For the Borough to achieve any improvement in reducing car usage in Watford the coverage level and frequency of public transport must be increased significantly.

## Full text:

Public transport is not mentioned Why? This featured heavily in the first draft. For the Borough to achieve any improvement in reducing car usage in Watford the coverage level and frequency of public transport must be increased significantly.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: The first communication that I received about the long term planning. I mentioned the issue of public transport every time I received an invitation to comment on the plans.

Appear exam: Not specified

Attachments: None

**Final Draft Local Plan 2021**

1879

Comment

Respondent: Canal &amp; River Trust

## Summary:

Please find attached the Trust's full response to the Final Draft Plan.

## Full text:

Please find attached the Trust's full response to the Final Draft Plan.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Canal & River Trust Response - <https://watford.oc2.uk/a/yr>

1880

Comment

Respondent: Mr Aubrey Muchamore

## Summary:

Site H27 (HS25)

had, overall, the most local responses and although each of the 7 “themes” (12.2) were mentioned, it was parking that troubled the community most.

[12.3] Community Facilities - “A demonstrated demand”

Demelza Slaney has written to the Council a comprehensive proposal for the site and I fully endorse its solutions to help residents with parking issues and promote E charging vehicles.

The site would not sustain the proposed 11 dwellings.

The pandemic and its fallout will have changed so many things.

Will current office buildings be repurposed?

Will there be a need for all the dwellings proposed?

## Full text:

Site H27 (HS25)

had, overall, the most local responses and although each of the 7 “themes” (12.2) were mentioned, it was parking that troubled the community most.

[12.3] Community Facilities - “A demonstrated demand”

Demelza Slaney has written to the Council a comprehensive proposal for the site and I fully endorse its solutions to help residents with parking issues and promote E charging vehicles.

The site would not sustain the proposed 11 dwellings.

The pandemic and its fallout will have changed so many things.

Will current office buildings be repurposed?

Will there be a need for all the dwellings proposed?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As set out in Draft Proposal resident feedback H27

Appear exam: Not specified

Attachments: None

## Stakeholder engagement

1782

Comment

Respondent: Ridge Residents Association

## Summary:

Local residents object at every step on the over development of the area. Whatever the objections, however reasonable they are always rejected in favour of developers because the Council is fearful of the cost of legal cases from the developers. This makes stakeholder engagement with residents perfunctory at best.

## Full text:

Local residents object at every step on the over development of the area. Whatever the objections, however reasonable they are always rejected in favour of developers because the Council is fearful of the cost of legal cases from the developers. This makes stakeholder engagement with residents perfunctory at best.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1905

Support

Respondent: Three Rivers District Council

## Summary:

The approach to stakeholder engagement is supported. Watford Borough Council has proactively engaged with Three Rivers through the duty to cooperate process and the Council is satisfied with the robust evidence base and Sustainability Appraisal provided by Watford Borough Council in support of the Plan.

## Full text:

The approach to stakeholder engagement is supported. Watford Borough Council has proactively engaged with Three Rivers through the duty to cooperate process and the Council is satisfied with the robust evidence base and Sustainability Appraisal provided by Watford Borough Council in support of the Plan.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**A brief portrait of Watford**

1783

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Sustainable development in England: The economic, environmental and social objectives**

1784

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## The key challenges and sustainable objectives for Watford: economy, society and environment

2027

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

### Summary:

The Final Draft Local Plan identifies that the town centre contains a mix of chain and independent retailers, creating a varied mix of retail, restaurant and leisure provision that make the area a retail and leisure hub for South West Hertfordshire. The 'Sustainable Objectives' for Watford's economy state that the town and wider area will have an attractive range of activities available, reinforcing Watford's appeal as a destination for leisure and recreation. The Local Plan should recognise that out of centre destinations such as Woodside Leisure Park play an important role in meeting the leisure needs of residents and will ultimately contribute to meeting this sustainable objective. Please see enclosed representations letter for further detail.

### Full text:

Letter and form received via email

### Change suggested by respondent:

Legal & General request that the role and contribution that Woodside Leisure Park makes to the community and economy of Watford is recognised within the sustainable objectives set out at Paragraph 1.23 and the Key Diagram at Figure 1.2. Please see enclosed representations letter for further detail.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft)

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>

Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>

Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2098

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

### Summary:

Transport. The approach of future development being concentrated within the Core Development Areas that focusses on more easily accessible parts of the town is welcomed. This will enable joined up planning and sufficient scale to enable the delivery of transformative sustainable transport infrastructure.

### Full text:

Form and letter received via email

### Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Watford's economy and the key challenges**

1785

Comment

Respondent: Ridge Residents Association

**Summary:**

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

**Full text:**

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Watford's economy in 2036 - the sustainable objectives**

1773

Comment

Respondent: R Kowalewski

**Summary:**

At the moment I do not see these aspirations happening, quite the opposite. Office space is being sacrificed, we have seen a lot of office space disappear in recent years. Despite changes in planning this trend must be stopped.

Industry seems to be a thing of the past in this town I do not see any evidence of any form of serious promotion to get industry back into the town after the decimation this sector suffered in the late seventies / early eighties.

**Full text:**

At the moment I do not see these aspirations happening, quite the opposite. Office space is being sacrificed, we have seen a lot of office space disappear in recent years. Despite changes in planning this trend must be stopped.

Industry seems to be a thing of the past in this town I do not see any evidence of any form of serious promotion to get industry back into the town after the decimation this sector suffered in the late seventies / early eighties.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: mentioned in the 2018 consultation.

Appear exam: Not specified  
Attachments: None

1821

Object

Respondent: Mrs Fran Clark

## Summary:

It is noted that the expected increase in jobs will be 11.4% but with impact of Covid the need for 14,988 additional homes and 136K sqm of office and industrial space is now unsound.

New ways of [home] working does not require the employed to work close to their place of residence. Why, when Watford has a high population density of 45 per hectare, do we need more homes now?

'New development will be of HIGH quality..' - how is 'high quality' to be regulated?

## Full text:

It is noted that the expected increase in jobs will be 11.4% but with impact of Covid the need for 14,988 additional homes and 136K sqm of office and industrial space is now unsound.

New ways of [home] working does not require the employed to work close to their place of residence. Why, when Watford has a high population density of 45 per hectare, do we need more homes now?

'New development will be of HIGH quality..' - how is 'high quality' to be regulated?

## Change suggested by respondent:

An economic objective - to help re build a strong, responsive and competitive economy, by reviewing the need for land of the right type is available, to support growth and improved productivity; and by identifying and coordinating the provision of infrastructure.

A social objective: to support the rebuilding of strong, vibrant and healthy communities, by ensuring that a sufficient range of quality homes can be provided to meet the needs of the present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1891

Comment

Respondent: T Norris

## Summary:

need to think carefully about the LT development and its impact on the neighbourhood overall - more expansion=less desirable=less skilled workforce=more crime=less attractive etc etc

Why is it central government dictate re housing quotas completely ridiculous - growth for growth sake - if there is a lack of housing tackle the new age landlords, the empty vacant houses and multiple house ownership by the few which actually causes the problems in the lack of housing

## Full text:

need to think carefully about the LT development and its impact on the neighbourhood overall - more expansion=less desirable=less skilled workforce=more crime=less attractive etc etc

Why is it central government dictate re housing quotas completely ridiculous - growth for growth sake - if there is a lack of housing tackle the new age landlords, the empty vacant houses and multiple house ownership by the few which actually causes the problems in the lack of housing

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**Watford's society and the key challenges**

1786

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Watford's society in 2036 - the sustainable objectives**

1804

Support

Respondent: Sport England

## Summary:

Support is offered for the sustainable objective relating to encouraging a public realm that encourages people to be active through walking and cycling as this objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Full text:

Support is offered for the sustainable objective relating to encouraging a public realm that encourages people to be active through walking and cycling as this objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes  
Raise LPA Why?: Preferred Options  
Appear exam: Not specified  
Attachments: None

## Watford's environment in 2036 - the sustainable objectives

1805

Support

Respondent: Sport England

## Summary:

Support is offered for the sustainable objective relating to improving the network of open spaces, parks and waterways and the connections between them in order to support increased recreational activities because this will encourage people to be active through walking and cycling. This objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Full text:

Support is offered for the sustainable objective relating to improving the network of open spaces, parks and waterways and the connections between them in order to support increased recreational activities because this will encourage people to be active through walking and cycling. This objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1822

Comment

Respondent: Mrs Fran Clark

## Summary:

Who is to monitor that the new development will be of high quality?

## Full text:

Who is to monitor that the new development will be of high quality?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1892

Object

Respondent: T Norris

## Summary:

The council states that it will:

The network of open spaces, parks and waterways, and the connections between them, will have been improved to support increased recreational activities.

Important biodiversity and wildlife habitats will have been protected and connections within the green and blue infrastructure networks improved, increasing their value for wildlife.

Yet the LT strategy and the small print goes against this headline.

## Full text:

The council states that it will:

The network of open spaces, parks and waterways, and the connections between them, will have been improved to support increased recreational activities.

Important biodiversity and wildlife habitats will have been protected and connections within the green and blue infrastructure networks improved, increasing their value for wildlife.

Yet the LT strategy and the small print goes against this headline.

## Change suggested by respondent:

Review plan and ensure that council mission is meaningful, fit for purpose and follows their commitment. This is because designated areas which fall into wildlife and green belt areas are actually considered high risk under the green belt review so the plan appears totally contradictory

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None



2099

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.2 Ecology. Reference to the NPPF and, correspondingly, to the inclusion of biodiversity as one of the three pillars of sustainable development is welcomed. This is a broad principle that should underpin development within the borough for the lifetime of the local plan and it is noted that this is given expression in 'Watford's environment in 2036 - the sustainable objectives' and 'Helping to create a better Watford in 2036 ...'. The main local plan Objectives are, of course, set at a high level, but are reasonable and proportionate and broadly reflect a contemporary vision for biodiversity.

5.3 However, the objectives could draw more on the emerging Environment Bill which is expected to receive Royal Assent this year. This is strongly expected to introduce the requirement to adopt biodiversity net gain (or net gain) and, as part of this, the establishment of a Nature Recovery Network (or NRN). Whilst the latter may have parallels with the more multi-functional green and blue infrastructure referred to in this vision, it will differ in having a clear statutory basis and (biodiversity) function. The potential for synergies between the two is obvious.

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore recommended that the text of the vision is amended accordingly, and consideration given to further explanation in the supporting text. Herts Ecology can advise on suitable wording if required. Reference to the NRN could also comfortably sit alongside some of the many references to the blue and green networks throughout the local plan where relevant. Establishment of an NRN may well require considerable effort to design and operate and so references should be worded accordingly.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Helping to make Watford a better place for everyone

1806

Support

Respondent: Sport England

## Summary:

Support is offered for the vision for Watford. This is because parts of the vision support the population being healthier through opportunities to get active, walking and cycling. Other elements of the vision such as the comprehensive network of cycle and walking routes, the conservation and green/blue infrastructure and high quality design will also help with encouraging active lifestyles. local people enjoying active lifestyles. The vision would therefore be consistent with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Full text:

Support is offered for the vision for Watford. This is because parts of the vision support the population being healthier through opportunities to get active, walking and cycling. Other elements of the vision such as the comprehensive network of cycle and walking routes, the conservation and green/blue infrastructure and high quality design will also help with encouraging active lifestyles. local people enjoying active lifestyles. The vision would therefore be consistent with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1823

Comment

Respondent: Mrs Fran Clark

## Summary:

The effects of Covid will cause a recession for many years to come and there is no need for extra homes as there will be a change of work patterns and Watford will no longer have a thriving retail town centre.

## Full text:

The target set by the Government should be negated with the effect of Covid - 'increasing [new homes] target three-fold' is ludicrous and will not be required if the population does not increase.  
The effects of Covid will halt the need for new homes to cover the increase in population for the workforce as this will not grow at the rate envisaged. As the document notes that 'COVID-19 has greatly impacted the economy to date, effects..... economic recession period of high unemployment and vacancy before any long-term recovery'  
Why when the increase in population is only expected to be around 400 - 96, 700 to 97,100 - do we need 14,988 extra homes?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1849

Comment

Respondent: Planning &amp; Development Associates Ltd

## Summary:

A separate Statement of Representations is attached containing comments on The Vision (page 15)

2.2.1 These Representations are considered consistent with the part of the Council's Vision which confirms that "green and blue infrastructure will be conserved and enhanced, maximising their value for biodiversity and other important ecosystem services".

2.2.2 The Vision is supported in principle, but these Representations indicate a missed opportunity to fully realise the vision.

## Full text:

A separate Statement of Representations is attached containing comments on The Vision (page 15)

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Watford Local Plan Representation REV 04.pdf - <https://watford.oc2.uk/a/k5>  
Planning & Development Associates - email\_Redacted - <https://watford.oc2.uk/a/n5>

1893

Object

Respondent: T Norris

## Summary:

The council states that New development will provide opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community - we cannot grow continual in such a small area - it is inconceivable that the local council is not challenging central governments directive by stating that it will deliver new development for the immediate and long term future. It will result in a poor, densely populated, run down, unattractive and crime invested area.

## Full text:

The council states that New development will provide opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community - we cannot grow continual in such a small area - it is inconceivable that the local council is not challenging central governments directive by stating that it will deliver new development for the immediate and long term future. It will result in a poor, densely populated, run down, unattractive and crime invested area.

## Change suggested by respondent:

Review and challenge

Legally No  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

## Planning for growth

1787

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1824

Comment

Respondent: Mrs Fran Clark

## Summary:

New development provides opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community. Why not 'deliver' on what we already have? Much has been spent on the Town Centre - but now with the decline in retail stores surely these spaces can be changed [of use] to living accommodation.

## Full text:

New development provides opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community. Why not 'deliver' on what we already have? Much has been spent on the Town Centre - but now with the decline in retail stores surely these spaces can be changed [of use] to living accommodation.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1920

Support

Respondent: Three Rivers District Council

## Summary:

The focus on brownfield development and sustainability zones is welcomed.

## Full text:

The focus on brownfield development and sustainability zones is welcomed.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1937

Comment

Respondent: Berkeley Homes

## Summary:

The Spatial Strategy for Watford sets out a clear vision for the Borough and we welcome the continued aspiration to deliver exemplar development which will contribute towards Watford becoming a better place for everyone. The high degree of public transport infrastructure, including bus and train services, makes Watford a highly sustainable and accessible location. However, there is a conflict between Figure 1.1 and Strategic Policy SS1.1. Strategic Policy SS1.1 identifies the Core Development Areas as having excellent access to public transport and facilities and highlights the need to make the most effective and efficient use of the land. However, in Figure 1.1, part of the Watford Gateway Core Strategic Development Area (e.g. land immediately to the north of Watford Junction station) is designated as medium sustainability which contradicts with the aspirations of SS1.1.

## Full text:

-

## Change suggested by respondent:

Figure 1.1 should be revised to designate all land within the Watford Gateway area as high sustainability.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made on the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting this amendment.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

## A sustainable development strategy for Watford

1788

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.

All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch.

We should be looking to "build back better" post pandemic - this plan won't achieve that.

All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1921

Support

Respondent: Three Rivers District Council

## Summary:

The approach to sustainable development is in line with national policy and is supported.

## Full text:

The approach to sustainable development is in line with national policy and is supported.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**The Spatial Strategy**

1922

Support

Respondent: Three Rivers District Council

**Summary:**

Focusing development in locations where there is good access to services and facilities and encouraging a reduction in car travel is supported and is consistent with national policy.

**Full text:**

Focusing development in locations where there is good access to services and facilities and encouraging a reduction in car travel is supported and is consistent with national policy.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**Policy SS1.1: Spatial Strategy**

1775

Support

Respondent: R Kowalewski

**Summary:**

The strategy is very aspirational, but as with all such documents the "devil is in the detail" HOW are the planners going to entice industry office based companies to come to Watford bringing quality jobs. We do not need more "barristas" and "deliveroo" type employment here.

How will the reach of public transport be expanded, both routes but equally important time wise.

**Full text:**

The strategy is very aspirational, but as with all such documents the "devil is in the detail" HOW are the planners going to entice industry office based companies to come to Watford bringing quality jobs. We do not need more "barristas" and "deliveroo" type employment here.

How will the reach of public transport be expanded, both routes but equally important time wise.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1859

Comment

Respondent: Watford Central Town Residents Association

## Summary:

Covid19 will have a transformative effect upon the Town Centre SDA and Business district. Working from home, shopping online, is unlikely to change. Assumptions of office growth, floorspace required and retailing extent must be revisited to ensure a sound plan. Readdressing the plan's starting point could enable WBC to pursue more residential development in the Town Centre and other SDAs, reducing pressure of inappropriate development on areas outside these zones. SPDs such as the Character of Area study and Residential Design Guide must continue to be referenced in the new local plan as they are in the current local plan.

## Full text:

The past year has seen an extraordinary change in circumstances for Watford, as with other cities and towns across the UK. Covid-19 will have a transformative effect upon the Town Centre SDA and Business district. The experience of the past year has compounded the reduction in high street retail caused by E-Commerce. This sea change in the way people conduct business, from home, online, is unlikely to revert to normal. As a consequence, the assumptions of office growth and floorspace required and the extent of retailing need to be revisited in order to ensure that that Plan is sound.

We appreciate the need to release more land for housing. Readdressing the starting point of the plan could enable WBC to pursue more residential development in the most sustainable part of the Borough i.e. the core town centre area and other SDAs. This would reduce the pressure of inappropriate development upon areas outside of these zones. Ultimately, WBC needs to carefully consider what sort of town centre is needed, in terms of its mix of uses, to meet Watford's needs.

Respect for area character is referenced in many of the policies here, which we commend. Yet we have concerns that the failure to reference existing SPDs such as the Character of Area study and Residential Design Guide (as they are in the current local plan, e.g. policy UD 1) will remove well respected evidence bases from decision-making, and lead to more subjective interpretation of an area characteristics. Therefore, the above Supplementary Planning Documents need to continue to be referenced in the new local plan until such time as, if deemed necessary, updated guidelines are adopted in their place.

## Change suggested by respondent:

-  
 Legally Not specified  
 compliant:  
 Sound: Not specified  
 Comply with Not specified  
 duty:  
 Raise LPA: No  
 Appear exam: Not specified  
 Attachments: None

1894

Object

Respondent: T Norris

## Summary:

14,988 homes is not feasible to maintain a liveable environment without having and impact not only on health, the environment, community, air quality, open space, child welfare etc etc

## Full text:

14,988 homes is not feasible to maintain a liveable environment without having and impact not only on health, the environment, community, air quality, open space, child welfare etc etc

## Change suggested by respondent:

A substantially lower number of homes can be offered regardless of central governments directive people want to be able to live, breathe, be safe and above all have a community spirit in a place they call home

Legally No  
 compliant:  
 Sound: No  
 Comply with Yes  
 duty:  
 Raise LPA: No  
 Appear exam: Written Representation  
 Attachments: None

1898

Comment

Respondent: Miss Rachel McGall

## Summary:

La Salle support the Council's identification of Core Development Areas to promote the growth objectives for the Borough. Furthermore, recognising a holistic approach towards larger development sites is supported, it is suggested that the policy includes reference to the phasing of development to help achieve the holistic strategy for the wider Core Development Areas

## Full text:

La Salle support the Council's identification of Core Development Areas to promote the growth objectives for the Borough. Furthermore, recognising a holistic approach towards larger development sites is supported, it is suggested that the policy includes reference to the phasing of development to help achieve the holistic strategy for the wider Core Development Areas

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/ys>

1919

Support

Respondent: Three Rivers District Council

## Summary:

The Spatial Strategy is supported as it sets out that the needs of the area will be met in a sustainable manner.

## Full text:

The Spatial Strategy is supported as it sets out that the needs of the area will be met in a sustainable manner.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1943

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs between 2018 and 2036. Growth will be focussed in the "Core Development Area" and it is expected to support 80% of the allocated development within the Borough.

All development will take place on brownfield and previously developed land and only in exceptional circumstances will development on greenfield land be supported. Development in the London Metropolitan Green Belt will not be supported unless it can be demonstrated that exceptional circumstances apply, in accordance with paragraph 143 of the National Planning Policy Framework (NPPF) (2019).

Our client is supportive of the Council's "Vision" up to 2036, its plans for growth and the proposed spatial strategy. The Plan Period of circa 18 years (15 left from the date of this consultation) is also supported and is in accordance with the NPPF.

The recognition of the high affordability ratio of 12.2, alongside the Council's aim to tackle it through meeting its housing requirement, is welcomed. Our client is supportive of the provision of 14,988 homes over the Plan period, as this is in accordance with the Government's latest Standard Method calculation for housing requirements.

In order to be in full compliance with paragraphs 11b) and 59 of the NPPF, this figure should be expressed as a minimum requirement and the text adjusted accordingly to the following:

"The Local Plan makes provision for a minimum of 14,988 additional homes"

It is noted that the Local Housing Needs Assessment (2020), which is included in the accompanying evidence base, on page 5, states that the level of housing requirement calculated using the Standard Methodology would help support a considerably higher rate of job growth.

The Assessment sets out that this level of housing requirement would support 16,405 jobs between 2020 and 2036. The Plan only identifies provision for 11,500 additional jobs between 2018 and 2036. It is unclear as to how this discrepancy has occurred and why the Council is aiming for a significantly lower level of job creation.

In the interests of positive plan-making and in accordance with paragraph 80 of the NPPF, the Council should include consideration to scenarios which may provide more jobs. There is no justified rationale provided for reducing the additional number of jobs which can be created when the Council is already using the Government's Standard Method figures for housing provision.

The long-term impact of the COVID pandemic on the economy and on working patterns is still unclear. However, the Government has stressed the importance of getting the economy back on track. As such, the Council should plan positively for this recovery and not suppress job growth.

A letter from WBC sent to St Albans City and District Council (SADC) on 4 January 2021, suggests that WBC is unable to meet its employment need and is asking for SADC to assist in meeting this demand. However, it is not clear from the Plan that this is the approach the Council is taking, nor the level which they are unable to meet this demand.

We recommend that the Council makes provision for the higher level of job growth over the Plan period.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

In order to be in full compliance with paragraphs 11b) and 59 of the NPPF, this figure should be expressed as a **minimum** requirement and the text adjusted accordingly to the following:

"The Local Plan makes provision for a minimum of 14,988 additional homes"

We recommend that the Council makes provision for the higher level of job growth over the Plan period.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1965

Support

Respondent: Transport for London Commercial Development  
Agent: Transport for London Commercial Development

## Summary:

TfL CD broadly support the part of Policy SS1.1, Spatial Strategy which seeks to optimise density in areas of good access to public transport both within the Core Development Area and outside the Core Development area. The requirement for development to seek to make the most of its location, such as access to public transport, cycling and walking and seek to provide off-site infrastructure to enhance them, and facilitate access to services and facilities is also supported.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: TfL Commercial Development reps\_Redacted - <https://watford.oc2.uk/a/nh>

TfL Commercial Development site map - <https://watford.oc2.uk/a/nx>



1988

Object

Respondent: Mr Richard Walker

## Summary:

Concerns about whether quantity of homes in plan is deliverable. See written reps.

"1.23 To sum up, the key issue is whether the assumed delivery from the proposed allocations (assuming the sites are confirmed as being available) is justified and suitably evidenced. If not then the allocations will not be effective in delivery the spatial strategy, and the plan as a whole will not be effective. The evidential basis for the windfall allowance is also a matter that affects the soundness of the Plan. The Council's justification and balance sheet appears to be amiss in respect small site completions assumptions for the plan period."

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Richard Walker - document - <https://watford.oc2.uk/a/n7>

Richard Walker - form\_Redacted - <https://watford.oc2.uk/a/n8>

1996

Comment

Respondent: JLL

Agent: JLL

## Summary:

We note that the Special Policy Areas within the Core Strategy (2006) have been identified as Core Development Areas in the Draft Local Plan, with the exemption of the Western Gateway. Core Development Areas are areas where significant revitalisation and transformative change are expected to bring new investment in the town. The Western Gateway has not been carried forward as one of the Core Development Areas. We acknowledge this may be linked to the uncommitted situation relating to the Metropolitan Line extension to the Croxley area. However, given the approval and construction of Ascot Road Phase 1 and the wider aspirations of Phase 2 for a residential-led, mixed-use scheme, this should still be considered a sustainable location and an opportunity for revitalisation and regeneration. We consider that the Western Gateway should be designated as a Core Development Area in order to carry out the long-standing vision for this area that has already been implemented by virtue of Ascot Road Phase 1. Please refer to our covering letter for further information.

## Full text:

Form received via email

## Change suggested by respondent:

We consider that the Western Gateway should be designated as a Core Development Area in order to carry out the long-standing vision for this area that has already been implemented by virtue of Ascot Road Phase 1. Please refer to our covering letter for further information.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: First Draft (representations submitted November 2019)

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>

Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2002

Comment

Respondent: Drax Investments Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

the Local Plan period needs to be extended by at least one year to 2036/37 to comply with the 15-year minimum period from adoption under Para. 22 of the NPPF. Increasing the Plan period by a year would result in a new minimum housing requirement of 15,067 – meaning the currently identified provision of 14,988 would not suffice. The use of a 5% buffer is noted, but this may need to be increased to 20% to account for recent under-delivery. The new housing target – when calculated – should be clearly set in policy as a minimum target to encourage exceedance. This applies to Policies SS1.1 and HO3.1. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information

## Full text:

n/a

## Change suggested by respondent:

It is recommended: 1) the Plan period is increased to at least 2036/37 in both policies; 2) the minimum housing requirement is increased as a result (at least to 15,067 – but this may need to be increased further should a 20% buffer be applied); and 3) the new housing requirement is clearly stated as a minimum target. In light of the shortfall, it is recommended that Land at 7-15 Bridle Path ('the site') is allocated for residential-led development (a minimum of 65 dwellings) to help contribute to a potentially higher housing requirement. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Drax - Form\_Redacted - <https://watford.oc2.uk/a/zf>

Drax written reps - <https://watford.oc2.uk/a/zg>

2006

Support

Respondent: Dacorum Borough Council

## Summary:

Dacorum Borough Council broadly welcomes and supports the positive strategy of the new Local Plan. It is clear that a significant amount of work has gone into optimising the use of land across Watford borough, including the strategies for the core area/strategic development areas. Dacorum Borough Council welcomes the fact that Watford now seek to meet their housing needs in full through the Local Plan and are not looking to neighbouring authorities to address any un-met needs. While Dacorum Borough Council supports the positive strategy for delivering economic growth we welcome further discussion on the quantum and type of employment needs that the Local Plan seeks to deliver. Our comments are set out in more detail in our response to Strategic Policy EM4.1 below. We recognise that engagement continues to take place with the South West Hertfordshire authorities on this and other strategic matters. There is an expectation that effective outcomes can be agreed through a Statement of Common Ground prior to the formal submission of the Watford Local Plan in due course.

## Full text:

n/a

## Change suggested by respondent:

n/a

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: This matter has been raised through regular duty to cooperate meetings with Watford Borough Council and the wider South West Hertfordshire authorities.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Dacorum Borough Council - form\_Redacted - <https://watford.oc2.uk/a/zc>

Dacorum Borough Council - letter\_Redacted - <https://watford.oc2.uk/a/zd>

2028

Support

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

Legal & General support the identification that areas outside of the Core Development Area can make towards the delivery of the spatial strategy. Please see enclosed representations letter for further detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Yes  
Comply with Not specified  
duty:  
Raise LPA: Yes

## Raise LPA Why?: Preferred Options (first draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>  
Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>  
Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2063

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Glyn Hopkin Holdings Ltd ('GHH') – landowners of 252-272 Lower High Street, Watford, WD17, 277 (which is allocated for residential development under allocation HS22) – support the preparation of a new Local Plan for Watford, and support the residential allocation for the site. However, it is recommended that several changes are required in order to strengthen the Local Plan and enable it to be found sound. Firstly, the Local Plan period needs to be extended by at least one year to 2036/37 to comply with the 15-year minimum period from adoption under Para. 22 of the NPPF. This has ramifications in relation to the minimum housing requirement, which would increase to 15,067. This means that the currently identified provision of 14,988 would not be suffice to meet minimum objectively assessed needs. It is also recommend that the wider housing target is clearly described in policy as a minimum target so as to encourage exceedance of the target. It is also recommend that a 20% buffer is applied to the housing requirement (in accordance with NPPG Para. 022 Reference ID: 68-022-20190722) to provide flexibility and account for recent levels of under-delivery (as evidenced by the 2020 Housing Delivery Test results). This applies to Strategic Policies SS1.1 and HO3.1. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reprs\_FINAL' for more detail

## Full text:

Letter and form received via email

## Change suggested by respondent:

For Strategic Policy SS1.1, it is recommended that the Local Plan period is extended to at least 2036/37 to align with the requirement under Para. 22 of the NPPF for Local Plans to cover a minimum of 15-years from adoption. It is also recommended that the housing requirement is increased to a minimum of 15,067 in light of this change to the Plan period. It is recommended that the word minimum is added to the policy to encourage both developers and the LPA to ensure that objectively-assessed housing needs are not just met in full but exceeded.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Appearance at the examination

## Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>  
Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2090

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

Concerns regarding the Housing Requirement, Plan Period and robustness of supply.  
See letter for details.

The Plan therefore as currently prepared is not sound with respect of:

- a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and
- b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

To address these matters of soundness, several amendments are proposed. The changes assume an April 2020 start date. The proposed changes are:

1. That Strategic Policy SS1.1 is amended (as underlined) to read:

"The Local Plan makes provision for at least 14,988 additional homes and 11,500 additional jobs between 2020 and 2038, along with other supporting infrastructure. Proposals for new development will be supported, where they demonstrate that they will contribute towards the Local Plan's economic, social and environmental objectives, cumulatively achieving sustainable development.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

2094

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

Exceptional circumstances do exist and have been acknowledged by the Authority through their allocation of the land north of Russell Lane as a site for 93 dwellings in policy SA13.1. Whilst it is a matter of planning judgement, the Council is entitled to make such a judgement consistent with their statutory duty (section 39(2)) and the NPPF which they have correctly done.

5.86 The points raised above confirm that exceptional circumstances do exist, are soundly based and support revisions to the Green Belt at North Western Avenue, Watford thereby reflecting the stance of the Council in allocating the site for 93 dwellings in policy SA13.1.

## Full text:

Form and letter received via email

## Change suggested by respondent:

That the Authority includes a Topic Paper alongside the submitted Local Plan summarising how the various factors as detailed above support the exceptional circumstances to remove land from the Green Belt, reflecting the approach outlined in the Final Draft Local Plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

2100

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. Watford's vision of creating sustainable neighbourhoods within these Core Development Areas (with investment in public transport, walking and cycling infrastructure) has been translated into Policy SS1.1 and is fully supported. Wording for areas outside the Core Development Area emphasising the need for the provision of infrastructure to enhance public transport, cycling and walking is also welcome. However, priority should be in line with Transport User Hierarchy set out in LTP4 (and reproduced in Chapter 11). This includes passenger transport which should also be given priority over private cars.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Therefore, it is suggested that the following wording within Policy SS1.1 be modified to ensure it is compliant with LTP 4:

“Proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian, ~~and~~ cycling and passenger transport travel will be prioritised.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Monitoring the Local Plan

1774

Comment

Respondent: R Kowalewski

## Summary:

I hope that the council will step up to the plate and properly monitor the developments. The council does not have a good track record in this department. I have seen planning permission creep regularly. Put in an initial small application and then submit the creep application. When looked at, the final developments it is very obvious that they would not have received PP but due to lack of proper council scrutiny the scope has been allowed to creep.

## Full text:

I hope that the council will step up to the plate and properly monitor the developments. The council does not have a good track record in this department. I have seen planning permission creep regularly. Put in an initial small application and then submit the creep application. When looked at, the final developments it is very obvious that they would not have received PP but due to lack of proper council scrutiny the scope has been allowed to creep.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1825

Support

Respondent: Mrs Fran Clark

## Summary:

Monitoring of the Local Plan is important to determine the effectiveness of planning policies.  
Please ensure that this is in line with the declining need for new homes.

## Full text:

Monitoring of the Local Plan is important to determine the effectiveness of planning policies.  
Please ensure that this is in line with the declining need for new homes.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1980

Support

Respondent: St Albans City &amp; District Council

Agent: St. Albans City &amp; District Council

## Summary:

SADC generally supports paragraph 1.43 which sets out:

“Where monitoring, particularly the updated housing trajectory that will be published in the Authority Monitoring Reports, demonstrates that there will not be sufficient progress towards meeting housing need, the Council will consider the reasons for this and whether the extent of under-performance is sufficient to trigger a partial or full review of the Local Plan.”

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>

St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

## Core Development Area

1802

Comment

Respondent: Mr John Snell

## Summary:

Your consideration of the Core Area ignores the events of the last 12 months: apart from the short-term effects of COVID, the medium and longer terms consequences cannot be ignored. For instance, the INTU mall now has significant empty premises which may be candidates for change of use from retail to residential. I suspect there are other medium/long term effects of COVID that professional planners should consider, even if only to appraise them and give reasons why they can be discounted.

## Full text:

Your consideration of the Core Area ignores the events of the last 12 months: apart from the short-term effects of COVID, the medium and longer terms consequences cannot be ignored. For instance, the INTU mall now has significant empty premises which may be candidates for change of use from retail to residential. I suspect there are other medium/long term effects of COVID that professional planners should consider, even if only to appraise them and give reasons why they can be discounted.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1837

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's proposals for higher density development in sustainable locations and proposals to reduce the reliance on the road network. Nevertheless, the mode of delivery for key services, with particular reference to healthcare and education provision, to support these growing communities would benefit from further explanation. The supporting text makes reference to community infrastructure proposals however the onus has been put on applicants to identify land and it would be helpful to further articulate how this will be secured and brought forward in a timely manner.

## Full text:

Hertsmere supports Watford's proposals for higher density development in sustainable locations and proposals to reduce the reliance on the road network. Nevertheless, the mode of delivery for key services, with particular reference to healthcare and education provision, to support these growing communities would benefit from further explanation. The supporting text makes reference to community infrastructure proposals however the onus has been put on applicants to identify land and it would be helpful to further articulate how this will be secured and brought forward in a timely manner.

Currently there is little reference to the interrelationship between facilities within Watford and neighbouring boroughs. Further information is required to establish the connection between existing neighbouring facilities and Watford. Hertsmere would want to be included as part of ongoing discussions relating to developer contributions (S106 and CIL) and infrastructure provision.

The Draft Local Plan defines three Core Development Areas, which will support 80% of the allocated development, including The Colne Valley. This area is in close proximity to Hertsmere and in particular Bushey. Whilst Hertsmere recognises that this area represents opportunities for growth in accessible and sustainable locations, the council would like for further clarification into the infrastructure provision for both of these sites. Policy CDA2.3 states that a new primary school will be provided as part of the development parcel and Hertsmere would seek further information on the size, location and timetable for this development.

All three Core Development Areas include the provision of public transport priority routes. Hertsmere support proposals to improve the public transport to the key facilities within these areas including to Watford Junction, Watford Town Centre, Vicarage Road Stadium, Watford General Hospital and Watford High Street Station. All of these facilities have large catchment areas which draw a significant proportion of residents from the neighbouring boroughs. Opportunities should be considered on how best to integrate these improvements into existing and/or new public transport improvements in the wider area. Growth in these locations will have to be carefully designed and managed to ensure access to these key strategic facilities isn't inhibited.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jk>

## Watford Gateway Strategic Development Area

2009

Support

Respondent: Network Rail

Agent: Network Rail

## Summary:

Network Rail supports the Council's proposals in relation to the Watford Gateway Strategic Development Area. Network Rail owns a large area of land within the Watford Gateway and recognises the benefits of making more effective use of the land by introducing new employment, office and residential development to the area as well as the need to improve accessibility and permeability of the wider area, and around Watford Junction Station, which is a key transport hub.

The station and interchange will play a key role in unlocking and facilitating the development potential of the area, and therefore it is necessary to ensure that the station, interchange and associated facilities are fit for purpose. Network Rail is working in partnership to bring forward enhancements for Watford Junction Station as part of its Putting Passengers First programme including the potential option to relocate station car parking to the east of the Abbey line.

Network Rail acknowledges that enhancements to routes from Colonial Way will improve the overall connectivity of the area and improve pedestrian links to the station from the north. Network Rail supports proposals set out in site allocation EM05 Land at Colonial / Clive Way and within the Infrastructure Delivery Plan and Schedules and recommends including the protection and safeguarding of infrastructure developments to improve Clive Way to support the wider objectives of the Watford Gateway Strategic Development Area. These proposals will improve vehicular and pedestrian access to the station from the north, supporting modal shift, and to the land and sites to the east of Watford Junction Station, without which the potential of these sites may not be properly realised.

## Full text:

Letter received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Network Rail - document - <https://watford.oc2.uk/a/ns>

Network Rail - email - <https://watford.oc2.uk/a/nt>

2071

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

The Final Draft WLP currently fails to identify the safeguarded facility on the Policies Map. All that is provided is highly simplified diagrammatic representation on Figure 2.2 (page 24) of the Plan which does not in any way define the extent of the site or its relationship with proposed Site Allocations that currently adjoin and include part of the safeguarded site.

## Full text:

Form received via email

## Change suggested by respondent:

On this basis, and as stated in the previous submissions made, the Local Plan should in particular:

- Expressly identify the extent of the Orphanage Road site (including the access road and sidings) on the Policies Map.
- Ensure that any allocations or development proposals in the Watford Junction area are expressly required to ensure the on-going safeguarding of the site and operations it supports – with clear guidance on what will be expected.
- This should include policy wording that precludes the introduction of noise sensitive uses in close proximity to the safeguarded site, and which requires new development in the vicinity of the safeguarded area should be planned, laid out and designed with appropriate mitigation to ensure that they do not prejudice the existing or future use of the safeguarded site and operations in line with the 'agent of change' principle.

The following changes are required to be made to the Policies Map

- Full extent of the safeguarded facility (including access road and sidings) and in accordance with the Figure 1 of this objection statement to be identified on the Policies Map.
- Allocation MU06 to be amended to exclude the sidings which serve the safeguarded facility and which are included in the safeguarded area.
- Allocation MU06 to be amended to exclude the access road to the safeguarded facility – unless required changes to the text of the Site Allocation are agreed with regard to working collaboratively with the landowners of Site Allocations MU07 and EM05 to (a) facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way; and (b) until that is provided, detailing that appropriate vehicle access will be required to be maintained at all times from Orphanage Road;
- Ideally, the safeguarded facility would be additionally identified as 'industrial land' and included as an extension to the adjoining Imperial/Colonial Way Designated Industrial Area. This would accord with the evidence base which supports the Local Plan as detailed. However, subject to appropriate identification and safeguarding of the site for its rail/minerals function which is required to make the plan sound – failure to additionally identify the site as part of a designated industrial area is not considered sufficient in itself to make the plan unsound.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2073

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

There is limited referencing or provision of context in respect of the safeguarded rail aggregates depot and CBP within the draft WLP. Paragraph 2.14 and 2.15 provide the first introduction to the facility albeit to a limited degree only. In particular paragraph 2.15 is not sufficiently clear and gives the impression that there is potential for relocation of the facility. As already confirmed AI are clear that there is very limited if any prospect of relocation of their facility.

## Full text:

Form received via email

## Change suggested by respondent:

The following changes are required (and link in with those proposed for Strategic Policy CDA2.1: Watford Gateway Strategic Development Area) The concrete batching plant and rail aggregates depot (including road access from Orphanage Road and rail sidings running parallel to the Abbey Line) is safeguarded by the Hertfordshire Minerals Local Plan and subject to a 250m Minerals Infrastructure Consultation Area. The safeguarded facility makes a valuable contribution toward the sustainable transport of minerals by rail and supply of aggregate and batched concrete to service the local construction market. Relocation of the facility will be very challenging to achieve and will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria. New development coming forward in the surrounding area should assume that the facility will remain for the long term. New development will be required to be designed and mitigated to ensure that it will not prejudice existing or future use of the safeguarded site and associated operations in accordance with the 'agent of change' principle.

Legally compliant: Yes

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>



2101

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Minerals & Waste Planning. The text within this paragraph regarding the safeguarding of the concrete batching plant at Orphanage Road within the current Minerals Local Plan is supported, along with the statement saying that its relocation will only be supported where a suitable alternative location has been found. It should be noted that the county council is intending to safeguard this site in the revised Minerals Local Plan and has provisionally done so in the proposed submission draft, published in January 2019.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2102

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.8 Children's Services: (Early Childhood Services). The Watford Gateway Strategic Development Area includes the station car park where The Co-operative Childcare Watford Junction is located. The paragraph states that "as part of the redevelopment of the area, a childcare facility should be re-provided." This is also listed as a requirement under Strategic Policy CDA2.1.

5.9 To date, very little childcare is located in this area. A minimum requirement would be for this childcare facility to be re-modelled and extended to meet the new demand in the area. Ideally, another childcare facility would be created as well as extending the existing provision in the locality if possible. However, there is a requirement under Strategic Policy CDA2.1 for a new Primary school and this will cover the nursery class need for this area.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Watford Junction Station area

2011

Comment

Respondent: Network Rail  
Agent: Network Rail

## Summary:

Watford Junction presently does not see many long distance trains stopping due to the intensity of use of the fast lines through the station and this is unlikely to change after HS2 opens due to similar numbers of 'Classic' services planned to use the West Coast Main Line. Network Rail has long aspired to build additional fast line platforms at the station to allow stops to be accommodated in the timetable and would like this provision incorporated into the framework for the Watford Gateway area. This will require earmarking or the protection of a wider West Coast rail corridor through the Gateway area to facilitate this provision without prejudicing the future development and enhancement of Watford junction as a major transport hub.

Watford Junction station requires other improvements to accommodate the already high passenger numbers. The station subway is inadequate for the current usage and Network Rail would seek, in conjunction with the Council, to redevelop the station to enhance the station environment and improve passenger facilities. This could incorporate the Council's aspirations for footbridges across the railway and the provision of improved interchange facilities with other transport modes.

## Full text:

Letter received via email

## Change suggested by respondent:

Network Rail has long aspired to build additional fast line platforms at the station to allow stops to be accommodated in the timetable and would like this provision incorporated into the framework for the Watford Gateway area. This will require earmarking or the protection of a wider West Coast rail corridor through the Gateway area to facilitate this provision without prejudicing the future development and enhancement of Watford junction as a major transport hub.

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: None

## Clarendon Road

1776

Comment

Respondent: R Kowalewski

## Summary:

If primarily and strongly targeted as a business area why place a primary school there? The worst place imaginable.

The message in 2.8 - 13 is confusing. More emphasis needs to be placed on not allowing non business use erode office space. We do not want sky scrapers in Watford.

## Full text:

If primarily and strongly targeted as a business area why place a primary school there? The worst place imaginable.

The message in 2.8 - 13 is confusing. More emphasis needs to be placed on not allowing non business use erode office space. We do not want sky scrapers in Watford.

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: First consultation paper about a planning application for the "junction triangle" was issued.

Appear exam: Not specified  
Attachments: None

1860

Comment

Respondent: Watford Central Town Residents Association

## Summary:

We support this statement that there should be a transition of height in developments along Clarendon Road (as well as Station Road and St. Albans Road) next to residential areas nearby of lower heights. We would like greater clarity on what 'lower height' means in these terms, since in a number of recent developments on these roads, lowest height remains some 3 times taller than these adjacent areas. We request an added statement that the step-up should occur entirely within this SDA, and proposals attempting to advance the step-up into nearby residential areas will not be tolerated.

## Full text:

We support this statement that there should be a transition of height in developments along Clarendon Road (as well as Station Road and St. Albans Road) next to residential areas nearby of lower heights. We would like greater clarity on what 'lower height' means in these terms, since in a number of recent developments on these roads, lowest height remains some 3 times taller than these adjacent areas. We request an added statement that the step-up should occur entirely within this SDA, and proposals attempting to advance the step-up into nearby residential areas will not be tolerated.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Community infrastructure

1931

Comment

Respondent: Cassiobury Residents' Association

## Summary:

re para 2.20 - There was supposed to be a new health facility on the Cassio College housing development site, but it never materialized (offset, no doubt). However that decision created havoc in the surrounding surgeries' lists which sky-rocketed. This affected the workload of GP surgeries and the GPs themselves, and their nurses and office staff, and last but not least the waiting times for an appointment; and saw mounting general public frustration over several years whilst trying to get an appointment to see their GP. This appalling situation should \*never\* be permitted to recur.

## Full text:

re para 2.20 - There was supposed to be a new health facility on the Cassio College housing development site, but it never materialized (offset, no doubt). However that decision created havoc in the surrounding surgeries' lists which sky-rocketed. This affected the workload of GP surgeries and the GPs themselves, and their nurses and office staff, and last but not least the waiting times for an appointment; and saw mounting general public frustration over several years whilst trying to get an appointment to see their GP. This appalling situation should \*never\* be permitted to recur.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Building height

1826

Comment

Respondent: Mrs Fran Clark

## Summary:

Where buildings of greater height than adjacent areas are proposed close to low lying residential areas, they will need designed so that they minimise their impact on the amenity of residents and demonstrate how they have embraced a transition from higher density development to areas of a different residential character. - Why was the new development approved at the TK Maxx site when the height is in excess of 10 storeys?

## Full text:

Where buildings of greater height than adjacent areas are proposed close to low lying residential areas, they will need designed so that they minimise their impact on the amenity of residents and demonstrate how they have embraced a transition from higher density development to areas of a different residential character. - Why was the new development approved at the TK Maxx site when the height is in excess of 10 storeys?

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Policy CDA2.1: Watford Gateway Strategic Development Area

1769

Comment

Respondent: Watford Borough Council

## Summary:

TEST

## Full text:

TEST

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: TEST

Appear exam: Not specified

Attachments: None

1938

Comment

Respondent: Berkeley Homes

## Summary:

Site Allocations MU05: Land and Buildings at 94-98 St Albans Road and MU06 Land at Watford Junction recognise that the number of homes within the CDA may give rise to a need for two new primary schools (with one currently proposed on the Site).

## Full text:

-

## Change suggested by respondent:

It is suggested that the policy in CDA2.1 (c) should therefore be amended to read: “c) Two new Primary school sites to meet the demands generated by the development area unless it can be demonstrated that there is no need”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1944

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

The Watford Gateway Strategic Development Area encompasses 31 hectares of land north of the town centre and comprises two key locations in the town; the Watford Junction railway and bus station, surrounding retail and employment land and Clarendon Road, which is the primary business district in the area.

This vision for Watford Gateway is broadly supported, however, the policy should clearly outline that only complimentary retail and services required to support new communities will be supported in any of these locations. It should state that any new town centre uses should be assessed against the sequential and impact tests of the NPPF as set out at paragraph 86 and paragraph 89. The Council needs to demonstrate that it has taken into consideration the potential impacts on existing town centres and their vitality and viability. This is to ensure conformity with national planning policy. We would recommend that an additional criterion added after criterion (j) which states:

“New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We would recommend that an additional criterion added after criterion (j) which states:

“New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

#### Summary:

A project team was engaged by Canada Life in July 2020 to review potential development options for Canada Life's site at Imperial Way known as Astral House (currently identified as site allocation MU07) and to advance discussions with Watford Borough Council. This was the first time that Canada Life had assessed the site in relation to the emerging local plan. No previous representations have been made to the Regulation 18 consultation stage or the Call for Sites.

At the time of engaging with the local authority in September 2020 we were informed that an infrastructure bid had been submitted to the Hertfordshire Growth Board to seek funding for various interventions in the Watford Gateway Strategic Development Area. Targeted projects identified included opening up

cycle and pedestrian bridge links from the west of the St Albans Abbey Branch Line ("Abbey Line") to the east, thereby providing access to and potential redevelopment opportunities for a wider range of land uses to the east of the Abbey Line.

On the basis of the high-level information provided, Canada Life expressed support, in principle, for the Watford Gateway Strategic Development Area and identified that the likely aspiration for the site would be to deliver a step change in scale and massing through the inclusion of tall buildings and mixed-use development; although the final mix was yet to be determined but would likely include residential, office and other E Class Uses. However, this approach would necessarily require further investigation with surrounding landowners.

Since that date, significant research has been undertaken by the Canada Life advisory Team to review the strategy for the redevelopment of the site.

These

representations are therefore submitted with the benefit of now having undertaken discussions with the surrounding landowners and additional engagement with Watford Borough Council. These recent and ongoing

discussions are important and have clarified Canada Life's position in respect of the future redevelopment potential for land east of the Abbey Line.

In summary, discussions have raised the following key matters:

1. The London Cement Batching Plant is highly unlikely to be relocated due to the lack of alternative sites, the planning and logistical difficulties of doing so (it is a safeguarded use under the Hertfordshire Minerals Local Plan), and because there is likely to be little / no value in doing so to justify the significant cost to its owners.
2. The Coal Board Pensions Land (site allocation EM05) has not been put forward for allocation as a mixed-use development opportunity and we understand that the site is now being brought forward for modern industrial uses which will maintain Clive Way.
3. The Redrow Land (known as Balmoral Storage, Clive Way) has not been promoted for redevelopment and will therefore be subject to allocation for its existing industrial use.
4. Network Rail is supportive of the principle of delivering a multi-storey car park ("MCSP") on land to the east of the Abbey Line. This is seen as a key move and a catalyst to unlock land around the station for regeneration via their partnership with Kier Construction, known as Solum Regeneration ("Solum").
5. Regeneration around the station to the west of the Abbey Line is going to be the main focus for regeneration during the lifetime of the emerging Local Plan.

The above key matters are germane to the delivery of the Watford Gateway Masterplan SDA and, in particular, how land to the east of the Abbey Line is now

likely to be redeveloped during the lifetime of the emerging local plan. It is therefore necessary for Policy CDA2.1 and associated supporting text at paragraphs 2.14 - 2.19 to be amended so that the plan meets the necessary tests of soundness in respect of being justified and effective. What this means in relation to land to the east of the Abbey Line is as follows:

- The policy must recognise that residential development and any associated infrastructure requirements such as a location for a primary school is very unlikely to happen during the lifetime of the emerging local plan. However, the wording of the policy should maintain flexibility to allow for these as part of a mix of uses if the cement batching plant relocates and adjacent landowners change their approach to the renewal of industrial units. This flexibility is required due to the clear environmental

constraints that have been identified in respect of the cement batching plant remaining in-situ, proposals that are underway for the renewal of older industrial units and ongoing retention of industrial / storage uses i.e. land that has not been promoted for redevelopment.

- It should be clear in the emerging local plan that the uses identified as appropriate for Canada Life's site through allocation MU07 can come forward as solus or mixed uses i.e. it can be redeveloped for a single type

or mix of employment uses and does not have to deliver a mixed-use scheme which includes residential uses. The opportunity for a mixed residential and employment scheme will only be possible if the batching plant relocates and adjacent landowners also seek a compatible mix of uses. While this opportunity may arise longer term, it is now clear that if a residential led mixed-use scheme was to happen it would be towards the

end of the new local plan period or, more likely, beyond. Development before then for beneficial solus or mixed employment uses cannot therefore be fettered if the policy was interpreted as only allowing a development if it includes a mix of uses (including residential).

- Key principles / physical interventions for unlocking and putting in place infrastructure to pave the way for the longer term regeneration of the area can be set by policy now. However, these principles and in particular

physical interventions, need to be refined to make best use of existing routes to avoid splitting development sites unnecessarily (making them unviable for redevelopment), losing existing employment land, and doubling up on infrastructure costs (see below for further discussion on this point).

- The construction of a MSCP with sustainable travel hub and pedestrian / cycle bridge to the station on land to the east of the Abbey Line and to the south of Clive Way is considered to be the main infrastructure and catalyst to further regeneration that will be deliverable during the lifetime of the emerging local plan.

At bullet point 3 we refer to the need to look again at what should constitute key infrastructure within the area to the east of the Abbey Line during the lifetime of

the plan, essentially putting in place key building blocks for longer term regeneration (or sooner if there is a substantial change in the current constraining factors identified through landowner discussions). Our conclusion, alongside that of Network Rail is as follows:

- Clive Way must be protected and extended through to Network Rail and Canada Life's land to the south of the east of the Abbey Line SDA area. This is the most appropriate route to bring mixed vehicular traffic

(alongside active travel options) through to a new MSCP and sustainable travel hub without unnecessarily sterilising substantial areas of developable land which would reduce the viability of projects seeking an

- uplift in employment densities.
- Canada Life will safeguard land at the end of a link from Clive Way and will collaborate with Network Rail for the construction of a MSCP / sustainable travel hub and linking bridge to the station (please refer to enclosed plan

SK08 which identifies the indicative area for safeguarding). As part of this approach the concrete batching plant traffic can be slightly re-routed, but still use the existing road through to Orphanage Road, without then needing costly re-routing to Imperial Way as suggested by Policy ST11.2.

- This MSCP / sustainable travel hub and linking bridge to the station is fundamental to cost effectively unlocking land between the Main Line and the Abbey Line for high density redevelopment. Furthermore, it is fundamental to alleviating the severe congestion experienced in the town centre due to all existing station parking being located in one area.

- In the longer term, a pedestrian and cycle bridge from Penn Road to allow further east west permeability for pedestrians and cyclists may be delivered.

With the batching plant retained, this new link could effectively

be routed just to the north of the batching plant and linked to the existing pedestrian infrastructure along Imperial Park.

We do not support a safeguarding policy objective to create a further, segregated vehicular link through the Canada Life site to the Network Rail land to the south / rerouting of batching plant traffic to Imperial Way via an extension of Imperial Way. This is not needed following further investigatory work with Network Rail, would double up on routes to the same point, and the associated costs of doing so would leave the Canada Life site undevelopable for employment uses (including industrial) during the emerging plan period. This is not acceptable to Canada Life and would lead to their withdrawal of support for the Masterplan

Area if it were to be maintained as a policy requirement (see additional representation in response to Policy ST11.2, Site Allocation MU07 and P202 of the Local Plan document).

The above analysis demonstrates that the current strategy for the Watford Gateway SDA needs to be amended for land to the east of the Abbey Line. Without amendments to respond to the evidence that has emerged through recent and ongoing landowner discussions, the policy is not justified. This is because it would not take into account the reasonable alternatives based on proportionate evidence that has been set out in these and other representations.

In addition, it would not be effective because Canada Life and Network Rail would not be in a position to safeguard land for an MCSP / sustainable travel hub on

land to the east of the Abbey Line. This is because the current strategy of extending Imperial Way / re-routing the batching plant traffic to Imperial Way would substantially and unnecessarily sterilise developable land within allocation MU07, where Class E(g), B2 and B8 employment uses are delivered, by splitting

the site and putting active travel users in conflict with secure yard areas etc. As stated previously, it is now considered that employment uses will be the most

likely form of development on land to the east of the Abbey Line during this local plan period. These uses are required due to the very high, objectively assessed

levels of need for employment uses, including industrial development, within the borough.

Full text:

-

Change suggested by respondent:

In light of the above, Policy CDA2.1 will require minor amendment as follows:

- Criteria g) - reword to state "Prior to the grant of planning permission for development proposals which include residential use on land east of the railway line, a pedestrian and cycle bridge for commuters and residents across the Abbey Line must be agreed before planning permission is granted". This is required to avoid preventing redevelopment of sites for employment uses during the plan period which should be allowed to come forward irrespective of the provision of the pedestrian bridge or not as long as land for the MCSP and access to it via an extended Clive Way is protected.
- Criteria i) - reword to state "The land east of the West Coast Mainline and west of the Abbey Line will support a mix of uses including replacement car parking, new homes, and employment uses and a replacement childcare facility as part of the commercial floorspace within this area." The replacement childcare facility will necessarily be required within the central part of the Masterplan area as it will not be appropriate to the east of the Abbey Line in light of the landowner discussions that have now taken place.
- Criteria j) reword to state "Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace (unless it is proven that the existing use is unviable) and the proposed use will not undermine existing uses through the Agent of Change Principle. As part of the commercial floorspace a replacement childcare facility should be provided." The replacement childcare facility will necessarily be required within the central part of the Masterplan area as it will not be appropriate to the east of the Abbey Line in light of the landowner discussions that have now taken place.
- Criteria K) reword to state "Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line. Applicants will be required to demonstrate this has been achieved as part of any proposal. The multi-storey car park to the east of the Abbey Line should be agreed prior to grant of planning permission for development to the west of the mainline";
- Criteria L) reword to state "New development will not compromise vehicle access from Colonial Way via Clive Way via Colonial Way into the site and access to the station." This is to provide clarity to the policy criteria which is unclear without the amendment.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

1985

Object

Respondent: Solum Regeneration  
Agent: Daniel Watney

## Summary:

## 6.0 Emerging Context

6.1 Application reference 19/00507/FULM (hereafter the St Albans Road Proposal) was approved on the 25th November 2020.

6.2 The application comprises building heights ranging between 8 to 28 storeys, reflecting a height, density, and scope beyond the policy parameters for the site at a local and regional level. Paragraph 6.48 of the Council's Committee Report stated that "it is unavoidable that the redevelopment of land at Watford Junction would not have at least moderate adverse effects in these views, particularly given the vision for high density, multi-storey development on this site", while the proposal was found to make "a high density, residential-led, mixed-use development on previously developed land in a highly sustainable location... the scheme accords with the vision and objectives of the Watford Junction Special Policy Area to provide major regeneration of land to the north of the station and will form the first phase of redevelopment that will form the catalyst for the development of the adjoining land within the special policy area".

6.3 The Draft Plan should adequately respond to the emerging context as defined by consented schemes within the CDA. With regards to the WGSDA, the above example demonstrates that the scale and density of development within will be inherently greater given the sustainability credentials of the site and the ability for developments within the area to assist the Borough in meeting its strategic objectives – not least, accommodating sufficient housing and supporting its delivery across the plan period. Any aspiration for a mid-rise development would have conflicted with the policy aspirations for the site at all levels.

6.4 This permission represents an important example as to the risk in setting baseline building heights through an indicative capacity study which relies heavily on notional assumptions. Draft Policy CDA2.1 fails to adequately reflect what this approved scheme has achieved and what should inform future schemes within the SDA, and the draft Policy now appears directly at odds with this proposal and any coherent approach to a masterplan across the WGSDA, which should include comparable or greater heights towards the gateway of Watford Junction station.

6.5 The Tall Buildings Study suggests that the baseline building heights within the WGSDA have been chosen in part as this would enable the consented St Albans Road scheme to sit more comfortably within a future higher density context. It is difficult to establish any reasonable comparison between the proposed baseline of between 8 to 10 storeys and the St Albans Road Proposal which spans up to 28 stories, clearly demonstrating that this reference is ineffective and unsound, and has the potential to limit development within the SDA.

## Full text:

Form received via email

## Change suggested by respondent:

Ensure that draft policies fully consider emerging context and consented development as part of their evidence base and reflecting the future scale of development within the Core Development Area.

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Solum - document - <https://watford.oc2.uk/a/n9>

Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

1986

Object

Respondent: Solum Regeneration  
Agent: Daniel Watney

## Summary:

## 5.0 Protection of Existing Employment Floorspace

5.1 Part j) of Policy CDA2.1 requires the protection of all existing employment floorspace. This wording is considered ambiguous. It is not clear as to whether the Council will accept a loss within the SDA in certain instances, or whether site specific circumstances such as the quality of the commercial offering or recent marketing evidence would be sufficient to demonstrate a loss.

5.2 In the absence of this explanatory wording, the policy may preclude or constrain development, resulting in retention of poor-quality employment floorspace in place of more meaningful floorspace.

## Full text:

Form received via email

## Change suggested by respondent:

Amend policy CDA2.1 to provide flexibility with regards to employment loss and how this can be justified.

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Solum - document - <https://watford.oc2.uk/a/n9>

Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

Respondent: Solum Regeneration  
Agent: Daniel Watney

#### Summary:

#### 2.0 Draft Strategic Policy

CDA2.1 'Watford Gateway Strategic Development Area' 2.1 The text of former Draft Policy SD2.7, concerning development within the WGSDA is set out in bold below. Proposals in this Strategic Development Area, as defined on the Policies Map, which contribute to achieving successful implementation of the development aims will be supported. Proposals for new development are expected to incorporate the following development considerations:

1. Transform the Watford Junction Station into a 21st century multi-modal public transport hub and enhance the visitor experience;
2. Create a new vibrant mixed use quarter to provide new homes and jobs in close proximity to Watford Junction station.
3. Reduce severance created by the railway lines and improve connectivity between different parts of the site and the wider area including the town centre;
4. Protect or reprovide existing bus related facilities on site.
5. Improve the public realm and create a safe and attractive network of streets and open spaces, incorporating the green infrastructure.
6. Ensure individual developments are planned in a comprehensive manner and contribute to the regeneration of the site as a whole.
7. Encourage high density development with school provision required to make it a fully sustainable location;
8. Support greater land use efficiency based on a mix of uses to benefit from the accessibility of the area;
9. Where necessary, Compulsory Purchase Orders may be applied.

2.3 This initial approach was supported, including the degree of flexibility within the policy and the inference that each site within the area would be subject to its own benefits and constraints, which could be managed as part of further detailed site specific assessment by the Council.

2.4 The text has since been heavily revised; the entirety of the original wording, in addition to the opportunity for some flexibility has been replaced. Notably, the first statement which set out the Council's in principle support for proposals that contribute to achieving the successful implementation of the developments aims has been removed. In addition, Criterion 7, and reference to the Council's encouragement of high-density development across the entirety of the WGSDA has been removed. This support has not been reprovided within the amended text.

2.5 These omissions are concerning. The amended text now risks stifling the development potential of the area and fails to sufficiently reflect the ambition and opportunity of the sites expressed by the Council and landowners.

2.6 The amended policy, Draft Strategic Policy CDA2.1, now requires Applicants to demonstrate how proposals make provision for and contribute towards thirteen new criteria. The policy is set out below. The Strategic Development Area will see co-ordinated change around Watford Junction railway station / bus station and the Clarendon Road area, creating a mixed use urban quarter of high quality design and place making, with excellent connectivity to support a mix of housing, employment and other subsidiary land uses and community orientated facilities. To achieve this, applicants will be required to demonstrate how proposals will make provision for and contribute towards the following criteria:

1. The regeneration of land north of Watford Junction railway station and how they will help transform the area into new, high density development providing homes, jobs and other uses;
2. In locations where new development is of a scale and is notably different in character to adjacent existing residential uses, proposals will need to be designed so that they demonstrate a transition of taller urban form to lower lying character and mitigate any significant impact on neighbouring residential or community amenity;
3. A new primary school site to meet the demands generated by the development;
4. Provision of a circa 1,300sqm of healthcare floorspace;
5. A high quality transport interchange hub located at Watford Junction connecting rail, bus, taxi, cycle and pedestrian facilities;
6. New walking, cycling and public transport infrastructure will be required to contribute towards the Local Transport Plan and supporting strategies;
7. On land east of the railway line, a pedestrian and cycle bridge for commuters and residents across the Abbey Line must be agreed before planning permission is granted;
8. A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded;
9. The land east of the West Coast Mainline will support a mix of uses including replacement car parking, new homes and employment uses;
10. Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace and the proposed use will not undermine existing uses through the Agent of Change Principle. As part of the commercial floorspace a replacement childcare facility should be provided;
11. Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line.

Applicants will be required to demonstrate this has been achieved as part of any proposal;

12. New development will not compromise vehicle access from Colonial Way and Clive Way into the site and access to the station;
13. The concrete batching plant and rail aggregates depot will be safeguarded as significant mineral infrastructure.

2.7 The proposed changes to the wording in this instance create a policy that is now prescriptive, including detailed floorspace expectations for new healthcare floorspace. Paragraph 21 of the National Planning Policy Framework sets out that Strategic Policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or non-strategic policies. The inclusion of detail is not appropriate and should therefore be removed.

2.8 The sites within the WGSDA represent some of the most sustainable sites for development across the entire Borough, intended as an opportunity to reinvigorate the Watford locale and lead on co-ordinated change around the railway station. The amendments to Draft Policy CDA2.1 do not reflect this ambition and miss a crucial opportunity to capitalise on these highly sustainable locations, conflicting with policy aspirations across all levels.

#### 3.0 Support for Higher Density Proposals

3.1 Planning policy across all levels advocates the effective use of land within highly sustainable locations. Paragraph 117 of the National Planning Policy Framework states that planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses. Strategic policies should set out a clear approach for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or brownfield land.

3.2 The Core Development Area (CDA) represents the primary location for growth within the Draft Local Plan. As set out within Draft Strategic Policy SS1.1, the CDA is expected to support 80% of allocated development in the borough and provides opportunities for further redevelopment. The three distinct locations within the CDA are included because of their character and the opportunities that each present.

3.3 Draft Policy CDA2.1 fails to capitalise on the potential of the CDA and does not sufficiently advocate the effective use of land. Criteria a) and b) are the only two that refer to density and taller urban form, set within the context of regeneration and neighbouring amenity. As mentioned above, the Council's encouragement of high-density development has now been omitted. The wording of the policy does not set out the in-principle support for higher density development within the CDA.

3.4 Given the recognised need for higher density development at this location, greater emphasis must be placed on the support for higher density schemes, sufficient to deliver the policy expectations for the area.

#### 4.0 Support for Taller Buildings

4.1 Draft Policy CDA2.1 does not explicitly confirm that taller buildings will be supported within the CDA in principle. Given the policy emphasis at all levels on the importance of making the most effective use of land in sustainable locations, this is a significant omission.

4.2 It is suggested that a sentence is included within the body of the policy to reflect the recognition of the Council's support for taller buildings. We would recommend that the following wording is incorporated: "Higher density proposals and taller buildings shall be supported in principle in the Strategic Development Areas, notwithstanding acceptability of their environmental impacts"

4.3 Draft Policy QD6.5 does not set out the Council's in principle support for taller buildings within the SDAs. This policy should be amended, as per the suggested wording above, so that it offers support for taller buildings in these locations and ensure that the opportunities presented by the SDA are fully realised in order to meet strategic objectives, and accordingly supported by policy.

4.4 The supporting text to Draft Policy CDA2.1 confirms that developments will be required to comply with Draft Policy QD6.5 where proposals meet the threshold triggers for a taller building. Figure 6.3 of the Draft Plan, 'Base Building Heights', as informed by the Tall Buildings Study (2021), sets out the base building height for development.



- 4.5 Within the WGSDA, the threshold is up to 8 storeys at street frontages, stepping up to 10 storeys to the rear. The Plan sets out that anything above these baselines shall be deemed a taller building and trigger Draft Policy QD6.5.
- 4.6 These heights have been identified following an indicative capacity study, which has recognised that the indicative development capacity supported through the preferred scenarios would have the potential to meet and exceed the notional capacities identified in the emerging Local Plan.
- 4.7 The methodology relies upon a series of notional assumptions related to environmental constraints, heritage sensitivities, development footprint, land use mix and conversion to housing numbers.
- 4.8 This notional approach undermines the primary purposes of the CDA and risks precluding taller schemes of more suitable density and design. The current capacity led approach is not considered appropriate and risks considerable restriction on development scope.
- 4.9 It is considered that Part b) of Draft Policy CDA2.1 is sufficient to inform proposals in the SDAs, having regard to character, heritage, and amenity. The base-line methodology, and therefore Figure 6.3 itself, is not necessary to guide development within the SDAs.
- 4.10 It is strongly encouraged that the definition of a taller building within the SDAs is amended to provide sufficient flexibility, reflecting their unique circumstances and opportunities. Higher density development within highly sustainable locations is inherently desirable and supported at a national level, particularly where this concerns the delivery of housing. Invariably, Draft Policies QD6.5 and CDA2.1 must reflect this support. Currently, they fail to do this.

Full text:

Form received via email

Change suggested by respondent:

- 1) It is suggested that a sentence is included within the body of the policy to reflect the recognition of the Council's support for taller buildings. We would recommend that the following wording is incorporated: "Higher density proposals and taller buildings shall be supported in principle in the Strategic Development Areas, notwithstanding acceptability of their environmental impacts"
- 2) Amend Draft Policies CDA2.1 and QD6.5 so that they adequately support schemes of increased height and density within the Core Development Area.

Legally No  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: Solum - document - <https://watford.oc2.uk/a/n9>  
Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

2010

Support

Respondent: Network Rail  
Agent: Network Rail

Summary:

Network Rail is required to ensure its operational and freight activities are not adversely affected by development and therefore welcomes and supports the safeguarding of the aggregate depot and associated concrete batching plant at Orphanage Way, which is a designated strategic freight site. Network Rail reiterates the importance of ensuring new development appropriately considers the concrete batching plant and rail aggregates depot including its access and the importance for early engagement with the site operator at design stage.

Full text:

Letter received via email

Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: None

2015

Object

Respondent: Mineral Products Association  
Agent: Mineral Products Association

## Summary:

Also affects policies ST11.2, CC8.5 and sites MU06 & 07

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

## Full text:

Form received by email

## Change suggested by respondent:

The Plan should accurately identify the Orphanage Road site (rail depot and concrete batching plant) on the Policies Map so the area that is safeguarded and to which safeguarding policy applies is clear. It should ensure that any allocations or proposals for development in the Watford Junction area are required to ensure that the site and operations at the rail depot and concrete batching plant are safeguarded. This should clearly set out how this is to be achieved including through not permitting noise-sensitive development in close proximity to the site unless it can be demonstrated that sensitivity can be mitigated, and so potential adverse effects and prejudicing of the operation of the site is avoided.

Policy CDA2.1 and supporting text should be amended to make it clear how safeguarding is to be applied including that proposals for development will be required to demonstrate that the proposed use will not undermine or prejudice the existing safeguarded uses, through application of the Agent of Change principle.

Legally Yes

compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>

2072

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

See letter for details

Inclusion of reference to the safeguarding of the rail aggregates depot and concrete batching plant within Policy CDA2.1 at criterion (m) is welcomed. However, this should be more robust and explicit in its requirements and consistent with the approach taken to protection of existing employment floorspace at criterion (j) of the same policy.

## Full text:

Form received via email

## Change suggested by respondent:

The following changes are required:

The Strategic Development.....To achieve this, applicants will be required to demonstrate how proposals will make provision for and contribute toward the following criteria:

a) The regen....

J) Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace and the proposed use will not undermine existing uses through the Agent of Change Principle. As part of...

m) The concrete batching plant and rail aggregate depot including its rail sidings and road access will be safeguarded as significant mineral infrastructure. Proposals for development will be required to demonstrate that the proposed use will not undermine the existing safeguarded uses through the Agent of Change Principle.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2103

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Children's Services: (School Place Planning). The policy requirement under paragraph c) for a new primary school to be located within this Strategic Development Area is supported. However, it is suggested that the paragraph is modified as follows, in order to ensure that a new 2 form entry (2fe) primary school is delivered on site MU05: Land and Buildings at 94-98 St Albans Road (as stated within the supporting text for this allocation) and a 3fe primary school on site MU06: Land at Watford Junction (as stated within the supporting text for this allocation) , which both meet the minimum requirements of BB103 including external areas.

...Given the well-developed urban setting of Watford, if the primary school located at MU06: Land at Watford Junction is to be delivered as a standalone site i.e. not a building integrated within a wider development, a sub-optimal requirement may be acceptable, providing that a minimum area of 0.9ha which otherwise complies with the county council's site standards is allocated for a 3fe primary school in this area. However, consideration will need to be given to the availability and accessibility of offsite sports pitches where these cannot be provided onsite.

## Full text:

Form and letter received via email

## Change suggested by respondent:

However, it is suggested that the paragraph is modified as follows, in order to ensure that a new 2 form entry (2fe) primary school is delivered on site MU05: Land and Buildings at 94-98 St Albans Road (as stated within the supporting text for this allocation) and a 3fe primary school on site MU06: Land at Watford Junction (as stated within the supporting text for this allocation) , which both meet the minimum requirements of BB103 including external areas.

c) A site for a new 2fe primary school site within Site MU05: Land and Buildings at 94-98 St Albans Road and a site for a new 3fe primary school within Site MU06: Land at Watford Junction, that are BB103 compliant, including external areas, to meet demands generated by development;

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2104

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Minerals & Waste Planning. The county council supports the safeguarding of the concrete batching plant and rail aggregates depot at Orphanage Road within this policy. Its safeguarding is in line with the NPPF, Minerals Policy 10: Railheads and Wharves, of the adopted Minerals Local Plan (March 2007) and draft Policy 9: Safeguarding Bulk Transport and Bulk Handling and Processing Sites of the Proposed Submission Minerals Local Plan (January 2019). However, the safeguarding of this site, along with the surrounding mineral infrastructure consultation area1 needs to be shown on the draft Policies Map and referenced as such within the policy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore suggested that the policy is amended as follows:

m) The concrete batching plant and rail aggregates depot will be safeguarded as significant mineral infrastructure and is shown on the Policies Map.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2105

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. The policy measures are in line with the access strategy being developed as part of the Watford Junction master planning work.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Town Centre Strategic Development Area

2036

Comment

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

The Final draft Local Plan refers to the replacement and improvement of Watford Market within the Town Centre Strategic Development Area. Part of the Watford Market lies within our development area and we would support bringing forward a better market for the town centre. However we would envisage that this would only come forward as part of a comprehensive scheme and balanced with the viability of the wider redevelopment of the site.

## Full text:

Forms received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>  
IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2106

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.14 Children's Services: (Early Childhood Services). Childcare premises are mostly clustered in the top end of the high street. There is enough provision in this area which could cater for an increased demand for childcare provision. However, this needs regular reviews to ensure sustainability of provision to meet this new demand.

5.15 It is expected however that any proposed primary school either in this area or close by would fulfil the additional nursery class need.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2107

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. The South High Street Area presents an opportunity to develop a new transport hub at the southern end of the town centre.

## Full text:

Form and letter received via email

## Change suggested by respondent:

As the route of the Mass Rapid Transit system (MRT) has not yet been determined, it is suggested that this paragraph is be modified as follows:  
"This area acts as a gateway to the Town Centre from the Watford High Street Overground Station and opportunities to improve local transport with improved cycle, pedestrian and bus connections which could potentially be developed further as part of connections to a future a Mass Rapid Transit port System will be supported."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2108

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Improving connectivity (Paragraph 2.48)

5.17 Transport. Improvements to key junctions to prioritise non-vehicle users are welcomed. However, paragraph 2.48 should be modified so that buses aren't excluded. It is recognised that this is part of ongoing work being undertaken as part of the Watford Sustainable Transport Strategy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"...Of particular importance are improvements to key junctions that should prioritise non-vehicle users (except for buses), including the junctions at the High Street / Rickmansworth Road, Albert Road South / Beechen Grove, Clarendon Road / Beechen Grove, south part of the High Street / Beechen Grove and Market Street / Exchange Road."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2109

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Children's Services (School Place Planning). The county council welcomes the suggestion within this paragraph that a new primary school could be located within this strategic development area. However, at Regulation 19 stage, HCC would expect a site to be allocated within the strategic development area, or at the very least, be added as a requirement within Policy CDA2.2: Town Centre Strategic Development Area.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**A thriving Town Centre**

1827

Comment

Respondent: Mrs Fran Clark

## Summary:

Unfortunately the effect of Covid has now completely reversed Watford as being 'a thriving town centre' . Now the Plan needs to seek methods of reviving the Town Centre and maybe converting some retail outlets to residential homes.  
Watford [and Hemel Hempstead] is in the top 10 towns that have been ranked amongst the UK's most 'vulnerable' in the wake of the Covid-19 pandemic.  
The town centre needs to be reinstated before the Watford Plan is continued.

## Full text:

Unfortunately the effect of Covid has now completely reversed Watford as being 'a thriving town centre' . Now the Plan needs to seek methods of reviving the Town Centre and maybe converting some retail outlets to residential homes.  
Watford [and Hemel Hempstead] is in the top 10 towns that have been ranked amongst the UK's most 'vulnerable' in the wake of the Covid-19 pandemic.  
The town centre needs to be reinstated before the Watford Plan is continued.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Central High Street area**

1932

Comment

Respondent: Cassiobury Residents' Association

## Summary:

re 2.43 accessibility. Oftentimes for the elderly, disabled and infirm, using a private car or taxi isn't a 'choice' but a \*necessity\*, yet such people have been denied simple accessibility to their banks and shops in the central area as most of the drop-off and collection points that existed for this purpose have been systematically removed. This situation, some say discrimination against such groups, ought to be remedied.

## Full text:

re 2.43 accessibility. Oftentimes for the elderly, disabled and infirm, using a private car or taxi isn't a 'choice' but a \*necessity\*, yet such people have been denied simple accessibility to their banks and shops in the central area as most of the drop-off and collection points that existed for this purpose have been systematically removed. This situation, some say discrimination against such groups, ought to be remedied.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Improving connectivity**

1780

Comment

Respondent: R Kowalewski

## Summary:

So what did the council do to aide pedestrian connectivity??? Only fill in the underpass. Why, that goes totally against what the written aspirations are. Are we going to be faced with more acts of such ineptitude with this development plan?

Think beyond "anti car" think what can be done to enable both to co-exist, to enhance connectivity by foot without creating additional bottle neck where this is possible. e.g. that underpass. It would also have been cheaper to improve the underpass rather than fill it in.

## Full text:

So what did the council do to aide pedestrian connectivity??? Only fill in the underpass. Why, that goes totally against what the written aspirations are. Are we going to be faced with more acts of such ineptitude with this development plan?

Think beyond "anti car" think what can be done to enable both to co-exist, to enhance connectivity by foot without creating additional bottle neck where this is possible. e.g. that underpass. It would also have been cheaper to improve the underpass rather than fill it in.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Policy CDA2.2: Town Centre Strategic Development Area

1945

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

The Town Centre Strategic Development Area encompasses 52 hectares of land at the heart of Watford, which also includes the Atria shopping centre. At paragraph 2.26, the supporting text to Policy CDA2.2 advises that Watford Town Centre will need to evolve and diversify in response to current and future retail and social trends, be adaptable to changes in technology, consumer behaviours and the shift from 9am-5pm towards longer, flexible, active hours.

The draft Plan, at paragraph 2.39, advises that that flexibility for retail and leisure uses will be required to help ensure the east side of the High Street and the shopping centre continue to make a positive contribution towards the town centre, while complementing the more traditional High Street retail offer. This represents a significant change in the Council's long-term policy position on protecting retail frontages and this step-change is strongly supported by our client.

The Plan, at paragraph 2.26, goes further to suggest that the need for adaptation and diversification, together with access to good public transport, makes the Town Centre appropriate for residential-led or mixed-use high-density development.

This position is supported by our client and reflects the need for flexibility in town centres as shopping and working patterns continue to change. It is also in accordance with paragraph 85 of the NPPF.

At paragraph 2.49 of the supporting text, reference is made to new development in the Town Centre Strategic Development Area, where it is anticipated that at least 546 new homes will be delivered.

There is no detail as to how the Council has calculated that 546 new homes will be delivered in the Town Centre Strategic Development Area or what source they will come from. The provision of these 546 new homes is also not included in the wording of Policy CDA2.2.

It is not clear if these homes are to be provided through an allocation or if the Council expect them to be delivered through windfall development. The Council needs to specify whether it expects these units to come forward as windfall sites or through allocations. This is to ensure that they are deliverable in line with the requirements of Annex 2 of the NPPF. Without this, the Plan cannot be considered to be sound.

The figure of 546 additional homes is a very low, specific, figure for the Town Centre. It is recommended that the Plan includes a table which sets out the sources for achieving the overall identified number of homes, including the 546 new homes in the Town Centre.

It is also considered that the Town Centre may have a greater capacity for residential development than is identified. As set out previously, there may be future opportunities at Atria shopping centre to consolidate the existing retail offer and provide housing in a highly sustainable location.

The Plan states, at paragraph 2.32, that developments within the Town Centre will need to consider how they relate to their surroundings, including heritage assets, and the impact they may have on the character and function of the area. Schemes will need to comply with policies set out in Chapter 6 'An Attractive Town' and consider how they relate to the existing built form.

At paragraph 2.5 of the Plan, it states that, informed by the Tall Buildings Study, the future base height in the Town Centre is considered to be five storeys. Proposed buildings taller than this will need to satisfy the requirements set out in draft Policy QD6.5 'Building Height'. It is considered that this is overly restrictive. More details on objections to the wording of this policy are set out in subsequent sections.

It is noted that paragraph 2.5 is not consistent with the base height stipulated at Policy QD6.5 for the Town Centre Strategic Development Area which states 5 storeys on the High Street, stepping up to 8 storeys to the rear. Therefore, it is suggested that paragraph 2.5 text is amended to the following: "future base height in the Town Centre is considered to be five storeys on the High Street stepping up to 8 storeys to the rear"

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

It is noted that paragraph 2.5 is not consistent with the base height stipulated at Policy QD6.5 for the Town Centre Strategic Development Area which states 5 storeys on the High Street, stepping up to 8 storeys to the rear. Therefore, it is suggested that paragraph 2.5 text is amended to the following: "future base height in the Town Centre is considered to be five storeys on the High Street stepping up to 8 storeys to the rear"

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>



2037

Support

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

The principles of this policy are supported particularly where it relates to making the effective use of land to intensify town centre uses and increase the amount of people living in the town centre.

## Full text:

Forms received via email

## Change suggested by respondent:

We consider that the thrust of this policy should be continued throughout the remainder of the housing provision policies and site allocations for the town centre which we feel are currently not evident particularly in the town centre site allocations.

Legally Yes

compliant:

Sound: Yes

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2110

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.19 Children's Services: (School Place Planning). Following on from the above, it is noted that there is no requirement within this policy to provide a site for a new primary school, despite the supporting text under paragraph 2.50 stating that applicants are encouraged to work collaboratively to identify where a new primary school can be provided within this area.

...5.20 Given the well-developed urban setting of Watford, if the primary school located within this strategic development area is to be delivered as a standalone site i.e. not a building integrated within a wider development, a sub-optimal requirement may be acceptable providing that a minimum area of 0.9ha which otherwise complies with the county council's site standards is allocated for a 3fe primary school in this area. However, consideration will need to be given to the availability and accessibility of offsite sports pitches where these cannot be provided onsite.

## Full text:

Form and letter received via email

## Change suggested by respondent:

If this area is to provide one, it would improve the soundness of the plan if it were stated within the policy and therefore the following amendment is required:

"j) A site for a new 3fe primary school should be located within the strategic development area that is BB103 compliant, including external areas and applicants are encouraged to identify where a new primary school can be provided."

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2111

Comment

Respondent: Hertfordshire County Council  
 Agent: Hertfordshire County Council

## Summary:

Transport. The wording within the policy should be modified as follows, in order to refer to the new transport hub at the southern end of the High Street. ...As parking is not mentioned in this policy, it would be expected that any development coming forward in this area would be "a car lite" development.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"f) Opportunities should be taken to reduce the vehicle dominance of the ring road, proposals that provide active frontages to the ring road will be supported, transforming the environment into a street that is a positive experience to use for pedestrians and cyclists that will support the use of the new transport hub at the southern end of the High Street, as well as vehicle users, will be a priority;

Legally Yes  
 compliant:  
 Sound: Yes  
 Comply with Yes  
 duty:  
 Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
 HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
 HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Colne Valley Strategic Development Area

1803

Comment

Respondent: Mr John Snell

## Summary:

This comment is made in the context of the Colne Area but has a wider application. Thomas Sawyer Way has to be the most expensive and least cost-effective road built in Watford in living memory: it is a cul-de-sac only giving access to the hospital --- laudable but poor value. It should be extended so that a connection is made to the Ricky Road near the Premier Inn (via Croxley estate). This would relieve several roads around the town centre, with significant savings in time and journey costs. At a minimum, provide all turning movements at junction with Wiggshall Road

## Full text:

This comment is made in the context of the Colne Area but has a wider application. Thomas Sawyer Way has to be the most expensive and least cost-effective road built in Watford in living memory: it is a cul-de-sac only giving access to the hospital --- laudable but poor value. It should be extended so that a connection is made to the Ricky Road near the Premier Inn (via Croxley estate). This would relieve several roads around the town centre, with significant savings in time and journey costs. At a minimum, provide all turning movements at junction with Wiggshall Road

## Change suggested by respondent:

-  
 Legally Not specified  
 compliant:  
 Sound: Not specified  
 Comply with Not specified  
 duty:  
 Raise LPA: No  
 Appear exam: Not specified  
 Attachments: None

1899

Comment

Respondent: La Salle Investment Management  
Agent: Miss Rachel McCall

## Summary:

In relation to building heights, the supporting text to Policy CDA2.3 stipulates that the base future building height in the area is 5 storeys. This however contradicts 'Policy QD6.5-Building Height' which confirms a base building height of up to 6 storeys in the Colne Valley Strategic Development Area, and we therefore suggest Policy CDA2.3 is updated to reflect heights up to 6 storeys.

Development of the wider area is likely to come forward in phases depending on landownership. The policy should recognise and consider the deliverability and future phasing of development coming forward in the area over the Plan period.

## Full text:

In relation to building heights, the supporting text to Policy CDA2.3 stipulates that the base future building height in the area is 5 storeys. This however contradicts 'Policy QD6.5-Building Height' which confirms a base building height of up to 6 storeys in the Colne Valley Strategic Development Area, and we therefore suggest Policy CDA2.3 is updated to reflect heights up to 6 storeys.

Development of the wider area is likely to come forward in phases depending on landownership. The policy should recognise and consider the deliverability and future phasing of development coming forward in the area over the Plan period.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/yt>

2112

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.23 Transport. The vision to transform this from a car dominated environment to a new mixed used quarter is supported but may be challenging to achieve, as it is traversed by a number of key vehicular routes into the town centre which divide the area into different sections. There are a wide variety of land uses within the area which again will be a challenge to its coherence as a defined quarter. It is noted that this is a diverse area which contains large developments in the River Colne area where masterplans have yet to be developed.

Watford Riverwell, Vicarage Road Football Stadium and Watford General Hospital area (Paragraph 2.68)

5.24 Transport. Safeguarding of the former Metropolitan Line Extension route is strongly supported.

## Full text:

Form and letter received via email

## Change suggested by respondent:

At this stage, as the route of the MRT system is not yet agreed, it is suggested the last paragraph should be modified as follows:

"This route offers the potential to provide a high quality sustainable transport link between West Watford and the High Street area which could potentially be ultimately used for a new public transport system such as a Mass Rapid Transit will form part of a Mass Rapid Transport system linking Watford High Street and Ascot Road to the west (on the boundary with Three Rivers District)."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2113

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.25 Children's Services: (School Place Planning). The text included in this paragraph (and repeated in paragraph. 10.11 of the local plan) states that: "For sites larger than 1,000 dwellings, education provision will be required on site'. However, in paragraph. 2.19 (and also repeated in different parts of the plan) the following comment leaves the possibility for developers to seek a solution away from the strategic development areas of Watford Junction, Town Centre and Colne Valley Retail, while being supported by the Local Planning Authority (LPA): 'If an alternative location for a new primary school is identified outside of the Strategic Development Area and will meet the needs of new residents this will be supported'. The two requirements appear to contradict to each other, and this approach should be clarified as the overall quantum of primary school provision in the plan is already under pressure. 5.26 Paragraph 2.70 further suggests that "For sites that are located in close proximity to each other and will have a cumulative impact that will generate demand for a new school, applicants are encouraged to work collaboratively with other landowners and the education authority to best meet this need. There is a need to identify where a new primary school can be provided that provides good amenity for young children." This does not seem to deal with the demand for primary education provision rather than a mere 'encouragement' for developers to find a solution.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-  
Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy CDA2.3: Colne Valley Strategic Development Area

1850

Comment

Respondent: Planning & Development Associates Ltd

## Summary:

A Statement of the Representations is attached containing comments on this Policy. 2.3.1 Sub-paragraph d) which states that, "New development will contribute towards the creation of, and connections to a linear park along the River Colne, from Water Lane to Oxhey Park, enabling public access for pedestrians and cyclists and the enhancement of wildlife habitats" is supported in principle, but by designating the additional areas proposed in this representation, greater connectivity could be achieved. An opportunity has therefore been missed.

## Full text:

A Statement of the Representations is attached containing comments on this Policy.

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y4>

1946

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The Colne Valley Strategic Development Area encompasses 83 hectares in the southern part of the Core Development Area with the defining feature being the River Colne. It includes destinations such as Vicarage Road Football Stadium; Watford General Hospital; Trade City employment area and a distribution of retail parks that perform an out-of-town shopping role in the Borough and Bushey and Watford High Street railway stations.

The overarching vision is to transform it from a car-dominated environment with large retail and commercial sheds, into a new mixed-use urban quarter with a quality public realm and an enhanced and accessible river environment.

Paragraph 2.56 of the draft Plan advises that proposals should not increase the amount of retail floorspace on site unless small-scale provision is needed to support the local community. Existing retail floorspace can be re-provided, where appropriate, however, a reduction of retail provision will be supported to contribute towards the objective of transforming this area into a residential and mixed-use quarter.

New development in the Colne Valley Strategic Development Area, is anticipated to include 4,361 new homes. Of these, 1,383 form part of the Watford Riverwell scheme which already has planning permission.

Our client is supportive of the overall vision but consider that more clarity should be included in the policy wording and supporting text, in relation to the size of retail provision which is acceptable in this location.

Under criterion "a)" Strategic Policy CDA2.3, the policy wording states that "the redevelopment of retail and commercial land will be intensified with mixed used development. Where retail use is re-provided, this should not exceed the existing net retail floorspace on site". This suggests that large format retail could come forward alongside a new housing community, whereas the supporting text at paragraph 2.56 to the policy suggests that any retail provision should be small scale.

The policy should clearly outline that only complimentary retail and services required to support the new housing community will be supported. Any additional town centre floorspace should be assessed against the sequential and impact tests of the NPPF as set out at paragraph 86 and paragraph 89. This is to ensure conformity with national planning policy.

We would recommend that criterion a) is amended to state:

"New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test"

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We would recommend that criterion a) is amended to state:

"New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2065

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

The general direction of the policy - to make the most efficient use of land in this highly sustainable location - is supported. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Strategic Policy CDA2.3 ('Colne Valley Strategic Development Area') states (inter alia) that "development will be supported where it contributes towards the objectives for the area and is consistent with other policies in the Local Plan".

The site is located in the CVSDA and GHH generally support the direction of the policy and consider it

to align with the requirements of the NPPF. To help achieve the objectives for the CVSDA, we recommend that the residential potential of sites - particularly allocated sites such as 252-272 Lower High Street - should be maximised.

## Full text:

Letter and form received via email

## Change suggested by respondent:

It is recommended that the residential potential of sites - particularly allocated sites such as HS22 - should be maximised. It is recommended that wording is included within the policy that encourages residential development to exceed the 95 dwellings-per-hectare (as set out within Strategic Policy SS1.1) where appropriate. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>

Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2114

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.27 Children's Services: (School Place Planning). Following on from the comments that have been made in relation paragraph 2.70, it is assumed that the provision for new primary school sites that have been included in this policy under paragraph f) refers to the new primary school that is to be constructed within the Riverwell redevelopment area, along with an additional primary school that has been suggested for allocation at Site MU16: Land at Tesco, Lower High Street.

...Given the well-developed urban setting of Watford, if the primary school, located at MU16: Land at Tesco is to be delivered as a standalone site i.e. not a building integrated within a wider development, a sub-optimal requirement may be acceptable providing that a minimum area of 0.9ha which otherwise complies with the county council's site standards is allocated for a 3fe primary school. However, consideration will need to be given to the availability and accessibility of offsite pitches where these cannot be provided onsite

## Full text:

Form and letter received via email

## Change suggested by respondent:

Paragraph f) should therefore be modified as follows in order to reflect this:

"f) A site for a new primary school within Site MU21: Land at Riverwell and a site for a new 3fe primary school within Site MU16: Land at Tesco, Lower High Street that are BB103 compliant, including external areas, New primary school sites to meet demand generated by new development."

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2115

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. Clarity is needed concerning the provision of new secondary schools as the county council as Highways Authority will need to ensure that sustainable links are in place. Reliance on off-site schools for large developments will potentially place pressure on the transport system.

5.30 The shared surface route that is mentioned in paragraph h) of the policy may not be a deliverable measure. Whilst the MRT is a major benefit, there may be other areas afforded a high level of connectivity and accessibility by other public transport options

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore suggested that paragraph h) is modified as follows, in order to ensure that walking, cycling and bus priority measures are included within the policy:

h) The Lower High Street should be prioritised for improved public transport (including bus priority measures) and the creation of an improved walking and cycling route, a shared surface route;

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2116

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.31 Children's Services: (Early Years). To date very little childcare provision is located in this area; therefore, a minimum requirement would be for this provision to be re-modelled and extended to meet the new demand in the area. Ideally, additional childcare provision would need to be created as well as extending the existing provision in the locality if possible. The new primary school sites that are to be delivered will potentially cover the nursery class need for this area.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2117

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.32 Ecology. Paragraphs (d) and (e) in respect of commitments to biodiversity enhancement including re-naturalisation of the Colne between Water Lane and Waterfields Way, is supported. Notwithstanding this, it is noted that item (d) states that: "New development will contribute towards the creation ... and the enhancement of wildlife habitats." Whilst this is welcomed, this wording is a little vague and it is questioned if this is sufficiently clear and robust to effectively influence development proposals beyond that specified elsewhere in the local plan or in the NPPF. Reference to the blue and green infrastructure could be useful here and, of course, any future NRN.

5.33 Furthermore, if the LPA has a genuine desire to secure biodiversity enhancement in this area above and beyond what is required by the existing policy and elsewhere, then the wording within this policy may not be adequate to either guide developers or the safeguarding of existing wildlife sites.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Homes for a Growing Community

1828

Object

Respondent: Mrs Fran Clark

## Summary:

Because of the effects of Covid, the growth will not be as per the Spacial Strategy. The Watford Plan needs to be reviewed with this in mind and certainly needs to remove the windfall number of 2095.

As the Plan notes" This forecasts the anticipated delivery of new homes each year to 2036 and provides a mechanism to evaluate the performance of the Plan." At what point does the 'mechanism' sweep into action?

## Full text:

Because of the effects of Covid, the growth will not be as per the Spacial Strategy. The Watford Plan needs to be reviewed with this in mind and certainly needs to remove the windfall number of 2095.

As the Plan notes" This forecasts the anticipated delivery of new homes each year to 2036 and provides a mechanism to evaluate the performance of the Plan." At what point does the 'mechanism' sweep into action?

## Change suggested by respondent:

The anticipated delivery of new homes of 2036 needs to be reduced to 1050. and the mechanism needs to evaluate the performance of the Plan.

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: More so, that the Watford Plan is revised in the light of Covid and how Watford can be removed from the 'most vulnerable town' list

Attachments: None

1838

Support

Respondent: Hertsmere Borough Council

## Summary:

Watford's Local Plan makes provision for 14,988 additional homes. Hertsmere supports the fact that Watford will be looking to fully address the identified local need though the government's standard methodology. Although the windfall assumptions within the plan are high, we consider that these are sufficiently justified by evidence.

## Full text:

Watford's Local Plan makes provision for 14,988 additional homes. Hertsmere supports the fact that Watford will be looking to fully address the identified local need though the government's standard methodology. Although the windfall assumptions within the plan are high, we consider that these are sufficiently justified by evidence.

The Local Plan proposes at least 35% affordable housing and a minimum of 60% of new affordable homes as homes for social rent. Whilst Hertsmere supports the principle of delivering a high number of homes for social rent, it is important to ensure that these levels are viable. It is understood that BNP Paribas have advised o this matter - and are also similarly advising HBC. For information, Hertsmere are considering a 40% requirement for affordable housing on schemes within Bushey. It is assumed that 40% has been proven to be unviable in Watford?

Whilst the Local Plan is clear about how the overall housing number is going to be met it lacks detail in terms of how the various different types of housing are going to be brought forward, and how the various needs of different groups are going to be met including:

- Specialist and care housing
- Student, Co-Living and Non Self Contained Accommodation
- Gypsies and Travellers

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jz>



1981

Comment

Respondent: St Albans City & District Council  
Agent: St. Albans City & District Council

## Summary:

Based on the Planning Practice Guidance (as below), SADC queries whether it is right to start the calculation of housing need and delivery from 2018. As WBC's Reg 19 Plan has been published in 2021 and will be submitted in 2021 that would appear to be a more appropriate starting date. SADC notes that WBC appears to be starting from an 'under-delivery' position of circa 1,500 homes against the Reg 19 date of 2021, whereas the PPG explicitly sets out that there is no need to address 'under-delivery' when the Standard Method is used:

Can strategic policy-making authorities take account of past under delivery of new homes in preparing plans?

The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.

Where an alternative approach to the standard method is used, past under delivery should be taken into account.

Paragraph: 011 Reference ID: 2a-011-20190220

Revision date: 20 02 2019

Full text:

Received via email

## Change suggested by respondent:

SADC notes that WBC appears to be starting from an 'under-delivery' position of circa 1,500 homes against the Reg 19 date of 2021, whereas the PPG explicitly sets out that there is no need to address 'under-delivery' when the Standard Method is used

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>

St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

2069

Comment

Respondent: Greater London Authority  
Agent: Greater London Authority

## Summary:

In terms of housing need, the Council is referring to the Government's standardised methodology for calculating need. It should be noted that our demographic modelling provides alternative population and household projections that could also be taken into account when applying this standardised approach. Our projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft new London Plan. They are available on the London Datastore: <https://data.london.gov.uk/dataset/2016-based-projections-national-outputs>.

We suggest the Council explores all options to accommodate its housing need. We also support the closer collaboration with the authorities in South West Hertfordshire and in particular the preparation of a Joint Strategic Plan.

Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options consultation from October 2018

Appear exam: Not specified

Attachments: Greater London Authority Nov 2019 response\_Redacted - <https://watford.oc2.uk/a/zn>

Greater London Authority Oct 2018 response\_Redacted - <https://watford.oc2.uk/a/zy>

Greater London Authority\_Redacted - <https://watford.oc2.uk/a/zp>

2091

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

See letter for details

The Plan therefore as currently prepared is not sound with respect of:

- a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and
- b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls;

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

That paragraph 3.1 is amended (as underlined) to read:

“The Spatial Strategy to 2038 seeks to deliver at least 14,988 new homes. This figure includes the amount of housing .....

3. That paragraph 3.3 is amended (as underlined) to read:

“As part of the housing to be provided to 2038, a windfall allowance of 1,624 units is included. This is based on a combination of three factors including the historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall development will contribute, on average, 116 new homes per year from April 2024 onwards as indicated in Appendix B.”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: The changes to the policies required are detailed in the attached Statement.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>  
North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>  
North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

2118

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.34 Transport. It is noted that the final draft local plan aims to deliver a total of 14,988 dwellings during the plan period during the 18-year plan period. It is also

13

noted that the windfall allowance of approximately 100dpa is potentially challenging (as it is significantly higher than the historic average of 70dpa). An additional buffer has also been assumed to be delivered through windfall (40 dpa).

5.35 The latest COMET (LPR6) run assumes 8,480 homes to be delivered on allocated sites and 2,550 from windfall and 3,543 through existing permissions. The total being modelled (including completions since 2014 rather than 2018) is 16,268. This compares with a total of 13,664 modelled as part of COMET Run 5.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HO3.1: Housing Provision

1830

Comment

Respondent: Mrs Fran Clark

## Summary:

As Covid has set the economic [retail, hospitality, leisure] and employment forecasts backwards this whole Plan needs to be delayed by 3 years to get the momentum back. The original requirement for nearly 15,000 new homes will not be needed if work place practices change to working from home. If the population increase was proposed to be 10,000 why is the requirement for new homes 150% of this?

Reduce the requirement for new homes to 8,750;  
review changing the use of retail outlets to residential; and  
postpone the period to 2040.

## Full text:

As Covid has set the economic [retail, hospitality, leisure] and employment forecasts backwards this whole Plan needs to be delayed by 3 years to get the momentum back. The original requirement for nearly 15,000 new homes will not be needed if work place practices change to working from home. If the population increase was proposed to be 10,000 why is the requirement for new homes 150% of this?

Reduce the requirement for new homes to 8,750;  
review changing the use of retail outlets to residential; and  
postpone the period to 2040.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1906

Support

Respondent: Three Rivers District Council

## Summary:

The Plan is aiming to meet the areas local housing need in full with a 5% contingency for flexibility and this is supported as neighbouring authorities will struggle to meet any additional needs beyond their own. The ongoing duty to cooperate process will offer local planning authorities the opportunity to consider how best to meet the needs of the wider area. The approach to Windfall seems justified based on historic delivery and increased densities.

## Full text:

The Plan is aiming to meet the areas local housing need in full with a 5% contingency for flexibility and this is supported as neighbouring authorities will struggle to meet any additional needs beyond their own. The ongoing duty to cooperate process will offer local planning authorities the opportunity to consider how best to meet the needs of the wider area. The approach to Windfall seems justified based on historic delivery and increased densities.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1939

Comment

Respondent: Berkeley Homes

## Summary:

Berkeley Homes is supportive of draft Policy HO3.1: Housing Provision, which notes that sustainable proposals for residential developments, where optimal use of the land is made, will be supported. The expectation of higher density development in Watford Junction is welcomed, and reflects the area's sustainable location well served by public transport and within walking distance of local facilities and services. An indicative density for the Watford Junction Strategic Development Area is noted at of at least 95 homes per hectare.

## Full text:

-

## Change suggested by respondent:

While the Borough's approach to setting a minimum, rather than maximum, density guide is supported, we consider that a more ambitious minimum density level could be set which better reflects the area's context and density precedents set by approved development proposals in the area.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made on the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting this amendment.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1947

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

Policy HO3.1 states that provision will be made for 14,988 new homes for the Plan period 2018- 2036. This figure includes the amount of housing required to meet local need as determined using the Government's latest Standard Method figure of 14,274 homes (December 2020) and an additional 5% allowance of 714 homes.

Whilst the use of the latest Standard Method calculation and the principle of an allowance on top is supported, the wording of the policy should explicitly state that this is a minimum target. This will ensure compliance with national policy and paragraphs 11b) and 59 of the NPPF. The text should be adjusted accordingly to the following:

"Provision will be made for a minimum of 14,988 additional homes"

At paragraph 3.1, it is noted that a 5% uplift has been included in order to "reduce the risk of sites identified in the plan not coming forward as anticipated". It is questionable whether a 5% buffer of 714 homes is enough, given the context of housing delivery in WBC.

Since the publication of the new NPPF (2019), the Government has set out the results of the Housing Delivery Test. This compares a local authority's housing completions versus housing requirement over the previous three monitoring years. In the 2018 test results, published in February 2019, Watford delivered 108% against its target. In the 2019 results (published February 2020) this fell to 70% and in the 2020 results (published January 2021), Watford only delivered 48% of its housing requirement. This significant reduction reflects that the housing requirement went up significantly in the monitoring year 2018/19 but housing delivery has continued to stay low. As Watford is delivering less than 75% of its housing requirement, the presumption in favour of sustainable development now applies (paragraph 11 of the NPPF), as well as a 20% buffer being added to Five Year Housing Land Supply (5YHLS) calculations.

The 5YHLS statement dated 31 March 2020 shows that based on a housing requirement of 787dpa plus a 20% buffer (bringing it to 944dpa), the Council can demonstrate a marginal land supply of 5.21 years. Therefore, moving forward the Council needs to significantly increase its housing delivery and a 5% buffer added to the minimum housing target is not considered to be sufficient. It is recommended that the housing target includes a 20% buffer in order to ensure the Council can maintain a 5YHLS throughout the Plan period, taking into account lapse rates.

Figure 3.1 of the Plan shows that 2,095 units will come from windfall sites and appears to show that the 5% buffer the Council has included to take account of sites not coming forward will be from these windfall sites. However, at paragraph 3.3, the Council states that its windfall allowance will be 2,132 units. It is not clear why there is this discrepancy in the figures. It is also questionable whether relying on windfall sites for a 5% buffer is a sound and justified approach.

The Plan states, at paragraph 3.3, that windfall will contribute on average 116 new homes per annum which will be made up of the historical annual average of 70 dwellings per year completed on sites of less than five units, development sites coming forward in density range identified in Housing and Economic Land Availability Assessment (HELAA, January 2021) but higher than projected and unidentified sites larger than five dwellings gaining permission. Combined, it is expected that windfall development will contribute, on average, 116 new homes per annum.

Paragraph 3.45 of the HELAA (January 2021) states that the 116 homes per annum windfall allowance has been calculated by taking the 70dpa baseline figure for developments from small sites and incorporating an uplift which uses densities of 220dph in some locations. This significant increase in density is not reflected in Policy HO3.2.

The housing trajectory at Appendix B includes a windfall allowance of 139 or 140dpa. It is not clear why this figure has been used, rather than the 116dpa identified in paragraph 3.3 of the Plan.

On 4 January 2021, WBC wrote to St Albans District Council (SADC) stating that:

"The Council intend to publish the final draft Local Plan setting out the intention to meet its housing need in full. However, should the appointed Planning Inspector consider that providing 835 homes, inclusive of the 5% buffer, through windfall development is not appropriate, St Albans City and District Council is asked if it could consider if it has the capacity to accommodate a proportion, or all, of the 835 homes identified as windfall over the plan period to 2036 as their Local Plan is progressed."

At a SADC Planning Policy Committee on 2 February 2021, it was confirmed that WBC no longer required SADC to take any up any of its unmet housing need but were asking for support to accommodate windfall development should an inspector find this approach unsound. SADC has reiterated its stance that it has no capacity to take any unmet housing need from Watford.

Therefore, it appears that WBC has concerns around the use of this windfall allowance. A sound approach would be to assume a windfall allowance of 70dpa. It is recommended that the Council amends this figure and seeks to meet its housing requirement through a greater number of allocated sites.

Figure 3.1 also identifies that 4,145 homes will be delivered through existing commitments. It is unclear from the housing trajectory table in Appendix B whether a lapse rate has been applied to this figure or not. As the Council has stated that it is increasing its housing target to mitigate for sites not coming forward, it would be positive plan-making to include an evidenced lapse rate to commitments.

The commitments column of the housing trajectory does not identify which permissions are expected to come forwards in which year. The blanket level of 676dpa between 2021/22 and 2025/26 is questionable as it is highly unlikely that the exact same number of dwellings will be completed for six years running.

Without a more detailed housing trajectory which clearly sets out which permissions are expected to come forward when and at what rate, the Plan cannot be considered to be sound and in compliance with the NPPF. Additionally, more details should be provided on the timings of delivery for site allocations, in order to determine whether the proposed number of dwellings can come forward as the Council have set out.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

Whilst the use of the latest Standard Method calculation and the principle of an allowance on top is supported, the wording of the policy should explicitly state that this is a minimum target. This will ensure compliance with national policy and paragraphs 11b) and 59 of the NPPF. The text should be adjusted accordingly to the following:

"Provision will be made for a **minimum of 14,988 additional homes**"

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1979

Comment

Respondent: St Albans City & District Council

Agent: St. Albans City & District Council

## Summary:

SADC note that the WBC Local Plan Regulation 19 document is aiming to meet and deliver their housing need within their administrative boundary. SADC are generally supportive of this approach. However, SADC note that this needs to be fully justified in line with paragraph 35 of the NPPF 'test of soundness'.

It would welcome more detail on the proposed 5% buffer as outlined in Strategic Policy HO3.1, in particular in the reasoned justification text. Furthermore, it reiterates that SADC has no current capacity to meet any of WBC's housing need.

## Full text:

Received via email

## Change suggested by respondent:

Would welcome more detail on the proposed 5% buffer as outlined in Strategic Policy HO3.1, in particular in the reasoned justification text.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>

St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

2007

Support

Respondent: Dacorum Borough Council

## Summary:

Dacorum Borough Council welcomes confirmation in the Local Plan that Watford Borough Council are able to meet their housing needs in full, incorporating a 5% buffer. As with Watford, Dacorum has a substantial level of growth to accommodate and, like the other authorities in South West Hertfordshire, is constrained by the Green Belt. However, unlike other neighbouring authorities in Hertfordshire a large part of Dacorum is covered by the Chilterns Area of Outstanding Natural Beauty (CAONB) and, uniquely amongst the authorities, Dacorum is home to the Chilterns Beechwoods Special Area of Conservation (SAC); a site protected under the Conservation of Habitats and Species Regulations 2017 (as amended). These represent substantial planning constraints for Dacorum if it is to meet its own housing growth requirements. You will be aware that the Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth was recently consulted on and sets out our intention to meet our objectively assessed development needs, working with adjoining authorities where this is not possible. The scale of growth required has led to the identification of Green Belt land around towns and villages with many of these sites in close proximity to the AONB. It should be noted that since the consultation started Government has confirmed its approach to calculating housing need, the result of which is to increase Dacorum's housing requirement from 922 per annum to 1,023 per annum. The Council will need to assess the implications for the additional growth and determine whether it is possible to meet these needs, in line with para 11 of the NPPF. Until further evidence is available the Council is unable to confirm the total level of growth that can be provided in Dacorum, including what level of, if any, unmet needs from other authorities can be accommodated. Dacorum Borough Council hopes further conclusions can be drawn on this later in 2021. Dacorum Borough Council wishes to remain in close contact with Watford and other South West Hertfordshire authorities on the findings of this work throughout 2021 and to confirm the implications this may have for accommodating future needs.

## Full text:

n/a

## Change suggested by respondent:

As highlighted above, any potential modifications would be addressed through a future Statement of Common Ground, to be agreed by the relevant authorities in South West Hertfordshire, and prior to the formal submission of the Watford Local Plan for examination.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: This matter has been raised through regular duty to cooperate meetings with Watford Borough Council and the wider South West Hertfordshire authorities.

Appear exam: Not specified

Attachments: Dacorum Borough Council - form\_Redacted - <https://watford.oc2.uk/a/zc>

Dacorum Borough Council - letter\_Redacted - <https://watford.oc2.uk/a/zd>

2058

Comment

Respondent: Home Builders Federation  
Agent: Home Builders Federation

## Summary:

The policy is unsound as the housing requirement is based on a plan period that is inconsistent with national policy.  
See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

The National Planning Policy Framework (NPPF) establishes at paragraph 22 that plans should look ahead over a minimum of 15 years from adoption. As such the Council should extend the plan period by at least one year to 2036/37. This would increase the requirement for this plan from 14,274 to 15,067 and lead to a shortfall in supply in Watford. This minimum requirement will also need to be set out in policy HO3.1, at present it is only set out in the supporting text at paragraph 3.1 of the Local Plan with the expected level of provision to meet its requirements being set out in policy.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>

Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

2064

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Glyn Hopkin Holdings Ltd ('GHH') – landowners of 252-272 Lower High Street, Watford, WD17, 277 (which is allocated for residential development under allocation HS22) – support the preparation of a new Local Plan for Watford, and support the residential allocation for the site. However, it is recommended that several changes are required in order to strengthen the Local Plan and enable it to be found sound. Firstly, the Local Plan period needs to be extended by at least one year to 2036/37 to comply with the 15-year minimum period from adoption under Para. 22 of the NPPF. This has ramifications in relation to the minimum housing requirement, which would increase to 15,067. This means that the currently identified provision of 14,988 would not be suffice to meet minimum objectively assessed needs. It is also recommend that the wider housing target is clearly described in policy as a minimum target so as to encourage exceedance of the target. It is also recommend that a 20% buffer is applied to the housing requirement (in accordance with NPPG Para. 022 Reference ID: 68-022-20190722) to provide flexibility and account for recent levels of under-delivery (as evidenced by the 2020 Housing Delivery Test results). This applies to Strategic Policies SS1.1 and HO3.1. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

For Strategic Policy HO3.1, again it is recommended that the Plan period is extended to at least 2036/37, and that provision is made for a minimum of 15,067 additional homes. It is also recommended that a 20% buffer is applied (as opposed to the current 5%) to take account of recent under-delivery (as evidenced by the 2020 HDT results, and the requirement under NPPG Para. 022 (see above ref ID) for Local Plans to take this into consideration. It is recommended that this increased housing requirement – when calculated – is stated as a minimum requirement in the policy. This updated minimum housing requirement should then be stated in both Strategic Policy SS1.1 and HO3.1. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>

Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2092

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

See letter for details

The Plan therefore as currently prepared is not sound with respect of:

- a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and
- b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls;

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

That Strategic Policy HO3.1 is amended (as underlined) to read:

“Provision will be made for at least 14,988 new homes, inclusive of a 5% buffer of 714 homes in Watford Borough for the period 2020 to 2038. Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development. Residential developments.....”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

## Housing mix, density and optimising use of land

2119

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.36 Transport. Higher density development within the core development areas is supported. This will ensure maximum opportunity is used in relation to those sites in the most accessible areas.

## Full text:

Form and letter received via email

## Change suggested by respondent:

In the light of this, it is suggested that the following wording is modified as follows:

“Higher density development will be particularly supported in areas where there is good access to the town centre and good access to transport services, ~~Mass Rapid Transport~~, such as at Watford Junction.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Design-led schemes and housing density**

1861

Comment

Respondent: Watford Central Town Residents Association

**Summary:**

There is an opportunity to revisit the availability of housing sites within the Core Development Area, due to the transformative changes brought by Covid, e-commerce and home working as stated in our comments under Policy SS1.1: Spatial Strategy above .

**Full text:**

There is an opportunity to revisit the availability of housing sites within the Core Development Area, due to the transformative changes brought by Covid, e-commerce and home working as stated in our comments under Policy SS1.1: Spatial Strategy above .

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Housing mix**

1789

Comment

Respondent: R Kowalewski

**Summary:**

Do not forget Gardens, very important for the well being of people. These need to be reasonable sizes, not courtyard size

**Full text:**

Do not forget Gardens, very important for the well being of people. These need to be reasonable sizes, not courtyard size

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Policy H03.2: Housing Mix, Density and Optimising Use of Land**

1862

Comment

Respondent: Watford Central Town Residents Association

**Summary:**

The replacement of Policy UD 1 means that specific reference to the Character of Area study and the Residential Design Guide has disappeared. We are therefore concerned that there is no definition of an area's character in policy and a prominent void in WBC's ability to define specific area character. As a result, we ask that mention of the Character Area SPD be reinstated into this policy and all other policies referring to character until such time as a replacement, if required, is devised, consulted upon and adopted.

**Full text:**

The replacement of Policy UD 1 means that specific reference to the Character of Area study and the Residential Design Guide has disappeared. We are therefore concerned that there is no definition of an area's character in policy and a prominent void in WBC's ability to define specific area character. As a result, we ask that mention of the Character Area SPD be reinstated into this policy and all other policies referring to character until such time as a replacement, if required, is devised, consulted upon and adopted.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None



1907

Comment

Respondent: Three Rivers District Council

## Summary:

The policy proposes a requirement of at least 20% of residential development to be family sized, however the Local Housing Need Assessment provides a further breakdown by number of bedrooms. It may be useful to include this in the policy.

The design-led approach and increased densities are supported and are consistent with national policy on making efficient use of land.

## Full text:

The policy proposes a requirement of at least 20% of residential development to be family sized, however the Local Housing Need Assessment provides a further breakdown by number of bedrooms. It may be useful to include this in the policy.

The design-led approach and increased densities are supported and are consistent with national policy on making efficient use of land.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1940

Comment

Respondent: Berkeley Homes

## Summary:

Draft Policy HO3.2 notes that residential developments will need to provide at least 20% of homes as family size units of three bedrooms or more. While it is acknowledged that larger family size homes are in need across the Borough, Watford has a chronic housing need and there is a forecast need for all housing sizes over the Plan period (as set out in the South West Hertfordshire Local Housing Needs Assessment 2020).

## Full text:

-

## Change suggested by respondent:

Berkeley Homes would support the Borough taking a more flexible approach to housing mix on a site-by-site basis, taking into account site specific locations and characteristics. We would suggest that Policy HO3.2 should be amended to acknowledge that there should be a focus on family accommodation within suburban areas, with lower occupancy homes in apartment-led developments being suited to more central locations in close proximity to public transport infrastructure.

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made on the Issues and Options and the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting this amendment.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1948

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

Policy HO3.2 states that residential development will be supported where provision is made for at least 20% of the total number of residential units to be family sized (at least three bedrooms).

Within the Core Development Area higher density development of at least 95 dwellings per hectare (dph) is expected. The policy also states that higher density development will be supported, particularly in areas where there is good access to Mass Rapid Transport, such as Watford Junction.

The higher development density of a minimum of 95dph within the Core Development Area reflects the sustainability credentials of the area and is considered to be appropriate and in accordance with national policy and the need to make the most efficient use of land.

Page 8

Within the policy wording, it should be acknowledged that some areas may be suitable for much higher levels of density. This should also reflect that the Council anticipates some windfall sites to be delivered at 220dph. It is recommended that the following changes are made to the second part of the policy.

“Residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher-density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings per hectare. However, in highly sustainable locations within the Town Centre, much higher levels of density may be appropriate in order to make the most efficient use of land. Outside of the Core Development Area, new residential developments are expected to achieve at least 45 dwellings per hectare, but the optimal density for individual sites should be established through careful consideration of local character, context and access to amenities and public transport.

The feasibility and viability of requiring 20% of dwellings to be at least three bedrooms, whilst also being a maximum of five storeys (or eight storeys in some limited locations – see Policy QD6.5) and a minimum of 95dph, is questionable.

There should be a greater level of flexibility within this policy to take into account of whether significant provisions of larger family units, in highly sustainable Town Centre locations, is appropriate.

Smaller units, rather than family units, are generally more desirable and suited to town centre locations. To require a minimum of 20% provision of family units across the whole Borough does not conduce itself to making the most efficient use of land in accordance with paragraph 122 of the NPPF. It is recommended that the first part of the policy wording for Policy HO3.2 is amended to read as follows.

“Proposals for new residential development will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms). However, it is acknowledged that a lower level of provision of family units will be acceptable in highly sustainable locations, such as the Town Centre”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

Within the policy wording, it should be acknowledged that some areas may be suitable for much higher levels of density. This should also reflect that the Council anticipates some windfall sites to be delivered at 220dph. It is recommended that the following changes are made to the second part of the policy.

“Residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher-density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings per hectare. **However, in highly sustainable locations within the Town Centre, much higher levels of density may be appropriate in order to make the most efficient use of land.** Outside of the Core Development Area, new residential developments are expected to achieve at least 45 dwellings per hectare, but the optimal density for individual sites should be established through careful consideration of local character, context and access to amenities and public transport.

It is recommended that the first part of the policy wording for Policy HO3.2 is amended to read as follows.

“Proposals for new residential development will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms). **However, it is acknowledged that a lower level of provision of family units will be acceptable in highly sustainable locations, such as the Town Centre”**

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1989

Object

Respondent: The Retirement Housing Consortium  
Agent: The Retirement Housing Consortium

## Summary:

Para 3.26 of the plan rightly recognises that specialist housing for older people takes a number of forms. These are also forms of grouped accommodation, normally based around some provision of communal facilities and services. A minimum number of units are required for such schemes to provide beneficial services is 25 – 30 units dependent on viability. The Policy as drafted in seeking to secure all forms of accommodation for the need which the plan identifies (which includes retirement housing ) is therefore not workable for all but the largest sites. Retirement housing is often provided on small windfall opportunities. It should also be noted that such housing has a very positive effect in addressing under occupation given the emphasis on the need to make available more family housing (see HO3.5 below)

## Full text:

Form received via email

## Change suggested by respondent:

The Policy should state that there is a specific policy for specialised housing for older and vulnerable people (HOU 3.5) and that such housing is therefore excluded from Policy HO.3.2

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

1997

Comment

Respondent: JLL  
Agent: JLL

## Summary:

Our client supports Watford Borough Council's ambition for new homes and the encouragement for a mix of homes including size, tenure and specialist adaptations. Both Ascot Road Phase 1 and Phase 2 seek to support the supply of new homes and mix of tenure within the Borough. Policy HO3.2 considers housing mix, housing density and optimising land, and protecting existing housing stock. Our client supports the need for family-sized housing, however in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. Watford has a relatively young population. This provides a high demand for smaller units for individuals leaving home and young professionals priced out of London. A demand also exists for elderly people downsizing from larger homes. There is still a great need for 1 and 2-bedroom properties particularly in Watford (as referenced in the South West Hertfordshire Local Housing Needs Assessment (2020).

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft (representations submitted November 2019)

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>  
Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2003

Comment

Respondent: Drax Investments Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Policy H03.2 – the need to provide 20% as 3+beds on all sites is not considered to be sound or flexible enough. Also considered that further flexibility needs to be built in to the policy to encourage developments to exceed 95 dwellings-per-hectare where appropriate. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information.

## Full text:

n/a

## Change suggested by respondent:

Recommended that this 'minimum 20% requirement for 3+ bedroom dwellings' is not applied rigidly across all sites, as some will be more appropriate for larger dwellings (in edge-of-town centre / settlement locations), whilst some will be more appropriate for high-density 1 and 2-bedroom dwellings (such as the site, which is in the CDA and High Sustainability Zone). Also recommended that an additional line is added to this policy that states "where appropriate, the density of sites within the Core Development Area should seek to exceed 95 dwellings-per-hectare." This approach is considered to be justified in the context of maximising the efficiencies of brownfield sites set out at Paras. 122 and 123 of the NPPF. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Drax - Form\_Redacted - <https://watford.oc2.uk/a/zf>

Drax written reps - <https://watford.oc2.uk/a/zg>

2033

Support

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

We support this policy to optimise the density of sites through a design-led approach taking account of the context and sustainability of a site, focusing on higher density development within the Core Development Area. We do however consider that a higher minimum dwelling per hectare density should be supported in the Core Development Area in order to deliver more housing in the most sustainable locations.

## Full text:

Forms received via email

## Change suggested by respondent:

Consideration to a higher minimum density per hectare for key sustainable and accessible parts of the town centre core development area.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2066

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

The requirement for all sites to deliver 20% of the dwellings delivered as 3+ bedroom units – under HO3.2 – is not considered to be sound. This approach is not flexible enough., and therefore does not align with NPPF Para. 11. It also considered that further flexibility needs to be built in to the policy – under 'housing density and optimising land' to encourage developments to exceed 95 dwellings-per-hectare, where appropriate and compliance with other Local Plan policies can be demonstrated. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Repls\_FINAL' for more detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

For Policy HO3.2 – under 'housing mix – it is recommended that the requirement to apply a rigid 'minimum 20% requirement for 3+ bedroom dwellings' on all sites proposing to deliver residential development is amended. Applying this across all development sites is not considered to be appropriate – certain sites (such as those within the CDA) will be more suited for 1 and 2-bedroom dwellings, whilst sites in the urban fringe / suburban areas will be more suitable for 3+bedroom dwellings. For Policy HO3.2 – under 'housing density and optimising land' – it is recommended that text is added after “Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings-per-hectare” that states “Where appropriate, the density of sites within the Core Development Area should seek to exceed 95 dwellings-per-hectare”. This is to encourage the maximisation of sustainable, brownfield sites within the CDA and is considered to align with NPPF Paras. 122 and 123. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Repls\_FINAL' for more detail.

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>  
Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2120

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.37 Transport. This policy is supported, although given the potential increase in households with children, careful consideration needs to be given to the location of new schools and their access to them.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HO3.3: Affordable Housing

1908

Comment

Respondent: Three Rivers District Council

## Summary:

The 35% affordable housing requirement is in line with the evidence base and national policy, as is the requirement for 60% of new homes to be for social rent. However, there has been no reference to the NPPF's requirement for 10% of new homes to be available for affordable home ownership. This needs to be added for this policy to be consistent with national policy.

## Full text:

The 35% affordable housing requirement is in line with the evidence base and national policy, as is the requirement for 60% of new homes to be for social rent. However, there has been no reference to the NPPF's requirement for 10% of new homes to be available for affordable home ownership. This needs to be added for this policy to be consistent with national policy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1949

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

Policy HO3.3 states that residential developments including residential institutions of 10 or more will be supported where they provide at least 35% affordable housing (by habitable room).

A minimum of 60% of new affordable homes should be for social rent and they should prioritise family sized accommodation.

Affordable housing should be provided on site, other than in exceptional circumstances. Affordable housing is to be fully integrated and built to the same standard as market housing.

It states that in exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a late-stage review mechanism, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority) will be required. Where it is demonstrated the number of affordable units achievable on site is higher than previously agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development. The Town and Country Planning (Use Classes) Order 1987 (as amended), was updated on 1 September 2020. Although many changes were made, the definitions of residential uses have remained the same. Residential institutions are defined under Class C2 and include the provision of residential accommodation and care to people in need of care, hospitals and residential schools.

It is assumed that Policy HO3.3 does not require the provision of affordable housing in all uses under Use Class C2, as affordable housing products are not viable or appropriate. Therefore, it is recommended that the wording of the policy is amended to provide clarification as to which residential institutions the Council is referring to.

The South West Hertfordshire Local Housing Needs Assessment (2020), which forms part of the Council's evidence base, identifies the need for affordable home ownership equates to around 30% of the overall housing need.

The BNP Paribas Local Plan Viability Assessment (January 2021), which forms part of the evidence base, states that it is not unreasonable to require an allocation of 35% affordable housing for new developments within the Borough. The report recommends that the target in emerging Policy H03.3 be retained and applied on a 'maximum reasonable proportion' basis, taking site-specific circumstances into account.

As the BNP Paribas Viability Assessment was undertaken on a strategic basis, it does not provide a comprehensive assessment of all allocations coming forward having regard to individual site constraints and abnormal costs in respect of remediation and mitigation. It assesses sites at a generalised level based upon assumptions of residual valuation approaches. It is acknowledged that site-specific costs will generate additional costs that have not been incorporated.

Based on the above, it is recommended that the policy should explicitly refer to the provision of 35% being required subject to a viability assessment being submitted and if such a viability assessment demonstrates that 35% affordable provision is not achievable then the Council will allow a lower provision to be delivered. This will ensure flexibility within the policy and encourage development.

The level of affordable housing provision required on developments should be based on evidence of identified housing need over the plan period in line with Paragraph 65 of the NPPF. The affordable housing need identified in the South West Hertfordshire Local Housing Needs Assessment (2020) is 30%. However, in line with the PPG it requires that Council's set affordable housing policies on the basis of both proven need and viability. The BNP Paribas Viability Assessment states that they consider that it is not unreasonable to require an allocation of 35% affordable housing for new developments within the Borough. They recommend that the target in emerging Policy H.03.3 be retained and applied on a 'maximum reasonable proportion' basis, taking site-specific circumstances into account. Setting a lower proportion of affordable housing is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so if the requirement is lowered.

The BNP Paribas viability assessment does not provide a comprehensive assessment of all allocations coming forward having regard to individual site constraints and abnormal costs in respect of remediation and mitigation etc. They have assessed a very generalised level based upon assumptions of residual valuation approaches. It is acknowledged that site-specific costs will generate additional costs that have not been incorporated. It is considered that reducing the requirement will boost housing delivery and developer confidence.

As such, we recommend the following policy wording:

"Residential developments, including residential institutions (as defined in this policy) of ten homes or more will be supported where they provide at least 30% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application."

As set out in the following section of these representations, the Council should also consider different thresholds for different types of housing products, for example Build to Rent schemes.

The policy also refers to a late-stage review mechanism on developments where it can be demonstrated that 35% provision is not viable. This mechanism is triggered where 75% of units are sold or let. Our client supports the note that this trigger can also be a period agreed between the Council and the developer.

However, in order to incorporate greater flexibility into the policy, it should be noted that this requirement should be considered on a site by site basis.

Late-stage review mechanisms are usually negotiated and agreed through Section 106 agreements, in order to take account of site constraints and not inhibit the delivery of schemes.

Further, the policy should note that any uplift in affordable housing can be through a financial contribution towards off-site affordable housing provision.

This would place Watford in conformity with the Greater London Authority's London Plan, which the Council shares many similarities with. These changes should be recognised in the policy wording. Our recommended wording is set out below.

"In exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a

late-stage review mechanism, the trigger for which will be negotiated on a site by site basis, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority) will be required. Where it is demonstrated the number of affordable units achievable on site is higher than agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development either on site or in the form of a financial contribution.”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

As such, we recommend the following policy wording:

“Residential developments, including residential institutions (as defined in this policy) of ten homes or more will be supported where they provide at least 30% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application.”

Further, the policy should note that any uplift in affordable housing can be through a financial contribution towards off-site affordable housing provision. This would place Watford in conformity with the Greater London Authority's London Plan, which the Council shares many similarities with. These changes should be recognised in the policy wording. Our recommended wording is set out below.

~~“In exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a late-stage review mechanism, the trigger for which will be negotiated on a site by site basis, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority) will be required. Where it is demonstrated the number of affordable units achievable on site is higher than agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development either on site or in the form of a financial contribution.”~~

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1990

Object

Respondent: The Retirement Housing Consortium

Agent: The Retirement Housing Consortium

## Summary:

Policy H0 3.3 seeks to apply 35% provision of affordable housing and the same tenure split over all new forms of residential development. The PPG “Viability” states “Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage” (Paragraph: 002 Reference ID: 10-002-20190509) “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. The characteristics used to group sites should reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan”. Paragraph: 004 Reference ID: 10-004-20190509. The Local Plan Whole Viability Study which must underpin the proposed affordable housing does not undertake any viability assessment of specialised housing for older people. It is well recognised that such housing has very different viability characteristics and inputs, as recognised by the PPG itself (Para 7 refers). To progress the Policy without viability testing being carried out or the policy including appropriate exemptions is therefore wholly unsound. Therefore either retirement housing should be properly assessed or the Recommendation below followed. NB: If viability testing is carried out, this must of course be reconulted upon and the Consortium reserves the right to comment.

## Full text:

Form received via email

## Change suggested by respondent:

Either Viability testing is carried out for all forms of specialised housing for older people as per those identified at Policy H03.5 and the policy amended accordingly to reflect (a) its findings (b) the actual tenure requirements for older persons housing OR the policy be amended to state that where appropriate to seek an affordable housing contribution from older persons housing, this will be subject to consideration at the application stage and therefore the policy and tenure requirements set out in policy H03.3 do not apply AND given these circumstances the late stage review mechanism of the policy do not apply to such housing. NB. If the Review clause remains, the Consortium reserves the right to present its position as to why this should not apply generally to specialised housing for older people t its position as to why this should not apply generally to specialised housing for older people 7)

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2059

Comment

Respondent: Home Builders Federation  
Agent: Home Builders Federation

## Summary:

The policy is unsound as it is not consistent with national policy.  
See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

Firstly, the Council should remove the term at least from the policy. The requirement in this policy must not be considered to be the lower end of a potentially higher level of delivery.  
Given that the Council's Viability Assessment concludes in paragraph 6.31 that many schemes in lower values areas are unviable then we would suggest that a greater degree of variability could have been introduced into the policy to reflect the evidence.  
... However, the third option, and one that would be more consistent with national policy, would be to require a lower level of affordable housing on schemes in the north of the Borough where viability is more challenging.

Legally Not specified  
compliant:  
Sound: No

Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

2067

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

While GHH recognise the importance of delivering affordable housing, it is considered that the inclusion of 'at least' is not appropriate, and lacks the necessary clarity required to accord with Para. 16 of the NPPF. The policy expects affordable housing to be provided on-site, and stipulates that "the Council will not support provision in lieu through commuted sums, other than in exceptional circumstances where it can be clearly demonstrated that it is not feasible to provide affordable housing on-site". The policy also states that "in exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a late-stage review mechanism, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority), will be required. Where it is demonstrated the number of affordable units achievable on-site is higher than agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development". The Viability Appraisal (2021) notes the differing levels of viability across the Borough, but the policy does not allow for a more flexible approach. The policy also proposes a late-stage review, but the wording of the policy – as drafted – does not allow for the event where the margins of viability may have tightened through worsening economic conditions. Greater flexibility and clarity in the policy – to align with Paras. 11 and 16 – is therefore required. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

It is recommended that 'at least' before the 35% requirement is removed. Given the NPPF now requires viability testing to be undertaken at the plan-making stage, and the Government's position that decision-makers can assume that policy compliant development is viable, local policies must take account of situations where development may be more marginal. In this regard, GHH note that the Viability Appraisal (2021) [which forms part of the evidence base] concludes in Section 6 that the margins of viability fluctuate across the Borough, and that some developments in lower value areas are more likely to be unviable. The varying margins of viability across the Borough – as identified by the evidence base – therefore suggests the need for a greater degree of flexibility in policy terms, rather than applying a unilateral approach to viability. GHH consider that the late-stage review mechanism requires greater flexibility. As drafted, the policy does not allow for the event where economic conditions may have worsened, thereby further tightening the potential development margins. It is therefore recommended that the Council should also state under the same provisions that it will support reductions in affordable housing requirements where changing economic circumstances render a site unviable and unable to deliver affordable housing requirements. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes  
compliant:  
Sound: No

Comply with Yes  
duty:  
Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>  
Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>



## Policy HO3.4: Build to Rent

1950

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

Policy states that proposals for Build to Rent homes will be supported in locations appropriate for residential development. It states that affordable housing should be provided in accordance with Policy HO3.3, although Discounted Market Rent, at a genuinely affordable rent, will be accepted in place of other affordable housing tenures. Genuinely affordable rents should be established against the most up-to-date Local Housing Market Needs Assessment and should be capped at a level equivalent to the Local Housing Allowance.

To qualify as a Build to Rent scheme, proposals should meet the following criteria:

- The development, block or phase within the development has at least 50 units;
- The homes are retained as Build to Rent under a covenant for at least 15 years;
- A clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken; and
- All the units are self-contained and let separately.

On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, this policy will only be applicable to the Build to Rent component. The scheme should be assessed as a whole, with affordable housing calculated as a proportion of the total habitable rooms across the scheme.

At paragraph 3.20, the Plan states that the discount on the market rent should be provided in line with the findings of the Local Housing Needs Assessment. It states that the Local Housing Needs Assessment (September 2020) identified that a discount of 26-34% would need to be applied to market rents for a person or family to afford a home in Watford. This is incorrect, the Assessment shows at Table 48 that this level of discount is required to make discounted home ownership affordable, not properties for rent. As such, this text should be removed.

In line with paragraph 5.179 of the South West Hertfordshire Local Housing Needs Assessment (September 2020) and paragraph 3 of the PPG (Reference ID: 60-003-20180913) affordable private rents should be set at least 20% below the private market rents. It is considered that this is a reasonable starting point for this type of housing.

It is therefore suggested that Paragraph 3.20 be amended to the following:

“discount rents should be set at least 20% below the private market rents in line with the South West Hertfordshire Local Housing Needs Assessment” Policy HO3.4 also states that affordable housing should be provided in accordance with Policy HO3.3 which sets a target for 35% affordable housing.

However, the PPG states that 20% affordable housing is a suitable benchmark for the level of affordable housing in Build to Rent schemes (Paragraph ID: 60-002-20180913). If a council wishes to decrease or increase this level then it should be justified using evidence from its local housing need assessment. This benchmark also should allow for viability assessments to be submitted as part of applications, where it is not possible to provide a policy compliant level of affordable housing.

The South West Hertfordshire Local Housing Needs Assessment (September 2020) states that councils should seek the maximum viable level of affordable private rental accommodation on build to rent schemes with a minimum contribution of 20% expected. However, no evidence is offered to suggest that this contribution should be any higher than 20%.

Therefore, it is recommended that both Policy HO3.4 and Policy HO3.3 are amended to require a 20% provision of affordable housing and this should be subject to a viability assessment and our suggested policy wording is set out below:

“Build to Rent residential developments will be supported where they provide at least 20% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application.”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

It is therefore suggested that Paragraph 3.20 be amended to the following:

“discount rents should be set at least 20% below the private market rents in line with the South West Hertfordshire Local Housing Needs Assessment”

Therefore, it is recommended that both Policy HO3.4 and Policy HO3.3 are amended to require a 20% provision of affordable housing and this should be subject to a viability assessment and our suggested policy wording is set out below:

“Build to Rent residential developments will be supported where they provide at least 20% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application.”

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1998

Comment

Respondent: JLL

Agent: JLL

## Summary:

Cortland are pleased to see the introduction of Policy HO3.4 relating to Build-to-Rent ('BTR'). As experienced operators of product, careful review has been given to this section of the Draft Local Plan and particularly the wording of Policy HO3.4. We agree Discount Market Rent ('DMR') to be appropriate in place of other affordable tenures for BTR in accordance with Policy HO3.4. The Discount Market Rent approach is a truly tenure blind solution and provides a much simpler management. The NPPG guidance notes under the management of DMR schemes 'Affordable private rent homes should be under common management control, along with the market rent build to rent homes. They should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size' (Paragraph: 006 Reference ID: 60-006-20180913). Requiring a BTR operator to act fully as a registered provider, as the emerging policy suggests, is a misalignment of national guidance. In terms of eligibility, we note paragraph 3.22 of the Draft Local Plan states Discounted Market Rent units that are provided as affordable housing will be allocated to eligible households on Watford Borough Council housing register. However the NPPG eligibility criteria notes 'Final decisions over the occupancy criteria for affordable private rent homes should be made by the build to rent scheme operator, working with the authority, taking into account the criteria below... Eligibility should be determined with regard to local household income levels, related to local rent levels. Where authorities maintain an 'intermediate housing list' they may wish to suggest names from this, or potentially even their Statutory Housing list, taking into account the affordability of the homes to those on the list. Authorities should refrain from having direct nomination rights from their housing list' (Paragraph: 009 Reference ID: 60-009-20180913). It appears that authorities should not have direct nomination rights. The Draft Local Plan policy currently does not appear consistent with the NPPG and hence not at this stage consistent with national guidance in this respect. Please refer to our covering letter for further information.

## Full text:

Form received via email

## Change suggested by respondent:

The Draft Local Plan policy currently does not appear consistent with the NPPG and hence not at this stage consistent with national guidance in this respect.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

## Policy H03.5: Specialist Housing and Care Homes

1991

Object

Respondent: The Retirement Housing Consortium

Agent: The Retirement Housing Consortium

## Summary:

Whilst the Council is to be applauded in proposing a policy specifically in respect of Specialist Housing and Care Homes, as drafted it is criteria led, potentially restricting delivery, and fails to recognise the considerable need for such housing. The Housing for Older and Disabled people section of the National Planning Practice Guidance (NPPG – June 2019) identifies the need to provide such specialist housing as critical, recognising the ageing demographic and the benefits that such developments bring with them. These benefits are not just for residents but include the wider economic and societal benefits, not least in addressing isolation and loneliness and also reducing the burden on health and social services. Recent research undertaken between 2019 and 2021 by the “Homes for Later Living Group” has reinforced previous research identifying these benefits as follows: Health and well being: • Each person living in housing specifically designed for later life enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of c.£3,500 per year. • Those in specialist housing are half as likely to have falls with resulting fractures, injuries and costly inpatient bed stays. • Building 30,000 more retirement housing dwellings every year for the next 10 years, which is the estimated demand, would generate fiscal savings across the NHS and social services of £2.1 billion annually. • Based on a selection of established national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living, Assisting the housing chain and the intergenerational divide • c.3 million people in the UK over the age of 65 (or 25%) want to downsize. • 90 per cent of projected household growth in the coming decades is set to be amongst those aged 65 and over, taking the total number of homes owned by those aged 65 and over from 3.9 million today to at least five million by 2030. • If all the homeowners over the age of 65 in England who wanted to move were able to do so, they would directly release one million properties back onto the market and free up two million spare bedrooms. • Every retirement property sold generates at least two moves further down the housing chain. This frees up homes at differing stages of the housing ladder for different demographics. A typical Homes for Later Living development which consists of 40 apartments therefore results in 80 additional moves further down the chain. • Roughly two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market. Research has also shown that the care, support and organisation that such schemes bring means that people living in retirement housing, have been less susceptible to COVID-19 infection. Across the 441 retirement communities that McCarthy Stone currently manage, which support c.20,000 older people, infection rates among residents were 27% below the national average for over 65s, and four times below the national average for over 85s, which is the closet age group to our homeowners. This has shown the value of retirement living in supporting older people at this difficult time. Research has also once more confirmed the positive benefits of housing for older people in supporting local shops and facilities: • “Retirement housing creates more local economic value and more local jobs than any other type of residential development. • People living in each retirement development generate £550,000 of spending per year, £347,000 of which is spent on the local high street. Some £225,000 of this is new spending in the local authority, directly contributing to keeping local shops open. • For just one retirement development of roughly 45 units, a local authority could expect to see benefits of 85 construction jobs for the duration of the build, as well as six permanent jobs and £13m in GVA over the lifetime of the development, as opposed to not developing a site. These benefits are now all the more significant as the government and planning policy turns to supporting and regenerating the high street following the Covid 19 Pandemic. These findings are particularly significant in respect of three key objectives of the Plan (a) a healthy and happy community with housing being provided that meets needs and is fit for purpose (b) to make available more family housing (c) help the recovery of the economy and the High Street in particular. Given the considerable level of need that is identified in the SHMA and the benefits that such housing brings, the policy should be amended to remove criteria for development and be explicit in its encouragement and support for older persons housing.

## Full text:

Form received via email

## Change suggested by respondent:

Given the considerable level of need that is identified in the SHMA and the benefits that such housing brings, the policy should be amended to remove criteria for development and be explicit in its encouragement and support for older persons housing . The final paragraph should be amended to reflect recommended changes for Policy H03.3

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2121

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.38 Adult Care Services. The county council supports the protection of existing specialist and supported housing where it meets the standards that are set out in existing Hertfordshire County Council guidance.

...5.43 Along with above site size guidance, it is essential that new extra care housing is situated in close proximity to good public transport links, be a short walk to local amenities, local shops and health care, have private outdoor space as well as shared private gardens, a communal lounge, plus a range of staff facilities. They should also include a communal café/restaurant, activity and health and fitness spaces. HCC welcomes the opportunity to work with stakeholders at the early stages of design.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy H03.6: Student, Co-living and Non-Self-Contained Accommodation

2122

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.44 Transport. The county council seeks clarification as to where the statement of: 'or within 800 metres of a railway station located in the Core Development Area' comes from, as this effectively means within 800m of Watford Junction and/or Watford High Street stations.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2123

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.45 YCH Services for Young People. The definition of 'student' within this policy should be amended to 'young people.' The county council considers it to be important that young people can have the same access to affordable accommodation as adults and that they are supported throughout the process. HCC support enables young people to succeed by providing high quality informal education opportunities to promote their personal and social development. It supports young people who are challenged in education, their communities or home life to ensure a successful transition to adulthood.

5.46 The county council supports a number of young people / young adults who live independently of their parents for a variety of reasons (Care-Leavers; estrangement; wanting to live independently; being required to contribute financially at home etc), and this cohort is generally more represented within our NEET2 cohort, as well as existing within EET cohorts, which brings more challenges in terms of access to financial resources. Whilst these young people may not be homeless, they can share similar characteristics/ challenges, transient / no fixed address / sofa surfing; lack of access to ICT to support with benefit claims, accessing support online, job applications etc; lack of resources, therefore communal shared space and amenities would support with this, e.g. HCC could offer advertised drop-in support in communal space.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HO3.7: Self-build and Custom Housebuilding

2060

Comment

Respondent: Home Builders Federation  
Agent: Home Builders Federation

## Summary:

This policy is unsound as it has not been sufficiently justified.

Whilst the HBF support the encouragement of self-build housing through local plans, we do not consider the requirement for all development of 50 or more dwellings to set aside 1 in every 10 market houses to be delivered on serviced plots for self-build and custom housebuilding to be justified or consistent with national policy.

See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

Therefore, on the basis of the evidence presented we would suggest that there is insufficient justification for the adoption of policy HO3.7 and as such it should be deleted.

Legally Not specified  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

**Policy HO3.8: Gypsies and Travellers**

2124

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.47 Ecology. The reference to Biodiversity Net Gain is welcomed within this policy, but it is considered that it shouldn't be limited to just policy, or allocation within the final draft local plan.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Houses in Multiple Occupation**

1790

Comment

Respondent: R Kowalewski

## Summary:

Watford has to implement a rented accommodation registration scheme otherwise there will be no control with regard to overcrowding etc. Registration can be requested by a private landlord paying the cost of the council to visit the premises and carry out an inspection. Or reduced nominal fee if the inspection is carried out by an accredited (by the council) property managing agent.

## Full text:

Watford has to implement a rented accommodation registration scheme otherwise there will be no control with regard to overcrowding etc. Registration can be requested by a private landlord paying the cost of the council to visit the premises and carry out an inspection. Or reduced nominal fee if the inspection is carried out by an accredited (by the council) property managing agent.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Policy HO3.9: Residential Conversions

1978

Comment

Respondent: Ms Carol Mounfield

## Summary:

Paragraph 3.40 states that “only ten percent of the total number of dwellings along a residential frontage ... will be permitted.” A) the text set out in HO3.9 does not include the policy in paragraph 3.40 regarding the number of dwellings to be permitted; B) Many residential roads in Watford already have HMOs in excess of 10%. The policy is therefore ineffective and not equally applicable throughout the borough. All residents should be entitled to clarity of the policy in respect of their residential road, e.g. is the policy to reduce the number of HMOs where roads are in excess of 10%? are there differing thresholds in such circumstances, e.g. 25%? 50%? or are HMOs unlimited in such circumstances? Without clarity, the policy is ineffective and divisive; and C) The policy generically refers to HMOs. By not distinguishing between different types of HMO, the policy is misleading and unachievable through its implication that the council can control permission for ALL HMOs, both large and small. Under the Town and Country Planning (General Permitted Development) (England) Order 2015, permitted development includes development of a change of use of a building from class 3 (dwelling houses) to class 4 (HMOs). No planning permission is required for conversions to HMOs for upto 6 households in such circumstances. The council cannot therefore enforce its policy of limiting HMO development in residential roads. The policy is therefore ineffective and unachievable.

## Full text:

-

## Change suggested by respondent:

To make the policy sound, i.e. effective and achievable, the Council needs to: A) update the text in HO3.9 to include reference to the % threshold for HMOs in residential roads; B) clarify its policy in respect of residential roads where HMOs already exceed 10%. Is it a free for all in such roads? Are there different thresholds depending on level of development, e.g. 25%? 50%? Or is the Council's policy to reduce HMO development in all residential roads to 10%? C) To enable control on achieving the threshold(s), the Council needs to be able to control planning permission for ALL HMOs. This includes those arising through a change from class 3 (dwellings) to class 4 (HMOs). To do this, the Council needs to implement an article 4 direction under the Town and Country Planning (General Permitted Development) (England) Order 2015. An Article 4 direction restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development. An Article 4 direction could be used to control conversions to HMOs to achieve the Council's policy in paragraph 3.40 of ensuring that HMOs "are available in the right locations without having an adverse impact on the surrounding area". Given the Local Plan lasts until 2036, the policy should include reference to the Council intending to introduce or exploring the option of introducing an Article 4 direction. Without amendment, the Council's policy is incomplete, ineffective and unachievable.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: I made this representation as part of the series of roadshows on the Local Plan. I made my comments to one of the officers at the Library event and left a sticker. I can see my sticker as part on one of the slides in the summary pack on the first draft.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Carol Mounfield\_Redacted - <https://watford.oc2.uk/a/z9>

## Internal space standards

1791

Comment

Respondent: R Kowalewski

## Summary:

Unregulated permitted build and loophole office conversion accommodation can be successfully fought with a rental registration scheme. Whilst the council has no powers to stop office blocks being converted into matchbox studio apartments. It has the power to declare them below standard for rental. So can refuse to grant licence to rent. If known the large building companies won't start as they know that they would not be able to sell the resulting matchboxes. Private land lords attempting to sub divide houses to too small units would also be shut down, again impossible to sell, so the practice would stop.

## Full text:

Unregulated permitted build and loophole office conversion accommodation can be successfully fought with a rental registration scheme. Whilst the council has no powers to stop office blocks being converted into matchbox studio apartments. It has the power to declare them below standard for rental. So can refuse to grant licence to rent. If known the large building companies won't start as they know that they would not be able to sell the resulting matchboxes. Private land lords attempting to sub divide houses to too small units would also be shut down, again impossible to sell, so the practice would stop.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**Policy HO3.10: Building Standards for New Homes**

1909

Comment

Respondent: Three Rivers District Council

## Summary:

The Local Housing Needs Assessment recommends 5% of market housing to be M4(3)(a) standard and up to 10% affordable dwellings to be M4(3)(b) standard. Further justification should be provided if the recommendation from the LHNA isn't followed.

## Full text:

The Local Housing Needs Assessment recommends 5% of market housing to be M4(3)(a) standard and up to 10% affordable dwellings to be M4(3)(b) standard. Further justification should be provided if the recommendation from the LHNA isn't followed.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2061

Comment

Respondent: Home Builders Federation

Agent: Home Builders Federation

## Summary:

Policy is not sound as elements have not been adequately justified.  
See letter for details

## Full text:

Letter received via email

## Change suggested by respondent:

...As such we would suggest that the requirement to meet NDSS is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.  
...Therefore, whilst we recognise that there is a need for some homes to be built to higher accessibility standards, we would suggest that the proposed level of delivery in policy HO3.10 has not been adequately justified.

Legally Not specified  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>



2125

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.48 Adult Care Services. The county council welcomes the requirement in this policy that all new housing be designed and built to comply with M4(2) Building Regulations, unless they are built to comply with M4(3) and a minimum of 10% of new homes to comply to M4(3) building regulations.  
5.49 The requirement within this policy that developments of 10 or more homes will have at least 10% that are wheelchair adaptable, is also welcomed. It should be noted that PANSI data (accessed in January 2021) predicts that by 2035 there will be 3,109 adults living in Watford with impaired mobility. The Hertfordshire HIA, which administers disabled adaptations on behalf of Watford, has had 562 enquiries for adaptations to homes within Watford since 2018. This indicates that current housing stock is often unsuitable for people who have disabilities.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HO3.11: Private and Communal Outdoor Amenity Space

1863

Comment

Respondent: Watford Central Town Residents Association

## Summary:

We agree with the sentiments of this policy but believe that far more should be said in reflection of the past year and the intrinsic importance of good quality open space for well-being. This policy should reaffirm what is stated in the Residential Design Guide (7.3.23) in terms of what the minimum acceptable communal open space should be, in order to provide clarity on what is expected, and to avoid accusations of having rowed back on previously higher standards.

## Full text:

We agree with the sentiments of this policy but believe that far more should be said in reflection of the past year and the intrinsic importance of good quality open space for well-being. This policy should reaffirm what is stated in the Residential Design Guide (7.3.23) in terms of what the minimum acceptable communal open space should be, in order to provide clarity on what is expected, and to avoid accusations of having rowed back on previously higher standards.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1992

Comment

Respondent: The Retirement Housing Consortium  
 Agent: The Retirement Housing Consortium

## Summary:

Support/Object/Comment not ticked on form.

As drafted, the Policy proposes a set open space requirement over all forms of housing and therefore does not recognise the very different characteristics of residents of specialised housing for older people and in turn the very different and much reduced amenity space requirements that will be based on quality communal spaces rather than private spaces. To apply this approach to such schemes for which the preferred locations are close to High Street and therefore hard to come by and often highly constrained will inhibit their delivery

## Full text:

Form received via email

## Change suggested by respondent:

The Policy should make clear that the policy requirement does not extend to specialised housing for older people and that such proposals will be considered on a case by case basis

Legally Yes  
 compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

## A Strong Economy

1839

Support

Respondent: Hertsmere Borough Council

## Summary:

Watford's Local Plan makes provision for 111,175sqm of office floorspace and 40,759sqm of industrial floorspace. Hertsmere understands that limited land supply makes it difficult to meet the requirements for industrial floorspace. The overprovision of office floorspace needs to be balanced with wider needs for all types of employment space across the Functional Economic Market Area.

## Full text:

Watford's Local Plan makes provision for 111,175sqm of office floorspace and 40,759sqm of industrial floorspace. Hertsmere understands that limited land supply makes it difficult to meet the requirements for industrial floorspace. The overprovision of office floorspace needs to be balanced with wider needs for all types of employment space across the Functional Economic Market Area.

Hertsmere accepts that Watford is an important employment hub however evidence suggests that the need for office uses exists elsewhere within the SW Herts area. The strategy should look to also provide suitable employment facilities across South West Herts, reflecting the demand for employment space close to all areas of population.

## Change suggested by respondent:

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Legally Not specified  
 compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jm>

**Policy EM4.1: Providing New Employment**

1792

Comment

Respondent: R Kowalewski

**Summary:**

These seem to new good words that are not being borne out in reality. I have seen a lot of office space demolished and replaced by housing in Watford in recent years. Even on Clarendon Road!

Similarly industrial units are also in some areas being turned in to apartments. Opposite The Range as an example.

Watford lacks both office space and is a shadow of its former industrial self.

More effort must be put into preserving the remaining industrial. DO not allow any more change of use from office or industrial use into residential AT ALL - NO EXCEPTIONS.

**Full text:**

These seem to new good words that are not being borne out in reality. I have seen a lot of office space demolished and replaced by housing in Watford in recent years. Even on Clarendon Road!

Similarly industrial units are also in some areas being turned in to apartments. Opposite The Range as an example.

Watford lacks both office space and is a shadow of its former industrial self.

More effort must be put into preserving the remaining industrial. DO not allow any more change of use from office or industrial use into residential AT ALL - NO EXCEPTIONS.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: I cannot remember

Appear exam: Not specified

Attachments: None

1829

Object

Respondent: Mrs Fran Clark

**Summary:**

This does not take into account the pandemic. Overall, as is said so many times this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

Train transport is being reduced by 30%

**Full text:**

This does not take into account the pandemic. Overall, as is said so many times this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

Train transport is being reduced by 30%

**Change suggested by respondent:**

Proposals for new employment floorspace will be supported after consideration of any identified employment need in the borough and Functional Economic Market Area.

The Council will seek to support economic growth in the borough and the wider Functional Economic Market Area where possible by:

Protecting existing employment land from inappropriate development;

Reviewing the need for the growth of new businesses and industries;

Supporting new models and ways of working, including more flexible working practices which will not require new buildings;

Ensuring employment land is reviewed as to changing use to residential to make the most effective use of land; and

Attracting new inward investment.

Legally No  
compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1910

Support

Respondent: Three Rivers District Council

## Summary:

It is recognised that Watford Borough Council may not be able to meet all of the employment needs in the Borough. The Economic Study Update provides individual District/Borough breakdown of employment needs, however it states these are only indicative and that employment needs are expected to be met across the FEMA. As such, Watford may be able to assist neighbouring authorities with office provision, whilst neighbouring authorities may be able to assist Watford with industrial/warehouse provision. Ongoing DtC between the SW Herts authorities will result in an agreement on the best way to distribute employment uses across the FEMA.

## Full text:

It is recognised that Watford Borough Council may not be able to meet all of the employment needs in the Borough. The Economic Study Update provides individual District/Borough breakdown of employment needs, however it states these are only indicative and that employment needs are expected to be met across the FEMA. As such, Watford may be able to assist neighbouring authorities with office provision, whilst neighbouring authorities may be able to assist Watford with industrial/warehouse provision. Ongoing DtC between the SW Herts authorities will result in an agreement on the best way to distribute employment uses across the FEMA.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1982

Support

Respondent: St Albans City &amp; District Council

Agent: St. Albans City &amp; District Council

## Summary:

SADC notes that WBC considers that it cannot meet its own employment need in full. In particular, WBC have an under-provision in industrial floorspace (paragraph 4.4). As stated at previous Duty to Cooperate meetings SADC may be in a position to support South West Herts Authorities in meeting the shortfall in industrial land based on the current South West Herts Economic Study Update (2019). However, SADC Local Plan is at early stages and no decisions have yet been made. We generally support the commitment in in Strategic Policy EM4.1 Providing New Employment to work with the South West Herts Authorities in meeting the shortfall.

SADC, however, do raise a concern that WBC consider that the undersupply of industrial floorspace is compensated for through an overprovision of office space. Office space cannot readily compensate for industrial floorspace.

## Full text:

Received via email

## Change suggested by respondent:

SADC, however, do raise a concern that WBC consider that the undersupply of industrial floorspace is compensated for through an overprovision of office space. Office space cannot readily compensate for industrial floorspace.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>  
St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

Respondent: Dacorum Borough Council

Summary:

Dacorum Borough Council broadly welcome the strong economic growth planned for through the new Watford Local Plan. Dacorum welcomes in particular the emphasis on delivering significant new office floorspace which will likely make an important contribution towards addressing predicted shortfalls elsewhere in the wider South West Hertfordshire area. This is appropriately reflected in both the supporting text and strategic policy of the Local Plan. On employment needs, there are still some additional steps which should be addressed through the duty to cooperate and these are identified in some of the evidence supporting the new Local Plan and are expanded on below. The most up-to-date evidence for future employment needs in Watford is set out in the South West Herts Economic Study Update (2019). This study provides an update to existing work published in 2016 and forms the basis for identifying future employment needs across the functional economic market area (FEMA), which consists of Dacorum, Hertsmere, St. Albans, Three Rivers and Watford. The Update recognises that the FEMA is "based on evidence of strong commuting and migration relationships and shared leisure, retail and public sector catchment areas" (page i). In considering future growth scenarios for the area, the study concludes that the FEMA will need to identify a sufficient supply of land to deliver 188,000 sq.m of additional office space between 2018 and 2036, equating to around 11,000 full time equivalent (FTE) jobs in that same period. For Watford, the study determines an overall requirement of 37,600 sq.m of office space to be delivered, however it recognises that this figure "should only be treated as a guide" (page vi). For industrial space, the study identifies a need for 481,500 sq.m to be delivered between 2018 and 2036 (152,000 sq.m of B1c/B2 and 329,500 sq.m of B8 space), capable of supporting a further 7,400 new FTEs. For Watford, the study identifies a requirement for industrial floorspace of 98,400 sq.m, again as a guide. For both office and industrial floorspace requirements, the study recommends that the final decision on land requirements for industrial floorspace in each authority's local plan should be informed by duty-to-cooperate discussions which take account of the availability of land for new development across the FEMA. Dacorum note that the Watford Local Plan, through strategic policy EM4.1, seeks to allocate/safeguard sufficient employment land to deliver 111,175 sq.m of office floorspace and 40,759 sq.m of industrial floorspace. These figures are based on the outputs of the Housing and Economic Land Availability Assessment (2021), and recognises the over/undersupply in floorspaces relative to the 2019 economic study. The Land Availability Assessment also notes at paragraph 4.15 that "further discussions through the duty to cooperate process are required to identify the distribution". The need for duty to cooperate discussions on the distribution on employment land is further reinforced as a key recommendation/ conclusion in paragraph 5.9. Dacorum Borough Council considers it important that outcomes are agreed by the SW Herts authorities (to which the 2019 study relates) with respect to the overall distribution of employment land and how each Local Plan will contribute towards meeting future employment growth across the FEMA. As such, Dacorum Borough Council consider that, in accordance with national policy and guidance, a Statement of Common Ground is agreed with all the South West Herts Authorities confirming this position. Dacorum Borough Council recognises that cross boundary discussions are ongoing with an expectation that a Statement of Common Ground will be secured in due course. Such an agreement will need to be completed prior to any formal submission of the Local Plan (Regulation 22) in order for the plan to be considered to have met its legal obligations with respect to the Duty.

Full text:

n/a

Change suggested by respondent:

As highlighted above, any potential modifications would be addressed through a future Statement of Common Ground, to be agreed by the relevant authorities in South West Hertfordshire, and prior to the formal submission of the Watford Local Plan for examination.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: This matter has been raised through regular duty to cooperate meetings with Watford Borough Council and the wider South West Hertfordshire authorities.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Dacorum Borough Council - form\_Redacted - <https://watford.oc2.uk/a/zc>

Dacorum Borough Council - letter\_Redacted - <https://watford.oc2.uk/a/zd>

2020

Comment

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy focuses on industrial and office investment across the borough and seeks to create 11,500 new employment opportunities. The policy aims to do this by; protecting existing employment land; encouraging the growth of new businesses and industry; supporting alternative working methods; intensifying employment land; and, attracting new inward investment.

Lidl are supportive of investment in the borough, however, it is considered that the policy, as currently drafted, does not adequately accommodate for the changes in the Use Class Order.

It is suggested that the changes to the Use Class Order represents recognition, from national government, that retail development represents a meaningful positive contribute to the provision of employment opportunities.

Given this, it is considered that Policy EM4.1 should acknowledge that retail investment can be a key contributor to the borough's employment targets.

Moreover, it is considered that the convenience retail sector has shown considerably more resilience in the face of the Covid-19 pandemic than other sectors, which have generally seen a substantial downturn. This cements the argument for retail being considered more heavily for its employment benefits.

Given the above, it is considered that Policy EM4.1 should be amended to more accurately reflect the changes brought about by the revised Use Class Order, and allow for a more flexible approach to the use of designated employment sites, taking into account the employment benefits of alternative uses.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Given the above, it is considered that Policy EM4.1 should be amended to more accurately reflect the changes brought about by the revised Use Class Order, and allow for a more flexible approach to the use of designated employment sites, taking into account the employment benefits of alternative uses.

Legally No  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

## Designated industrial areas

1793

Support

Respondent: R Kowalewski

## Summary:

Permitted development is something that cannot be challenged but surely the council can block "change of use"? The developer can build all he wants but could not use the buildings for anything other than industrial use. Watford MUST keep what industrial space it has left. Why is Germany so successful? Because as a country they have retained industrial output, unlike the UK.

## Full text:

Permitted development is something that cannot be challenged but surely the council can block "change of use"? The developer can build all he wants but could not use the buildings for anything other than industrial use. Watford MUST keep what industrial space it has left. Why is Germany so successful? Because as a country they have retained industrial output, unlike the UK.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

## Policy EM4.2: Designated Industrial Areas

1895

Object

Respondent: Reach PLC  
Agent: Lichfields

## Summary:

Reach PLC object to the finalised allocation is set out below:

- The allocation does not reflect the mix of business uses currently on site as there is a substantial office function;
- The allocation does not consider the specific requirements of the property as a locally listed building, its setting and context in the future;
- The allocation does not reflect what is in the immediate area; and
- The allocation is more restrictive than that which was previously consulted on.

## Full text:

Reach PLC, objects to the allocation of land south of the A41 and immediately north of the Asda in the area known as the Dome Roundabout being allocated for purely industrial use on the Proposals Map (Designated Industrial Area of Sandown/Greycaine/Odhams) and the corresponding policy, Policy EM4.2: Designated Industrial Areas.

Reach plc is the largest national and regional news publisher in the UK with a leading portfolio in Ireland. Their portfolio includes the Daily Mirror, Daily Express, Daily Star, Daily Record and Sunday People as well as leading celebrity and entertainment magazine OK! They also publish leading regional titles including the Manchester Evening News, Liverpool Echo, Birmingham Mail, Western Mail and Bristol Post.

It is our view that the allocation of this site as a "Designated Industrial Site" does not fully reflect the current use of the site and is too restrictive. The Former Odhams Press Hall, now Reach Printing Services (Watford) Ltd, St Albans Rd, Watford is the property to which this representation relates. Our client notes that whilst an objection is lodged against the allocation of the site for industrial uses only, it not because they have any intention of vacating the property. Rather our client are looking to protect their position should circumstances change during the plan period - up to 2036 - and rectify what seems to be unjustifiable policy constraints that have been introduced new to the Submission Draft Plan. Reach plc as the building's owners are concerned to ensure that any future changes to the needs of a publishing business can be accommodated and ensure the flexibility exists in the plan to ensure the continued survival of a locally listed building.

The area of concern is the land south of the A41 and immediately north of the Asda in the area known as the Dome Roundabout. Please see the attached document which includes an excerpt from the Proposed Local Plan Proposals Map for clarification. Under the finalised Proposed Plan the area is covered under Policy EM4.2: Designated Industrial Areas, with the specific building being recognised as a locally listed building and covered by Policy HE7.3: Non-Designated Heritage Assets. This is a change from the First Draft Plan that identified this land via Policy E5.1 as a "Designated Employment Site". The First Draft Plan also identified this area as a Strategic Development Area. The land adjacent is now allocated as a site for the delivery of mixed use, Policy SA13.1: Allocated Sites for Delivery and it is important that the allocation of this site is considered in this context.

Reach plc object to the finalised allocation is set out below:

- The allocation does not reflect the mix of business uses currently on site as there is a substantial office function;
- The allocation does not consider the specific requirements of the property as a locally listed building, its setting and context in the future;
- The allocation does not reflect what is in the immediate area; and
- The allocation is more restrictive than that which was previously consulted on.

It is recognised that the print hall element of the property and the storage and distribution function of the building are currently industrial uses but a good proportion of this building is in office use and this is important given the recent changes to the Use Class order. The Office element of the building is clearly now Class E(g) and this does not sit well within an allocation that is solely for industrial uses. As stated above Reach plc have no intention of changing their operation on site in the short to medium term but recognise the long term nature of the plan and wish to ensure that any policies associated with this site reflect a reasonable future scenario. It is Reach plc's view that by limiting the future use of this site to Industrial uses only as now defined by the Use Class Order as a result of Policy EM4.2: Designated Industrial Areas this will not ensure a justifiable future for this site beyond its current use. This is explored further below.

Former Odhams Press Hall is a locally listed building, the property is valued by the local community and is a part of Watford's heritage that it is important to protect into the future. It is currently protected as part of Reach plc's operations but it is important that the policies of the new plan protect the future and setting of this locally important building. We do not believe that an industrial designation, which is much more narrowly defined in the revised Use Class Order, will do that should the building come up for redevelopment at some point in the future.

Industrial uses could have a significantly detrimental effect on the setting and the preservation of this building. In order to protect listed buildings and allow their conversion to new uses flexibility is required and the current designation the opportunities are far too narrow and could result in a detrimental impact on this asset in the future.

A review of the proposed Proposals Map shows that the site is isolated from the wider industrial area, largely segregated by the adjacent retail and the railway line. There is no logical reason to allocate this site for industrial use. Yes, it is part of an industrial use now but that doesn't mean other industrial uses would be suitable and acceptable for this site in the future given the adjacent allocation for mixed use development and the fact that the site is occupied by a locally listed building.

It is our view that rather than being a designated industrial area it would be better suited to be included in the MU23 allocation - Land at Asda Dome Roundabout allocation for mixed use development. This would not change its current status nor Reach plc's commitment to the site as their printworks but it would ensure that should it become available for redevelopment sometime in the future a suitable new use could be found that would sit appropriately with the adjacent mix of uses, enabling a suitable future to be found for the locally listed building that wouldn't be to its detriment. Furthermore, this is a prominent site on the A41 and future uses should also be considered in this context.

Policy E5.1 as set out in the First Draft Local Plan, previously consulted on, designated this site as an "employment" site not as an "industrial site". This is a much less restrictive allocation and included for B1, B2 and B8 uses. With B1 uses now becoming E(g) uses the Council have without justification dropped this use from the designation without proper consideration. We object to this overly restrictive designation for a site that is clearly stand alone, remote from other industrial allocations and adjacent to an area to be allocated for mixed use development. There is no justification provided for this and this is not a sound approach.

## Change suggested by respondent:

Based on the above Reach PLC propose the following modifications to ensure the soundness of the policy.

Consideration must be given to current uses which include a substantial office element and what would be suitable for the future. As set out above this site does not warrant an "industrial" only allocation as this neither reflects its current use nor what would be desirable in the future.

Rather this site would be much better suited to a "mixed use" designation and we would propose the extension of the already identified MU23 designation to include the Reach plc land and buildings. This is highlighted in Figure 2, red, below.

The Reach plc land and buildings are clearly separate from the adjacent industrial areas and there is no justification to include them in that designation.

Alternatively, we would support the removal of the "industrial" land designation without affording the site a subsequent allocation, leaving it as 'white land'. This would allow any potential development to be assessed against all other relevant local plan policies, ensuring a sustainable outcome for the locally listed building should it become available for a change of use in the future.

On this basis, we require the deletion of this site from the proposals map as an industrial designation and either the extension of the mix use designation to the south to include this area as illustrated on Figure 2 or no further allocation.

Related to this will be changes to the Final Draft Plan:

- Figure 1.2 Key Diagram
- Figure 4.1 Areas designated for office or industrial use
- Figure 13.1 Allocated sites for delivery
- Table 13.2 Mixed use sites, Site MU23 Land at Asda, Dome Roundabout – the key plan needs amended to include the Reach plc landholding and also the text needs amended to specifically state that this site is considered suitable for mixed use development to be consistent with the other entries in this table.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: Our participation in the hearing session(s) would be necessary as the designations significantly restricts the potential use of the site over the lifetime of the plan. In addition it is not necessarily compatible with surrounding designations and or with the existing uses which have a significant office component.

Attachments: Reach PLC - Watford Rep 1.pdf - <https://watford.oc2.uk/a/kd>

1924

Support

Respondent: Three Rivers District Council

## Summary:

Resisting a loss of industrial employment uses is supported as there are opportunities for these uses in the Borough.

## Full text:

Resisting a loss of industrial employment uses is supported as there are opportunities for these uses in the Borough.

## Change suggested by respondent:

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None



2126

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.50 Minerals & Waste Planning. The designated industrial areas within this policy that are shown on the Policies Map, also cover the following Employment Land Areas of Search (ELAS) that are identified in the adopted Waste Site Allocations DPD:

- ELAS221 Watford Business Park
- ELAS213 Odhams and Sandown
- ELAS214 Greycaine

5.51 These ELAS are identified as having potential compatibility with waste management uses. Whilst the Waste Local Plan does not rely on the need for all land within ELAS across the county for the delivery of waste capacity, the cumulative loss of ELAS to non-waste uses reduces the likelihood of such sites coming forward.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Whilst the revised Draft Waste Local Plan, which was published for consultation in January 2021, does not propose to identify specific employment land that may be suitable for waste management uses, it is requested that the above listed ELAS are shown on the Policies Map.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy EM4.3: Office development

1794

Support

Respondent: R Kowalewski

## Summary:

If this is the policy, than why have we seen non-office development in Clarendon road in the recent past???? Again words not reflecting what is going on. Also the council need to make Watford more attractive to bigger businesses. A lot of the office space in Clarendon road is "rent by the hour"

## Full text:

If this is the policy, than why have we seen non-office development in Clarendon road in the recent past???? Again words not reflecting what is going on. Also the council need to make Watford more attractive to bigger businesses. A lot of the office space in Clarendon road is "rent by the hour"

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Not sure

Appear exam: Not specified

Attachments: None

1925

Support

Respondent: Three Rivers District Council

## Summary:

This policy is consistent with national policy and the Economic Study Update and is therefore supported.

## Full text:

This policy is consistent with national policy and the Economic Study Update and is therefore supported.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1951

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The policy states that proposals for development of new office uses outside the Clarendon Road Primary Office Location must support the Office Development Hierarchy. Where these are 250 sqm (gross) or more, they must be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no significant adverse impact on the office function of Clarendon Road, and that good accessibility by walking, cycling and public transport is provided or available.

Proposals for supporting uses under 100 sqm will be supported where their job generating potential can clearly be demonstrated. This should be assessed on a case by case basis.

We challenge the requirement for an impact test for office development in the town centre. Offices are a main town centre use and so should be supported and should not therefore not be the subject of an impact test in line with the NPPF and the 'town centre first approach'. Regardless, the 250sqm cap seems very low and it is questioned how this figure has been formulated and we would request the reasoning behind this figure. It is suggested the policy wording be amended to the following:

"Proposals for development of new office uses outside the Clarendon Road Primary Office Location or outside Watford Town Centre must support the Office Development Hierarchy. Where these are 250sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no significant adverse impact on the office function of Clarendon Road, and that good accessibility by walking, cycling and public transport is provided or available."

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

Regardless, the 250sqm cap seems very low and it is questioned how this figure has been formulated and we would request the reasoning behind this figure. It is suggested the policy wording be amended to the following:

"Proposals for development of new office uses outside the Clarendon Road Primary Office Location or **outside Watford Town Centre** must support the Office Development Hierarchy. Where these are 250sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no significant adverse impact on the office function of Clarendon Road, and that good accessibility by walking, cycling and public transport is provided or available."

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2021

Comment

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy outlines the desired land use for the Primary Office location at Clarendon Road and states that any development at the site should not lead to a net loss in office space, unless it can be demonstrated that the site is no longer required for office use. The policy goes on to state that mixed-use development (including residential and commercial uses) will be accepted where the amount of office space is maintained. Lidl are supportive of this policy and agree that mixed-use development should be permitted in the area.

However, Lidl would like to stress the need for flexibility in planning policy and decision making. It is proposed that a reduction in office floorspace does not necessarily represent a reduction in the economic potential or function of the site, as measures such as office sharing and home working can allow a small floor plate to be utilised more effectively than 'traditional' office uses.

Given this, it is suggested that any mixed-use development (and indeed solely office development) on designated office sites is assessed based on the number of jobs created, as opposed to the floorspace created.

Moreover, this measure of potential employment opportunities should take into account all employment generating land uses, including retail, in line with the changes to the Use Class Order.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Given this, it is suggested that any mixed-use development (and indeed solely office development) on designated office sites is assessed based on the number of jobs created, as opposed to the floorspace created.

Moreover, this measure of potential employment opportunities should take into account all employment generating land uses, including retail, in line with the changes to the Use Class Order.

Legally No  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

2127

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.52 Transport. The designation of Clarendon Road as a primary office location is supported. As this is in a highly accessible location, it is advised that the policy should be modified by including the following text that minimises on-site parking provision given its highly sustainable nature and presence of nearby public car parks.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"On-site parking provision should be minimised, given its location within a highly accessible area."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2128

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Economic development outside of designed employment areas

5.53 Transport. The county council will support office locations outside the Core Development Areas where there is good accessibility to them by walking, cycling and public transport, in line with the county council's adopted LTP4.

## Full text:

Form and letter received via email

## Change suggested by respondent:

.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Policy EM4.4: Economic Development Outside Designated Employment Locations**

2022

Support

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

**Summary:**

As currently drafted, Policy EM4.4 sets out the councils approach to the loss of 'traditional' employment sites outside of the designated employment designations, which allows for the loss of employment uses, provided that the loss can be justified in line with a set criteria.

Lidl support this policy in its entirety and believes that the proposed criteria allows for enough flexibility to ensure that potential investment can come forward.

**Full text:**

Form and letter received via email

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

**Policy EM4.5: Different ways of working**

2129

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

**Summary:**

5.54 Transport. Flexible workspace and communal offices should (where possible) be located where there are existing facilities (e.g. shops, cafes) and good transport connectivity. Opportunities should be taken to develop such spaces as part of evolving transport hubs.

**Full text:**

Form and letter received via email

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## A Vibrant Town

1795

Comment

Respondent: R Kowalewski

## Summary:

Applications are going in for development of apartments over the "night club area" of Watford. These must only be allowed with a covenant that residents cannot in the future demand club closure on account of noise. That has happened too many times in the past. Inappropriate development (usually) around an industrial site which is later forced to close on account of residents complaints. Don't let such a situation develop here.

## Full text:

Applications are going in for development of apartments over the "night club area" of Watford. These must only be allowed with a covenant that residents cannot in the future demand club closure on account of noise. That has happened too many times in the past. Inappropriate development (usually) around an industrial site which is later forced to close on account of residents complaints. Don't let such a situation develop here.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Not sure

Appear exam: Not specified

Attachments: None

1840

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere recognises the importance of Watford as a sub-regional retail centre. It is therefore important that any development gives due consideration to impact on existing linkages between Watford and the wider area, and the need for improved accessibility for those travelling from slightly further afield. Furthermore Bushey High Street is in close proximity to Watford and we ask that any impact assessment fully considers the potential implications on all local facilities not just those within the Borough Council boundary.

## Full text:

Hertsmere recognises the importance of Watford as a sub-regional retail centre. It is therefore important that any development gives due consideration to impact on existing linkages between Watford and the wider area, and the need for improved accessibility for those travelling from slightly further afield. Furthermore Bushey High Street is in close proximity to Watford and we ask that any impact assessment fully considers the potential implications on all local facilities not just those within the Borough Council boundary.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jn>

2030

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

Paragraph 5.9 of the Final Draft Local Plan refers to the potential for redevelopment of out-of-centre retail parks to make better use of land by providing new residential development alongside appropriate retail that is easily accessible and well integrated with the surrounding area. This wording should be expanded to include leisure destinations such as Woodside to recognise the potential for intensification and the optimisation of land.

## Full text:

Letter and form received via email

## Change suggested by respondent:

This wording should be expanded to include leisure destinations such as Woodside to recognise the potential for intensification and the optimisation of land.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>  
Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>  
Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2130

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.55 Transport. Redevelopment of out-of-centre retail parks to make better use of land is supported. In addition, recognition of the potential to redevelop sites such as Waterfields and Lower High Street and repurpose the road network is welcomed.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## The changing nature of retail in Watford

1832

Comment

Respondent: Mrs Fran Clark

## Summary:

This does not take into account the Covid pandemic which has halted any economic expansion for the last year and will be slow to return to anything like the fortunes of 2019.

There will not be a need for the nearly 15,000 new homes by 2036 - this should be reduced to 10,500 as there will not be the proposed increase in population. Or there should be at least a 2 year delay in the plan.

## Full text:

This does not take into account the Covid pandemic which has halted any economic expansion for the last year and will be slow to return to anything like the fortunes of 2019.

There will not be a need for the nearly 15,000 new homes by 2036 - this should be reduced to 10,500 as there will not be the proposed increase in population. Or there should be at least a 2 year delay in the plan.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Policy VT5. 1: Supporting Vibrant Retail Centres

1952

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

The Plan recognises that the retail environment is changing, with traditional retail declining and service sectors, such as food and drink, health and fitness, and hotels increasing in prominence.

The Plan emphasises the importance of retaining flexibility in retail policy to encourage footfall with popular uses, such as leisure and food and drink.

The Council is seeking to enhance the offer for families in the town and create a balanced centre that meets the needs of all residents and users at different times of the day and night. New proposals for cultural and social uses will be encouraged as appropriate town centre uses that can add vibrancy and activity. It is anticipated that a building may be in a number of different uses concurrently or at different times of the day.

In relation to the out-of-centre retail parks in Watford, the draft Plan advises that redevelopment of these sites, such as Waterfields and Lower High Street, should make a better use of land by providing new residential development alongside appropriate retail that is easily accessible and well-integrated with the surrounding area (as referenced in the Colne Valley Strategic Development Area above). In this chapter the draft Local Plan advises that the consolidation of retail floor space in such locations may be appropriate to support additional economic spend or investment in the Town Centre, Watford's primary retail destination.

Our client is supportive of the overall vision of Strategic Policy VT5.1: Supporting a Vibrant Retail Centre but stress the importance of the need to protect the town centre. Any additional town centre floorspace in edge or out of town centre locations should be assessed against the sequential and impact tests of the NPPF as set out at paragraph 86 and paragraph 89 and this should be included in the policy text. This is to ensure conformity with national planning policy. It is recommended that the policy be amended to the following:

“Where appropriate, a limited amount of retail development will be supported on strategic sites to provide for the new community, subject to: compliance with the Sequential Test; proposals being of an appropriate scale; provision of good accessibility by walking, cycling or public transport; and there being no significant adverse impact on the vitality and viability of the Town Centre or Local Centres in the vicinity. Any additional town centre floorspace of over 250 sqm should be assessed against the impact tests”

At paragraph 5.12, the draft Plan comments on the retail hierarchy, however, the description of the town centre includes reference to a regional centre rather than a sub-regional centre. This needs to be amended.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

It is recommended that the policy be amended to the following:

“Where appropriate, a limited amount of retail development will be supported on strategic sites to provide for the new community, subject to: compliance with the Sequential Test; proposals being of an appropriate scale; provision of good accessibility by walking, cycling or public transport; and there being no significant adverse impact on the vitality and viability of the Town Centre or Local Centres in the vicinity. **Any additional town centre floorspace of over 250 sqm should be assessed against the impact tests”**

At paragraph 5.12, the draft Plan comments on the retail hierarchy, however, the description of the town centre includes reference to a **regional centre** rather than a **sub-regional centre**. This needs to be amended.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Appearance at the examination  
Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>  
WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>  
WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2023

Comment

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy sets out that town centre uses will be directed towards the defined District and Local Centres, provided that they are acceptable in terms of scale and function. Furthermore, the policy states that Watford Town Centre will be predominantly used for comparison retail, leisure, entertainment, civic and cultural activities.

The policy outlines that a 'town centre first' approach will be taken when making planning decisions, with limited retail development outside of the town centre, provided the proposal meets the sequential test and other material considerations. Additionally, retail development to provide local good and service local communities is considered to be appropriate through the policy.

Throughout the whole policy, great emphasis is put on ensuring the vitality and viability of designated centres. Convenience retail patterns over the past 10-20 years have changed substantially; medium to large store formats have become more popular and prevalent, and as such convenience retail has moved out from small format town/city centre locations to larger sites in out or edge of centre locations. Given that many customers now perform weekly shops, it is considered that this larger format in edge or out of centre locations more effectively meets the needs of the consumer.

With this in mind, it is considered that the town and city centres no longer perform a significant convenience retail function, and focus more heavily on comparison retail, leisure and services. Subsequently, it is considered that new edge or out of centre convenience retail development is unlikely to have a substantial impact on the vitality or viability of town centres. Moreover, it is proposed that edge and out of centre convenience retail almost exclusively impacts on other edge or out of centre convenience retail.

Policy VT5.1 does not list convenience retail as a primary town centre use, suggesting that Watford Council agree, at least in part, with the above assessment. Moreover, the policy allows for limited out of centre retail development, provided that the site is compliant with the Sequential Test and other material considerations.

However, the local planning authority still require a 'town centre first' approach to be taken for all retail and other town centre uses.

Overall, Lidl are supportive of the policy, and believe that it allows for a suitable level of flexibility and acknowledges the prevailing convenience retail pattern. However, it is considered that somewhere in the policy, the councils approach to medium to large convenience retail should be explicitly outlined.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Overall, Lidl are supportive of the policy, and believe that it allows for a suitable level of flexibility and acknowledges the prevailing convenience retail pattern. However, it is considered that somewhere in the policy, the councils approach to medium to large convenience retail should be explicitly outlined.

Legally No  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>



2029

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

L&G's previous representations to the Preferred Options (First Draft) Local Plan requested that the Local Plan make specific reference to the fact that Watford is served by a number of retail and leisure parks which provide vital large format accommodation, land uses and occupiers not found within the designated centres.

Despite this request the Final Draft Local Plan still remains relatively silent on the role that such facilities play in contributing to the overall retail and leisure offer within the Borough. Whilst paragraph 5.9 of the Final Draft Local Plan does acknowledge the existence of "a number of out-of-centre retail parks in Watford" there is no specific reference made to Woodside being the only recognised out-of-centre 'leisure' destination in Watford.

L&G would request that Woodside is recognised to form part of the established retail and leisure hierarchy set out at Table 5.1 of the Final Draft Local Plan.

Woodside should be formally identified as an 'out of centre commercial destination' which performs a role in supporting the wider retail and leisure hierarchy. That is that it complements the offering found within designated retail centres and ensures that Watford has a comprehensive offer to meet the requirements of its immediate and wider catcher area population.

Paragraph 5.9 of the Final Draft Local Plan refers to the potential for redevelopment of out-of-centre retail parks to make better use of land by providing new residential development alongside appropriate retail that is easily accessible and well integrated with the surrounding area. This wording should be expanded to include leisure destinations such as Woodside to recognise the potential for intensification and the optimisation of land.

The potential for intensification or, in some cases, comprehensive redevelopment, of such facilities should also be incorporated into Strategic Policy VT5.1 or a separate new policy. This would ensure that the Local Plan recognises the potential that some existing commercial sites within the Borough provide in terms of land supply and opportunities for diversification through a greater mix of uses.

It is noted that the retail and leisure sector has experienced a material change in recent years which has been further accelerated by the current pandemic. A number of further changes to the overall function of these sectors is projected in the short and longer term given the different market forces and change in consumer trends. It is anticipated that demand for retail and leisure floorspace within the Borough, including at Woodside, will change (either in terms of overall demand, type of premises or size of requirements).

The policy framework should support the introduction of a mix of uses including retail, leisure and residential at sites such as Woodside to support the function of the existing floorspace and ensure they can adapt to the changing habits and needs of the consumers they serve. This accords directly with the objective of national policy to ensure that local plans apply a presumption in favour of sustainable development to meet development needs of the area and ensure they are sufficiently flexible to adapt to rapid change.

## Full text:

Letter and form received via email

## Change suggested by respondent:

Various; see summary/letter. See also comments for paras 5.9 and 5.11.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>  
Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>  
Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

## Retail hierarchy

1926

Support

Respondent: Three Rivers District Council

## Summary:

The proposed retail hierarchy is supported.

## Full text:

The proposed retail hierarchy is supported.

## Change suggested by respondent:

.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

2031

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

L&G's previous representations to the Preferred Options (First Draft) Local Plan requested that the Local Plan make specific reference to the fact that Watford is served by a number of retail and leisure parks which provide vital large format accommodation, land uses and occupiers not found within the designated centres.

Despite this request the Final Draft Local Plan still remains relatively silent on the role that such facilities play in contributing to the overall retail and leisure offer within the Borough. Whilst paragraph 5.9 of the Final Draft Local Plan does acknowledge the existence of "a number of out-of-centre retail parks in Watford" there is no specific reference made to Woodside being the only recognised out-of-centre 'leisure' destination in Watford.

L&G would request that Woodside is recognised to form part of the established retail and leisure hierarchy set out at Table 5.1 of the Final Draft Local Plan.

Woodside should be formally identified as an 'out of centre commercial destination' which performs a role in supporting the wider retail and leisure hierarchy. That is that it complements the offering found within designated retail centres and ensures that Watford has a comprehensive offer to meet the requirements of its immediate and wider catcher area population.

## Full text:

Letter and form received via email

## Change suggested by respondent:

L&G would request that Woodside is recognised to form part of the established retail and leisure hierarchy set out at Table 5.1 of the Final Draft Local Plan.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>  
Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>  
Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

## Policy VT5.2: Watford Town Centre

1953

Support

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

Policy VT5.2: Watford Town centre, outlines the general considerations when considering applications that require permission for town centre uses including that town centre uses will be supported where they maximise the proportion of ground floor fronting a street as positive and / or active frontage and support the flexibility and adaptability to future proof for changing uses.

Our client is supportive of this policy in particular the need for future proofing development for changing uses.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>  
WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>  
WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

## Policy VT5.3: Local Centres

2019

Object

Respondent: McDonald's Restaurants Ltd  
Agent: McDonald's Restaurants Ltd

## Summary:

Please see letter for full details.

We have considered proposed Policy VT5.3 with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date.

1.2 Within these broad points we have the following policy objections to draft Policy VT5.3:

- A. The 400m exclusion zone is inconsistent with national planning policy
  - B. The policy is inconsistent, discriminatory and disproportionate.
  - C. Examination of other plans have found similar policy approaches to be unsound.
  - D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.
- 1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy VT5.3 Point F, which imposes a blanket ban on restaurants that include an element of hot food takeaway within 400-metres walking distance of a primary school entrance.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Point F is unsound it should be deleted from the plan.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: McDonalds\_Redacted - <https://watford.oc2.uk/a/mp>

2131

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.56 Transport. It is suggested that the following criteria is added to this policy, in order to ensure that potential communal office facilities and co working spaces in local centres are well connected to transport services.

## Full text:

Form and letter received via email

## Change suggested by respondent:

i) Communal office facilities and co working spaces in local centres are well connected to transport services.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## An Attractive Town

1841

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's proposals for high density development within Core Development areas, and recognises the potential benefits that high density development can bring. Nevertheless, suitable measures should be included to ensure that a high level of accessibility is retained for those travelling to or from places outside of Watford.

## Full text:

Hertsmere supports Watford's proposals for high density development within Core Development areas, and recognises the potential benefits that high density development can bring. Nevertheless, suitable measures should be included to ensure that a high level of accessibility is retained for those travelling to or from places outside of Watford.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jy>

## Policy QD6.1: Design for an Attractive Town

1851

Comment

Respondent: Planning &amp; Development Associates Ltd

## Summary:

This representation identifies an omission and inconsistency in Figure 6.2

Figure 6.2 identifies all designated area of Open Space and Green Infrastructure and in paragraph 6.4 states that "Protected areas include all parks and open spaces (detailed map at Figure 9.1)". This is not only incorrect because the areas in Blackwell Drive are omitted, but Figure 6.2 needs to be amended to include the additional areas proposed in this representation and as shown on the proposals map.

## Full text:

This representation identifies an omission and inconsistency in Figure 6.2

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y5>

1864

Comment

Respondent: Watford Central Town Residents Association

## Summary:

For the section on Established Areas, 'gentle uplift' is an imprecise term for such a critical issue and requires a clearer definition. We suggest terminating the sentence as follows: "The degree of change will be more limited than in the Core Development Area". The Character of Area study and Residential Design Guide should be specifically named in this policy, and "existing characteristics" should be changed to read "existing design characteristics".

## Full text:

For the section on Established Areas, 'gentle uplift' is an imprecise term for such a critical issue and requires a clearer definition. We suggest terminating the sentence as follows: "The degree of change will be more limited than in the Core Development Area". The Character of Area study and Residential Design Guide should be specifically named in this policy, and "existing characteristics" should be changed to read "existing design characteristics".

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1885

Object

Respondent: T Norris

## Summary:

Medium sustainable labelled on Haydon Hill Pastures and Pond aka Attenborough Fields

## Full text:

Medium sustainable labelled on Haydon Hill Pastures and Pond aka Attenborough Fields

## Change suggested by respondent:

Attenborough Fields must be a designated green open space and protected area. It cannot be seen as an area for construction and at risk of development, whilst allotments in the same area are protected and give much less to the majority of the community, natural habitat, animals, environment and health and wellbeing of the population

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes but no response to my query was provided although they said it would be

Appear exam: Written Representation

Attachments: None

1911

Support

Respondent: Three Rivers District Council

## Summary:

The requirement for high quality and attractive design is supported. Following the Government's consultation on changes to the NPPF this month this is a policy area that is expected to be tightened.

## Full text:

The requirement for high quality and attractive design is supported. Following the Government's consultation on changes to the NPPF this month this is a policy area that is expected to be tightened.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1954

Support

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

Policy QD6.1 states that within the Core Development Area, high-density development will be supported, with the highest densities to be located in the most sustainable locations. Proposals for taller buildings will be of an appropriate height that reflects its location, role in the built-up area, contributes to wayfinding as a key marker in the townscape and which makes a positive contribution towards an attractive skyline. We support this policy for higher densities in sustainable locations and this is discussed further at Policy QD6.5.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2038

Support

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

This policy states that in the core development areas (that includes the town centre), higher densities will be supported particularly in sustainable locations. Tall buildings will also be supported where they are appropriately designed, support wayfinding, positively contributes to the skyline and other criteria.

## Full text:

Forms received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>  
IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2132

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.57 Historic Environment. The county council welcomes the policy requirement, regarding the provision for the design of new developments in the borough to take into account heritage assets. It is recommended that the local plan encourages any new development to reference the local architectural styles and building materials, which should be sympathetic to historic buildings of the borough. It is considered that this will help Watford to be distinctive and create a sense of place and enable development to sit appropriately within the local area. Where possible, historic buildings should be kept and maintained to compliment this.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Design principles

1833

Comment

Respondent: Mrs Fran Clark

## Summary:

It is not clear as to who is going to agree and monitor 'the quality and distinctiveness of a place'?

## Full text:

It is not clear as to who is going to agree and monitor 'the quality and distinctiveness of a place'?

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No

Appear exam: Not specified

Attachments: None

## Policy QD6.2: Design Principles

1807

Comment

Respondent: Sport England

## Summary:

In view of the importance attached to supporting healthier communities in the plan's vision and sustainable objectives it is surprising that the Design Principles make no reference to designing new developments to promote active and healthier lifestyles and thereby contribute to the wider healthier communities objectives. This would be consistent with paragraphs 91/92 of the NPPF. It is therefore requested that the Movement and Connectivity principle is amended to require new developments to be designed provide the opportunity for people to be healthy and active. This would be consistent with Policy HC12.1 which expects developments to promote active design.

## Full text:

In view of the importance attached to supporting healthier communities in the plan's vision and sustainable objectives it is surprising that the Design Principles make no reference to designing new developments to promote active and healthier lifestyles and thereby contribute to the wider healthier communities objectives. This would be consistent with paragraphs 91/92 of the NPPF. It is therefore requested that the Movement and Connectivity principle is amended to require new developments to be designed provide the opportunity for people to be healthy and active. This would be consistent with Policy HC12.1 which expects developments to promote active design.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1927

Support

Respondent: Three Rivers District Council

## Summary:

The proposed Design Principles are supported.

## Full text:

The proposed Design Principles are supported.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

2133

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.58 Lead Local Flood Authority. It is suggested that this policy needs to be reviewed to show how it accommodates aspirations later in the local plan with regard to buildings with "Green roofs" and "Green Walls" which may be proposed as part of sustainability and managing the impacts of climate change.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy QD6.3: Public Realm

1808

Support

Respondent: Sport England

## Summary:

Support is offered for designing the public realm to improve health and well-being through encouraging physical activity. Criteria b, c and d in particular are welcomed as they would all contribute towards encouraging physical activity through the design of the public realm. This would be consistent with paragraphs 91/92 of the NPPF.

## Full text:

Support is offered for designing the public realm to improve health and well-being through encouraging physical activity. Criteria b, c and d in particular are welcomed as they would all contribute towards encouraging physical activity through the design of the public realm. This would be consistent with paragraphs 91/92 of the NPPF.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2134

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.59 Lead Local Flood Authority. It is suggested that this policy needs to be reviewed to show how it supports multifunctional greenspace as the emphasis is very much on recreation and aesthetics. Although it mentions green infrastructure, it is in the sense of individual use rather than the space providing an environmental service. Examples would be tree pits and rain gardens which would green and soften the public realm and also help with surface water management.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>



## Building design

2135

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.60 Lead Local Flood Authority. It is considered that 'rainwater harvesting' should also be mentioned. This is in order to minimise the removal of excess water to a drainage network (which infers surface water sewers) rather than rainwater conservation and Sustainable Drainage Systems (SuDS) being integrated into building design.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Safe and attractive environments

2050

Comment

Respondent: Hertfordshire Constabulary  
Agent: Hertfordshire Constabulary

## Summary:

Crime prevention and security

By using Designing Out Crime techniques and ensuring that building developments achieve the police preferred minimum security standard: Secured by Design (SBD), secure, safer and sustainable environments are created, providing a better quality of life for the residents living in the area.

Commercial/industrial sites, footpaths, play areas, retail units, landscaping, car parking areas and lighting can all be designed to reduce criminal activity and the fear of crime, and have a significant impact on anti-social behaviour.

There are also substantial environmental benefits to Designing Out Crime; research indicates that the annual carbon cost of crime in the UK is approximately 6,000,000 tonnes of CO2 Independent academic research suggests that housing developments built to the Secured by Design standard have 25% less criminal damage, 25% less vehicle crime and 87% less burglary. Incorporating crime prevention and security considerations into the local plan would help to align police and planning department efforts in the future to provide safer environments for living, working and leisure.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Herts Constabulary\_Redacted - <https://watford.oc2.uk/a/m7>

## Policy QD6.4: Building Design

1809

Comment

Respondent: Sport England

## Summary:

Support is offered for new residential development being designed to provide spaces that support health and well-being. However, as criteria e-h do not specifically provide guidance on designing homes to encourage physical activity, it is requested that an additional criterion is added along the following lines:

- Buildings should be designed to promote the use of stairs and provide secure cycle parking in easily accessible locations.

This would be consistent with Policy HC12.1 which requires developments to promote active design by adhering to the 10 Principles of Active Design (one of which specifically covers Active Buildings).

## Full text:

Support is offered for new residential development being designed to provide spaces that support health and well-being. However, as criteria e-h do not specifically provide guidance on designing homes to encourage physical activity, it is requested that an additional criterion is added along the following lines:

- Buildings should be designed to promote the use of stairs and provide secure cycle parking in easily accessible locations.

This would be consistent with Policy HC12.1 which requires developments to promote active design by adhering to the 10 Principles of Active Design (one of which specifically covers Active Buildings).

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1941

Comment

Respondent: Berkeley Homes

## Summary:

Berkeley Homes supports the Borough's approach to requiring new developments to make a positive contribution to design and place making, including through the delivery of high quality and well-designed public realm (draft Policies QD6.2, QD6.3 and QD6.4). Design is critical in terms of ensuring that increased density across the Borough does not have a detrimental impact on the urban environment. The overarching principles set out in Policy QD6.4: Building Design are supported, however in Berkeley Homes' experience it is not always feasible or practical to meet some of the more restrictive requirements in part e) and h) without compromising the design of the building or the ability to optimise land for the delivery of homes and affordable homes. As has been demonstrated at 94-98 St Albans Road, through considered design, cores serving more than 8 homes can be achieved without hindering the amenity or environment of residents where these spaces are well ventilated and lit with core access which meets fire regulations.

## Full text:

-

## Change suggested by respondent:

Suggested amendments to these part of the policy are: "e) Ground floor homes should be designed with primary access directly onto the street where practical and feasible" "h) Internal cores are to serve no more than eight units unless it can be demonstrated that the internal living environment would not be compromised"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made on the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting greater flexibility on this Policy.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1955

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The policy states that new building design should adhere to the following design principles for safe, healthy and attractive internal and external environments, and amongst other things:

- All ground floor units to be designed so that the primary access for each individual unit is directly on to the street;
- Include a high proportion of dual aspect units to create quality internal spaces, able to receive good light and air ventilation and, where possible, avoid using single aspect form; and
- Internal cores are to serve no more than eight units.

It is considered that meeting these design criteria although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these exceptional circumstances. We would advise that an exceptions criterion is inserted into the policy such as:

“It is acknowledged that meeting this design criteria is not always achievable due to site constraints and this should be negotiated on a site by site basis”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We would advise that an exceptions criterion is inserted into the policy such as:

“It is acknowledged that meeting this design criteria is not always achievable due to site constraints and this should be negotiated on a site by site basis”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

## Building height and taller development

1831

Object

Respondent: Mrs Fran Clark

## Summary:

This not take into account the pandemic. As this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

So new homes need to take this into account

## Full text:

This not take into account the pandemic. As this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

So new homes need to take this into account

## Change suggested by respondent:

To meet the borough's need for new homes and jobs the Local Plan anticipates any development after Covid to continue at the same densities across the borough. This means Watford is more likely to decline new buildings that are taller than the existing prevailing height within an area.

Legally No

compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2039

Comment

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

It is recognised that the Tall Building Study 2021 has enabled the Council to establish a base height for areas across the Borough however as set out in the Study, there is only the more intense scenario of development in the town centre that can meaningfully achieve the housing requirements of this sustainable area. In the Town Centre this is given as 5 storeys on the High Street and stepping up to 8 storeys. Any proposals above these heights will fall to be assessed under policy QD6.5 which is a fair policy criteria for assessment. The site we have been promoting (draft allocation MU11) has been subject to discussions with officers under pre-application reference 19/01469/PREAPP where officers considered that there is scope for a taller building.

## Full text:

Forms received via email

## Change suggested by respondent:

Additional scenarios for taller buildings coming forward in the town centre should be assessed as they are clearly supported (subject to meeting certain criteria) in the wider policies of the local plan.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

## Policy QD6.5: Building Height

1865

Comment

Respondent: Watford Central Town Residents Association

## Summary:

The policy refers to table 6.1 but it is table 6.2, Base building heights, that should be referred to. We find the base building height of 4 storeys for 2-storey residential areas is not appropriate, and that the base building height should be reduced to a maximum of 3 storeys.

## Full text:

The policy refers to table 6.1 but it is table 6.2, Base building heights, that should be referred to. We find the base building height of 4 storeys for 2-storey residential areas is not appropriate, and that the base building height should be reduced to a maximum of 3 storeys.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1900

Comment

Respondent: La Salle Investment Management  
Agent: Miss Rachel McGall

## Summary:

La Salle support the objectives for high-density development across the borough to help meet the need for new homes and jobs.

Whilst appreciating the sensitivity of particular areas, La Salle consider greater flexibility could be included within the base building heights as set out in Table 6.3. For example, supporting text of Policy QD6.5 confirms that schemes may identify opportunities that maximise changes in topography to achieve additional height. It is therefore considered that Table 6.3 should offer greater flexibility and potential building height ranges which take into account variation in topography and other sensitivities to ensure development opportunities are maximised.

## Full text:

La Salle support the objectives for high-density development across the borough to help meet the need for new homes and jobs.

Whilst appreciating the sensitivity of particular areas, La Salle consider greater flexibility could be included within the base building heights as set out in Table 6.3. For example, supporting text of Policy QD6.5 confirms that schemes may identify opportunities that maximise changes in topography to achieve additional height. It is therefore considered that Table 6.3 should offer greater flexibility and potential building height ranges which take into account variation in topography and other sensitivities to ensure development opportunities are maximised.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/yy>

1956

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The policy states that proposals for buildings that exceed the base building height set out in Table 6.1 will be classified as a taller building. We recommend submitting a representation requesting that this table is correctly labelled as Table 6.1 in line with text.

The policy states that proposals for taller buildings should clearly demonstrate:

- Exceptional design quality, including height, massing, proportion, materials, detailing, site layout and its relationship with the surrounding area, which set it apart in terms of quality and distinctiveness, and which positively contribute towards the context and character of the area;
- Significant public benefits that the development will provide, clearly setting out why these would not be achievable as part of a development restricted to the base building height;
- Significant sustainability benefits including the building design, construction, operation and connections to the surrounding area;
- A clear townscape rationale for the specific siting of taller buildings, marking key locations or nodes, and responding to public transport accessibility and activity;
- A positive relationship with relevant heritage assets and their setting and the historic character that contributes to the town's distinctiveness;
- A desire to achieve a specific skyline shape or cluster;
- That proposals have been designed to avoid harmful impacts on daylight, sunlight, wind conditions, overheating and microclimate, including the provision of appropriate mitigation where required;
- That appropriate amenity and play spaces are incorporated to a high standard for all residents;
- That the setting of the development will not be dominated by car parking as a result of the higher-density. In this context, a car-lite approach should be taken where this would be an appropriate response to higher local public transport accessibility;
- A balanced and comprehensive approach to servicing to avoid impact on local streets and spaces; and
- Proposals for tall buildings are unlikely to be accepted in Outline form.

Although we appreciate that tall buildings are only appropriate in some locations, we seek to challenge this policy in relation to town centres. Although the Policy is informed by the Tall Buildings Study (2021) we consider the base height for the Town Centre Strategic Development Area of up to 5 storeys on the High Street, stepping up to 8 storeys to the rear to be modest, especially for town centre locations where higher densities/building heights should be suitable providing there is no substantial harm (subject to heritage and townscape analysis). There should be areas identified for tall buildings beyond the site allocations and height should be considered on a site by site basis. Height caps will affect the viability of delivering brownfield sites in the borough and impact on housing delivery including the delivery of affordable housing which is not in line with national policy. The criteria for demonstrating a tall buildings acceptability is also quite onerous, especially the criteria to demonstrate significant public benefits above the base height and should be removed.

The building heights do not tie in with density requirements in HELAA or acknowledge capacity in Town Centre location and should be more flexible.

It is recommended that the policy wording be amended to the following:

"Proposals for buildings that exceed the base building height (and are not identified on sites suitable for a taller building) should achieve the following:

- Exceptional Good design quality, including height, massing, proportion, materials, detailing, site layout and its relationship with the surrounding area, which set it apart in terms of quality and distinctiveness, and which positively contribute towards the context and character of the area;
- Significant public benefits that the development will provide, clearly setting out why these would not be achievable as part of a development restricted to the base building height;
- Significant sustainability benefits including the building design, construction, operation and connections to the surrounding area;
- A clear townscape rationale for the specific siting of taller buildings, marking key locations or nodes, and responding to public transport accessibility and activity;
- A positive relationship with Respectful of relevant heritage assets and their setting and the historic character that contributes to the town's distinctiveness;
- A desire to achieve a specific skyline shape or cluster;
- That proposals have been designed to avoid harmful impacts on daylight, sunlight, wind conditions, overheating and microclimate, including the provision of appropriate mitigation where required;
- That appropriate amenity and play spaces are incorporated where possible to a high standard for all residents;
- That the setting of the development will not be dominated by car parking as a result of the higher-density. In this context, a car-lite approach should be taken where this would be an appropriate response to higher local public transport accessibility;
- A balanced and comprehensive approach to servicing to avoid impact on local streets and spaces; and
- Proposals for tall buildings are unlikely to be accepted in Outline form."

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

The policy states that proposals for buildings that exceed the base building height set out in Table 6.1 will be classified as a taller building. We recommend submitting a representation requesting that this table is correctly labelled as **Table 6.1** in line with text.

It is recommended that the policy wording be amended to the following:

**“Proposals for buildings that exceed the base building height (and are not identified on sites suitable for a taller building) should achieve the following:**

- ~~Exceptional Good~~ design quality, including height, massing, proportion, materials, detailing, site layout and its relationship with the surrounding area, ~~which set it apart in terms of quality and distinctiveness~~, and which positively contribute towards the context and character of the area;
- ~~Significant public benefits that the development will provide, clearly setting out why these would not be achievable as part of a development restricted to the base building height;~~
- ~~Significant~~ sustainability benefits including the building design, construction, operation and connections to the surrounding area;
- A clear townscape rationale for the specific siting of taller buildings, marking key locations or nodes, and responding to public transport accessibility and activity;
- ~~A positive relationship with~~ **Respectful of** relevant heritage assets and their setting and the historic character that contributes to the town’s distinctiveness;
- A desire to achieve a specific skyline shape or cluster;
- That proposals have been designed to avoid harmful impacts on daylight, sunlight, wind conditions, overheating and microclimate, including the provision of appropriate mitigation where required;
- That appropriate amenity and play spaces are incorporated **where possible** to a high standard for all residents;
- That the setting of the development will not be dominated by car parking as a result of the higher-density. In this context, a car-lite approach should be taken where this would be an appropriate response to higher local public transport accessibility;
- A balanced and comprehensive approach to servicing to avoid impact on local streets and spaces; and
- Proposals for tall buildings are unlikely to be accepted in Outline form.”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2034

Comment

Respondent: IDA Plymouth Holdings

Agent: Savills

## Summary:

In the town centre there is again support given for higher density development (which is also confirmed in Strategic Policy CDA2.2) subject to various criteria. The various criteria are relatively usual requirements for tall buildings however from the Allies and Morrison Tall Building Study 2021, there doesn't appear to be any scenarios tested for tall buildings in the town centre as taller development is considered to be contrary to a context-led approach. The Tall Building Study has assessed three scenarios of which only the more intense form of development option achieves the housing targets of the Local Plan. This therefore again confirms that the level of development and density requirement in the town centre needs to be higher through the future local plan in order to meet the Council's targets. The site we are promoting (draft allocation MU11) has been subject to discussions with officers under pre-application reference 19/01469/PREAPP where officers considered that there is scope for a taller building.

## Full text:

Forms received via email

## Change suggested by respondent:

The tall buildings study needs to reflect the wider policies in the local plan which are supportive of greater density developments coming forward in the core development areas and accessible locations in order to demonstrate deliverability of the local plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2136

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.61 Community Protection (HFRS). Hertfordshire Fire & Rescue considers there to be no issue with the proposals for taller buildings, as long as they comply with and satisfy Policy QD6.5: Building Height, local building regulations/restrictions, and fire protection legislation.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## The Historic Environment

1867

Comment

Respondent: Canal & River Trust

## Summary:

Sited along the Grand Union Canal within the Plan boundary are numerous locally and nationally listed buildings and structures, notably the Canal Cottage by Grove Mill Lane Bridge, Grove Park Ornamental Bridge and Lady Capel's Footbridge. We observe that the locations of these structures have been accurately depicted in Figure 7.2. Moreover, a section of the GUC lies within the Mill Grove Conservation Area, and the GUC can be considered as a non-designated heritage asset at various locations within the Plan boundary.

## Full text:

Sited along the Grand Union Canal within the Plan boundary are numerous locally and nationally listed buildings and structures, notably the Canal Cottage by Grove Mill Lane Bridge, Grove Park Ornamental Bridge and Lady Capel's Footbridge. We observe that the locations of these structures have been accurately depicted in Figure 7.2. Moreover, a section of the GUC lies within the Mill Grove Conservation Area, and the GUC can be considered as a non-designated heritage asset at various locations within the Plan boundary.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Referred to Historic Environment in response to First Draft Consultation.

Appear exam: Not specified

Attachments: None

2137

Comment

Respondent: Hertfordshire County Council  
 Agent: Hertfordshire County Council

## Summary:

5.62 Historic Environment. It is considered that the final draft local plan lacks an archaeological thread, as it often equates heritage assets with designated and locally listed buildings which is incorrect. There are below ground heritage assets with archaeological interest in the borough and these should also be discussed. The final draft local plan does not discuss the full range of local heritage assets or provide a local distinctiveness to its aspirations.

5.63 There are, however, some positive themes running through the plan. For example, a requirement that heritage assets revealed during development should be conserved, if necessary, by changes to the development scheme. It is important however that this is clearly applied to archaeological remains as well as buildings, and it is noted that the significance of previously recorded heritage assets may be better understood which may require similar provisions to be made.

5.64 The local plan is expected to recognise those archaeological remains with equivalent significance to a scheduled monument and make provision for both appropriate conservation of the heritage assets and include those that have distinctive local significance. It is also recommended that a requirement for access to a suitable depository to store archives and make them available to the public should be included in the supporting text.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
 compliant:  
 Sound: Yes  
 Comply with Yes  
 duty:  
 Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
 HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
 HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HE7.1: Enhancement and Protection of the Historic Environment

1868

Comment

Respondent: Canal & River Trust

## Summary:

The Trust acknowledges the inclusion of Policies HE 7.1, 7.2, 7.3 and 7.4 within Chapter 7, as well as the accompanied supporting text. It is noteworthy that included within the list of the benefits associated with the historic environment there is an acknowledgement of the positive impacts heritage assets can offer in regard to health and well-being, as well as their fundamental importance in attractive place-making. We would welcome the encouragement of consultation with the Trust for proposals which may have an impact on the character of the canal corridor and on designated/non-designated waterway heritage assets.

## Full text:

The Trust acknowledges the inclusion of Policies HE 7.1, 7.2, 7.3 and 7.4 within Chapter 7, as well as the accompanied supporting text. It is noteworthy that included within the list of the benefits associated with the historic environment there is an acknowledgement of the positive impacts heritage assets can offer in regard to health and well-being, as well as their fundamental importance in attractive place-making. We would welcome the encouragement of consultation with the Trust for proposals which may have an impact on the character of the canal corridor and on designated/non-designated waterway heritage assets.

## Change suggested by respondent:

-

Legally Not specified  
 compliant:  
 Sound: Not specified  
 Comply with Not specified  
 duty:  
 Raise LPA: Yes

Raise LPA Why?: Historic Environment was referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None



2138

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.65 This policy simply repeats parts of the NPPF rather than being locally distinctive and it also includes reference to Heritage Impact Assessments. This should be clarified. The information required to enable the planning authority to make an informed decision regarding the historic environment is more clearly contained in existing document types such as archaeological desk-based assessments, historic building assessments and Conservation assessments. The county council considers this lack of clarity has the potential to affect the relevance of archaeological information which is usually submitted alongside a planning application.

## Full text:

Form and letter received via email

## Change suggested by respondent:

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Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HE7.2: Designated Heritage Assets

2042

Object

Respondent: Historic England  
Agent: Historic England

## Summary:

We welcome the inclusion of a comprehensive set of historic environment policies in the draft Plan and the changes which have been made since the Regulation 18 draft, but recommend the Council review the wording to make sure that it is consistent with the NPPF. As currently drafted, HE7.2 Designated Heritage Assets states infers that some level of (less than substantial) harm is to be expected ("proposals will be supported where they will not result in the loss of, or substantial harm....") whereas NPPF paragraph 193 is clear that any potential harm should be avoided, regardless of whether it amounts to substantial harm or not. The following text then needlessly repeats NPPF paragraphs 195 and 196 without adding to it.

## Full text:

Letter received via email

## Change suggested by respondent:

We suggest the Council delete the first sentence of HE7.2 to reflect the hierarchy of avoiding harm before mitigating as per NPPF paragraph 190, and replace with:

There is a presumption in favour of the preservation and enhancement of designated heritage assets and therefore substantial harm to or loss of an asset will be strongly resisted. Where appropriate proposals will be supported which enhance or better reveal the significance of designated heritage assets.

Legally Not specified  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Historic England\_Redacted - <https://watford.oc2.uk/a/m9>

**Non-Designated heritage assets**

1866

Comment

Respondent: Watford Central Town Residents Association

## Summary:

There needs to be better reference to the immediate context of heritage assets here. Explicit reference should be made to the surrounding area of an asset.

We advance the case that 11-19 Monmouth Road should be considered as Non Designated Heritage Assets/Buildings of Local Historic Value as defined in the NPPF. When compared to several Locally Listed Buildings within the L- list (most of which are focused upon the Cassiobury Park Avenue area), these properties are very early examples of their type and of equal quality to the ones recognised in 2018.

## Full text:

There needs to be better reference to the immediate context of heritage assets here. Explicit reference should be made to the surrounding area of an asset.

We advance the case that 11-19 Monmouth Road should be considered as Non Designated Heritage Assets/Buildings of Local Historic Value as defined in the NPPF. When compared to several Locally Listed Buildings within the L- list (most of which are focused upon the Cassiobury Park Avenue area), these properties are very early examples of their type and of equal quality to the ones recognised in 2018.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Policy HE7.3: Non-Designated Heritage Assets**

2139

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.66 The wording within this policy should be amended as it currently only refers to Locally Listed Buildings. Non-designated heritage assets are not restricted to Locally Listed Buildings. The NPPF (Annex 2: Glossary) defines Heritage Assets as a "building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest". Although the paragraph notes that this includes local listing, it is a misunderstanding to apply this description solely to the local list.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Archaeology

2140

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.67 The text and policy for the section Archaeology repeats the NPPF and has no information distinctive to the borough. For example, it is considered that the supporting text should state what is the type and significance of heritage assets in the borough, what types of heritage assets might be found, as well as significance, and what local value might various heritage assets hold. This is an opportunity to discuss local archaeological finds that would make the subsequent policy and the local plan distinctive and effective that complements the guidance of the NPPF rather than repeating it.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HE7.4: Archaeology

2141

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.68 The post of 'County Archaeologist' no longer exists and the wording within the policy should be modified as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

"To protect the significance of archaeological assets, measures will need to be taken that are proportional to their importance to ensure the physical preservation of the assets and their setting. These measures should be prepared in collaboration with the county council's historic environment team archaeologist and secured through planning conditions."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Sustainable construction and resource management

1842

Support

Respondent: Hertsmere Borough Council

## Summary:

Along with Watford, Hertsmere declared climate emergency in September 2019. The council are encouraged by proposals within the Local Plan to tackle climate change. Where appropriate the Local Plan should consider the potential for cross boundary initiatives including resource management, transport improvements, waste management, and health and well-being initiatives.

## Full text:

Along with Watford, Hertsmere declared climate emergency in September 2019. The council are encouraged by proposals within the Local Plan to tackle climate change. Where appropriate the Local Plan should consider the potential for cross boundary initiatives including resource management, transport improvements, waste management, and health and well-being initiatives.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jp>

1869

Comment

Respondent: Canal &amp; River Trust

## Summary:

The Trust supports the use of renewable energies in new development/existing developments. Canal water can be used as a source of low/zero carbon energy, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. We would therefore request that the Local Plan include reference for this for developers who may wish to explore this technology.

## Full text:

The Trust supports the use of renewable energies in new development/existing developments. Canal water can be used as a source of low/zero carbon energy, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. We would therefore request that the Local Plan include reference for this for developers who may wish to explore this technology.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

## Policy CC8.2: Sustainable Construction Standards for Non-residential Development

1957

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

Policy CC8.2 states that applicants should provide a BREEAM pre-assessment completed by a suitably qualified assessor as part of an application. The submission of a Compliance Certificate to the Local Planning Authority upon completion will be secured through planning conditions.

In our experience it is extremely difficult to achieve an Excellent rating when assessing 'Shell only' commercial units. When you assess the 'Shell only' there are large number of credits that are not available, mainly due to the required assessment credits not necessarily being specified (M&E for performance, commissioning and monitoring for example).

We request an amendment to the above wording is sought that states that

"development should achieve BREEAM very good for 'Shell only' commercial developments, with best endeavours to reach excellent target for Fit out"

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We request an amendment to the above wording is sought that states that

"development should achieve BREEAM very good for 'Shell only' commercial developments, with best endeavours to reach excellent target for Fit out"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2024

Object

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy sets out (inter alia) that all proposals should be designed to reduce their impact on the environment and in the case of major non-residential developments achieve a BREEAM rating of 'excellent'.

Whilst Lidl aim to ensure that their stores are as sustainable as possible, it is considered that the BREEAM accreditation process is overly complicated and costly, and as such represents a significant barrier to investment.

The Council would be better placed to identify an alternative energy / CO2 reduction target within their policy. It is considered that an equivalent target would achieve the same goal of reducing carbon emissions and increasing sustainability across the borough, without adding additional burden to the developer and allowing greater flexibility in scheme design and more efficient construction.

This would bring non-residential development more in line with the requirements of residential development set out in Policy CC8.3, which sets energy and water efficiency targets and aims to reduce waste.

## Full text:

Form and letter received via email

## Change suggested by respondent:

The Council would be better placed to identify an alternative energy / CO2 reduction target within their policy. It is considered that an equivalent target would achieve the same goal of reducing carbon emissions and increasing sustainability across the borough, without adding additional burden to the developer and allowing greater flexibility in scheme design and more efficient construction.

This would bring non-residential development more in line with the requirements of residential development set out in Policy CC8.3, which sets energy and water efficiency targets and aims to reduce waste.

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

## Policy CC8.3: Sustainable Construction and Resource Management

1912

Comment

Respondent: Three Rivers District Council

## Summary:

Current national planning guidance only allows local authorities to require approx. 20% improvement (equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes) over the target emission rate in Building Regulations Part L (2013). The requirement for a 35% improvement from 2025 needs to be justified.

## Full text:

Current national planning guidance only allows local authorities to require approx. 20% improvement (equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes) over the target emission rate in Building Regulations Part L (2013). The requirement for a 35% improvement from 2025 needs to be justified.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1960

Support

Respondent: Thames Water Utilities Ltd

Agent: Savills

## Summary:

Thames Water support the requirement for water efficiency measures and for new residential development to meet the technical standards of 110litres per person per day. It is noted that, in order for this standard to be secured through Part G of the Building Regulations, planning conditions will be required to ensure the optional standard is applied. Paragraph 2.8 of Part G of the Building Regulations states: "The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission.". As such it is clear that planning conditions will need to be used to ensure the aims of the policy in relation to water efficiency are achieved.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Consultation CC6.1

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2079

Comment

Respondent: Environment Agency

## Summary:

## Water Efficiency

Our concerns about water resources have been addressed by the requirement for water efficiency measures for new residential and non-residential development. However, we recommend you are consistent throughout the local plan in applying the same water efficiency standard, and so it should be encouraged that all development should achieve BREEAM standards of excellence.

In order to be consistent with Policy CC8.2. and paragraph 8.6., we recommend the following amendment to Policy CC8.3:

In new, non-residential developments, water conservation measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM ~~very good~~ 'excellent' for the appropriate building typology.

We are pleased to see the inclusion of a higher standard of a maximum of 110 litres per person per day is applied to all residential developments, due to Watford being an area of serious water stress (as identified in our report (Water stressed areas - final classification).

In regards to evidence base, Affinity Water's Water Resource Management Plan (2020) identifies how Affinity will work to provide a reliable, resilient, efficient and affordable water supply between now and 2080, whilst also protecting the environment. It shows what demand and supply measures will be introduced to manage the longer term challenges of population increase, climate change, drought resilience and growing environmental needs. Reducing levels of water consumption is crucial to ensuring sustainable water supplies in future. In response, reducing the levels of consumption will help to counteract the reduction in resource availability as well as other proactive alterations.

Wastewater

The soundness issue of provision for wastewater is mainly discussed later in this response in relation to infrastructure delivery policy (Chapter 10). However, wastewater is a strategic issue that also relates to issues of climate change and sustainable development.

In our response to Regulation 18 we stressed the importance of ensuring water quality and provision of infrastructure for wastewater is captured in the Local Plan. We require a strategic position, based on evidence, within Local Plan policy to make it clear to developers the standards expected of them. Accordingly, we recommend Policy CC8.3. should be amended to include a new sub-heading for Wastewater:

Wastewater

Development must demonstrate that the local water supply and wastewater infrastructure have adequate capacity, both on and off site, to sufficiently serve the development, taking into consideration the cumulative impacts of current and proposed development. Developers are required to undergo pre-application engagement with infrastructure providers, and demonstrate consideration of the need to conserve and sustainably use natural resources.

Policy CC8.5.

Full text:

-

Change suggested by respondent:

In order to be consistent with Policy CC8.2. and paragraph 8.6., we recommend the following amendment to Policy CC8.3:

In new, non-residential developments, water conservation measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM 'very good' 'excellent' for the appropriate building typology.

Accordingly, we recommend Policy CC8.3.

should be amended to include a new sub-heading for Wastewater:

Wastewater

Development must demonstrate that the local water supply and wastewater infrastructure have adequate capacity, both on and off site, to sufficiently serve the development, taking into consideration the cumulative impacts of current and proposed development. Developers are required to undergo pre-application engagement with infrastructure providers, and demonstrate consideration of the need to conserve and sustainably use natural resources.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: during Regulation 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

## Managing air quality

2142

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.69 Public Health. It is suggested that the following supporting text is added at the start of this section, before paragraph 8.22:

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Objective 8b of the NPPF states that the planning system has a social objective to support strong, vibrant and healthy communities and to support communities’ health and social wellbeing. This has been retained from the previous version of the NPPF and should be seen as an equal consideration to environmental and economic objectives. Paragraph 91 aims to achieve healthy places. Physical health and mental wellbeing can be positively influenced by well-designed developments with consideration of the location, density and mix of land uses that offer services to the community (NPPF, paragraph 70.)  
Air pollution causes more harm than passive smoking and is responsible for the early deaths of an estimated 40,000 people in the UK.3 Every new development will have an impact on air quality, usually by increasing emissions from buildings or from traffic generation. The links between poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk alongside cancer, heart disease and obesity.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2143

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.70 Public Health. It is suggested that the text within the paragraph is modified as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

The exposure of vulnerable residents, such as children, the elderly, and those with respiratory issues to poor air quality, is a particular concern. These include:

- Long-term exposure is linked to reduced life expectancy, increased cardiovascular disease, poor lung function and mental health issues.
- Short-term exposure (over hours or days) to elevated levels of air pollution can also cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality.
- The impacts of air pollution on our health can be felt throughout our lifetime.

Air pollution can affect anyone’s health; nevertheless, some individuals can be more susceptible than others. These include:

- children
- the elderly
- individuals with existing cardiovascular or respiratory diseases
- pregnant women
- communities in areas of higher pollution, such as close to busy roads
- low-income communities

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>



2144

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.71 Transport. The paragraph should be modified as follows, in order to ensure provision is made for Electric Vehicle and bike charging facilities to be provided.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"Air quality is often managed through soft measures, such as active modes of travel, urban greening and the use of sustainable construction methods. [3 https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution](https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution).

21

The ways new developments are designed can also assist in mitigating against the negative impacts of poor air quality. For instance, strategically planting trees and hedges between major roads and residential development can create a barrier to shield residents from poor air quality caused by traffic. Measures such as these will be supported as part of the Plan. However, to ensure that national and international objectives for ambient air quality are met, additional steps must be taken to guide new development, including provision being made for electric vehicle and bike charging facilities."

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2145

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.72 Public Health. It is suggested that the text within the paragraph is modified as follows. Further details can be viewed using the following link: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/937341/Principal\\_interventions\\_for\\_local\\_authorities-air\\_quality\\_public\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/937341/Principal_interventions_for_local_authorities-air_quality_public_health.pdf)

## Full text:

Form and letter received via email

## Change suggested by respondent:

Development should seek to achieve overall improvements to air quality and minimise the potential adverse impacts. Development should adopt Public Health England's 2019 'net health gain' principles to improve outdoor air quality and public health. These principles should be incorporated in design to reduce emissions and contribute to better air quality management - applicable irrespective of air quality assessments.4 Local health data in the form of the Public Health Outcomes Framework should also be used and referred to.

The policy intends to ensure that the potential impacts of new development upon air quality is an issue considered early in the design process and when planning applications are determined. Regard should be given to the location of development where users may be more sensitive to poor air quality.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Policy CC8.4: Managing Air Quality**

2146

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

**Summary:**

5.73 Transport. Air quality management areas are located within or adjacent to the Core Development Areas (Watford Junction – St Albans Road), Colne Valley CDA (Vicarage Road / Hornets gyratory and Bushey Arches) which creates a tension and a risk of worsening air quality unless new (petrol and diesel based) vehicle trips are minimised as far as possible.

5.74 It is suggested that all developments within the CDAs will be required to demonstrate whether traffic from them is likely to travel through the AQMA.

**Full text:**

Form and letter received via email

**Change suggested by respondent:**

In addition, the policy should be modified and refer to provision for electric vehicle charging where parking is provided as follows:

“Development will be supported where it does not contribute towards a worsening of existing air quality and, where possible, seeks to improve existing air quality. Appropriate mitigation measures will be required to address any potential impact on air quality, along with encouraging the provision of electric vehicle charging where parking is provided.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Policy CC8.5: Managing the Impacts of Development**

1870

Comment

Respondent: Canal & River Trust

**Summary:**

Policy CC8.5 'Managing the Impacts of Development' ensures that developments must be designed to minimise any significant detrimental impact of external lighting on... biodiversity... and watercourses. The canal corridor provides a popular habitat for bats and other nocturnal species, and as such regard should be had to the Bat Conservation Trust's "Bats and Lighting" paper which stipulates Lux levels lower than 5 to be bat safe (though the Trust would prefer Lux levels to be of 0), the spectrum to be 'warm' (2700-300K) and for no external lighting to spill over the water surface from the development.

**Full text:**

Policy CC8.5 'Managing the Impacts of Development' ensures that developments must be designed to minimise any significant detrimental impact of external lighting on... biodiversity... and watercourses. The canal corridor provides a popular habitat for bats and other nocturnal species, and as such regard should be had to the Bat Conservation Trust's "Bats and Lighting" paper which stipulates Lux levels lower than 5 to be bat safe (though the Trust would prefer Lux levels to be of 0), the spectrum to be 'warm' (2700-300K) and for no external lighting to spill over the water surface from the development.

**Change suggested by respondent:**

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Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

1961

Support

Respondent: Thames Water Utilities Ltd  
Agent: Savills

## Summary:

The policy is necessary to ensure that developments are not located in positions where future occupiers will be affected by existing sources of noise, light pollution or odour without mitigation for any adverse impacts being secured.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan response comments on policy NE8.6

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2016

Object

Respondent: Mineral Products Association  
Agent: Mineral Products Association

## Summary:

See also policies CDA2.1 & ST11.2, also sites MU06 & 07

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

## Full text:

Form received by email

## Change suggested by respondent:

Policy CC8.5 and supporting text should also clarify what the Agent of Change principle involves, including making it clear that development must not prejudice the operation of existing uses in its vicinity through introducing noise sensitive uses.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>

2074

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

References in Policy CC8.5 to the Agent of Change Principle are welcomed. However, they are not particularly clear in defining what is expected under the Agent of Change Principle - this being that critically new development should not result in the curtailment of existing activities. The clear issue of concern in the context of the active rail aggregates depot/CBP is the introduction of sensitive uses in close proximity. It is acknowledged that the implications of the 'Agent of Change Principle' is more clearly set out at supporting paragraph 8.30 - this should translate through to the policy itself.

## Full text:

Form received via email

## Change suggested by respondent:

The following changes are required:

Development should be designed to protect the amenity of adjacent land uses and their occupants and local amenity, and to enhance public realm. In accordance with the 'Agent of Change Principle', new development must ensure it does not cause existing uses in the vicinity to curtail their activities. New development will be required to assess its potential impacts on neighbouring land uses, including the cumulative effects and set out mitigation measures where appropriate. To achieve this....

Light Pollution:

Developments must be designed....

Noise pollution and vibration:

Where development is noise sensitive, noise-generating, or the surrounding area is sensitive to noise and vibration, applicants must undertake a noise assessment to identify potential issues and the required attenuation measures to achieve acceptable noise levels, as defined in national guidance. Noise assessments should....

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2080

Comment

Respondent: Environment Agency

## Summary:

Contamination, including contamination of groundwater

We are pleased to see the requirement for a comprehensive ground investigation report and appropriate remediation measures have been included in Policy CC8.5. In order to strengthen this position, we suggest the following additional information is included in the policy wording:

Development that could adversely affect the groundwater quality flow or volume will not be granted permission. Where sites are situated in a vulnerable groundwater area within a Source Protection Zone (SPZ) and/or principal and secondary aquifers, proposals must be dealt with in a way that protects the underlying groundwater. No infiltration based SuDs should be constructed on land affected by contamination to avoid the mobilisation of contaminant and consequent groundwater pollutions.

Recommended additional justification text:

Developers should address any risks to controlled waters from contamination at the site following the requirements of the NPPF and the Environment Agency's Guiding Principles for Land Contamination. Reports and Risk Assessments are expected to be prepared in line with The Environment Agency's Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM).

Flood Risk and Climate Change

One of the key impacts of the climate emergency is the increased frequency of extreme weather events, including rainfall. The Local Plan should require all new development to undergo an assessment of the impact of climate change on flood risk. This assessment is required to identify the appropriateness of the location for the development, finished floor levels, safe access/egress and the potential need for floodplain storage compensation. This is in line with paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the NPPF (2019) which states the requirement to demonstrate development is 'safe' for its lifetime.

We recommend Policy CC8.5 is amended to include flood risk and climate change:

Development must take into consideration the future impacts of climate change within planning proposals. In particular, all new development within flood zones require an assessment of the impact of climate change on flood risk.

Full text:

-

Change suggested by respondent:

we suggest the following additional information is included in the policy wording:

Development that could adversely affect the groundwater quality flow or volume will not be granted permission. Where sites are situated in a vulnerable groundwater area within a Source Protection Zone (SPZ) and/or principal and secondary aquifers, proposals must be dealt with in a way that protects the underlying groundwater. No infiltration based SuDs should be constructed on land affected by contamination to avoid the mobilisation of contaminant and consequent groundwater pollutions.

Recommended additional justification text:

Developers should address any risks to controlled waters from contamination at the site following the requirements of the NPPF and the Environment Agency's Guiding Principles for Land Contamination. Reports and Risk Assessments are expected to be prepared in line with The Environment Agency's Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM).

We recommend Policy CC8.5 is amended to include flood risk and climate change:

Development must take into consideration the future impacts of climate change within planning proposals. In particular, all new development within flood zones require an assessment of the impact of climate change on flood risk.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2147

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.75 Ecology. Item (a) in respect of reducing light pollution and its impacts on biodiversity is supported. Reference to guidance from the Institute of Lighting Professionals<sup>5</sup> on reducing light pollution should be made in any supporting text.  
5.76 Lead Local Flood Authority. It is noted that flood risk is not mentioned within this policy. It is therefore suggested that the policy is modified as follows to state that other impacts (including flood risk) should be taken into account when managing the impacts of development.

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Other impacts (including flood risk) should be taken into account when managing the impacts of development.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Conserving and Enhancing the Environment

1843

Support

Respondent: Hertsmeere Borough Council

## Summary:

The level of growth suggested is going to generate additional pressures on the natural environment. A number of important natural habitats exist along the border between Hertsmeere and Watford including the River Colne. It is important that all development considers the wider impact on these areas and that the cumulative impact of development along this boundary is fully considered. Hertsmeere would want to be included as part of any discussions relating to habitat and environmental enhancements along this route and any measures that relate to the wider green and blue infrastructure networks including any potential water management schemes.

## Full text:

The level of growth suggested is going to generate additional pressures on the natural environment. A number of important natural habitats exist along the border between Hertsmeere and Watford including the River Colne. It is important that all development considers the wider impact on these areas and that the cumulative impact of development along this boundary is fully considered. Hertsmeere support Watford's proposals for a strategic green infrastructure link along the Borough boundary. Hertsmeere would want to be included as part of any discussions relating to habitat and environmental enhancements along this route and any measures that relate to the wider green and blue infrastructure networks including any potential water management schemes along the River Colne.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: As part of Hertsmeere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jg>

1852

Comment

Respondent: Planning & Development Associates Ltd

## Summary:

A separate Statement of Representations is attached

## Full text:

A separate Statement of Representations is attached

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y6>

2148

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

HCC welcomes some of the recommendations that have been adopted. However, when considered within the context of the entire Plan we believe it would benefit from further modifications.

## Full text:

Form and letter received via email

## Change suggested by respondent:

See document for details

At present, use of the phrase within paragraph 9.33: "Other locally important but non-designated wildlife sites also make a significant contribution towards biodiversity in the area." is therefore considered inadequate and could be taken to rank LWS (for instance) alongside any semi-natural habitat in the wider countryside or urban settings.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy NE9.1: The Natural Environment

1882

Object

Respondent: T Norris

## Summary:

Whilst the council has stated that it supports and recognised the importance of green space, not only to the environment but also its economic and social benefits, it does not recognise Haydon Hill Pastures and Pond as a green space. The area is down as an established area which means it can be developed, yet it is also green belt and wildlife area.

## Full text:

Whilst the council has stated that it supports and recognised the importance of green space, not only to the environment but also its economic and social benefits, it does not recognise Haydon Hill Pastures and Pond as a green space. The area is down as an established area which means it can be developed, yet it is also green belt and wildlife area.

## Change suggested by respondent:

Haydon Hill Pastures and Pond is a crucial area to the neighbourhood, a green corridor to wildlife and migrating birds, well used by the people, enhances the area and yet is not deemed as a green space as well. How is it the the allotments are in the green zone and not this area which provides more benefit to more people, children, local schools, promotes long term promotion of sustainable health and social inclusion and yet it is at higher risk of development (as outlined in the green spaces review) than paddock close allotments, allotment gardens or colne valley linear park which provide no wildlife benefit nor do they have ancient oak trees on them. This area should not be deemed as an established area but as a green space.

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2081

Comment

Respondent: Environment Agency

## Summary:

To strengthen Policy NE9.1. we recommend the following amendments:

- c) Ensuring all ~~new~~ development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, following the mitigation hierarchy of avoidance, mitigation or compensation ~~locally, where possible~~;
- e) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, as required under the Water Framework Directive
- f) ~~Minimising~~ Reducing the risk of flooding, including surface water flood risk;
- j) ~~Where necessary~~ Ensuring that protected species and their habitats are a key material consideration when determining planning applications;
- l) Considering the cumulative impacts of development on green and blue infrastructure. Where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.

## Full text:

-

## Change suggested by respondent:

To strengthen Policy NE9.1. we recommend the following amendments:

- c) Ensuring all ~~new~~ development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, following the mitigation hierarchy of avoidance, mitigation or compensation ~~locally, where possible~~;
- g) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, as required under the Water Framework Directive
- h) ~~Minimising~~ Reducing the risk of flooding, including surface water flood risk;
- j) ~~Where necessary~~ Ensuring that protected species and their habitats are a key material consideration when determining planning applications;
- l) Considering the cumulative impacts of development on green and blue infrastructure. Where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2149

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.82 Ecology. It is considered that although perhaps unlikely, the risk that existing or proposed Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites in neighbouring districts/boroughs could be adversely affected also merits protection (from, for instance, an increase in recreational pressure).

## Full text:

Form and letter received via email

## Change suggested by respondent:

5.83 It is suggested that the text in paragraph c) should be modified as follows and should also be include a reference to Policy NE9.8 which deals with net gain in more detail:

- c) ~~Ensuring all new development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, locally, where possible~~; Proposals that would adversely affect the notified features of a Site of Special Scientific Interest, Local Nature Reserve, Local Wildlife Site, Regional Geological Site, a Species or Habitat of Principal Importance or any other valuable feature (eg those identified in the Biodiversity Action Plan) will only be permitted where the benefits of the development clearly outweigh the impact on the feature of interest. Proposals that would adversely affect irreplaceable habitats should be refused unless there are wholly exceptional reasons. Proposals that adversely affect features created as biodiversity net gain compensation or enhancement sites should also be refused. In terms of Special Areas of Conservation, Special Protection Areas and Ramsar sites, development will only be permitted where the assessment indicates that the proposal either on its own or in combination with other plans or projects, would have no adverse effect on the integrity of the site. Development which cannot satisfy this test will only be permitted in exceptional circumstances.”

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>



2150

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.84 Ecology. Reference to the mitigation hierarchy in paragraph (d) is welcome, however, the requirement for 'avoidance' can be given greater emphasis if it is to align fully with national policy.<sup>9</sup> This should underpin not only the strategic allocation of sites but also the corresponding development proposals.

5.85 This is considered to be an important principle, especially, the need for 'avoidance' (as the first step in the process) and this should be explained clearly in the supporting text, for those projects which require an Environmental Impact Assessment.

5.86 It should be noted that as the hierarchy requires, it should be used before reliance on mitigation and compensation which can be interpreted, incorrectly, as the outcome of net gain. However, compelling evidence of its use is often lacking, especially at the planning application stage.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy NE9.2: Green Infrastructure Network

1853

Comment

Respondent: Planning & Development Associates Ltd

## Summary:

A separate Statement of Representations is attached explaining the reasons for the comments.

2.6.1 The policy requirement of NE9.2 for the 'proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided' is supported. Similarly, the recognition in paragraph 96 that 'trees also make an important contribution and should be protected where possible' is welcomed, and reflects the role that trees and native vegetation have in climate change mitigation. In addition, this policy approach is consistent with the ambitions of the climate change emergency declared by Watford Borough Council on the 9th July 2019. Areas such as the urban woodland belt in Character Area C play an invaluable role in amenity as well as climate change mitigation, and their ecological value is such that they should be protected.

2.6.2 Whilst the principle of improving the green infrastructure network, as referenced in paragraph 9.5 is welcomed, it is noted that the extent to which this is illustrated in Figure 9.1 is questioned further to the inconsistency cited in Section 2.5 of this representation. Furthermore, where Policy NE9.2 states that 'priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan' this should also recognise the importance of smaller green amenity spaces around the borough which have an invaluable role in promoting residents' amenity. In addition, it is noted that the Green Infrastructure Plan is dated from 2011, and as such there should be sufficient flexibility in the policy wording to recognise the importance of other areas which may have further developed over the past decade, and therefore not been sufficiently assessed within the Green Infrastructure Plan. It should also be noted that the Watford Green Infrastructure Plan is not included in the local plan evidence documents - only the appendices are currently published and available for online inspection.

## Full text:

A separate Statement of Representations is attached explaining the reasons for the comments.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y7>

1883

Object

Respondent: T Norris

## Summary:

As previously outlined Haydon Hill Pastures and Pond has not been included as a green open space area

## Full text:

As previously outlined Haydon Hill Pastures and Pond has not been included as a green open space area

## Change suggested by respondent:

Haydon Hill Pasture and Pond must be included as if anything it supersedes the importance of allotments and should take priority. There is no clear reason in the document why these areas are open space and Haydon Hill Pastures and Pond is not (other than the people who live near these areas)

Legally No  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Written Representation  
Attachments: None

1886

Object

Respondent: T Norris

## Summary:

A proposed loss or damage of non-protected trees, woodland or hedgerows must be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. Native planting should be prioritised. Priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan, of which some are not included such as Attenborough Fields

## Full text:

A proposed loss or damage of non-protected trees, woodland or hedgerows must be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. Native planting should be prioritised. Priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan, of which some are not included such as Attenborough Fields

## Change suggested by respondent:

In today's environment we must maintain green space and improve air quality therefore no tree should be seen as not important and must be protected especially more so than ever when there is evidence that without the natural environment we as a species will not survive and neither will our planet

Legally No  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Written Representation  
Attachments: None

2082

Comment

Respondent: Environment Agency

## Summary:

To strengthen policy NE9.2, we recommend that the following amendments:  
A proposed loss or damage of non-protected to trees, woodland or hedgerows should be avoided will be refused. If demonstrated as being unavoidable, a measurable net gain assessment will be required to provide appropriate adequate replacement and compensation will be required. Native planting should be prioritised used in any proposed new open spaces or habitat creation. Non-native species planting should be kept to a minimum and should be carefully assessed to ensure no impact to native flora and fauna. Where invasive non- native species are found on site, prior to site enabling and clearing works, developers should create a long-term management plan to stop the spread, and where feasible, eradicate the species.

## Full text:

-

## Change suggested by respondent:

To strengthen policy NE9.2, we recommend that the following amendments:  
A proposed loss or damage of non-protected to trees, woodland or hedgerows should be avoided will be refused. If demonstrated as being unavoidable, a measurable net gain assessment will be required to provide appropriate adequate replacement and compensation will be required. Native planting should be prioritised used in any proposed new open spaces or habitat creation. Non-native species planting should be kept to a minimum and should be carefully assessed to ensure no impact to native flora and fauna. Where invasive non- native species are found on site, prior to site enabling and clearing works, developers should create a long-term management plan to stop the spread, and where feasible, eradicate the species.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2151

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.87 Ecology. Recognition of the ecological benefits that the green infrastructure network can provide is welcomed. In addition, the county council welcomes the need for new development to consider the impact on it by taking account of lighting, noise and other urban-edge effects, and the need for suitable mitigation.

5.88 However, it is not clear why this policy does not require measures proposed in Policy NE9.3 which requires the production of management plans and habitat creation.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2152

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.89 Lead Local Flood Authority. It is suggested that flood risk's role for green infrastructure should not be overlooked, and reference should be linked to the Watford Borough Green Infrastructure Plan (Final Report Prepared for Watford Borough Council by Land Use Consultants March 2011).

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**The blue infrastructure network**

2153

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.90 Lead Local Flood Authority. This paragraph should include a definition of blue infrastructure, in order for it to be consistent with paragraph 9.3 that includes a definition of 'green infrastructure.'

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Policy NE9.3: Blue Infrastructure Network**

1871

Comment

Respondent: Canal & River Trust

## Summary:

Welcome the emphasis on interconnectivity between blue and green infrastructure networks. A buffer strip of 8 metres is a requirement of the Environment Agency; the Trust would consider each proposal on its own merit. In some instances, building closer to the canal may be appropriate, but it is entirely dependent on location/application type.

Any work to deculvert a watercourse adjacent to the Trust's network must ensure that suitable access is provided for the Trust to inspect remaining culverted sections under the canal. Adequate measures will be needed to ensure that any rubbish/vegetation/other debris does enter the Trust's culverts.

## Full text:

The Trust welcomes the emphasis on interconnectivity between blue and green infrastructure networks contained within Policy NE9.3 'Blue Infrastructure Network'. Furthermore, we note the identification with Policy NE9.3 of the need for the maintenance of an undeveloped and unobstructed buffer strip of 8 metres from the top of the bank of all watercourses. We advise that an undeveloped and unobstructed buffer strip of 8 metres is a requirement of the Environment Agency, though the Trust would consider each proposal on its own merit. That is to say, in some instances, building closer towards the GUC would serve as better place-making, but it is entirely location dependent, as well as dependent on the type and nature of the proposal.

Policy NE9.3 supports the deculverting and the re-naturalisation of watercourses to improve the water environment. It should be known that any work to deculvert a watercourse adjacent to the Trust's network must ensure that suitable access is provided in order for the Trust to be able to inspect remaining culverted sections under the canal. Moreover, adequate measures will need to be in place in order to ensure that any rubbish/vegetation/other debris which enters opened up watercourses does not find its way into the Trust's culverts.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

Respondent: Environment Agency

Summary:

Policy NE.9.3. reflects our comments made during Regulation 18 that there should be recognition of the waterbodies that run through Watford, and the inclusion of their WFD status. Within the justification text for this policy, we recommend that the Revitalising the River Colne through Watford scheme is highlighted as key opportunity that the Council and partners are working to implement.

To strengthen Policy NE9.3, we recommend the following amendments: Development proposals in close proximity to watercourses must support the strategic importance of Watford's blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits.

Where development is adjacent to watercourses, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives. Development proposals in close proximity to, or that include a watercourse must:

a) Maintain an undeveloped and unobstructed buffer strip of at least eight metres from the top of the ~~bank of all watercourse~~ bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Buffer zones should be natural in character, distinct from the built environment, with no light pollution greater than 2 lux, and with native species. ~~Where this enables public access~~ Proposals should be accompanied by a management plan.

b) Conserve and enhance the biodiversity value of the watercourse and its corridor by including WFD action measures within the proposal. Action measures could include but are not limited to, ~~through the inclusion of~~ in-channel enhancements, the creation of priority wetland habitats, the removal of hard engineering, ~~prioritising native planting schemes and by~~ addressing misconnections, and the eradication and management of Invasive Non-Native Species;

c) Enhance the role of the watercourse corridors as an accessible active travel and leisure route for pedestrians, cyclists and boaters and increase connectivity along the length of the watercourse...

e) Open and re-naturalise modified watercourses, including culverted and piped waterways. New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A WFD assessment should be submitted as part of proposals and should include an assessment of the works to preventing future improvement, in addition to how the proposal will impact WFD status.

f) Address misconnections and ensure strong protection to water quality issues both on and offsite, such as the need for a surface water management plan and inclusion of SuDs.

The provision of crossings and bridges will be supported where they improve connectivity for pedestrians and cyclists, are in keeping with the setting of the area, and are designed to avoid obstructing flood flows and damage to a watercourse.

Policy NE9.3. - Justification text

Paragraph 9.7. identifies the Grand Union Canal, Berkhamstead to Maple Lodge (Rivers Bulbourne, Gade and Colne) (GB70610185) as an ordinary watercourse within Watford. However, it is important to note that this watercourse is still a WFD waterbody and therefore the WFD requirements still apply. We would expect no deterioration of the watercourse through any works of development upstream or within the vicinity of the waterbody. We would also expect to be informed of any works on the section of Grand Union Canal (GB70610185) that runs through Watford.

In reference to paragraph 9.9, we support your commitment to seize opportunities to enhance the quality of watercourses and to support the achievement of WFD 'good' status, as well as the consideration of the impact of development on the water environment.

Full text:

-

Change suggested by respondent:

To strengthen Policy NE9.3, we recommend the following amendments: Development proposals in close proximity to watercourses must support the strategic importance of Watford's blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits. Where development is adjacent to watercourses, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives. Development proposals in close proximity to, or that include a watercourse must:

d) Maintain an undeveloped and unobstructed buffer strip of at least eight metres from the top of the ~~bank of all watercourse~~ bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Buffer zones should be natural in character, distinct from the built environment, with no light pollution greater than 2 lux, and with native species. ~~Where this enables public access~~ Proposals should be accompanied by a management plan.

e) Conserve and enhance the biodiversity value of the watercourse and its corridor by including WFD action measures within the proposal. Action measures could include but are not limited to, ~~through the inclusion of~~ in-channel enhancements, the creation of priority wetland habitats, the removal of hard engineering, ~~prioritising native planting schemes and by~~ addressing misconnections, and the eradication and management of Invasive Non-Native Species;

f) Enhance the role of the watercourse corridors as an accessible active travel and leisure route for pedestrians, cyclists and boaters and increase connectivity along the length of the watercourse...

g) Open and re-naturalise modified watercourses, including culverted and piped waterways. New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A WFD assessment should be submitted as part of proposals and should include an assessment of the works to preventing future improvement, in addition to how the proposal will impact WFD status.

h) Address misconnections and ensure strong protection to water quality issues both on and offsite, such as the need for a surface water management plan and inclusion of SuDs.

The provision of crossings and bridges will be supported where they improve connectivity for pedestrians and cyclists, are in keeping with the setting of the area, and are designed to avoid obstructing flood flows and damage to a watercourse.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2154

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.91 Ecology. Paragraph (a), (b), (c) and (e) are supported as these will all encourage beneficial biodiversity outcomes. There are clear links with (the suggested amendment that the county council has proposed) to Policy NE9.1. However, it is not clear why Policy NE9.3 does not require measures proposed in Policy NE9.2 which implies use of the mitigation hierarchy by seeking to prevent the avoidable loss of a range of named features and the need for compensation.

5.92 Lead Local Flood Authority. Culverted and piped waterways is mentioned in this policy, but not building over culverted watercourses. It is recommended that Policy 7 and Policy 8 page 96 of the Local Flood Risk Management Strategy for Hertfordshire should be referred to as a reference. The presumption is, under this policy is that all culverted streams and rivers that are underneath development sites will be opened up.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Flood risk and groundwater management

1881

Object

Respondent: T Norris

## Summary:

There is one area which should be designated as a flood area and that is Haydon Hill Pastures and Pond. T

## Full text:

There is one area which should be designated as a flood area and that is Haydon Hill Pastures and Pond. T

## Change suggested by respondent:

The area should be a designated as a flood zone to ensure that the neighbourhood is kept safe from flooding During rainy periods the tributary it overflows badly, the ground is heavily saturated and therefore serves as a flood relief zone.

Legally No  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No

Appear exam: Written Representation

Attachments: None

## Policy NE9.4: Flood Risk and Mitigation

1913

Comment

Respondent: Three Rivers District Council

## Summary:

Recommend the policy includes reference to the risk of flooding 'elsewhere'. Recommends adding text referring to SuDS. Recommends referring to both Flood Zones 3a & 3b rather than just Flood Zone 3.

## Full text:

The policy could include stronger wording firstly to discourage residential development in areas at higher risk of flooding and secondly to include a presumption against development where it would exacerbate flooding on site or elsewhere. Paragraph 155 of the NPPF states that "Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The policy, therefore, needs to include reference to the need to avoid flood risk elsewhere and not just in the context of Flood Risk Assessments needing to consider cumulative impacts.

The policy should include a requirement for SuDS on major sites, as stated in paragraph 165 of the NPPF, and should seek SuDS on minor sites wherever possible. The SW Herts Level 1 SFRA recommended that policies on SuDS are incorporated into Local Plans but there is no reference to SuDS in the policy or supporting text.

The policy should also refer to Flood Zones 3a and 3b rather than just Flood Zone 3. Development in Flood Zone 3b should not be permitted unless it is water-compatible or introduces a less vulnerable use.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2084

Comment

Respondent: Environment Agency

## Summary:

The Local Plan must support effective management and reduction of surface water, fluvial, and groundwater flooding. As stated in the Level 1 SW Herts SFRA, "It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the SFRA)" and also, that "where possible, development will reduce flood risk overall".

Floodplains

It is noted that Flood Zones and compatibility are mentioned in the justification text paragraphs 9.14 and 9.18. However, as outlined in the NPPF and SW Herts SFRA, flood risk policy should provide further detail about development in functional floodplains (amendment below).

Sequential and Exception Test

In accordance with the NPPF (paragraph 158), development should not be permitted if there are reasonable available sites appropriate for the proposed development in areas with lower probability of flooding. It is the responsibility of the local planning authority to determine if the sequential test has been applied and whether or not there are other sites available at lower flood risk.

The Sequential and Exception Tests are mentioned in paragraphs 9.19 and 9.20, as well as the NE9.4 policy. The wording in the policy specifically regarding passing the Exception test could be strengthened by adding a wording from the SFRA which states development must provide wider sustainability benefits, as well as reduce flood risk where possible. (The suggested amendment included below).

Flood risk and climate change

As mentioned in relation to Policy CC8.5., in order to demonstrate that the development is 'safe' for its lifetime, an assessment of the impact of climate change on flood risk on site and elsewhere is required. Although climate change is mentioned in Paragraph 9.18, it would be good to include the need to assess climate change within Policy NE9.4 itself. This assessment is required to identify the appropriateness of the location for the development, finished floor levels, safe access/egress and the potential need for floodplain storage compensation. (The suggested amendment is included below).

Buffer zones

There is no mention of a need for an 8 metre buffer zone between any main river and new development within Policy NE9.4. Whilst buffer zones are referenced elsewhere in the Local Plan, it is important to note their critical importance for managing the impact of flood risk on floodplains, the impact of development on the structural integrity of flood defences and also provides adequate space for access for maintenance/emergency works along the river. Buffers are also critical to minimising disruption to the environment along rivers and encouraging biodiversity, supporting WFD objectives and the TRBMP. The SFRA also states the 8m buffer requirement. Therefore we recommend that this policy is amended to include the buffer zone requirement (wording provided below).

Culverts

We are pleased to see policy NE.9.4. supports de-culverting and improving WFD status of waterbodies. Firstly, the policy should include a presumption against the use of hard engineering, including gabions. Secondly, we suggest the additional detail is added to strengthen your position concerning culverts, which we have included in the amend policy text wording below.

Flood defences

The wording around development proximity to flood defences requires some more detail. Flood defences and Main Rivers adjacent to a development should be maintained whether they are within the site boundary or not, for example the developer may assume riparian responsibilities. Additionally, any development within 8 metres of a main river must demonstrate that access to the river and banks will still be possible for maintenance and emergency works. We have provided suggested wording to cover these points in the amended policy text below.

Flood Risk justification text

We are pleased to see that flood risk betterment has been recommended, both within the site and in the surrounding area. We recommend Paragraph 9.15 is amended to include the need to assess the impact of climate change on flood risk as follows:

"Applicants are expected to consider how their proposals affect, or could potentially impact other sites in the vicinity and the cumulative impact on flood risk, taking into account climate change."

Whilst Paragraph 9.18 mentions the need to assess climate change, it would be good to also identify the need for flood mitigation of both existing and new developments through the use of flood resilience and resistance measures. For example, resilience measures such as installing easy-to-clean hard floors and installing electrical sockets above the modelled flood level to reduce the potential impacts of flooding. Flood resistance measures can include installing flood doors, barriers or windows for example to reduce the likelihood of flood water entering a building

## Full text:

-

Change suggested by respondent:

Policy NE9.4 suggested amendments

Based on the comments above, to strengthen Policy NE9.4. we recommend the following amendments:

**Fluvial flooding**

When located within areas identified as being at risk of flooding, applicants are required to demonstrate how appropriate and effective mitigation measures have been integrated into the scheme, including management of residual flood risk.

Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. Only water compatible and essential infrastructure are will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within FZ3b. Developers should seek to increase the extent of FZ3b where possible and appropriate. To demonstrate compliance with the Exception Test, a flood resilient design and emergency planning considerations will need to be accounted for, over the lifetime of the development including:

- a) The development to remain safe and operational under flood events;
- b) Safe evacuation and/or safely remaining in the building under flood conditions;
- c) Key services must continue to be provided under flood conditions; and
- d) Buildings are to be designed for quick recovery following a flood.

Any development within Flood Zones 2 and 3, and those over one hectare in Flood Zone 1, should use a Flood Risk Assessment to show how they have considered flood risk beyond the site boundaries, including cumulative impacts arising from other developments. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the SFRA) and that where possible, development will reduce flood risk overall. Proposals for development in the floodplain must ~~show~~ demonstrate that suitable flood compensation storage will be provided ~~is available~~ to avoid any net loss in floodplain. Additionally, all new development within flood zones require an assessment of the impact of climate change on flood risk on site and elsewhere.

Developers should seek to provide an undeveloped buffer zone of 8 metres between the top of the bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Proposals located in areas where waterways have been culverted or altered should seek to re-naturalise the river and surroundings, improve water storage and enhance riparian habitats, in line with requirements to meet Water Framework Directive objectives and the Thames River Basin Management Plan. There is a presumption against the use of hard engineering, including gabions. For any development within 8 metres of a culvert, the developer must demonstrate that they have sought to de-culvert, as well as undertake a survey of the culvert to assess its exact location, condition and whether it is commensurate with the lifetime of the development or demonstrate how it will be repaired/upgraded. Flood defences and Main Rivers ~~within the site boundary~~ adjacent to development sites must be maintained, repaired or replaced by the developer for the lifetime of the development. For any development within 8 metres of a main river, the developer must demonstrate that access to the river and banks will still be possible for maintenance and emergency works.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2085

Comment

Respondent: Environment Agency

Summary:

**Groundwater Protection**

New development could result in the pollution, especially for sites situated in vulnerable groundwater areas with Source Protection Zones (SPZ) or on principal or secondary aquifers. In particular, sites where the previous land use suggests the potential presence of contamination or the proposed land use is potentially contaminative will need to be dealt with in a way which protects the underlying groundwater.

Full text:

-

Change suggested by respondent:

To strengthen Policy NE9.4. we suggest the following amendments are made to the groundwater protection section:

Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), ~~deep infiltration~~ infiltration via deep borehole soakaways ~~should be the last resort~~ will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated. Certain discharges into the ground may require an Environmental Permit.

Secondly, Paragraph 9.16 should be amended as follows:

'~~minimise~~ avoid these potential negative impacts on the ground source'.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>



2155

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.93 Ecology. Where watercourses have been culverted, the re-naturalisation of the surroundings (including, presumably the de-culverting of channels) is supported.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Surface Water Management

1872

Comment

Respondent: Canal & River Trust

## Summary:

We welcome that the discharge of water direct to a watercourse is included within the list and is considered to be a more preferable option that discharging rainwater to any public sewer.

Our waterways may well be able to receive runoff from future development sites. This will require careful design and assessment, and mitigation works to the canal infrastructure may be necessary to cope with this. The Trust is not however a land drainage authority and any such direct discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.

## Full text:

We note the inclusion of a hierarchical list (paragraph 9.23) which sets out the approach that should be considered where a development scheme could use single or multiple methods of surface water management. The discharge of water direct to a watercourse is included within the list. We welcome that this option is included within the list and is considered to be a more preferable option that discharging rainwater to any public sewer.

Our waterways may well be able to receive runoff from future development sites. This will require careful design and assessment, and mitigation works to the canal infrastructure may be necessary to cope with this. The Trust is not however a land drainage authority and any such direct discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

**Policy NE9.5: Surface Water Management**

1781

Comment

Respondent: Ms Sarah Baxter

## Summary:

Any planning of rewilding to alleviate surface water run off should be doubles/ tripled to take into account that further up the country we have 108 ancient woodlands being destroyed for HS2 and the impact of that devastation on flooding is unknown. This could be catastrophic for our community. Any influence our council has on stopped HS2 would be even more preferable. Its a very massive concern on a number of aspects in the area.

## Full text:

Any planning of rewilding to alleviate surface water run off should be doubles/ tripled to take into account that further up the country we have 108 ancient woodlands being destroyed for HS2 and the impact of that devastation on flooding is unknown. This could be catastrophic for our community. Any influence our council has on stopped HS2 would be even more preferable. Its a very massive concern on a number of aspects in the area.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1962

Support

Respondent: Thames Water Utilities Ltd

Agent: Savills

## Summary:

Thames Water support the policy requirements in relation to sustainable drainage. Following the drainage hierarchy set out in the supporting text will help to ensure that surface water is dealt with as close to source as possible and will reduce surface water entering the sewerage network thereby helping to reduce the risk of sewer flooding.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Consultation comments on policy CC6.2

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2086

Comment

Respondent: Environment Agency

## Summary:

Policy NE9.5. and Paragraph 9.22. have incorporated our previous concerns raised during Regulation 18 about the need for multifunctional SuDS, rather than its previous inception of alleviating surface water flooding only. However, with reference to the Hertfordshire Water Study's (2017) statement that to ease the pressure of the drainage systems, rainwater harvesting and retrofitting of SuDS should be required in planning policies, we feel this opportunity is missed in the current policy wording.

## Full text:

-

## Change suggested by respondent:

We suggest the following amendment to strengthen Policy NE9.5:

Sustainable Drainage Systems should be designed and integrated into the proposal to effectively manage the existing surface water flow paths on the site, protect and enhance water quality, and help to mitigate other flood risks.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2156

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.94 Ecology. The policy which states that sustainable drainage systems should make effective use of land by being multifunctional, to maximise ecological benefits is supported.

5.95 Lead Local Flood Authority. The content of this policy is supported by the Lead Local Flood Authority (LLFA). The term: lead flood risk authority should be amended to: 'Lead Local Flood Authority', as there is not a separate authority within HCC that deals with flood risk.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"Measures should be agreed with the ~~lead flood risk authority~~ Lead Local Flood Authority and be consistent with the Hertfordshire Local Flood Risk Management Strategy."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Protecting open space

1887

Support

Respondent: T Norris

## Summary:

Whilst you state that there are a variety of open space and acknowledge the important contribution they make to green infrastructure network and offer valuable space and amenity as well as contributing to flood management you fail to include protection for Attenborough Fields, a place with high value to the neighbourhood, an area for wildlife to roam, beneficial to health and wellbeing and air quality. Attenborough fields should be a safe haven and a tribute to David Attenborough as a way of acknowledging the importance of maintaining green, wildlife inhabited space rather than a potential development area

## Full text:

Whilst you state that there are a variety of open space and acknowledge the important contribution they make to green infrastructure network and offer valuable space and amenity as well as contributing to flood management you fail to include protection for Attenborough Fields, a place with high value to the neighbourhood, an area for wildlife to roam, beneficial to health and wellbeing and air quality. Attenborough fields should be a safe haven and a tribute to David Attenborough as a way of acknowledging the importance of maintaining green, wildlife inhabited space rather than a potential development area

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Policy NE9.6: Protecting Open Space**

1810

Comment

Respondent: Sport England

## Summary:

The policy is broadly supported. However, a minor amendment is requested to improve clarity. It is requested that references in the policy to “assessment” are amended to “assessment of needs” to avoid potential misinterpretations of what the assessment relates to and for consistency with paragraph 96 of the NPPF which clarifies that what such assessments relate to in this context. It is also requested that the reasoned justification to the policy refers to the Council’s recent Playing Pitch Strategy as this justifies and supports the implementation of the policy.

## Full text:

The policy is supported as it seeks to safeguard open spaces which would include outdoor sports facilities and playing fields used for formal and informal sport and active recreation. The criteria in the policy are considered to broadly accord with Government policy in paragraph 97 of the NPPF.

However, a minor amendment is requested to improve clarity. It is requested that references in the policy to “assessment” are amended to “assessment of needs” to avoid potential misinterpretations of what the assessment relates to and for consistency with paragraph 96 of the NPPF which clarifies that what such assessments relate to in this context.

It is also requested that the reasoned justification to the policy refers to the Council’s recent Playing Pitch Strategy as this provides the current evidence base that helps justifies the policy and will be used for assessing proposals against the policy in relation to outdoor sports facilities.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1854

Comment

Respondent: Planning &amp; Development Associates Ltd

## Summary:

A Statement of Representations is attached.

2.7.1 The importance of Watford’s open spaces outlined in paragraph 9.26 is supported and reflects the borough’s high number of amenity spaces that residents can access and should be duly recognised within this Local Plan. Paragraph 9.26 highlights that “open space can make an important contribution to the green infrastructure network and offer valuable space for recreational and amenity space.” Similarly, the role of open space also performs a broader environmental purpose which is also recognised in paragraph 9.26 where it states that “open spaces can also contribute towards flood risk management schemes and sustainable drainage systems.” In light of the importance that open space has in supporting the borough’s environmental objectives, the protection afforded to such spaces under Policy NE9.6 is supported.

2.7.2 Whilst the policy indicates that, “the absence of identification of an open space on the Policies Map does not imply that development is appropriate”, the basis of this representation is that the identification of existing open spaces is not technically sound or sufficiently robust to provide a confident basis that all opportunities for increasing open space designations have been explored. This representation proposes additional areas of open and green space which are of much higher quality than the existing designated area and already perform a function in terms of air quality mitigation, amenity, environmental and ecological value.

## Full text:

A Statement of Representations is attached.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y3>

2087

Comment

Respondent: Environment Agency

## Summary:

Open spaces provide many benefits to the wider community beyond that which development may offer, such as mental and physical health and well-being, biodiversity, flood risk management, social/community benefits, air quality, climate regulation/carbon capture and so on. Therefore, Policy NE9.6. requires further clarification in regards to the following statement:

'Development proposals for alternative open space uses will be supported where an up-to-date assessment clearly shows the benefits outweigh the loss'. A clear position on which benefits outweigh the loss is necessary for ensuring development does not prevent opportunities for improved green and open spaces.

## Full text:

-

## Change suggested by respondent:

Policy NE9.6. requires further clarification in regards to the following statement:

'Development proposals for alternative open space uses will be supported where an up-to-date assessment clearly shows the benefits outweigh the loss'. A clear position on which benefits outweigh the loss is necessary for ensuring development does not prevent opportunities for improved green and open spaces.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

## Providing new open space

1811

Comment

Respondent: Sport England

## Summary:

The policy is supported. The clarification in the paragraph 9.31 of the reasoned justification that contributions will be sought for outdoor sport facilities through the Playing Pitch Calculator in line with the Playing Pitch Strategy is welcomed.

For accuracy, it is requested that paragraph 9.30 refers to financial contributions being secured through planning obligations rather than planning conditions as it is not lawful to secure financial contributions through conditions.

The reference to the design of new play areas and formal open spaces accounting for Active Design in paragraph 9.32 is welcomed.

## Full text:

The policy is supported as it should help ensure that new residential development makes provision for the open space (including outdoor sports) needs that it generates. The clarification in the paragraph 9.31 of the reasoned justification that contributions will be sought for outdoor sport facilities through the Playing Pitch Calculator in line with the Playing Pitch Strategy is welcomed as this is supported by the Council's evidence base and is the appropriate form of provision for this type of open space.

For accuracy, it is requested that paragraph 9.30 refers to financial contributions being secured through planning obligations rather than planning conditions as it is not lawful to secure financial contributions through conditions.

The reference to the design of new play areas and formal open spaces accounting for Active Design in paragraph 9.32 is welcomed.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**Policy NE9.7: Providing New Open Space**

1958

Comment

Respondent: Watford Centre Limited  
Agent: WSP

**Summary:**

Policy NE9.7 states that development proposals of 10 dwellings or more will be required to provide publicly accessible open space on site. It is noted that this policy although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these exceptional circumstances. It is recommended that the Council includes an exceptions criterion to this policy which states that, if open space cannot be provided on-site, then a financial contribution to off-site open space can be made as an alternative. The following wording could be accommodated: "It is acknowledged that providing open space on development sites is not always achievable due to site constraints and if this cannot be accommodated then an open space contribution will be sought"

**Full text:**

Date received 15/03/2021 via email.

**Change suggested by respondent:**

It is recommended that the Council includes an exceptions criterion to this policy which states that, if open space cannot be provided on-site, then a financial contribution to off-site open space can be made as an alternative. The following wording could be accommodated:

**"It is acknowledged that providing open space on development sites is not always achievable due to site constraints and if this cannot be accommodated then an open space contribution will be sought"**

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

**Biodiversity**

1888

Object

Respondent: T Norris

**Summary:**

I object to 9.36 in particular where: Compensatory measures will only be considered when no other measures are demonstrated to be feasible as set out in the mitigation hierarchy (Figure 9.4). In such an instance, Biodiversity Offset Agreements must be secured through Section 106 Agreements. The process for this will be set out in a Supplementary Planning Document.

**Full text:**

I object to 9.36 in particular where: Compensatory measures will only be considered when no other measures are demonstrated to be feasible as set out in the mitigation hierarchy (Figure 9.4). In such an instance, Biodiversity Offset Agreements must be secured through Section 106 Agreements. The process for this will be set out in a Supplementary Planning Document.

**Change suggested by respondent:**

Biodiversity must take precedence over manmade infrastructure as we only have one planet

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2157

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Ecology. Net Gain is a vital component of how the planning system can hope to maintain biodiversity and deliver the expectations of local and national policy, and law, as expressed in the final draft local plan, NPPF and the Environment Bill. Whilst Policy NE9.8: Biodiversity effectively explains the requirements of biodiversity net gain, this is largely absent from the supporting text. It is therefore suggested that the addition of the following text which draws heavily on existing best practice, could be included within the supporting text and would provide some useful context for the policy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

“The Government’s 25 Year Environment Plan aims to ensure we leave ‘the environment in a better state than we found it’. In terms of new development, best practice and policy apply the mitigation hierarchy which seeks to ensure harmful effects are first avoided before mitigation and compensation are considered.

Furthermore, national policy encourages new development to achieve an overall biodiversity net gain. The emerging Environment Bill currently requires that each development should compensate for unavoidable losses and deliver a 10% net gain to be measured by means of a ‘biodiversity metric’, a standardised tool developed by Defra/Natural England that quantifies losses and gains in terms of biodiversity ‘units. Where enhancement measures, and compensation for unavoidable losses cannot be secured on-site, this can be delivered beyond the application site boundary preferably nearby and/or within a borough-wide Nature Recovery Network.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy NE9.8: Biodiversity

2088

Comment

Respondent: Environment Agency

## Summary:

We note our suggested amendment to Policy NE9.8. about referencing the most recent version of the Defra Biodiversity Metric has been taken on board. To clarify, the Natural England Biodiversity Metric and the Defra Biodiversity Metric are the same tool, which has been renamed The Biodiversity Metric. We expect version 3.0 to be published later this spring, alongside updated guidance.

We recommend the following aspects of this policy should be strengthened: explaining that Net Gain should be sought even if the development is not proposing loss; consistency and proportionality; thresholds and exclusions; and timescales for management and maintenance requirements

## Full text:

-

## Change suggested by respondent:

Policy NE.9.8 could be amended to include greater detail and best practical as follows:

‘Development should not lead to the loss or degradation of sites of local, national or international importance. Developments likely to cause harm to sites of nature conservation importance will be refused except in exceptional circumstances. New developments should seek to achieve an overall net gain in biodiversity. All development proposals are required to:

- ◆ prepare a proportionate ecological survey and assessment report;
- ◆ demonstrate minimising the impacts of development on biodiversity in accordance with the mitigation hierarchy;
- ◆ demonstrate that any off-site measures proposed seek to enhance locally and nationally important priorities;
- ◆ demonstrate a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss; and
- ◆ prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on- and off-site measures.’

Additionally, Policy NE9.8. should reference supporting information, such as the Hertfordshire State of Nature Report 2020, which provides evidence for the latest data on biodiversity across the country and supports the argument that the Local Plan should play a significant role in protecting and improving biodiversity.

We recommend you review Box 4.1 of the CIEEM practical guide, which is a quite helpful checklist for putting together a strong biodiversity net gain policy. Ultimately, Natural England are the authority on Biodiversity Net Gain and we recommend they are consulted for better judgement of any other requirements.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2158

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.97 Ecology. It is considered that the policy should be modified as follows to better reflect the decision-making process and the primacy of the mitigation hierarchy. It should be noted that the final paragraph within the policy which relates to habitats and species has been deleted as it would best be delivered via Policy NE9.1: Managing the Impacts of Development

## Full text:

Form and letter received via email

## Change suggested by respondent:

New development should apply the mitigation hierarchy to firstly avoid and then if this is not possible to mitigate harmful effects on biodiversity. Where harmful effects are unavoidable, these should be compensated effectively.  
New development should also seek to achieve an overall net gain in biodiversity. This must be measured by the latest Defra/Natural England biodiversity metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.  
Where it is not possible to avoid, mitigate, compensate or provide enhancements within the application site, an offsite Biodiversity Offset Agreement should be submitted. Offsite measures should be located close by and/or within the Nature Recovery Network.  
~~Where there is a reasonable likelihood of the presence of a protected species or its habitat, applications must be supported by an ecological survey. If present, the proposal must mitigate or compensate appropriately in accordance with the legislation that protects them.~~

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Infrastructure

1844

Support

Respondent: Hertsmere Borough Council

## Summary:

Details of Watford's infrastructure requirements are set out within Watford Infrastructure Delivery Plan (IDP). HBC consider that the Local Plan could benefit from transferring across some of that detail to explain more fully exactly what infrastructure improvements are being proposed, both in terms location and size of facility, to enable the growth scenario to be delivered. Hertsmere understand that constraints on land generate additional complications when securing the land required for infrastructure improvements. However, further information is required to address role that services and facilities outside of Watford play in meeting the needs of local Watford residents.

## Full text:

Details of Watford's infrastructure requirements are set out within Watford Infrastructure Delivery Plan (IDP). HBC consider that the Local Plan could benefit from transferring across some of that detail to explain more fully exactly what infrastructure improvements are being proposed, both in terms location and size of facility, to enable the growth scenario to be delivered. For example, the policy map shows land allocated for education facilities yet this is not referenced within the plan, and whilst the site specific site policies provide detail on where new facilities are likely to be located it would be useful to have a summary table and map showing the level of provision and the potential locations.

Hertsmere understand that constraints on land generate additional complications when securing the land required for infrastructure improvements. However, further information is required to address role that services and facilities outside of Watford play in meeting the needs of local Watford residents. Ongoing discussions between Hertsmere and Watford will be encouraged so to better understand the connections between neighbouring facilities and Watford and how these may evolve over time. Hertsmere would want to be included as part of the process relating to developer contributions (S106 and CIL) and infrastructure provision.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/kr>



1968

Comment

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

TfL supports the intention to safeguard the disused rail line from Croxley Green to Watford High Street station for a potential mass transit link in place of the former proposals for the Metropolitan Line Extension (MLX). Although powers to construct the MLX have now lapsed and it will not be going ahead in the original form, TfL is working with partners including Watford Borough Council and Hertfordshire County Council to explore alternatives and we will be happy to continue to provide advice. Safeguarding of the route will enable the Councils to take forward these options in the future.

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

2049

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

We also note that an Infrastructure Delivery Plan (IDP) has not yet been prepared to accompany the Local Plan and without this the plan may be challenged. The Local Plan does not provide any details of infrastructure funding, which may be unknown at this stage if the specific infrastructure schemes that are required have not yet been identified. It is important that once the schemes are identified that the funding method for each is outlined, including any Central Government or Local Government funding that is available, the amount that could be collected from developers and any shortfall that could occur. It is recommended that an IDP is prepared to provide further details regarding the infrastructure provision and funding. We welcome an opportunity to comment on the IDP when available.

As outlined above, there is a high level of development proposed within this Local Plan and it should be ensured that the transport evidence base for the Local Plan, following this consultation, provides an indication as to what the residual impacts of the development would be on the SRN. We would anticipate that this is clarified prior to submission of the updated plan for examination, to enable us to make an informed decision as to the soundness of the plan at the appropriate time. We would expect to make a representation to the Plan EIP and also anticipate agreeing a SOCG with yourselves.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2160

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.98 The county council has concerns regarding the funding of critical infrastructure that is outlined in the draft IDP. The reliance on CIL to fund the many projects that are outlined in the Infrastructure Funding Schedules that are listed in Appendix A of the IDP (particularly education and transport) will not be able to cover the cost of these projects, resulting in a major funding gap. These are detailed further within this representation. If other sources of funding are not able to be sourced, the deliverability of some of these critical projects to support the intended growth within the final draft local plan is questionable.

5.99 Although the county council supports the LPA's commitment to producing an Infrastructure and Funding Strategy in the light of these concerns, the soundness of the plan could be improved, and HCC is keen to explore future modifications to the plan that may include identification of key critical infrastructure which is required to be in place, prior to development taking place.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2162

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.110 Waste Management Unit. None of the county's 17 Recycling Centres (RC) are located within the borough. The closest is Waterdale, which is located to the north of the borough, within Three Rivers District. The site contains a waste transfer station, along with a separate RC that is predominantly used by Watford Borough residents.

5.111 At this point in time, the county council is looking to make improvements to Waterdale RC in order to anticipate the increase in demand, due to the housing growth that is expected to take place within the centre's catchment area. Appreciating the pressure on future CIL this form of infrastructure is one where the county council is likely to request a CIL contribution, in order to facilitate improvements to the site.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2163

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.112 Lead Local Flood Authority. The term: 'flood prevention' that is contained within the second bullet point in this paragraph should be amended to: 'the management of flood risk' as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

• Physical infrastructure: roads, footpaths, cycleways, water provision and treatment, sewerage, ~~flood prevention~~ the management of flood risk and drainage, waste disposal, electricity, gas and electronic communications networks.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2165

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.118 Transport. References to contributions towards projects identified in the Infrastructure Delivery Plan, Local Cycling and Walking Infrastructure Plan and Watford's Sustainable Transport Strategy is welcomed.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2166

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Metropolitan Line Extension (Paragraph 10.14)

5.119 Transport. Reference to the Metropolitan Line Extension (MLX), or a comparable alternative to it, is welcomed. The MLX should be identified, and land safeguarded within the plan (as shown as a Safeguarded Transport Route on the Policies Map) for the implementation of a transport scheme. Although it is recognised that this will not be considered as critical infrastructure in this local plan, the long-term ambition is the use of this corridor for major sustainable transport use.

5.120 It is suggested that the wording within the paragraph is modified as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Watford Borough Council continues to support the Metropolitan Line Extension, or a comparable alternative, and considers that the route along the disused former Croxley Rail Line is safeguarded and provides the opportunity for a walking and cycling link and a potential future route a potential future route for a Mass Rapid Transit, as well as an opportunity for a walking and cycling link.”

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy IN10.1: Integrated Infrastructure Delivery

1963

Comment

Respondent: Thames Water Utilities Ltd  
Agent: Savills

## Summary:

Thames Water supports the aims of both Policies IN10.1 and IN10.2. In particular, the requirement to engage early with infrastructure providers is welcomed together with the supporting text in paragraph 10.7 which states that infrastructure should be well integrated alongside new development with the phasing agreed, alongside providers, as part of a planning application. It will be important for sewerage upgrades that may be necessary to support new development to be delivered ahead of the relevant phase of development. However, Thames Water are unable to prevent connections to the sewerage network, as such where there is a need to phase development and infrastructure, planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed.

## Full text:

Form received via email

## Change suggested by respondent:

See also IN10.2

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Policy V9.5

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

Respondent: Environment Agency

Summary:

Water efficiency

We acknowledge that the IDP will reference Affinity Water's Water Resource Management Plan, however this concerns water resources and not wastewater. As previously mentioned, our concerns about water resources have been addressed through the inclusion of water efficiency requirements in Policy CC8.3.

Provisions for wastewater

We note the Council's request for us to direct our comments about wastewater infrastructure to the Infrastructure Delivery Plan (IDP). IDP will need to evidence how wastewater capacity considerations have been taken into account in the planning for growth and that the infrastructure will be in place to support this, at the right time, without detriment to the water environment.

In our response to Regulation 18 we stressed the importance of ensuring water quality and provision of infrastructure for wastewater is captured in the Local Plan. We made it clear that wastewater infrastructure is a strategic issue for the Local Plan, and set out our requirement for a strategic position, based on evidence, within a policy to make it clear to developers the standards expected of them. Wastewater provision is a soundness issue, because (a) it is included in the NPPF (paragraph 20), and (b) it is not justified if you have not used an evidence base to inform your Local Plan. As the IDP is an evidence document for the Local Plan, your position on wastewater needs to be reflected in the planning policies themselves. Furthermore, the Local Plan currently fails to highlight the sensitivities around sewage trunk capacity as highlighted in the Hertfordshire Water Study (2017). The Water Study also highlights that the immediate strategic intervention is necessary from 2021.

**To find the Local Plan sound, this issue must be resolved by having text and policy within the plan that explain how you will tackle wastewater provisions.**

In our Regulation 18 consultee response we expressed the importance of liaising and working closely with Thames Water to ensure the existing sewage network and wastewater treatment infrastructure have enough capacity for the proposed new development. We note that Thames Water have identified sites that may require upgrades to their wastewater network, and as a result the following standardised sentence has been applied to site allocations MU05, MU06, MU07, MU09, MU13, MU16, MU18, MU21, MU22, MU23, HS22:

"Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided".

Within Local Plan policy, developers should be encouraged to undertake early pre-application engagement with the wastewater infrastructure provider and the Council, to ensure there is capacity for their development. Lack of wastewater capacity, could lead to backing up of foul water in to buildings. Furthermore, overburdening of the sewerage system, will lead to more prevalent overflows in Combined Sewerage Overflows (CSOs) in times of dry weather and low flows, impacting water quality. Additionally, we require a policy within the Local Plan that endorses the approach that the wastewater infrastructure needs to be in place prior to development, and this is the responsibility of the developer to ensure this happens.

Full text:

-

Change suggested by respondent:

In light of the above, we suggested the following amendments to Policy IN10.1. to address this issue of wastewater provisions:

**Policy IN10.1. Integrated Infrastructure Delivery**

Proposals should demonstrate a comprehensive integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and:

- a) Contributes appropriately and proportionately towards required infrastructure identified in Watford's Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan;
- b) Where applicable, connects to area-wide infrastructure and enables future connections;
- c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the Watford's Infrastructure Delivery Plan, Site Allocations and / or other policies in the Local Plan;
- d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; it is the responsibility of the developer to ensure that this will be delivered on site prior to development. Where there is a capacity constraint, the Council will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.
- e) Is appropriately designed into development from the outset, so that it complements and does not unduly restrict development on adjacent or connected sites. Water supply and provisions for wastewater must be taken into consideration, and development should improve and not cause harm or deterioration to the water environment

Developers will be expected to undergo early pre-application engagement with the Council and infrastructure service providers to discuss their requirements and to demonstrate that there is sufficient infrastructure capacity, both on and off site, to support the proposed development from commencement. The Council will work with infrastructure providers, the Environment Agency and neighbouring planning authorities to explore the mitigation of issues surrounding water supply and wastewater capacity caused by development.

Developer contributions will be sought where needs arise, in line with the policy requirements of this plan; where provision is made on site, this will be considered in the context of the other developer contributions.

Legally compliant: Yes

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2164

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.113 Children's Services (School Place Planning). It is considered that the following wording within Policy IN10.1 should be modified, due to the lack of availability of new secondary school sites within the borough, or acknowledgement within the supporting text that additional secondary capacity is required. The final draft local plan needs to explicitly reference where the funding will be sourced from developments arising within the borough.

...Currently, the closest potential site for a new secondary that should be able to accommodate some of Watford's demand is the county council owned site at Carpenter's Park. This is being promoted by HCC for a new secondary school site and is located within both Hertsmeare Borough and Three Rivers District...

...Another site for a secondary school could potentially be located within the Bushey area and this is currently being discussed with Hertsmeare Borough Council for potential allocation in their emerging local plan...

## Full text:

Form and letter received via email

## Change suggested by respondent:

Proposals should demonstrate a comprehensive integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and:

a) Contributes appropriately and proportionately towards required infrastructure identified in Watford's Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan;

d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; this will be delivered on site, at the earliest opportunity. Where infrastructure that is not able to be delivered on site, such as a secondary school, then the relevant local authorities should work together to find a satisfactory solution, to ensure the associated infrastructure will be in place;

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Providing infrastructure to support new development

1800

Comment

Respondent: Mrs Jessica Webb

## Summary:

Being a local area with only a couple of non selective secondary schools, what are the plans to create a new secondary school (or more than one) that will create the spaces needed for the ever growing population. And where would this likely to be as currently all of the local schools are in "huddles" so a new school doesn't need to be placed close to existing ones. What about a compulsory purchase order on the Langleybury site which has to be used for educational purposes and already has the infrastructure in place?

## Full text:

Being a local area with only a couple of non selective secondary schools, what are the plans to create a new secondary school (or more than one) that will create the spaces needed for the ever growing population. And where would this likely to be as currently all of the local schools are in "huddles" so a new school doesn't need to be placed close to existing ones. What about a compulsory purchase order on the Langleybury site which has to be used for educational purposes and already has the infrastructure in place?

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

2161

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.109 YCH Services for Young People. The county council considers it to be important that young people and young adults have appropriate and accessible support and any new development should take into account young people as a user, with associated community facilities offered on-site where possible. The co-location of services in the same premises should also be considered where possible in order to ensure maximising support and shared costs.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2175

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.134 The equivalent policy (Policy V9.5 Infrastructure Provision) in the First Draft Local Plan, made reference to the need for future-proofed communications, in particular broadband, when it came to approving new developments. This has been omitted from Policy IN10.2. The final draft local plan should aim to expand gigabit connectivity in the borough, through the role-out of 'Fibre To The Premises' (FTTP) for all qualifying developments...

5.139 Whilst the county council welcomes the support the LPA has given to future-proofed, high quality digital infrastructure to support well-functioning employment areas, it is essential that all new developments (including residential) are supported by superfast broadband....

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore requested that the wording within both paragraph 10.17 and Policy IN10.2 are modified as follows:

10.17 Future-proofed, high quality digital infrastructure is considered vital to support well-functioning employment and residential areas. The National Planning Policy Framework requires planning policies to set out how high quality digital infrastructure is expected to be delivered.

Policy IN10.2: Providing Infrastructure to Support New Development

"Proposals for employment uses and new residential areas should demonstrate that provision is made for high quality digital facilities as part of the application. All qualifying developments shall deliver Fibre to the Premises (FTTP)."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Health facilities

1933

Comment

Respondent: Cassiobury Residents' Association

### Summary:

NB of comment re Health facilities made re para 2.20 - Where the need for a new health facility is identified it should not be offset to the detriment of existing health facilities, but should fully materialize in order to wholly and appropriately meet the anticipated local level of need.

### Full text:

NB of comment re Health facilities made re para 2.20 - Where the need for a new health facility is identified it should not be offset to the detriment of existing health facilities, but should fully materialize in order to wholly and appropriately meet the anticipated local level of need.

### Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Education

1914

Comment

Respondent: Three Rivers District Council

### Summary:

There are concerns about potential primary school provision with limited locations and capacity available locally. Ongoing duty to cooperate discussions between Watford and its neighbouring authorities may lead to some secondary school education capacity being provided outside the Borough.

The requirement for sites larger than 1,000 dwellings to provide education on site is consistent with Hertfordshire County Council's requirements for Tier 3 sites (PDL with a dominance of 1-2 bed flatted development). Sites providing family homes, as per the housing mix requirement, should require the lower threshold of 500 dwellings.

### Full text:

There are concerns about potential primary school provision with limited locations and capacity available locally. Ongoing duty to cooperate discussions between Watford and its neighbouring authorities may lead to some secondary school education capacity being provided outside the Borough.

The requirement for sites larger than 1,000 dwellings to provide education on site is consistent with Hertfordshire County Council's requirements for Tier 3 sites (PDL with a dominance of 1-2 bed flatted development). Sites providing family homes, as per the housing mix requirement, should require the lower threshold of 500 dwellings.

### Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None



2159

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

Children's Services (School Place Planning).

...With the allocation of both the former Meriden School Site and the former Bill Everett Centre for future education need (which the county council supports and considers that two 3fe primary schools may be able to be accommodated on each allocation, subject to detailed feasibility), along with the possible expansion of Orchard and Holywell primary schools by 1fe each, there will still be a shortfall of 11fe within the borough.

## Full text:

Form and letter received via email

## Change suggested by respondent:

5.107 It is therefore requested that additional primary school sites (each up to 3fe) are allocated within the following sites:

- Site: HS21 Land at Waterfields Retail Park;
- Site: MU23 Land at ASDA, Dome Roundabout;
- The wider Town Centre Strategic Development Area (as suggested within paragraph 2.50 of the final draft local plan).

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Metropolitan Line Extension

1915

Comment

Respondent: Three Rivers District Council

## Summary:

Support the approach to keeping the route safeguarded, however there have been no discussions about safeguarding the section of MLX in Three Rivers. Is the intention to include the Three Rivers section?

## Full text:

Support the approach to keeping the route safeguarded, however there have been no discussions about safeguarding the section of MLX in Three Rivers. Is the intention to include the Three Rivers section?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

## Policy IN10.2: Providing Infrastructure to Support New Development

1964

Comment

Respondent: Thames Water Utilities Ltd  
Agent: Savills

## Summary:

Thames Water supports the aims of both Policies IN10.1 and IN10.2. In particular, the requirement to engage early with infrastructure providers is welcomed together with the supporting text in paragraph 10.7 which states that infrastructure should be well integrated alongside new development with the phasing agreed, alongside providers, as part of a planning application. It will be important for sewerage upgrades that may be necessary to support new development to be delivered ahead of the relevant phase of development. However, Thames Water are unable to prevent connections to the sewerage network, as such where there is a need to phase development and infrastructure, planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed.

## Full text:

Form received via email

## Change suggested by respondent:

In order to ensure the policies are effective at aligning the delivery of development alongside any necessary infrastructure upgrades it is considered that the wording of policy IN10.2 should be amended as follows: "Planning permission, except for householders, will be granted where it is demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from proposed development. Where necessary planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades."

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Policy V9.5

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2167

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

Infrastructure Delivery Plan (IDP)

5.121 The county council considers that the IDP published alongside the final draft local plan should have been consulted separately. It is likely that comments made to the IDP may lead to changes in wording, and subsequent modifications will be required to be made to the plan....

5.125 . On this basis, coupled with preliminary forward projections of CIL receipts, the county council has concerns that adequate funding will be secured to ensure a reasonable prospect of infrastructure schemes being delivered....

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2168

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Early Years Education

5.127 Paragraph 4.3.16 of the Watford IDP states that no further provision of early years education is required at this stage; however, the county council believes further provision will be required across the plan period. At Watford Gateway, there is currently very little in terms of childcare facilities. The final draft local plan states that as a part of the redevelopment of the area, a childcare facility should be re-provided. At a minimum, there is a requirement for childcare provision here to be remodelled and extended to meet the new demand in the area. New childcare provision should be created. At Colne Valley the minimum requirement is for the current childcare facility to be remodelled, and extended, to meet the new demand in the area. Ideally, provision for another childcare

33

facility would be created, as well as extending the local provision. The need for increased provision at Watford Gateway and Colne Valley should therefore be identified in the IDP, the funding source identified, and the plan viability tested to ensure its delivery. It should be noted that the average build cost per place, per the latest Draft Hertfordshire County Council Developer Contributions Guidance (February 2021), is £9,250.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
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HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2169

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

Primary Education

5.128 The quantum of primary provision in the IDP broadly aligns with that identified in the local plan, subject to the amendments that are outlined within the comments that relate to Chapter 10 of the final draft local plan. The costs that are presented in Appendix A of the IDP are not aligned with those that we would expect for Hertfordshire, based on the Department of Education scorecards.

## Full text:

Form and letter received via email

## Change suggested by respondent:

See document for details

The IDP should be updated to reflect these costs

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
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HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2170

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

## Secondary Education

5.129 The IDP recognises that there are no sites within the LPA area that are suitable and that the need will be met in neighbouring authorities. Developer contributions will be sought from new units in Watford to fund places that arise from that growth and the final draft local plan needs to explicitly reference where the funding will be sourced from developments arising within the borough. The costs presented in the IDP, associated with delivering new secondary school sites should be presented in the IDP. The costs below are taken from the Department of Education scorecard.

## Full text:

Form and letter received via email

## Change suggested by respondent:

See document for details

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2171

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.130 Adult Care Services. The IDP recognises the need to deliver a quantum of housing for older people, and adults with disabilities that is in alignment with the need set out by Adult Care Services colleagues. The IDP is not clear where or how this identified need will be delivered.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2172

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.131 YCH Services for Young People. The recognition of the need for youth services to be provided in the IDP is welcomed, however, the likely scale of expected contribution should be set out in Appendix A with a link to the emerging Developer Contributions Guidance (February 2021).

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2173

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.132 Libraries. HCC has no plans to provide additional libraries in Watford, so any required increase in provision will be met by increasing the capacity of service provision in the most appropriate library or libraries nearest to any new housing developments. HCC will therefore seek contributions from developers or CIL for service improvements appropriate to the scale and nature of proposed developments. As stated in this representation, the county council is open to opportunities to re-provide North Watford Library in partnership or as part of a co-location with other facilities. The value identified in Appendix A that is to be required for the improvement of library facilities is £9000. The emerging developer contributions guidance places a cost of £38.85 per person where it is necessary for libraries to increase resource requirements and a cost of £123.54 per person where a project has been identified to expand or provide a new centre. It is therefore suggested that the value in the IDP is too low.

## Full text:

Form and letter received via email

## Change suggested by respondent:

...It is therefore suggested that the value in the IDP is too low.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2174

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.133 Waste Management. There are no specific projects identified in the IDP, as none of the county's Recycling Centres that are operated by the county council are located within the borough. However, the Waterdale Recycling Centre is located close to the borough's boundary and it is conceivable that CIL contributions could be directed towards improvements to this facility. It is therefore suggested that the figure of £10,000 within the IDP is too low.

## Full text:

Form and letter received via email

## Change suggested by respondent:

...It is therefore suggested that the figure of £10,000 within the IDP is too low.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Development contributions

2013

Comment

Respondent: Network Rail  
Agent: Network Rail

## Summary:

this wider plan with suitable legal and property agreements being required to allow Network Rail to potentially release or develop lands. Network Rail also need to understand what level of Section 106 allocations will be provided to provide much needed station and access enhancements at the station. This should include funding to wider infrastructure elements such as footbridge that links across the railway to facilitate further access and help to release plots of land identified within the local plan.

## Full text:

Letter received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: None

2176

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.140 Transport. The paragraph should refer to onsite provision of high-quality walking and cycling access as part of the onsite works to deliver a sustainable development. There will likely also be off site infrastructure identified at later planning stages that will be required for each site (e.g. Transport Assessments).

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

### Policy IN10.3: Development Contributions

1812

Support

Respondent: Sport England

## Summary:

The policy is supported as this makes provision for the Council to seek new or improved infrastructure (potentially including sport and physical activity related infrastructure) on site or through financial contributions secured through CIL or section 106 agreements. The Council's Playing Pitch Strategy provides the evidence base for outdoor sport which supports this approach.

## Full text:

The policy is supported as this makes provision for the Council to seek new or improved infrastructure (potentially including sport and physical activity related infrastructure) on site or through financial contributions secured through CIL or section 106 agreements. The Council's Playing Pitch Strategy provides the evidence base for outdoor sport which supports this approach.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2177

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.141 It is considered that the policy needs to be more explicit on how “infrastructure necessary to support the growth outlined in this plan” will be secured.

5.142 Policies IN10.3 a), b) and c) are rather ambiguous in their current form...

5.151 As stated in section 1 of this representation, the county council has concerns regarding the funding of critical infrastructure that is outlined in the draft IDP. The reliance on CIL to fund the many projects that are outlined in the Infrastructure Funding Schedules that are listed in Appendix A of the IDP (particularly education and transport) will not be able to cover the cost of these projects, resulting in a major funding gap. If other sources of funding are not able to be sourced, the deliverability of some of these critical projects to support the intended growth within the final draft local plan is questionable.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2178

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.152 Transport. It is suggested that the wording within paragraph d) should be amended to include provision for cycling and walking as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

“d) Securing off-site highway works including provision for cycling and walking where necessary;”

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>



## A Sustainable Transport Town

1845

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's proposals for sustainable travel, modal shift, reduced car dependency and the use of Hertfordshire's transport hierarchy. The plan also includes the provision of shared mobility initiatives and Hertsmere would be open to having discussions about how these services could be facilitated within the wider area including Bushey and Borehamwood.

## Full text:

Whilst Watford's compact form does generate significant potential for more walking and cycling within the town centre consideration needs to be given to improving commuter flows and trips to key regional infrastructure from locations outside of Watford. The South West Herts Growth and Transport Plan (2018) make reference to the linkages between the wider area and particular Watford and Bushey and this should be reflected within the wider transport strategy. Given the location of Core development Areas this could have a detrimental impact on the accessibility of the town centre for Hertsmere residents unless suitable transport improvements are brought forward. Policy ST11.3 highlights this point and Hertsmere would want to be included as part of the process relating to sustainable transport initiatives for major development on the eastern side of Watford with particular reference to the Colne Valley and Bushey Arches. These are known congestion hotspots that could have significant impacts on some of the major links between Watford and Hertsmere; this especially important given the correlation between the location and provision of key facilities and movement patterns.

Hertsmere supports Watford's proposals for sustainable travel, modal shift, reduced car dependency and the use of Hertfordshire's transport hierarchy. Policy ST11.2 suggests the protection and enhancement of certain routes within Watford with a number of these areas forming part of wider routes from Watford to other large settlements including Bushey and Borehamwood. Consideration should be given to how these improvements could link into the wider route network for the area. The plan also includes the provision of shared mobility initiatives and Hertsmere would be open to having discussions about how these services could be facilitated within the wider area including Bushey and Borehamwood.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/ks>

1873

Comment

Respondent: Canal &amp; River Trust

## Summary:

Over 20,000 (23%) of Watford's population live within 1km of the canal, i.e. within easy reach for walking and cycling, either as part of a commute/utility journey or for leisure and recreation.

The canal is well linked with stations at Rickmansworth, Watford (Metropolitan Line) and Croxley, as well as the town centre, hospital and commercial/employment areas. The GUC provides residents with active travel routes that assists in getting them where they want to be in a way that is safe, efficient and enjoyable as desired within the Plan. This should be acknowledged within the supporting text of Chapter 11.

## Full text:

It is disappointing that reference to the GUC and the wealth of sustainable transport opportunities it offers is absent entirely. Whilst the GUC is rural in setting – located to west of the city centre, of Watford's resident population of 90,000, over 20,000 (23%) live within 1km of the canal, i.e. within easy reach for walking and cycling, either as part of a commute or utility journey or for leisure and recreation.

The canal is well linked with stations at Rickmansworth, Watford (Metropolitan Line) and Croxley. The canal is within 2km of Watford Town Centre and Watford General Hospital by road routes, and neighbours the commercial/employment areas of Holywell and Watford Business Park. As such, the GUC provides residents with active travel routes that would assist in getting them where they want to be in a way that is safe, efficient and enjoyable as desired within the Plan. This should be acknowledged within the supporting text of Chapter 11.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

1967

Comment

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

The Mayor's Transport Strategy was published in March 2019 and the London Plan was published on 2 March 2021. We would be grateful, given the amount of cross boundary travel if you would consider extending some of the Mayor's strategic transport policy objectives to Watford including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

1983

Support

Respondent: St Albans City & District Council  
Agent: St. Albans City & District Council

## Summary:

SADC notes that the WBC Local Plan recognises the importance of the Abbey Line. Paragraph 11.11 states that the route should be safeguarded, which SADC is supportive of.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>  
St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

2048

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

It has been brought to our attention by Hertfordshire County Council that a Park and Ride Facility is proposed, at the Berry Grove Interchange M1 J5, to serve Watford Town Centre. However, the Local Plan appears to make no reference to this. A proposal of this nature could have a significant impact on the SRN, most notably on Junction 5 and would be a concern for us. Could you please provide some detail about this proposal and indicate where it is covered in the Local Plan? We are interested in having a discussion about a potential P & R site ahead of any further local plan work.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2070

Comment

Respondent: Greater London Authority  
Agent: Greater London Authority

## Summary:

Given Watford's good access to the motorway network (M1 in particular), it would be useful to understand the Council's broad consideration of land for industry and logistics in the context of related requirements for the wider area.

Watford is located within the new London Plan's Strategic Infrastructure Priority called 'Midlands and West Coast Mainline (London – Luton – Bedford / Milton Keynes)' (see Policy SD3 and Figure 2.15).

We support in principle the South West Hertfordshire Growth and Transport Plan measures for the Watford area.

Although the Metropolitan Line Extension (MLX) project in its original form is not currently being progressed and the powers granted by the Transport and Works Act Order are no longer in place, Transport for London is supporting Hertfordshire County Council's and Watford Borough Council's assessment of potential alternatives and we look forward to continuing to work with you on this.

In the light of Watford's proximity to London, we would be grateful, if you would consider extending some of the Mayor's strategic transport policy objectives set out in the Mayor's Transport Strategy to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options consultation from October 2018

Appear exam: Not specified

Attachments: Greater London Authority Nov 2019 response\_Redacted - <https://watford.oc2.uk/a/zn>

Greater London Authority Oct 2018 response\_Redacted - <https://watford.oc2.uk/a/zy>

Greater London Authority\_Redacted - <https://watford.oc2.uk/a/zp>

2179

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.153 YCH Services for Young People. Climate change was the top priority identified by young people in the 2019/2020 YCH Services for Young People's survey. It is considered that it's important that environmental friendly travel options are explored at every opportunity. In addition, it is important that young people grow up in the habit of utilising sustainable travel options to access education and leisure facilities.

5.154 Transport. The county council supports the approach taken within this section of the final draft local plan, as it clearly emphasises that the local plan will support the LTP and it reiterates the Transport Hierarchy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2180

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.155 Transport. It is recommended that the paragraph is modified to include reference to the now adopted Speed Management Strategy (2020).

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Additional county-wide transport strategies, to which development should align, include the Intalink Bus Strategy (2019), draft Rail Strategy (2020), the Speed Management Strategy (2020) and forthcoming Highways Network Management Strategy.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2181

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.156 Transport. It should be noted that the Mass Rapid Transit that is mentioned within this paragraph, is unlikely to be delivered during the plan period. Suggesting that development is dependent on it may lead to viability issues.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy ST11.1: Sustainable Travel Town

1813

Support

Respondent: Sport England

## Summary:

The policy is supported as it promotes active travel which will encourage physical activity as well as meeting other sustainability objectives as recognised in paragraph 11.3 of the reasoned justification. Criterion b is particularly welcome as it expects neighbourhoods to be created that encourage people to walk or cycle through high quality walking/cycle routes that enhance connectivity and reduce severance. This is consistent with Sport England's Active Design principles which are referenced in policy HC12.1.

## Full text:

The policy is supported as it promotes active travel which will encourage physical activity as well as meeting other sustainability objectives as recognised in paragraph 11.3 of the reasoned justification. Criterion b is particularly welcome as it expects neighbourhoods to be created that encourage people to walk or cycle through high quality walking/cycle routes that enhance connectivity and reduce severance. This is consistent with Sport England's Active Design principles which are referenced in policy HC12.1.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2182

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.157 Transport. References to LTP4 and Growth and Transport Plan packages and STS and LCWIP is welcomed.

## Full text:

Form and document received via email

## Change suggested by respondent:

However, it is suggested that the following modifications to the policy are made:

- d) Supporting the development of a potential mass rapid transit in Watford by providing high quality cycle and pedestrian links along with bus priority where appropriate to enable future development of the system  
j) Produce Travel Assessments and Travel Plans where required by, and in line with, Hertfordshire County Council's relevant guidance, along with the borough council's parking standards.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Protecting and enhancing future public transport routes and Watford Junction station area as a transport hub

2183

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

### Summary:

5.158 Transport. The title of the report that is listed within this paragraph should be amended as follows:

### Full text:

Form and document received via email

### Change suggested by respondent:

“As such, the route and access to it should be safeguarded to maintain the possibility of its use by these modes; details of the land to be preserved are set out within the Watford ~~Mass Rapid Transit~~ Metropolitan Line Extension Safeguarding ~~Technical~~ Report.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2184

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

### Summary:

5.159 Transport. It is worth noting that it is unlikely that a preferred route for the mass rapid transit will have been identified prior to the examination of the local plan. It may therefore be difficult to prevent development along a proposed route that has not yet been identified. (other than for the MLX alignment).

5.160 Reference to the Intalink Bus Priority Feasibility Study should be included as this also includes suggestions for bus priority which forms an important part of the Enhanced Partnership that the county council has developed with bus operators. The introduction of the Enhanced Partnership measures and priority schemes in the feasibility study forms the first step in moving towards a network with the MRT.

### Full text:

Form and document received via email

### Change suggested by respondent:

“Hertfordshire County Council is developing plans for a new, mass rapid transit system to significantly increase connectivity across the county. This will bring significant benefits to Watford, and it is expected therefore that proposed routes for this system will not be prevented by new development although a route has yet to be finalised. The introduction of the Enhanced Partnership measures and priority schemes in the feasibility study, forms the first step in moving towards a network with the mass rapid transit.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2185

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.161 Transport. The county council supports the need to provide new pedestrian / cycle bridges across the railway line. There is a potential ransom strip with the proposed bridge between Penn Road and Colonial Way which may lead to viability issues.

5.162 The need to keep the bus station and railway station together at Watford Junction is strongly supported, as this allows making bus use more attractive. Ongoing work, and consultation with bus operators, is required and welcomed to enhance our understanding of public transport measures coming forward.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub

1974

Comment

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

### Summary:

Paragraph 11.15 states:

"A key requirement in developing Watford Junction as a transport hub is ensuring the existing bus station is well integrated with Watford Junction Station, as well as making travelling by bus as attractive as possible. Opportunities for improved infrastructure and facilities for passengers and bus operator staff should be preserved, and the bus and rail station should not be separated. A further element to the redevelopment of the area is a new multi-mobility hub, containing a multi-storey car park as well as facilities for a range of other modes, to be located immediately east of the station, space for which should be preserved. Improvements to the road network through an extension of Imperial Way, to provide a connection with the new proposed mobility hub and the rerouting of vehicle access to the concrete batching plant via Imperial Way, should also be facilitated." [Emphasis added by Williams Gallagher].

The supporting text at Paragraph 11.15 in relation to land east of the Abbey Line is then translated into Criteria h) of Policy ST11.2 which states:

"h) Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub."

Criteria h sets a policy requirement for the extension of Imperial Way to provide a connection to the station and the rerouting of vehicle access to the concrete batching plant via Imperial Way.

We do not support a safeguarding policy objective to create a further, segregated vehicular link through the Canada Life site to the Network Rail MSCP area / rerouting of batching plant traffic to Imperial Way via an extension of Imperial Way. This is not needed following further investigatory work with Network Rail, would double up on routes to the same point, and the associated costs of doing so would leave the Canada Life site undevelopable for employment uses (including industrial) during the emerging plan period. This is not acceptable to Canada Life and would lead to their withdrawal of support for the Masterplan Area if it was to be maintained as a policy requirement.

The most appropriate and logical routing for connecting Imperial Way to a new MSCP is to extend Clive Way, which is already an adopted highway with sufficient

width to accommodate pavements with cycle ways, through a very small section of land owned by Redrow Plc which is formed of internal access road and a hand

car wash (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding as an extension to Clive Way).

Utilising the Clive Way access would result in the need to construct only 25-30 metres of new road in a location that does not stymie future development opportunities but in fact enhances opportunities. This is in comparison to 200 + metres of new road and associated services and the stymieing of development potential if inappropriately required through site MU07.

Full text:

-

Change suggested by respondent:

The supporting text at Paragraph 11.15 should be amended as follows:

"A key requirement in developing Watford Junction as a transport hub is ensuring the existing bus station is well integrated with Watford Junction Station, as well as making travelling by bus as attractive as possible. Opportunities for improved infrastructure and facilities for passengers and bus operator staff should be preserved, and the bus and rail station should not be separated. A further element to the re-development of the area is a new multi-mobility hub, containing a multi-storey car park as well as facilities for a range of other modes, to be located immediately east of the station, space for which should be preserved.

Improvements to the road network through an upgrade of the Colonial Way / Clive Way junction and an extension of Clive Way ~~Imperial Way~~, to provide a connection with the new proposed mobility hub ~~and the rerouting of vehicle access to the concrete batching plant via Imperial Way~~, should also be facilitated."

In light of the above and the representations to the following elements of the Local Plan, there will be a requirement for amendments to the infrastructure table at page 202 of Appendix C:

- Para 2.14 - 2.22 and Policy CDA2.1
- Para 3.5 and Appendix B
- Para 11.15 and Policy ST11.2
- Allocation MU07
- Allocation EM05

The comments made in respect of these elements of the plan provide evidence that justifies the requirement for the emerging local plan to safeguard a route via Clive Way to facilitate access to a new Eastern Mobility Hub. The route for safeguarding is annotated on enclosed Plan SK08. The comments made also identify the need to amend the approach to key infrastructure delivery within SDA land to the east of the Abbey Line. To summarise the key points are as follows:

essentially putting in place key building blocks for longer term regeneration (or sooner if there is a substantial change in the current constraining factors identified through landowner discussions). Our conclusion, alongside that of Network Rail is as follows:

- Clive Way must be protected and extended through to Network Rail and Canada Life's land to the south of the east of the Abbey Line SDA area (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding as an extension to Clive Way). This is the most appropriate route to bring mixed vehicular traffic (alongside active travel options) through to a new MSCP and sustainable travel hub without unnecessarily sterilising substantial areas of developable land which would reduce the viability of projects seeking an uplift in employment densities.
- Canada Life will safeguard land at the end of a link from Clive Way for the construction of a MSCP / sustainable travel hub and linking bridge to the station and will continue to collaborate with Network Rail. As part of this approach the concrete batching plant traffic can be slightly re-routed, but still use the existing road through to Orphanage Road, without then needing costly re-routing to Imperial Way as suggested by Policy ST11.2. This is fundamental to cost effectively unlock land between the Main Line and the Abbey Line for high density redevelopment. Furthermore, it is fundamental to alleviating the severe congestion experienced in the town centre due to all existing station parking being located in one area.
- In the longer term, a pedestrian and cycle bridge from Penn Road to allow further east west permeability for pedestrians and cyclists may be delivered. With the batching plant retained, this new link could effectively be routed just to the north of the batching plant and linked to the existing pedestrian infrastructure along Imperial Park.

In light of the above, the text at p202 of Appendix C: Transport and Infrastructure will require amending in line with the table provided as part of written representations attached.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>



2012

Comment

Respondent: Network Rail

Agent: Network Rail

## Summary:

sustainable rail transport solution for a large area of the borough, and would recommend not using the valuable railway corridor for other uses in the interim such as a cycleway or footpath.

Network Rail require further engagement with WBC and HCC to determine the potential use of its land to support

## Full text:

Letter received via email

## Change suggested by respondent:

.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: None

2017

Comment

Respondent: Mineral Products Association

Agent: Mineral Products Association

## Summary:

See also policies CDA2.1 & CC8.5, also sites MU06 & 07

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

## Full text:

Form received by email

## Change suggested by respondent:

Policy ST11.2 and supporting text should also make clear that if the access to the rail depot and concrete batching plant is to be re-routed this must not result in any disruption to operations and exports from the site, which needs to be reflected in the text in Site Allocations MU06 and MU07.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>

2045

Support

Respondent: Highways England  
Agent: Highways England

## Summary:

We would like to note that we support a number of the policies within the Local Plan, most notably those that are relevant to transport impacts, including:

- ST11.2: which prevents development that would compromise future mass transit, bus prioritisation, walking, and cycling infrastructure.

## Full text:

Received via email

## Change suggested by respondent:

-

- Legally Not specified compliant:
- Sound: Not specified
- Comply with Not specified duty:
- Raise LPA: Not specified
- Appear exam: Appearance at the examination
- Oral exam why: n/a
- Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2075

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

Supporting paragraph 11.15 and Policy ST11.2 seek to protect the potential for an extension of Imperial Way to enable the re-routing of vehicle access to the concrete batching plant (by which it is assumed is also meant the aggregates rail depot). Whilst there is no objection in principle to the re-routing of vehicle access this has the potential to prejudice the future use of the safeguarded facility if not appropriately planned for and secured. Notably no reference is made to this 'route protection' or potential re-routing in the relevant Site Allocations which it can only be assumed will be expected to facilitate the re-routing and which would need to be co-ordinated with development of Site Allocation MU06 – though which the existing access route (forming part of the safeguarded facility) currently traverses. Further commentary and required changes are detailed in the context of the relevant Site Allocations.

## Full text:

Form received via email

## Change suggested by respondent:

For the purposes of Policy ST11.2 referencing in full to the 'safeguarded aggregate depot and concrete batching plant' is required principally for clarity and consistency as follows:  
To prevent development that .....the following routes will be protected from development whose designs would compromise their ability to prioritise public transport and active travel routes:

- The disused, former....
- Extension of Imperial Way to provide connection to the station and the rerouting of vehicle access to the safeguarded rail aggregates depot and concrete batching plant via Imperial Way;

- Legally Yes compliant:
- Sound: No
- Comply with Yes duty:
- Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>  
Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2186

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.163 Transport. As mentioned in previous comments, it is unlikely that a preferred MRT route (as stated in paragraph e) would be identified by the time of the Local Plan examination.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Providing sustainable transport infrastructure for major development

2043

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

We note that you have taken account of our response to Regulation 18 consultation on 7th November 2019. We are pleased to see that Highways England has been referenced within the Local Plan document in "Chapter 4: Housing", which states that Highways England highlights the potential impact of the proposals on the Strategic Road Network and provides guidance. However, as we stated in our response to the Regulation 18 consultation, we would request transport evidence and modelling to be undertaken to determine what the cumulative impact of these developments could be on the SRN and therefore, what measures may be required to mitigate these impacts. This should be submitted as a Strategic Transport Assessment. It is therefore unclear at this stage whether it will be possible to sufficiently mitigate the impact of the allocated development locations or whether the impact will be too great to feasibly ensure that the network operates within capacity at the end of the plan period. If it is the intention of Watford not to produce such a document I would be grateful if you could submit to me the reasons why you consider this should not be done. Until this has been submitted, Highways England is not in a position to offer further comments as to the soundness of the plan. I would be happy to have a conversation on this if it would be helpful.

If a Strategic Transport Assessment is produced it should be in accordance with Circular 02/2013. We require suitable measures to be considered and evidenced in the Local Plan to manage demand of future traffic levels and growth. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound. The evidence base should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates for interim assessments to show when mitigation action will be required.

The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs over the Plan period, along with other supporting infrastructure. It is thought that there are a number of developments that could impact the SRN, particularly the 'Allocated Sites for Delivery', where Watford has identified developable land to support 8,748 new homes and made an allowance for an additional 2,095 homes to be delivered through windfall sites not allocated in the Local Plan.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2187

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

Paragraph 11.18

5.164 Transport. Walking and cycling routes need good connections to the existing network and the Colne Valley Transport Area, as shown in Figure 11.3 an should be aligned to the proposed future development of the network as set out in the LCWIP.

Paragraph 11.19

5.165 Transport. It is important to stress that routeing of the MRT is not yet defined. It is suggested that wording should be modified to reflect this.

## Full text:

Form and document received via email

## Change suggested by respondent:

"Lower High Street should be seen as a corridor primarily for sustainable transport, preserving the current high frequency bus service, as well as helping to link the potential future Mass Rapid Transit system ~~accommodating mass rapid transit, plus being a key walking and cycling route for the site.~~"

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2188

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

Bushey Arches (Paragraph 11.20)

5.166 Transport. The importance of minimising vehicular movements from development needs to be emphasised.

## Full text:

Form and document received via email

## Change suggested by respondent:

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Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2189

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Watford Riverwell (Paragraph 11.21)  
5.167 Transport. The following text should be included to make reference to safeguarding of land to provide access to former MLX route (and a potential station area).

## Full text:

Form and document received via email

## Change suggested by respondent:

“Land should be safeguarded to provide access to the former metropolitan line extension route (and a potential station area).”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2190

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Town Centre (Paragraph 11.27)  
5.168 Transport. As the Mass Rapid Transit route has not yet been identified, wording within the paragraph should be modified to read:

## Full text:

Form and document received via email

## Change suggested by respondent:

“This would ~~should~~ include bus priority interventions along and in the vicinity of the ring road which in future could develop to potentially support the provision, as well as preserving its ability to become part of a mass rapid transit route system...”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2191

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.169 Transport. In addition, the transport hub should also mention links to the High Street station, and the need to enhance pedestrian and cycle facilities at key junctions with the ring road.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

**Policy ST11.3: Providing Sustainable Transport Infrastructure for Major Development**

1901

Comment

Respondent: La Salle Investment Management  
Agent: Miss Rachel McGall

## Summary:

La Salle support the Council's objectives to promote sustainable transport infrastructure in accessible locations such as Colne Valley Strategic Development Area.

## Full text:

La Salle support the Council's objectives to promote sustainable transport infrastructure in accessible locations such as Colne Valley Strategic Development Area.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/y8>

1999

Support

Respondent: JLL  
Agent: JLL

## Summary:

Further to the text in Policy ST11.3, paragraphs 11.22 and 11.23 provide more detail into the Council's aspiration that development should contribute positively towards Ascot Road becoming a sustainable transport corridor through new and significantly enhanced bus priority measures and pedestrian / cycle infrastructure. Improvement to active travel permeability and routes should include significant enhancement to links between Croxley View and Greenhill Crescent, to Tolpits Lane, to Watford Station, overcoming the severance of Rickmansworth Road, and to the Ebury Way; which we fully support.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: First Draft (representations submitted November 2019)

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>  
Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2046

Support

Respondent: Highways England  
Agent: Highways England

## Summary:

We would like to note that we support a number of the policies within the Local Plan, most notably those that are relevant to transport impacts, including:

- ST11.3: which states major developments should maximise opportunities for sustainable transport, protecting and supporting current and future active and public transport routes.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2192

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Colne Valley Strategic Development Area

5.170 Transport. With regard to the paragraph relating to the Colne Valley Strategic Development Area, the term: 'car-lite' needs defining or cross referencing with the Parking Standards in Appendix E. Colne Valley needs to be defined on the supporting sites figure, so it does not get confused with the entire Colne Valley Strategic Development Area.

5.171 Cycle access into the site along with good, safe and secure cycle parking within it should also be mentioned. It is also not clear what bus prioritisation on key access links means within this paragraph (is it related to Lower High Street?).

Bushey Arches

5.172 Transport. Links from the site north towards the town centre needs to be included in the paragraph.

Watford Riverwell

5.173 Transport. The text should be modified to include links to the potential upgraded MLX corridor, along with an opportunity to provide for bus priority along Vicarage Road itself.

## Full text:

Form and document received via email

## Change suggested by respondent:

"Permeability for active travel should be substantially improved, linking to bus stops, Watford General Hospital, Vicarage Road, Stripling Way, Thomas Sawyer Way and Ebury Way, along with the potential upgraded former metropolitan link extension corridor. Developments should contribute to bus priority or cycle infrastructure on Vicarage."

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## A walking and cycling infrastructure improvement town

1874

Comment

Respondent: Canal & River Trust

## Summary:

Towpaths make excellent places for people to walk and cycle considerably, providing attractive active travel routes for residents.

Improved access, wayfinding and relatively simple improvements to the towpath can have a big impact on people's propensity to use it for walking and cycling as part of their daily routine. We are keen to work with key stakeholders in Watford (including the Council) to better link the towpath to the strategic East and West routes and would welcome further engagement on how we could achieve this.

## Full text:

Towpaths make excellent places for people to walk and cycle considerably. The towpath in Watford has a variety of loose gravel, bound aggregate, and tarmac surfacing, with some grass/rough tracks in places further north. It provides a rural, flat, quiet, traffic-free route suitable for most cyclists and walkers and is an excellent option for those learning to ride or with lower confidence of cycling in traffic. It provides attractive leisure and recreational routes both close to Watford and with access further afield for longer rides. In places the towpath surface has been upgraded to provide facilities for year-round access. In places the network would benefit from further investment/ improvements to the surface making it accessible all year round.

Improved access, wayfinding and relatively simple improvements to the towpath can have a big impact on people's propensity to use it for walking and cycling as part of their daily routine. We are keen to work with key stakeholders in Watford (including the Council) to better link the towpath to the strategic East and West routes and would welcome further engagement on how we could achieve this.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

2193

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Cycle parking in residential developments (Paragraph 11.34)

5.174 Transport. Paragraph a) needs to emphasise the location of convenient, accessible and secure locations for cycle parking that are close to buildings. Some provision for bikes with trailers and potential charging facilities for e-bikes should be mentioned. Opportunities to incorporate within the shared cycle scheme should be explored. It would be ideal if a requirement to fund allocated spaces for a stand in developments over a certain size.

## Full text:

Form and document received via email

## Change suggested by respondent:

a) In large apartment complexes, single, large, communal storage does not provide sufficient security. Multiple cycle storage areas or individual storage compartments located outside the apartment, within the blueprint of the building, that are capable of taking cycles, prams and other large items, should be provided, in close proximity to buildings;

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2194

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.175 Paragraph c) should be modified as follows, as –cycle parking at the front of houses should not be ruled out as it is often the most convenient location.

## Full text:

Form and document received via email

## Change suggested by respondent:

c) For houses, cycle storage should preferably be at the rear, the side or within the building, as storage at the front can be unsightly, and tends to advertise to thieves that cycles are there. Where adequate cycle parking cannot be provided within residential developments, alternative cycle parking arrangements for residents should be provided, such as the provision of a provision of a cycle hangar on the highway in a location agreed with the Council.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None



2195

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Bicycle hire and share schemes (Paragraph 11.39)

5.176 Transport. Bike share provision within larger developments is supported and this requirement can be linked to the site-specific policies.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy ST11.4: A Walking and Cycling Infrastructure Improvement Town

1814

Support

Respondent: Sport England

## Summary:

The policy is supported as it supports developments being designed to encourage walking and cycling through a variety of measures which are broadly consistent with Sport England's Active Design guidance.

## Full text:

The policy is supported as it supports developments being designed to encourage walking and cycling through a variety of measures which are broadly consistent with Sport England's Active Design guidance.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1969

Support

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

Given the number of cross boundary journeys between London and Watford, many of which are relatively short and capable of being cycled, we welcome the setting of minimum cycle parking standards for new developments

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

1993

Object

Respondent: The Retirement Housing Consortium  
 Agent: The Retirement Housing Consortium

## Summary:

The Policies makes reference to providing cycle and car parking in accordance with Appendix D but Appendix D does not recognise the very different characteristics of older persons housing and lead to significantly reduced requirements. This is not inappropriate given, not least that most residents will be over the age of 75 years

## Full text:

Form received via email

## Change suggested by respondent:

The Policies should make clear that the policy requirement does not extend to specialised housing for older people

Legally Yes  
 compliant:  
 Sound: No

Comply with Yes  
 duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2196

Comment

Respondent: Hertfordshire County Council  
 Agent: Hertfordshire County Council

## Summary:

5.177 Transport. The text should be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

All development proposals will be required to provide on-site cycle parking facilities in line with the cycle parking standards detailed in Appendix D. Secure and convenient cycle parking facilities should be designed at the outset of the scheme. Should the standards for visitor cycle parking mean a requirement in excess of ten spaces, part of this provision can be replaced with a contribution to publicly accessible bike share bays in a suitable location nearby, further detail on this is provided in Appendix D.

Legally Yes  
 compliant:  
 Sound: Yes

Comply with Yes  
 duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Car parking, car clubs and electric vehicles

2197

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

## Electric vehicle charging

5.179 Transport. Clarification is sought by the county council, regarding the meaning of 'passive provision' in relation to active charging infrastructure for electric vehicles.

## Car club parking

5.180 It is considered that the ratio of one parking space per 50 units that would be designed for car club use only seems relatively low.

## Managing the transport impacts of development (Paragraph 11.61)

5.181 Transport. Recognition for future development of MRT is welcomed but it is important to see whether this approach is applicable under the viability test requirements of the NPPF. It is understood that this approach has been used elsewhere (e.g. in Hampshire) with regard to contributions sought for measures off site which could potentially be diverted when MRT comes forward.

## Travel Plans (Paragraph 11.62)

5.182 Transport. The wording within the paragraph should be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

~~“A Travel Plan is required in all cases where a Transport Assessment is needed, as well as other circumstances where local factors make one necessary as determined by the Council. Travel Plans should be produced to support all developments generating significant amounts of movement and/or where other local circumstances make one necessary. For smaller developments, a Travel Plan Statement, with a reduced quantity of detail, may be sufficient to accompany the planning application. For smaller developments a Travel Plan Statement will be required instead of a Full Travel Plan. It will contain less detail to reflect the scale of development and focus primarily on implementing site measures and action targets, and monitoring is generally more limited. Travel Plans should be produced in accordance with regard to Hertfordshire County Council’s Travel Plan guidance. A Draft Travel Plan should be submitted with relevant planning applications. It should set out objectives, measures and targets linked to the analysis contained within the Transport Assessment. It could, for example, use the maximum permissible trip rates to inform target setting. It should also explicitly state the agreed trigger points for producing and submitting a Full Travel Plan, including baseline monitoring. Where the travel behaviour of the end user is unknown at the time of the planning application submission, applications will be expected to prepare draft Travel Plans with indicative modal shift targets for the planning application, before agreeing to update the Travel Plan with site specific data upon occupation”~~

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Car parking standards

1916

Comment

Respondent: Three Rivers District Council

## Summary:

Paragraph 106 of the NPPF states that:

“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres...”

Although maximum parking standards may be justifiable in the case of Watford Borough, potentially further justification could be provided for their use.

## Full text:

Paragraph 106 of the NPPF states that:

“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres...”

Although maximum parking standards may be justifiable in the case of Watford Borough, potentially further justification could be provided for their use.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

## Electric vehicles

1875

Comment

Respondent: Canal &amp; River Trust

## Summary:

In the same way that there is a contemporary movement towards the provision of electric charging points for motor vehicles, there could be similar opportunities for electric charging points for boats subject to discussion with the Trust and the identification of suitable locations.

## Full text:

In the same way that there is a contemporary movement towards the provision of electric charging points for motor vehicles, there could be similar opportunities for electric charging points for boats subject to discussion with the Trust and the identification of suitable locations.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2218

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

Transport. This section should be aligned with HCC's Electric Vehicle strategy

## Full text:

document and form received via email

## Change suggested by respondent:

it is suggested that this is referenced at the end of this paragraph:

"Hertfordshire County Council's Local Transport Plan (adopted in May 2018) supports the uptake of Ultra Low Emission Vehicles (ULEV)."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

## Policy ST11.5: Electric Vehicles, Car Parking and Car Clubs

1970

Support

Respondent: TfL Planning

Agent: TfL Planning

## Summary:

Given the number of cross boundary car journeys between London and Watford, TfL has an interest in ensuring that car parking at new developments is limited. We welcome the setting of maximum car parking standards that vary according to the area and support car free or car lite development in the Core Development Area. We also welcome the requirement to provide for electric vehicles at all developments

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

1994

Object

Respondent: The Retirement Housing Consortium  
Agent: The Retirement Housing Consortium

## Summary:

The Policies makes reference to providing cycle and car parking in accordance with Appendix D but Appendix D does not recognise the very different characteristics of older persons housing and lead to significantly reduced requirements. This is not inappropriate given, not least that most residents will be over the age of 75 years

## Full text:

Form received via email

## Change suggested by respondent:

The Policies should make clear that the policy requirement does not extend to specialised housing for older people

Legally Yes  
compliant:  
Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2025

Object

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy sets out the parking standards for new developments across the borough, and sets out (inter alia) the following requirements of new development:

- 20% of any scheme's parking spaces should provide active electric vehicle charging provision, with all other spaces providing the opportunity for passive charging provisions;
- development proposals must meet the parking standards set out in Appendix E, and all development in the 'Core Development Area' should incorporate car-lite parking provisions;
- for non-residential development the disabled parking spaces must be accurately estimated on a case-by-case basis through a transport assessment/statement, and should be provided within 50m of the entrance; and,
- one 'powered two wheeler' parking space should be provided for every 30 car parking spaces, with a minimum of two per site.

With regards to EV charging points, it is argued that the policy does not adequately take into account the difference in quality between different types of charging points. It is considered that it is useful to set a minimum percentage of charging points, however, the percentage should be reflective of the speed and efficiency of the type of charging point.

For example, a rapid charging point could charge more than 10 cars in the time a fast charging point could charge 2-3 cars and in the time it takes a slow charging point to charge a single car.

The percentages in the policy should be amended and staircased on this basis, for example:

- Slow Chargers – 20% of parking spaces;
- Fast Chargers – 5% of parking spaces; and
- Rapid Chargers - 2% of parking spaces.

It is considered that in its current form the policy has the potential to act as a substantial barrier to future development and the role out of EV charging points. Whilst there are some schemes that wont be greatly impacted by the 20% EV parking space requirement, it is considered that such a large proportion of EV charging points could jeopardize many future investments in the borough. It is considered that the proposed staircased percentages; 1) allows developers more flexibility to select the most appropriate EV charging facilities; and, 2) reduces the likelihood of the policy making a development proposal unfeasible.

In terms of the car parking standards outlined through the policy and Appendix E, it is considered that the proposed parking figures are much too restrictive. The parking standards sets the maximum parking figures for all shops (Use Class E) at car-free in the 'Core Development Area' and 1 space per 100sqm in all other locations across the borough.

Whilst the 'car-free' and 'car-lite' model is suited to numerous retail types, it is considered that convenience retail, and particularly larger groceries stores, require adequate parking provisions in order to meet the needs of customers. Lidl acknowledges and accepts that a part of their customer base is performing a 'top-up' shop of goods, which can, and often are, undertaken by the use of public transport or through walking or cycling. However, a typical weekly shop is both bulky and heavy to transport. It would be unreasonable to assume that simply not providing parking would force these types of trips onto the abovementioned modes to achieve this identified target.

Moreover, Lidl raise concerns over the potential impacts of fewer parking spaces at future retail developments. Although a reduction in parking spaces may reduce the number of customers traveling by car, and increase the use of alternative modes of transport, it is considered that the proposed 'car-free' and 'car-lite' model may drive customers to travel further to alternative stores, which provide adequate parking facilities. Additionally, the reduction in parking spaces may well result in more on-street parking, as customers struggle to find a parking space, this will undoubtedly undermine the safety and efficiency of the existing highways network.

Given this, it is considered that the policy and Appendix E should be reconsidered to either allow for greater parking numbers for large convenience retail or allow for more flexible parking standards, which take into account all aspects of each development proposal and can be decided on a case-by-case basis between the council, the applicant and any other relevant stakeholders.

Lidl do not have any issues with the policy with regards to Disabled or Powered Two Wheeler Parking.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Given this, it is considered that the policy and Appendix E should be reconsidered to either allow for greater parking numbers for large convenience retail or allow for more flexible parking standards, which take into account all aspects of each development proposal and can be decided on a case-by-case basis between the council, the applicant and any other relevant stakeholders.

Lidl do not have any issues with the policy with regards to Disabled or Powered Two Wheeler Parking.

Legally compliant: No  
 Sound: No  
 Comply with duty: Yes  
 Raise LPA: No  
 Appear exam: Not specified  
 Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>  
 Lidl written reps - <https://watford.oc2.uk/a/mn>

2062

Object

Respondent: Home Builders Federation  
 Agent: Home Builders Federation

## Summary:

Objection on the basis of inconsistency with national policy.  
 See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

...As such we would suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric vehicles.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
 Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

## Managing the transport impacts of development

2198

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.183 Transport. In the light of the amendments that have been suggested for paragraph 11.63, wording within paragraph 11.64 should also be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

~~The Travel Plan should demonstrate how site users are being encouraged to travel in a sustainable manner, with a package of measures to support this. Highways Travel Plans are unique to each development and identify a package of measures for a specific location to improve accessibility and encourage use of sustainable modes of travel. Travel Plan implementation is an ongoing process requiring regular monitoring, review and adjustment to ensure agreed objectives are delivered. Potential Travel Plan measures and objectives are provided within Hertfordshire County Council's guidance, measures that would support take up of the Council's sustainable transport schemes – bike share and on demand bus service – will be encouraged. They should set targets or objectives, with accompanying monitoring, management and enforcement approaches. Monitoring of the Travel Plan's progress should take place on an annual basis for a minimum of five years following full occupation for residential developments, or first occupation for workplace or commercial developments. Travel Plans for educational establishments should be monitored for a minimum of seven years following first occupation through the Modeshift STARS National Accreditation Scheme online system or, another accreditation scheme recognised by the county council. This is a mandatory requirement of all educational establishments. For residential developments, monitoring of the Travel Plan's progress should take place on an annual basis from first occupation to a minimum of five years post full occupation. For workplace or commercial developments, monitoring should take place for a minimum of 5 years post first occupation. Hertfordshire County Council recognises the need for a standardised approach to monitoring and has historically used the TRICS Standard Assessment Methodology for Travel Plan monitoring ("SAM"), however it acknowledges that "SAM" is not always financially proportionate, particularly for smaller, non-strategic sites. For smaller, non-strategic sites annual questionnaire surveys would be deemed appropriate. Thresholds for larger developments requiring TRICS SAM monitoring are outlined in Hertfordshire County Council Travel Plan Guidance, Appendix A.~~

A Travel Plan Review document, covering results, implementation updates and recommended revisions, should be shared with HCC within 30 days of data collection, and this will be assessed and recorded in Hertfordshire's Travel Plan monitoring system. Travel Plans must be secured via Section 106 agreements with an Evaluation and Support Contribution in accordance with development thresholds within Hertfordshire County Council Travel Plan Guidance (March 2020), Appendix A. This is to ensure that all the key elements of the approved travel plan are effectively protected and to facilitate monitoring and compliance with the outcomes anticipated. The standard level of Travel Plan Evaluation and Support Contribution is outlined in Hertfordshire County Councils Travel Plan Guidance (March 2020), section 3. The Council will secure a fee as part of the financial obligations of the planning permission to cover Travel Plan monitoring. Potential Travel Plan measures and objectives are provided within Hertfordshire County Council's guidance, measures that would support take up of the Council's sustainable transport schemes – bike share and on demand bus service – will be encouraged.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

## Policy ST11.6: Managing the Transport Impacts of Development

1971

Comment

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

Taking into account the large number of cross boundary journeys by road and public transport, we welcome the requirement for comprehensive assessment and mitigation of transport impacts.

## Full text:

Email received

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

2047

Support

Respondent: Highways England  
Agent: Highways England

## Summary:

We would like to note that we support a number of the policies within the Local Plan, most notably those that are relevant to transport impacts, including:

- ST11.6: which states that a Transport Statement or Transport Assessment is required to support planning applications for all developments that will impact upon the transport network, in accordance with Hertfordshire County Council (HCC) thresholds. A Travel Plan that encourages sustainable travel behaviour should be developed for all developments, meeting the requirements set out by the HCC. Significant negative impacts on the transport network as a result of new development must be satisfactorily mitigated. Developers will be required to contribute to and deliver appropriate transport infrastructure or other mitigation measures, with financial contributions required through planning conditions.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

## A Healthy Community

1846

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's health and well-being policies and consideration sider benefit these schemes can have on the local area. Where cultural and community facilities are being provided the catchment areas of these facilities should be fully considered and efforts should be made to improve accessibility of these facilities by public transport to serve residents travelling from slightly further afield.

## Full text:

Hertsmere supports Watford's health and well-being policies and consideration sider benefit these schemes can have on the local area. Where cultural and community facilities are being provided the catchment areas of these facilities should be fully considered and efforts should be made to improve accessibility of these facilities by public transport to serve residents travelling from slightly further afield.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/kt>



2199

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.184 Public Health. It is considered that the link between health and planning should be more explicit within the supporting and the wording should be added at the beginning of this section.

## Full text:

Form and document received via email

## Change suggested by respondent:

Our health is determined by our genetics, lifestyle, the health care we receive and our wider economic, physical and social environment. Although estimates vary, the wider environment (by this we mean everything outside of health care and genetics) has the largest impact. The principle of health inequalities states that those who are most economically, environmentally and socially disadvantaged are also those more likely to experience poorer health, live longer with chronic conditions and have lower life expectancy. This is a fundamental concept that must underpin urban development and regeneration.

The Watford Local Plan seeks to recognise that inequalities can be identified according to where people live, and that this is particularly true in some areas where there are high levels of deprivation and need. Action on health inequalities requires improving the lives of those with the worst health outcomes, fastest.

People who have good quality and secure jobs and housing in the communities where they have families and social networks stay healthier, feel happier and live longer. In order for them to secure work, homes and relationships, they need a good start in life, support when they have problems, and care when they need it. When these conditions exist, areas are attractive to investors and visitors, creating more opportunities for residents, and more resources that can be directed to support the most vulnerable.

Building health into our urban environments is a vital step towards delivering longer term improvements in health across the whole of society by tackling some of the biggest drivers of health inequality: housing, how places work and how people use them. This can be as important as investment in medical interventions.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2200

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.185 The wording within paragraph 12.1 should be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

Good masterplanning and the high-quality design of buildings, outdoor spaces and the relationship between them make an important contribution towards health and wellbeing. It can lift the spirits or have a negative impact on people both in terms of their physical health and their mental wellbeing. Internal living spaces, personal and shared, and access to open space are known to help people relax and counter the stress of modern urban life.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2201

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.186 The wording within paragraph 12.2 should be modified as follows, in order that the NHS document: "Putting Health Into Place" is referred to. This document is a signpost for developers which sets out 10 principles, along with clear guidance on building health into place shaping and development:

## Full text:

Form and document received via email

## Change suggested by respondent:

Considering health and wellbeing as an opportunity can help to improve the quality of a scheme for both its marketability for people occupying a building. Figure 12.1 shows factors that contribute towards health and wellbeing while the Health and Wellbeing Planning Guidance (Hertfordshire County Council, 2017), sets out seven themes that should be considered and incorporated into the planning of new developments to ensure they are promoting health and sustainability including: air quality, movement and access, open spaces, design, employment and education, and healthy food choices. The NHS document: "Putting Health into Place" should also be referred to. The Coronavirus pandemic has further highlighted how important both public open space and quality internal living spaces within a home are to people.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

2202

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Paragraph 12.3  
5.187 It is worth noting that some of the data that has been used to inform this paragraph has been updated on the Public Health Outcomes Framework as follows:  
[https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/12/gid/1000041/pat/6/par/E12000006/ati/301/are/E07000103/cid/4/page-options/ovw-do-0\\_ine-vo-0\\_ine-yo-3:2017:-1:-1\\_ine-ct-9\\_ine-pt-0](https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/12/gid/1000041/pat/6/par/E12000006/ati/301/are/E07000103/cid/4/page-options/ovw-do-0_ine-vo-0_ine-yo-3:2017:-1:-1_ine-ct-9_ine-pt-0); <https://fingertips.phe.org.uk/static-reports/public-health-outcomes-framework/at-a-glance/E07000103.html?area-name=Watford>.

## Full text:

Form and document received via email

## Change suggested by respondent:

-  
Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

## Policy HC12.1: Healthy Communities

1815

Comment

Respondent: Sport England

## Summary:

This policy is supported due to its support for development that will create high quality environments that encourage physical activity and its requirement for developments to adhere to Sport England's Active Design principles.

As Sport England's Active Design guidance is intended to be applicable to a range of development sizes including small scale proposals, it is requested that "major" is deleted from the policy however to avoid potential misinterpretations that the guidance does not apply to schemes that are not considered to be major.

## Full text:

This policy is supported due to its support for development that will create high quality environments that encourage physical activity. The part of the policy relating to an active population is particularly supported as it expects development to promote active design by adhering to Sport England's Active Design principles. The policy is considered to accord with paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

As Sport England's Active Design guidance is intended to be applicable to a range of development sizes including small scale proposals, it is requested that "major" is deleted from the policy however to avoid potential misinterpretations that the guidance does not apply to schemes that are not considered to be major.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2203

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.188 Ecology. The commitment to promoting 'Healthy Eating' within this policy is supported, in respect of the provision of allotment, community orchards and the planting of fruit trees in open spaces. These have powerful cultural benefits, in addition to biodiversity (blossom, pollination, horticultural diversity), local climate and hydrology, landscape and visual amenity, in addition to local food production, which as an activity has physical and mental health benefits.

5.189 Consideration could also be given to providing sensory gardens, similar to herb gardens which are related but provide a diversity of colour, patterns, smells, touch, taste and even sounds to present experiences of benefit physical relaxation or mental stimulation of benefit to a wider range of the community.

## Full text:

Form and document received via email

## Change suggested by respondent:

5.190 Public Health. The following wording within the second paragraph of Policy 12.1 should be modified as follows:

"The council will seek to deliver development and growth which has a positive impact on the health and well-being of residents and addresses issues of health deprivation and health inequality in the borough. New development will be supported where it will contribute towards an inclusive and healthier community through delivering the following these objectives:"

5.191 It is also requested that the paragraph titled: 'A healthy older population' is also modified as follows:

"Providing homes and facilities to meet the needs of an aging population such as adaptable and specialist homes and access to health facilities, in locations which enable residents to remain active members of the community."

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Health Impact Assessments

2204

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.192 Public Health. The following amendments should be made to paragraphs 12.4-12.6 that relate to the supporting text to Policy HC12.2: Health Impact Assessments:

## Full text:

Form and document received via email

## Change suggested by respondent:

**Health Impact Assessments**

The Watford Local Plan seeks to ensure that positive opportunities from development are optimised and that any unintended consequences do not have a disproportionate impact upon the population especially those more at risk from health inequalities.

A Health Impact Assessment (HIA) is an essential assessment for any development proposal to demonstrate that it will not have negative implications for the physical health and mental wellbeing of both existing communities in the vicinity, as well as the future residents of the new development. HIAs is a tool through which development can:

- Understand the local community health needs and demonstrate how it can support these;
- Demonstrate how it has considered health inequalities;
- meet the requirements of the 2017 EIA regulations for human health;
- meets the policy requirements of the Watford Local Plan that major development proposals undertake an HIA;
- demonstrate the opportunities of a proposal and how a development has been positively planned.

~~12.4 A Health Impact Assessment seeks to inform and influence decision making, ensuring that health impacts, and the distribution of those impacts, are considered as part of the planning policy process. They provide a mechanism to understand more broadly how a wider range of economic, social and environmental factors can combine to affect a development.~~

~~12.5 In November 2019, Hertfordshire County Council adopted a HIA Position Statement.13 This sets out when a HIA should be undertaken and frameworks to use for each stage of the HIA process. The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units. The HIA Position Statement sets out a threshold for different types of development, including a threshold for the development of 100 residential units or more to be subject to a HIA. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of HIA Health Impact Assessment that may be required. The two types of HIA Health Impact Assessment are:~~

- Rapid Assessment for simpler proposals;
- In-depth (comprehensive) assessment for more complicated or larger proposals.

~~12.6 Large development proposals can benefit from undertaking an HIA objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth, or comprehensive HIAs will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid HIA Health Impact Assessment to support their planning application.~~

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy HC12.2: Health Impact Assessments

1816

Support

Respondent: Sport England

## Summary:

The policy is supported in principle as it requires HIAs to be prepared for all major development and part of a HIA would be expected to include the consideration of the opportunities for encouraging physical activity through the design of a development.

## Full text:

The policy is supported in principle as it requires HIAs to be prepared for all major development and part of a HIA would be expected to include the consideration of the opportunities for encouraging physical activity through the design of a development.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1889

Object

Respondent: T Norris

## Summary:

Only carrying out an assessment when there are 100 units are more is criminal - do we not want to make watford a more desirable place to be and be more attractive?

## Full text:

Only carrying out an assessment when there are 100 units are more is criminal - do we not want to make watford a more desirable place to be and be more attractive?

## Change suggested by respondent:

Any construction proposed should have a HA associated with it

Legally No  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2205

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.193 Public Health. The first paragraph, sub paragraph a) should be modified as follows and an additional sentence added to the final paragraph within this policy:

## Full text:

Form and document received via email

## Change suggested by respondent:

Health Impacts Assessments are required for proposals that may are likely to have an impact on health of the population in adverse impact on the immediate area and affect people living in the development and close by. More specifically, Health Impacts Assessments are intended to highlight both the opportunities as well as the unintended consequences of development and should be provided as part of a planning application submitted for the following types of applications:

a) All developments ~~Major residential proposals~~ of 100 units or more, or 1,000m<sup>2</sup> of floor space or more;

Where a Health Impact Assessment has identified an issue that may have a significant adverse impact, the applicant should set out how this has been addressed and mitigated as part of the proposal. Applicants should engage early the planning authority and the county council, in order to agree the appropriate Health Impact Assessment scope and methodology.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

**Policy HC12.3: Built Cultural and Community Facilities**

1817

Comment

Respondent: Sport England

**Summary:**

The policy is broadly supported as it supports new community uses (including sports facilities) and seeks to safeguard existing facilities. The policy would be considered to broadly accord with Government policy in paragraph 97 of the NPPF in relation to sports facilities.

It is requested that "suitable" is added before "alternative facilities" in criterion (b). As well as providing consistency with paragraph 97 (b) of the NPPF, this would avoid potential misinterpretations of the policy that it would be acceptable to provide a re-provided community facility in any alternative location regardless of its relationship to the community it serves.

**Full text:**

The policy is broadly supported as it supports new community uses (including sports facilities) and seeks to safeguard existing facilities. The policy would be considered to broadly accord with Government policy in paragraph 97 of the NPPF in relation to sports facilities.

It is requested that "suitable" is added before "alternative facilities" in criterion (b). As well as providing consistency with paragraph 97 (b) of the NPPF, this would avoid potential misinterpretations of the policy that it would be acceptable to provide a re-provided community facility in any alternative location regardless of its relationship to the community it serves.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1848

Object

Respondent: CAMRA (Watford &amp; District Branch)

**Summary:**

CAMRA feels that the policy does not fulfil NPPF paragraph 92(c) because there is no procedure for testing whether a community facility (e.g., public house) is no longer needed.

**Full text:**

CAMRA feels that the policy does not fulfil NPPF paragraph 92(c) because there is no procedure for testing whether a community facility (e.g., public house) is no longer needed.

**Change suggested by respondent:**

The CAMRA Model Planning Policy says that claims of unviability should be supported by trading accounts over three years, evidence that measures were taken in this time to improve trading and diversify use, and that the CAMRA Public House Viability Test or similar objective method was used to assess viability. We would like these viability tests in the Local Plan.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: We raised the issue in the First Draft Local Plan consultation, referring to the Draft London Plan, which has a Policy HC7 which requires 'authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future'.

Appear exam: Written Representation

Attachments: CAMRA representation Draft Watford Plan 2018-2023 - Policy HC12.3 Built Cultural and Community Facilities.docx - <https://watford.oc2.uk/a/k4>

1903

Support

Respondent: The Theatres Trust

## Summary:

The Trust supports and welcomes this policy, which provides strong protection for the town's valued cultural assets including its theatres, reflecting paragraph 92 of the NPPF (2019).

## Full text:

The Trust supports and welcomes this policy, which provides strong protection for the town's valued cultural assets including its theatres, reflecting paragraph 92 of the NPPF (2019).

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues & Options and Preferred Options

Appear exam: Not specified

Attachments: None

## Site allocations and new development

1798

Comment

Respondent: tadpoles

## Summary:

Dear Watford,

I would like to bring to your attention site which should be part of the site allocations and new development, Garages between 56 and 58 Radlett rd, WD24 4LL

i LOOK FORWARD TO HEARING FROM YOU

## Full text:

Dear Watford,

I would like to bring to your attention site which should be part of the site allocations and new development, Garages between 56 and 58 Radlett rd, WD24 4LL

i LOOK FORWARD TO HEARING FROM YOU

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: YES I RAISED THIS BEFORE AND HAVE NOT HAD A RESPONSE

Appear exam: Not specified

Attachments: Untitled.png - <https://watford.oc2.uk/a/jx>

1799

Object

Respondent: Mr David Agnew

## Summary:

Watford has been over developed already with large blocks of flats going up all over the town, without adequate park allowances being made. It is now ridiculous to decide that all the large shopping areas in the town are suitable areas for further development. If these supermarkets etc are demolished where are the replacement supermarkets going to be built to help feed the thousands of extra people that will be living on the areas where the supermarkets once were?

## Full text:

Watford has been over developed already with large blocks of flats going up all over the town, without adequate park allowances being made. It is now ridiculous to decide that all the large shopping areas in the town are suitable areas for further development. If these supermarkets etc are demolished where are the replacement supermarkets going to be built to help feed the thousands of extra people that will be living on the areas where the supermarkets once were?

## Change suggested by respondent:

Stop over developing Watford! If you must build on site then adequate parking should be proved and not use the excuse that because the flats are close to a train station then nobody will need to own a car. Unbelievably naive if you really think this is the reality.

Legally No

compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: .

Attachments: None

1801

Comment

Respondent: Hertsmere Borough Council

## Summary:

The interactive policies map is excellent but it would be preferable to be able to view surrounding areas in adjoining boroughs. This isn't possible other than for a brief moment when zooming in and out.

## Full text:

The interactive policies map is excellent but it would be preferable to be able to view surrounding areas in adjoining boroughs. This isn't possible other than for a brief moment when zooming in and out.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1847

Support

Respondent: Hertsmere Borough Council

## Summary:

The site allocations policy lists all of the proposed sites to be allocated within Watford's Local Plan. Whilst Hertsmere appreciate that it is difficult to predict the exact build out rates of development parcels, it would be useful to get some further clarification in terms of the timeframes for development coming forward, so that suitable consideration can be given to how this may affect the programme works for Hertsmere. This is particularly important when it comes to programming infrastructure projects and community facilities.

## Full text:

The site allocations policy lists all of the proposed sites to be allocated within Watford's Local Plan. In terms of presentation it would be beneficial if the site references were displayed on the policies map (including the interactive map). Whilst Hertsmere appreciate that it is difficult to predict the exact build out rates of development parcels, it would be useful to get some further clarification in terms of the timeframes for development coming forward, so that suitable consideration can be given to how this may affect the programme works for Hertsmere. This is particularly important when it comes to programming infrastructure projects and community facilities.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/k3>



1890

Comment

Respondent: T Norris

## Summary:

Will the council be considering other services on mixed development sites such as GP/schools/Nurseries?

## Full text:

Will the council be considering other services on mixed development sites such as GP/schools/Nurseries?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1959

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

There are few site allocations for mixed use development including housing within the town centre. Our client supports new housing development in the town centre but requests that all site allocations being brought forward should be the subject of transport assessments and parking surveys to ensure that they do not result in parking stress and harmful highways impact.

Although it is noted that the draft Plan is far advanced, our client would like the southern end of the Shopping Centre to be included for consideration for allocation for a range of uses including residential.

As we are suggesting that Watford should increase their housing supply to include a 20% buffer, then the site should be included as part of this buffer. If an Inspector were to tell the Council that more sites should be included in the Local Plan, then our site would be available for consideration.

A council's priority should be to deliver the required housing within its boundaries before looking to other councils within the Housing Market Area to meet their need (formed of LPAs which share similar characteristics in terms of their housing market). There is a relatively small and limited amount of potential development land and Watford needs to be able to keep up with its increased housing targets. We therefore hope that the Council will support some repurposing of underutilised land for residential and a mix of uses.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

Respondent: Drax Investments Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Please see above comments on the need to increase the Plan period and the housing requirement shortfall. In order to strengthen the Plan and enable it to be found sound, additional sites may be required.

## Full text:

n/a

## Change suggested by respondent:

The site forms part of the Core Development Area (and, within this, the Watford Gateway Strategic Development Area ('SDA')); the Clarendon Road Primary Office Location; and a Transport Improvement Area. The site is also identified as being located in the 'High Sustainability Zone'. Drax consider the site to represent a deliverable and developable residential development opportunity. The NPPF requires new Local Plans to provide a five-year supply of deliverable land for housing. 'Deliverable' and 'developable' is defined within the NPPF as follows: Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years; Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged." The site has strong potential and represents a deliverable and developable residential development opportunity. The site is available; offers a suitable location for development; and delivery is achievable within the first five-years of the Local Plan. Para. 67 of the NPPF requires policies to identify a sufficient supply and mix of sites, and emphasises the importance of identifying deliverable sites for the first five years of the plan period. In addition to this, Para. 68 underlines the important role small and medium-sized sites can make in contributing to the housing requirement of an area. Part (a) of Para. 68 states that LPAs should "identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless it can be shown that there are strong reasons why the 10% target cannot be achieved". The site represents a logical allocation that would align with the requirement in national policy to ensure sufficient sites are identified for delivery in the first five years of the Local Plan, as well as helping to ensure that the Council meet the 10% small-medium sized sites requirement. The NPPF stipulates that for sites for housing to be considered deliverable, "they should be available now; offer a suitable location for development now; and be achievable with a realistic prospect that housing will be delivered on-site within five years". To be considered developable, "sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged". Below is our assessment in respect of the site's availability, suitability and achievability. Available – The site is in a single land ownership (Drax). There are no identified issues in bringing forward the site for development, and there are no constraints or restrictions in terms of ownership which mean the site cannot come forward in the first five years of the new Local Plan period. Although the site benefits from an implemented hotel use planning permission, the difficulties in this sector following the Covid pandemic now mean it is unlikely that this land use will come forward. It is therefore available for residential-led development. Suitable – The site is suitable for residential development. The site is located within the Watford Gateway SDA – this area is expected to witness significant transformation over the Local Plan period, with new high-density development expected to deliver homes, jobs and other uses. The site's central position within the SDA and close proximity to local services and facilities (including public transport) therefore renders it an appropriate and sustainable brownfield site that is able to contribute to the wider strategic objectives of the Local Plan. It is a logical location for residential-led development, and would align with the recently approved development proposals at Clarendon House – located immediately adjacent to the north – to demolish the existing building and redevelop the site to provide 1,800sq.m of office floorspace and 41 residential dwellings. Furthermore, the principle of re-developing the site has already been established under the implemented hotel permission. This permission also establishes buildings heights of 5-9 storeys. The suitability of the site for redevelopment has already been established – the only change sought is the land use (which is acceptable within the SDA and wider CDA). Achievable – Development on the site is considered to be achievable. There are considered to be no insurmountable constraints to development. We consider that development would be able to commence on-site within the first five years of the new Local Plan. Summary Comments – We consider that the site could make an important contribution to ensuring the Borough's housing land needs are met in full, and would also align with the strategic requirements of national planning policy by identifying a mix of sites (including smaller sites) that can be prioritised for immediate delivery. The site is able to accommodate a minimum of c.65 dwellings, and given its location within the Clarendon Road Employment Area, would also be able to provide commercial floorspace at ground floor level. We consider that the site could either be allocated individually – which, as detailed above, is available, suitable and achievable – or could potentially form part of a wider allocation comprising the neighbouring sites to the north (Holiday Inn and Clarendon House) and south (Apex House). Notwithstanding a potential wider allocation, the site is able to make a compelling contribution to the Borough's development needs and is therefore recommended for allocation. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Repls' for further information.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Drax - Form\_Redacted - <https://watford.oc2.uk/a/zf>

Drax written reps - <https://watford.oc2.uk/a/zg>

2041

Object

Respondent: Historic England  
Agent: Historic England

## Summary:

The identification of potential sites for development within a Local Plan is an important step in establishing where change and growth will happen across a local authority area, as well as the type of development and when it should occur. It is important that the sites that are selected as allocations are based on an understanding of their potential impact upon the historic environment. At regulation 18 we identified that several the proposed sites and Strategic Development Areas have the potential to impact on heritage assets and strongly advised that Heritage Impact Assessments (HIA) be prepared for:

- CDA2.1 (Watford Gateway Strategic Development Area)
- CDA2.2 (Town Centre Strategic Development Area)
- CDA2.3 (Colne Valley Strategic Development Area)
- MU05 (Land at 94 - 114 St Albans Road);
- MU06 Land at Watford Junction); MD09 (Land at the Telephone Exchange Car Park);
- MU16 (Land at Tesco Lower High Street);
- HS18 (Car Park at Junction of Vicarage Road and Exchange Road);
- HS21 (Land at Waterfields Retail Park); and
- MU15 (Land at 18 Watford Field Road).

To our knowledge this work has not been done, and while development of these sites may be feasible, HIAs are required to confirm their suitability, to determine their extent and capacity, and to inform any development criteria that may be required in order to avoid or mitigate any harm identified. Without this evidence base these sites are not justified. This is because the allocations are not based on an understanding of potential impacts on the historic environment. Furthermore, they are not effective. This is because without HIAs are needed to determine what impact the historic environment has on site capacity and in turn deliverability. Finally, while we welcome that there are specific measures for the historic environment in these policies, their content, the lack of contextual information means that the historic environment is vulnerable to inappropriate development. As currently drafted, we find these policies unsound.

## Full text:

Letter received via email

## Change suggested by respondent:

To ensure the soundness of the Plan the sites listed above will need to be subject to Heritage Impact Assessment (HIA) prior to allocation. The HIAs should assess the suitability of each site for development and the impact on the historic environment. Should the HIA conclude that development could be acceptable, and the site be allocated, then any specific measures required to remove or mitigate any harm to assets identified within the HIA should be included in the corresponding site-specific policies.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Historic England\_Redacted - <https://watford.oc2.uk/a/m9>

2044

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

There are several allocated sites that are either of significant scale or in proximity to the SRN, which we have provided comments on below:

MU23 Land at Asda, Dome Roundabout allocated for 442 units is located close to the M1 at Junction 5 and therefore, there is potential for this site to have an impact on the SRN. Traffic impact assessments would need to be undertaken as part of any planning application; these should include an assessment of the impact on the SRN.

MU05 Land and Buildings 94-98 St Albans Road and MU06 Land at Watford Junction allocated for a combined 2,446 units, 21,292sqm office floorspace and 4,960sqm commercial land. These sites are located close to Watford Junction Station, and therefore will likely promote travel by sustainable transport modes. However, these sites are of a substantial size and are located near to the M1 at Junction 5, and therefore have the potential to impact on the SRN. A traffic impact assessment would need to be undertaken as part of any planning application, which should consider the impact on the SRN.

MU16 Land at Tesco, Lower High Street and MU18 Land at Colne Valley Retail Park allocated for 1,338 and 466 units respectively. These sites are located close to Watford High Street Station, Bushey Station and the town centre, and will therefore likely promote travel by sustainable transport modes. However, these sites are substantial in size and are also located in proximity to the M1 Junction 5, and therefore have the potential to impact on the SRN.

A traffic impact assessment would need to be undertaken as part of any planning application, which should consider the impact of the proposals on the SRN.

## Full text:

Received via email

## Change suggested by respondent:

Various, see summary/email

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2206

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.194 Adult Care Services. The county council is concerned that the provision of housing for older people, or adults with disabilities is not mentioned in any of the allocated sites that are listed within this chapter. Due to the shortage of suitable housing for older people currently in Watford and based on the predicted increase, there is an additional need for 444 extra care homes (equating to around 4-5 new schemes depending on location and facilities) of which 105 should be affordable for people who have fully funded care packages from HCC. Older people should be allowed an alternative to remaining in under-occupied homes, or moving into residential care, which may not meet their needs or aspirations. As stated previously, such provision for older people and

50

people with disabilities should be close to public transport links, local amenities, shops and health care.

5.195 Ecology. Site specific comments that are made in relation to the allocations listed within Chapter 13 are contained within the tables in Appendix A.

5.196 Historic Environment. There is no in principle objection to any of the sites that have been allocated within the final draft local plan. Some of the sites will require an archaeological assessment, prior to the submission of a planning application, as they have the potential to contain heritage assets which may be a constraint on development.

5.197 Lead Local Flood Authority. It is considered that the recommendations regarding flood risk are appropriate with welcome references to surface water and groundwater flood risk as well as the requirements of fluvial flood zones 2 and 3.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2216

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document appendix A for a large table of site-specific ecology comments

## Full text:

Form and document received via email

## Change suggested by respondent:

See document appendix A for a large table of site-specific ecology comments

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: See document appendix A for a large table of site-specific ecology comments

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy SA13.1: Allocated sites for delivery

2032

Comment

Respondent: Legal &amp; General Investment Management

Agent: Savills

## Summary:

L&G requests that Woodside is identified as an allocated site by Strategic Policy SA13.1 to include a mix of uses including: leisure, retail, health and fitness, entertainment and residential.

Recognising these additional functions within the emerging Local Plan will be vital to Woodside's long term sustainability. It will empower L&G to act decisively to meet future opportunities and capture some of the substantial expenditure growth expected within the north.

The Site should be afforded a site reference and should be identified on the Proposals Map. A red line boundary map which illustrates the Site is enclosed as part of these representations.

Optimisation of land at Woodside accords with the overarching objective of the NPPF to deliver sustainable forms of development and would ensure that the Site can make an important contribution towards meeting the strategic objectives of the Local Plan.

L&G requests that the potential for the introduction of residential uses at the Site is formally recognised by the Local Plan. It is noted that this should be a longer term policy ambition in which flexibility is provided for the delivery of comprehensive mixed use development and retains an element of the existing commercial uses.

Any allocation should not jeopardise the existing commercial uses and the active asset management of Woodside in the medium term. In particular, we propose that the policy text which relates to the redevelopment of the Leisure Park read as follows:

“Should the Leisure Park come forward for comprehensive redevelopment during the Plan period then the council will seek a mix of uses such as; leisure, business, residential and retail “.

This would enable any future development scheme to respond appropriately to market forces in terms of what is viable and ensure that the Plan is positively prepared and makes the most effective use of previously developed land.

## Full text:

Letter and form received via email

## Change suggested by respondent:

Any allocation should not jeopardise the existing commercial uses and the active asset management of Woodside in the medium term. In particular, we propose that the policy text which relates to the redevelopment of the Leisure Park read as follows:

“Should the Leisure Park come forward for comprehensive redevelopment during the Plan period then the council will seek a mix of uses such as; leisure, business, residential and retail “.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>

Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>

Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2040

Comment

Respondent: IDA London Holdings

Agent: IcenI Projects

## Summary:

See letter for details. Site MU12

The allocation of the wider site as a standalone site for a residential development is welcomed and we are in agreement that the site is suitable, available and achievable, as acknowledged in draft policy.

The site has excellent levels of accessibility to local services and facilities by foot and cycle, being located within the town centre. The site is also excellently located in terms of public transport links to bus routes and Watford Junction Station, with links to central London and beyond. We believe that this location can support a higher density of development.

Our client is currently engaged in a pre-application process with Watford Council, and has presented a high-density residential-led scheme through this, including making a presentation to the Design Review Panel. Although there are naturally some points of detail to work through before a planning application can be submitted, it is clear from this process that the site is considered as suitable to deliver a high number of residential dwellings.

Through this Local Plan Review, the site has been allocated for only 14 units, we are of the understanding that this figure should be greatly increased.

Through these representations we would request that the site allocation within the draft Local Plan is updated to reflect an increased capacity of 100-120 units. This density is consistent with other recent permissions, or successful developments on sites of similar characteristics around Watford town centre.

## Full text:

Letter and form received via email

## Change suggested by respondent:

As such, it is considered that the allocation within Strategic Policy SA13.1: Allocated sites for delivery should be updated to read as follows (update shown in red):

“The Site is suitable for mixed-use development, including residential and commercial uses, **due to its highly sustainable location within the Centre of Watford. The Site can therefore achieve an indicative yield of between 100 – 120 units.**”

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA London Holdings - form\_Redacted - <https://watford.oc2.uk/a/mc>

IDA London Holdings reps\_Redacted - <https://watford.oc2.uk/a/md>

IDA London Holdings site plan - <https://watford.oc2.uk/a/mw>

Respondent: North Western Avenue Watford Ltd

Agent: Woolf Bond Planning

Summary:

See letter for details

...Taking account of the assessment above, policy SA13.1 is sound (particularly with respect of the specific requirements for land north of Russell Lane (site ref HS06) other than the 3rd requirement for on-site compensatory measures associated site HS06 which is inconsistent with paragraph 138 of the NPPF which seeks these to be off-site on other land retained in the Green Belt.

Full text:

Form and letter received via email

Change suggested by respondent:

See letter for details

That the detailed requirements for site HS06 are revised to omit the third item - "incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy".

And replaced with:

"A proportionate contribution for compensatory improvements to the environmental quality and accessibility of remaining parts Watford's Green Belt which include areas of existing "Open Space and Green Infrastructure" via a Section 106 agreement."

...For the reasons set out above the site's allocation for around 93 dwellings should be retained and confirmed through the Submitted Draft Local Plan.

The Green Belt boundary should be revised as envisaged in the Final Draft Local Plan to exclude the site.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: The changes to the policies required are detailed in the attached Statement.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

## Table 13.1: Housing sites

1777

Object

Respondent: Ms susan wilkins

Summary:

The original parking spaces were sealed off unlawfully? by XXX denying residents parking as per leases and land registry plans when flats and maisonettes were built in 1962. By whose authority allowed XXX to do this as none of the residents where notified or compensated of this Land Grab. This has denied the residents the right to park in this space. Now you want to build properties which will only compound parking issue, we already have issues with emergency services, deliveries and essential services gaining access.

Full text:

The original parking spaces were sealed off unlawfully? by LPM denying residents parking as per leases and land registry plans when flats and maisonettes were built in 1962. By whose authority allowed LPM to do this as none of the residents where notified or compensated of this Land Grab. This has denied the residents the right to park in this space. Now you want to build properties which will only compound parking issue, we already have issues with emergency services, deliveries and essential services gaining access.

Change suggested by respondent:

The plan of proposed housing needs to be rejected and the land restored back to its original source Residential Parking as per Original Land Registry Plans when properties were built in 1962

Legally No

compliant:

Sound: No

Comply with No

duty:

Raise LPA: Yes

Raise LPA Why?: I submitted my feedback/comments at the first draft plan back in October 2019

Appear exam: Appearance at the examination

Oral exam why: I have been a resident for over 27 years additional residential development will destroy the environment in which I am living it will have a huge impact not only on my property but all the other properties in Lychgate

Attachments: Susan Wilkins\_Redacted - <https://watford.oc2.uk/a/nw>

1778

Object

Respondent: Mr Bill Jacobs

## Summary:

The parking situation is already ridiculous in lych gate and the glebe.

## Full text:

The parking situation is already ridiculous in lych gate and the glebe.

## Change suggested by respondent:

Do not build extra housing in lych gate

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1779

Comment

Respondent: tadpoles

## Summary:

Hi, I would like to bring to your attention an additional site for potential housing. Land and Garages between 56 and 58 Radlet rd WD24 4LL there is easily potential for housing on this site,

I look forward to hearing your response if you support my suggestion to add the site to your local plan.

Thank you

## Full text:

Hi, I would like to bring to your attention an additional site for potential housing. Land and Garages between 56 and 58 Radlet rd WD24 4LL there is easily potential for housing on this site,

I look forward to hearing your response if you support my suggestion to add the site to your local plan.

Thank you

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1818

Comment

Respondent: Sport England

## Summary:

Site Allocation HS20: Land at Lower Derby Road

No objection is made to this allocation as the skate park on this site has now been reprovided at Oxhey Park North.

## Full text:

Site Allocation HS20: Land at Lower Derby Road

No objection is made to this allocation as the skate park on this site has now been reprovided at Oxhey Park North.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1834

Object

Respondent: Mr Paul Elfick

## Summary:

I object strongly to the redevelopment of the TK Max and the Range site. The proposed plans are out of character to the surrounding areas and this will have an adverse effect on the local environment in terms of aesthetics, infrastructure, traffic, pollution, density of people, wellbeing of the community and not forgetting the upheaval in regard to the building works which will also affect the environment.

## Full text:

I object strongly to the redevelopment of the TK Max and the Range site. The proposed plans are out of character to the surrounding areas and this will have an adverse effect on the local environment in terms of aesthetics, infrastructure, traffic, pollution, density of people, wellbeing of the community and not forgetting the upheaval in regard to the building works which will also affect the environment.

## Change suggested by respondent:

I do understand the need and the pressures to build new housing. However, no one ever seems to mention that the growing population is the issue. As our local Council you need to push back to Central Government and raise this important issue.

Building and redeveloping areas is not the solution. The plan needs to explore the maintaining of existing buildings are redevelop these into suitable and affordable housing.

Any redevelopment or buildings need to fit into the already developed environment.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1835

Support

Respondent: CPC Planning Consultants

## Summary:

Punch Partnerships (PML) supports the proposed housing site: HS05 Land at the Badger Public House. Punch's intention is to redevelop the site for housing in accordance with Policy HC12.3 'Built Cultural and Community Facilities' within the 1-5 year timescale envisaged. Given the size of the site and the character of adjacent properties, 9 units is considered a reasonable indicative yield.

## Full text:

Punch Partnerships (PML) supports the proposed housing site: HS05 Land at the Badger Public House. Punch's intention is to redevelop the site for housing in accordance with Policy HC12.3 'Built Cultural and Community Facilities' within the 1-5 year timescale envisaged. Given the size of the site and the character of adjacent properties, 9 units is considered a reasonable indicative yield.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1917

Support

Respondent: Three Rivers District Council

## Summary:

The selected sites are supported with two exceptions, HS24 and HS33 are only for four units. The Government's planning guidance considers sites with a minimum of 5 dwellings appropriate for inclusion in the HELAA. Therefore site allocations ought to be for 5 dwellings or more and sites with fewer dwellings can come forward as windfall sites.

## Full text:

The selected sites are supported with two exceptions, HS24 and HS33 are only for four units. The Government's planning guidance considers sites with a minimum of 5 dwellings appropriate for inclusion in the HELAA. Therefore site allocations ought to be for 5 dwellings or more and sites with fewer dwellings can come forward as windfall sites.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None



1929

Object

Respondent: Cassiobury Residents' Association

## Summary:

Re HS11 - This proposed site is considered part of the amenity space for the flats above the parade of shops in Langley Way & Cassiobury Drive at the roundabout. It is private land, the owners have not given any indication they would wish to sell. We have been led to understand that the Trustees would not contemplate a sale, and nor would they give permission for such a development. Moreover, this site appears to be a form of back garden development & hence would be contrary to both the government's stated policy and the NPPF.

## Full text:

Re HS11 - This proposed site is considered part of the amenity space for the flats above the parade of shops in Langley Way & Cassiobury Drive at the roundabout. It is private land, the owners have not given any indication they would wish to sell. We have been led to understand that the Trustees would not contemplate a sale, and nor would they give permission for such a development. Moreover, this site appears to be a form of back garden development & hence would be contrary to both the government's stated policy and the NPPF.

## Change suggested by respondent:

The HS11 proposed site should be deleted and expunged from the final draft of the Local Plan.

Legally No  
compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: The HS11 proposed site should never have been included in the draft Local Plan in the first place.

Attachments: None

1930

Comment

Respondent: Cassiobury Residents' Association

## Summary:

Whilst broadly in favour of appropriate new development to meet residents' aspirations and demands, as a general comment, Watford is already densely populated for its relatively small size, as compared to other local authorities in the south of England; and we wish to reflect residents' general concerns regarding housing density, attendant traffic generation and infrastructural demands that every such new development brings (with perhaps the exception of a couple of genuine brownfield sites); most of which appear to have been forced on Watfords' planners, thus negating the very ethos of local decisions made via local democracy.

## Full text:

Whilst broadly in favour of appropriate new development to meet residents' aspirations and demands, as a general comment, Watford is already densely populated for its relatively small size, as compared to other local authorities in the south of England; and we wish to reflect residents' general concerns regarding housing density, attendant traffic generation and infrastructural demands that every such new development brings (with perhaps the exception of a couple of genuine brownfield sites); most of which appear to have been forced on Watfords' planners, thus negating the very ethos of local decisions made via local democracy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1966

Support

Respondent: Transport for London Commercial Development

Agent: Transport for London Commercial Development

## Summary:

TfL are the leaseholders of Bushey Station Car Park where Network Rail own the freehold. TfL CD supports the allocation of land at Bushey station as suitable for residential led development. TfL CD are keen to work with the borough and Network Rail to bring forward development on site allocation HS31 Land at Bushey Station.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: TfL Commercial Development reps\_Redacted - <https://watford.oc2.uk/a/nh>  
TfL Commercial Development site map - <https://watford.oc2.uk/a/nx>

2014

Comment

Respondent: Mr Murtaza Esmailji

## Summary:

Site: HS01 Land and garages at Lych Gate

The land allocated for development was originally partially off street parking for the flats I live in, the freeholder/ flat developer had decided some years ago to block access and the land became overgrown, only being cleared recently (still blocked by sleepers so cannot be used for parking). Furthermore some of the garages are privately owned via long leases. How are you able to allocate this land/property for development? The parking survey comment is a laughable, there is little parking available for residents – people from other streets come and park on Lych Gate. The parking space on your plan should be re-instated. Lastly it took Jack Green MRTPI Spatial Planning Manager over a month to reply to a simple email last time I had a query (to which he only replied when I sent a email to the Mayor of Watford as to why I was not getting a response). He did not answer all my queries.

## Full text:

Form received via email

## Change suggested by respondent:

A more suitable location should be found for your plan!

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Raise LPA: Yes

Raise LPA Why?: Email to Jack Green MRTPI Spatial Planning Manager

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Murtaza Esmailji\_Redacted - <https://watford.oc2.uk/a/nr>

2026

Object

Respondent: Mr Lawrence Farrelly

## Summary:

Site HS25:

I feel this development would put more pressure on the parking situation in the area which is already at breaking point. At the moment trying to find a parking space after 3pm in either Cardiff road, St James road or Liverpool road is virtually impossible, the adding of another 11 dwellings will only add to the problem

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: n/a

Appear exam: Not specified

Attachments: Lawrence Farrelly - <https://watford.oc2.uk/a/mh>

2051

Support

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

HS20 - Land at Lower Derby Road

Hertfordshire County Council (HCC) as joint landowner support the allocation of the site for housing.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
 HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
 HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
 HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
 HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

#### Summary:

HS22 Land and buildings at 252-272 Lower High Street

Our comments in relation to HS22 are directly related to the comments made above. 252-272 Lower High Street is identified under reference HS22 in the Regulation 19 Local Plan as a 0.5-hectare residential development site with an indicative yield of 110 units expected to be delivered within years 1-5 of the Plan period. To summarise our earlier comments, it considered that in order to be found sound, the Local Plan needs to lengthen the Plan period by at least one year to 2036/37; increase the minimum housing requirement / provision to 15,067 (and potentially more if the 20% buffer is applied); state that the density of development should seek to exceed 95 dwellings-per-hectare within the CDA where appropriate; and make various amendments to HO3.2 and HO3.3. To help strengthen the Local Plan and enable it to be found sound, it is recommended that the indicative yield at HS22 is increased. This is detailed in 6) below. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

#### Full text:

Letter and form received via email

#### Change suggested by respondent:

GHH support the allocation of the site for residential development, but recommend that the indicative yield is increased to 189 dwellings for the following reasons: 1) To achieve the minimum overall housing requirement of 15,067 over a 15-year plan period. Currently there is a shortfall of 79 dwellings; 2) To achieve the regeneration objectives of the Colne Valley Strategic Development Area and wider Core Development Area 3) To deliver sustainable patterns of development by utilising a previously-developed site in the High Sustainability Zone; 4) It would prevent the de-designation of Green Belt / greenfield land to meet objectively assessed needs; and 5) An increased yield would deliver a much greater quantum and variety of social, economic and environmental benefits. In the context of housing need (explained in further detail earlier in this representation form), GHH consider the site able to accommodate a greater quantum of development, and therefore make a compelling contribution to ensuring the shortfall is not just met in full but exceeded. GHH consider the site able to accommodate the entirety of this shortfall (79 dwellings) if necessary. Furthermore, with the site anticipated to be delivered within the first five years of the Local Plan period, this shortfall would be addressed immediately, rather than being directed towards the end of the Plan period. It is fundamentally important that the most sustainable locations for development are maximised. The Colne Valley Strategic Development Area ('CVSDA') – which forms the southern part of the CDA – is recognised as being one of high sustainability, with development able to benefit from excellent access to public transport and existing services and facilities. In the Housing and Economic Land Available Assessment ('HELAA') [2021], the site is considered to be "suitable, available and achievable" and "accordingly considered a deliverable site and recommended for inclusion in the Local Plan as a site allocation". The allocation of the site for residential development has already been ratified by the Council in the preparation of the evidence base. Chapter 11 of the NPPF underlines the importance of making effective use of land. Para. 117 states that "planning policies and decision should promote an effective use of land in meeting the need for homes and other uses" and that strategic policies "should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously-developed or 'brownfield' land". In addition to this, Para. 118 states that "planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes" and "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively". Strategic Policy HO3.2 – under 'housing density and optimising land' – states that "residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher-density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings-per-hectare". The draft strategic policy seeks to align with the aforementioned requirements of the NPPF to ensure land is utilised to the maximum extent. Significantly, the policy makes reference to new residential developments achieving a minimum density of 95 dwellings-per-hectare ('dph'). The use of the word minimum is important, and does not set a ceiling for residential density. Intensifying the allocation would align with the national and local planning policy directive to direct higher-density development to previously-developed land in the most sustainable locations. GHH therefore consider an uplift on the indicative yield of 110 units to be appropriate and still in accordance with the minimum density requirements under Strategic Policy HO3.2. Taking the above into consideration, GHH consider a minimum density of 378 to be appropriate. This would result in an uplift in the allocation to 189 dwellings, therefore ensuring that the shortfall of 79 dwellings is met in full. GHH recommend the inclusion of specific wording within the allocation that stipulates a minimum expected quantum of 189 dwellings. This is to provide the allocation with the necessary flexibility required under the NPPF, and encourage development to exceed this figure, provided compliance with other policies can be achieved and demonstrated. Focusing additional development within urban areas on previously-developed land would also prevent the loss of additional Green Belt / greenfield land. With a minimum shortfall of 79 dwellings, GHH consider it essential to direct this additional development towards already-allocated sites, such as 252-272 Lower High Street. As detailed above, the site is able to accommodate a greater quantum of development, and seeking to intensify the allocation would protect against potential further Green Belt / greenfield land release to meet objectively assessed needs. Enhancing the allocation would also deliver a greater range and quantum of social, economic and environmental benefits both in the short-term and long-term. An increased number of dwellings / residents would, as a minimum: 1) Generate a significant increase in annual convenience goods; comparison goods; and leisure expenditure; 2) Create direct and indirect employment opportunities during the construction phase; 3) Increase demand for, and use of, local services, facilities and businesses in the local area. This increased demand and spending would help to maintain and enhance the services available and improve their viability; 4) Provide the Council with a significant increase in potential New Homes Bonus and Council Tax Revenue receipts; 5) Provide improvements to infrastructure (either directly (i.e. on-site) or through planning obligations); 6) Introduce new areas of planting which would be of greater environmental / biodiversity benefit; and 7) Achieve a significant reduction in vehicle movements and contribute to the Council's green infrastructure and climate change objectives. It is therefore strongly recommended that the site allocation is increased to 189 to ensure minimum housing requirements are met and the most efficient use of an already allocated sustainable brownfield site. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>

Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2207

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: HS01 Land and garages at Lych Gate

5.198 Minerals and Waste Planning. This site is approximately 850m from the existing Waterdale Recycling Centre and Waste Transfer Station which is a safeguarded waste site under Policy 5: Safeguarding of Sites within the adopted Waste Core Strategy & Development Management Policies DPD, July 2012. Paragraph 182 of the NPPF states:

"Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

## Full text:

Form and document received via email

## Change suggested by respondent:

5.199 It is therefore requested that the following wording is added to the supporting text for this site, in order to ensure that the continued operation of both the recycling centre and waste transfer station at Waterdale are taken into account at the planning application stage:

- The Waterdale Recycling Centre and Waste Transfer is approximately 850m from this site and its operations should be taken into account.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2208

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.200 Children's Services (School Place Planning). It is requested that a site for a 3fe primary school within this housing allocation is allocated, in the light of the need to cater for a potential shortfall that has been identified in the county council's comments to the education section in Chapter 10 of the final draft local plan.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Table 13.2: Mixed use sites

1770

Comment

Respondent: Mr Brian Jackson

## Summary:

Please clarify MU13, would Sainsbury's stay open? This is VERY unclear. There are barely sufficient supermarkets in walking distance in Town Centre since Little Waitrose closed. I would have to drive to another supermarket, which is hardly likely to increase chances of meeting green objectives if others also have to do the same.

## Full text:

Please clarify MU13, would Sainsbury's stay open? This is VERY unclear. There are barely sufficient supermarkets in walking distance in Town Centre since Little Waitrose closed. I would have to drive to another supermarket, which is hardly likely to increase chances of meeting green objectives if others also have to do the same.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1897

Object

Respondent: West Hertfordshire Hospitals NHS Trust

Agent: Montagu Evans LLP

## Summary:

The proposed Riverwell allocation should be amended to include hospital use and the existing Watford General Hospital site in order to facilitate the re-provision of Watford General Hospital, part of which will be built on land covered by the proposed Riverwell allocation. It will also facilitate the delivery of development on surplus Trust land once the new hospital has been delivered.

## Full text:

These representations have been prepared by Montagu Evans LLP on behalf of West Hertfordshire Hospitals NHS Trust in relation to Watford Borough Council's 'Final Draft Local Plan' (i.e. the Regulation 19 Local Plan) and specifically in relation to the Watford General Hospital site and adjacent land known as the Riverwell site.

## Background

## The Trust

West Hertfordshire Hospitals NHS Trust ('the Trust') runs three National Health Service ('NHS') hospitals: Watford General Hospital, St Albans City Hospital and Hemel Hempstead Hospital.

It provides acute healthcare services to a core catchment population of approximately half a million people living in west Hertfordshire and the surrounding area.

The Trust also provides a range of more specialist services to a wider population, serving residents of north London, Bedfordshire, Buckinghamshire and east Hertfordshire.

As an employer of almost 5,000 people the Trust is one of the biggest employers in the area and sees nearly a million patients each year.

## Watford General Hospital

Watford General Hospital dates back to the formation of the NHS. It comprises buildings of a variety of ages, including buildings of the Victorian Watford Workhouse and of the Shrodells Public Assistance Institution which date from the interwar period. In 1965 the Peace Memorial Wing was opened and in the 1980s The Princess Michael of Kent Wing was built.

This collection of buildings is now outdated and inefficient and does not reflect the high-quality environment that the Trust wants to provide for its patients and staff. Furthermore there has been increasing pressure on capacity as demand for services has grown, and the inflexibility of the estate as it stands is an impediment to achieving a long-term, sustainable solution.

The Trust was delighted when, in late 2019, it learned that it had been one of the six successful first round Health Infrastructure Plan ('HIP1') parties. It subsequently undertook work to examine the potential of each of its sites and a number of green field locations to provide a large acute hospital to meet the catchment area's needs long into the future. This work culminated in a decision to develop a new emergency hospital at Watford which was made at a meeting between the Trust and Herts Valley Clinical Commissioning Group ('CCG') on 1 October 2020. It is the intention that the Trust will also continue to provide services from its other sites in Hemel Hempstead and St Albans.

Rather than redeveloping existing buildings, the new hospital will be built on land adjacent to the existing hospital so that the existing hospital can continue to provide services until the new hospital is ready. This will be a very significant development project that will take place over a number of years.

The hospital development will include land which forms part of what is referred to as the 'Riverwell' site in the draft Local Plan. Riverwell is being delivered by a local asset backed vehicle ('LABV') known as Watford Health Campus Partnership LLP which is a 50:50 limited partnership between Watford Borough Council and Kier Project Investment Limited. The aim of the LABV (as set out in its Business Plan) is:

“...to deliver an integrated and viable solution for Watford Riverwell which will support the regeneration of west Watford, introducing; high quality homes, market facing commercial and employment uses, improved public realm and local connectivity and facilitating the re-provision of Watford General Hospital.”

Thus the new hospital is wholly in line with well-established aims for this part of Watford.

The new hospital project is progressing apace – a design team is in place and discussions will continue to take place over the coming months to hopefully reach final agreement on the acquisition of the remaining land that is not under the Trust's control; whilst it has not ruled anything out at this stage, the Trust is hoping to be able to acquire land by agreement rather than by exercising its Compulsory Purchase powers.

The Trust has been working closely with Watford Borough Council to move the project forward and is grateful for Watford Borough Council's support thus far. To date six pre-application meetings have been held, together with a submission to the Design Review Panel. Submission of an outline planning application for the hospital development is currently planned for late May 2021. The Trust looks forward to a continued strong and collaborative relationship with the local authority to help deliver this critical piece of major infrastructure for the area.

These representations are intended to assist the delivery of the hospital by:

1. seeking express support in the Local Plan for the redevelopment of Watford General Hospital - an important consideration for the business case process;
2. confirming to Watford Borough Council that, in its capacity as landowner, the Trust is happy for the existing Hospital site to be included in the Local Plan as part of an allocation; and
3. enabling the Trust to be represented at the Examination in Public if needs be, hence why these representations are framed as an 'objection'.

#### Comments on the Draft Plan

The Trust welcomes the Council's general aims to regenerate areas of the borough such as west Watford / Riverwell. It is pleased to note that the Council recognises the importance of delivering supporting infrastructure alongside the significant growth that is being planned (paragraph 3.5). The Trust considers that Watford General Hospital is an essential part of the area's infrastructure (and should be recognised as such in the Local Plan) and that the effects of growth on the hospital should be fully considered and facilitated as part of the planning process.

The Trust particularly welcomes the Council's statement that it will support improvements to the hospital (paragraph 2.67).

However, the Trust objects to absence of clear provisions in the draft Local Plan in relation to improvements to the hospital. The Trust recognises the strong support of the Borough Council for a new hospital (as illustrated, for example, by the LABV's aims) and recognises that the omission of express provisions for the new hospital is likely a consequence of the different timescales of the Local Plan and HIP1 programmes.

Nevertheless, the Trust is keen to see this addressed in the final version of the Local Plan lest the Local Plan be found to be 'unsound'.

Such certainty will be particularly important when it comes to considering a planning application for the new hospital and in avoiding any undue delays to the determination of a planning application. Furthermore, having a clear development position is also a very important consideration when justifying and drawing down on Government funding for a major project such as this.

#### Draft Site Allocation

Draft Policy MU21 (Land at Riverwell) proposes the allocation of land upon which part of the new hospital will be built. It says that the site is considered suitable for mixed-use development, including residential, commercial uses and a primary school. It also seeks the provision of a 'public square' and estimates that the site has a capacity of 1,383 dwellings. The draft plan suggests that the timescale for development is "1-15 years".

The draft allocation presents three avoidable issues:

1. as it stands any planning application for new hospital floorspace on this land would be a departure from the development plan and would have to be justified against a loss of housing potential (which, given the pressing need for new homes, is likely to be given substantial weight in the planning balance). This is an avoidable hurdle if the site allocation is amended. It is also an unnecessary hurdle given the strong support that the Council has clearly expressed towards improvements to the hospital and given the strong local support for better facilities;
2. whilst there is a clear need for a new hospital, there is also a significant need for housing in the borough. As already tested by the Trust there are no reasonable alternative locations for the development a new hospital other than on land adjacent to the existing facility. However, such a development may alter the Council's assumptions relating to the housing capacity of the Riverwell site as currently defined; and
3. the assumed residential capacity of the draft allocation as currently drawn may not be achievable given that it could involve residential blocks that are immediately adjacent to the Trust's land and in a location where the Trust is proposing development. Such proximity of housing could give rise to 'agent of change' issues which in turn could prejudice the improvement of the healthcare estate as well as the longer-term operation of the hospital.

These issues then result in two potential concerns relating to the 'soundness' of the emerging Local Plan, specifically that:

1. the plan would not be 'positively-prepared' as it would not be providing a strategy which seeks to meet the area's objectively-assessed needs whether in terms of the new hospital or in terms of any decrease in housing capacity of the currently-proposed Riverwell allocation as a result of the hospital development; and
2. the plan would not be 'effective' as it would not be deliverable, specifically in terms of the assumed housing capacity of the currently-proposed Riverwell allocation.

#### Other Considerations - Developer Contributions

Returning to the Council's recognition that infrastructure must keep step with housing and other growth, we highlight that the new hospital will need to serve the occupants of new homes as well as the existing population. We note that, elsewhere in the draft Local Plan, the Council is seeking developer contributions for healthcare, for example:

"2.20 The Herts Valleys Clinical Commissioning Group has indicated that a new health facility, with a floorspace area of approximately 1,300 sq m, is required in the Watford Gateway Strategic Development Area."

Whilst the Trust supports the new healthcare facility at Watford Gateway, it also believes that developer contributions should be sought (whether by way

of the Community Infrastructure Levy or by way of section 106 obligations) from all development that will generate additional demand for NHS healthcare services. Although such contributions will represent but a small proportion of the overall expenditure on NHS facilities that will occur in the borough during the plan period, the collection of contributions – however modest – will help to address the common complaint amongst those raising issue with new development that additional housing only serves to add unwelcome pressure on healthcare facilities. The Trust would welcome the opportunity to engage further in relation to this matter.

#### Change suggested by respondent:

We are confident that these issues can be fully addressed by way of a modification to include the existing hospital site as part of the allocation. This is because whilst the new hospital will be in part built on the currently-proposed Riverwell allocation, parts of the existing hospital site will become available for development within the same 1-15 year timescale for Riverwell. Consequently the allocation of the existing hospital site in combination with the currently-proposed Riverwell allocation will ensure that the emerging Local Plan will both facilitate delivery of the new hospital and continue to provide for the significant housing delivery that is envisaged in the current draft local plan.

#### Requested Changes

To address the above matters we respectfully request that the Borough Council amends the draft Riverwell policy as follows:

1. allocate (see attached drawing) the existing Hospital site in combination with the Riverwell site as currently illustrated – as noted above we confirm that the landowner is content for its site to be allocated;
2. revise the text of draft Policy MU21 (Land at Riverwell) to read: “The site is considered suitable for mixed use development, including hospital, residential, commercial uses and a primary school”; and
3. note for the avoidance of doubt in the explanatory text that a new hospital will be built on land outside of the current hospital boundary and that parts of the existing hospital site will be released for development following the commissioning of the new Hospital. The Trust envisages that such land will be made available within the 15-year timeframe of the Riverwell allocation as currently drafted.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: Because the proposed Hospital is a matter of strategic importance for the area. It is very important that the Local Plan facilitates this.

Attachments: WBC Reps - WGH 180321 (submitted).pdf - <https://watford.oc2.uk/a/kg>

1902

Comment

Respondent: La Salle Investment Management

Agent: Miss Rachel McGall

#### Summary:

La Salle support the designation of the Retail Park as a Mixed-Use Site for residential-led development, considering the Site an excellent opportunity to deliver new housing. La Salle suggests that if development proceeds in advance it would continue to conform to the Site Allocation.

La Salle is aware development options have been considered for the parcel of land to the north of the Retail Park, and land south. Both parcels of land are suggested to be included within the Allocation to help development come forward aligning with the Area's objectives, but acknowledge that they may come forward in phases.

#### Full text:

La Salle support the designation of the Retail Park as a Mixed-Use Site for residential-led development, considering the Site an excellent opportunity to deliver new housing. La Salle suggests that if development proceeds in advance it would continue to conform to the Site Allocation.

La Salle is aware development options have been considered for the parcel of land to the north of the Retail Park, and land south. Both parcels of land are suggested to be included within the Allocation to help development come forward aligning with the Area's objectives, but acknowledge that they may come forward in phases.

#### Change suggested by respondent:

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Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Appendix 1- Colne Retail Park Plan 1 - Site Location Plan.JPG - <https://watford.oc2.uk/a/km>

Appendix 2- Colne Retail Park Plan 2- Tear-drop Site.JPG - <https://watford.oc2.uk/a/kn>

Appendix 3- Colne Retail Park Plan 3- Jaguar and Land Rover Car Dealership Site.JPG - <https://watford.oc2.uk/a/ky>

La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/y9>

1942

Comment

Respondent: Berkeley Homes

## Summary:

Berkeley Homes supports the site allocation MU05 for land and buildings at 94-98 St Albans Road for a mixed use development in accordance hybrid planning permission (ref. 19/00507/FULM) approved in November 2020.

## Full text:

-

## Change suggested by respondent:

To ensure accuracy and consistency with the policy the floorspace figures should be amended as follows: 2,050sqm GEA of commercial floorspace  
2,910sqm GEA of educational floorspace

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1975

Comment

Respondent: Tesco

Agent: Tesco

## Summary:

In summary, Tesco supports the Council's intention to review its Local Plan, and the principle of the draft site allocation (MU16). Specifically, the principle of residential-led development at the site, with re-provision of Class E uses (including a replacement Tesco) is supported. In this way, an efficient and high density mixed use scheme would make a significant contribution to the delivery of new housing in a highly sustainable location, whilst also contributing to the vitality of this established retail area.

## Land Uses

The emerging proposals for the site incorporate retention/replacement of the Tesco store (E Class), residential development, and provision of space for a primary school.

Draft site allocation MU16 indicates that the subject site is considered suitable for 'mixed use development, including residential, E and F class uses and a primary school.'

It is unclear why the site allocation refers to both F class uses and a primary school, when a primary school would fall within the F Class. To avoid ambiguity, it is proposed that the allocation be amended to read:

'The site is considered suitable for mixed use development, including residential, E class, and potential for F class (primary school) use.'

## Retail Re-provision

Draft allocation MU16 currently states that development proposals for the subject site should 'Provide no additional retail floorspace above the existing on site provision.'

Tesco raise concern with this current wording. Whilst the current intention is to retain the existing store and fuel station, redevelopment of the current retail unit to provide a replacement superstore and fuel station is a potential option. It is unclear why such a restrictive approach is taken, given that the site is located within an established retail area, and that additional retail floorspace could provide significant local benefits. It is held that a degree of flexibility should be afforded, to allow for the dynamic nature and ever changing needs of the retail industry. Accordingly, it is proposed that the allocation wording be amended to read:

'Provide circa 100% retail floorspace re-provision, subject to operational requirements'.

## Indicative Residential Yield

It is Tesco's view that the indicative yield of 1,338 residential units is an appropriate indicative figure, given the sustainable nature of the site located within the Core Strategic Development Area, and ability to contribute to a sustainable new community in the centre of Watford.

## SUMMARY AND CLOSINGS

To summarise, the subject site represents a unique opportunity to deliver a range of benefits in an important and highly sustainable location. Tesco welcomes the provision of a mixed use allocation for the subject site, given the potential to both retain and enhance the retail offer on site, and assist with the delivery of a major new residential development. However, there is some concern in respect of the detailed wording of the site allocation as highlighted in this letter. We have made suggested alterations accordingly.

## Full text:

Form received via email

## Change suggested by respondent:

To avoid ambiguity, it is proposed that the allocation be amended to read:

'The site is considered suitable for mixed use development, including residential, E class, and potential for F class (primary school) use.'

It is held that a degree of flexibility should be afforded, to allow for the dynamic nature and ever changing needs of the retail industry. Accordingly, it is proposed that the allocation wording be amended to read:

'Provide circa 100% retail floorspace re-provision, subject to operational requirements'.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Tesco Response Form\_Redacted - <https://watford.oc2.uk/a/nf>Tesco Written Reps\_Redacted - <https://watford.oc2.uk/a/ng>

1976

Object



Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

Summary:

A project team was engaged by Canada Life in July 2020 to review potential development options for Canada Life's site at Imperial Way known as Astral House (currently identified as site allocation MU07) and to advance discussions with Watford Borough Council. This was the first time that Canada Life had assessed the site in relation to the emerging local plan. No previous representations have been made to the Regulation 18 consultation stage or the Call for Sites.

At the time of engaging with the local authority in September 2020 we were informed that an infrastructure bid had been submitted to the Hertfordshire Growth Board to seek funding for various interventions in the Watford Gateway Strategic Development Area. Targeted projects identified included opening up cycle and pedestrian bridge links from the west of the Abbey Line to the east, thereby providing access to and potential redevelopment opportunities for a wider range of land uses to the east of the Abbey Line.

On the basis of the high level information provided, Canada Life expressed support, in principle, for the Watford Gateway Strategic Development Area and identified that the likely aspiration for the site would be to deliver a step change in scale and massing through the inclusion of tall buildings and mixed use development; although the final mix was yet to be determined but would likely include residential, office and other E Class Uses. However, this approach would necessarily require further investigation with surrounding landowners.

Since that date, significant research has been undertaken by the Canada Life advisory Team to review the strategy for the redevelopment of the site.

These

representations are therefore submitted with the benefit of now having undertaken discussions with the surrounding landowners and additional engagement with Watford Borough Council. These recent and ongoing

discussions are important and have clarified Canada Life's position in respect of the future redevelopment potential for land east of the Abbey Line.

In summary, discussions have raised the following key matters:

1. The London Cement Batching Plant is highly unlikely to be relocated due to the lack of alternative sites, the planning and logistical difficulties of doing so, and because there is likely to be little / no value in doing so to justify the significant cost to its owner.
2. The Coal Board Pensions Land (site allocation EM05) has not been put forward for allocation as a mixed-use development opportunity and we understand that the site is now being brought forward for modern industrial uses which will maintain Clive Way.
3. The Redrow Land (known as Balmoral Storage, Clive Way) has not been promoted for redevelopment and will therefore be subject to allocation for its existing industrial use.
4. Network Rail is supportive of the principle of delivering a MCSP on land to the east of the Abbey Line. This is seen as a key move and a catalyst to unlock land around the station for regeneration via their partnership with Kier Construction, known as Solum Regeneration ("Solum").
5. Regeneration around the station to the west of the Abbey Line is going to be the main focus for regeneration during the lifetime of the emerging Local Plan.

The above key matters are germane to the delivery of the Watford Gateway Masterplan SDA and, in particular, how land to the east of the Abbey Line is now

likely to be redeveloped during the lifetime of the emerging local plan. It is therefore necessary for MU07 to be amended so that the plan meets the necessary tests of soundness in respect of being justified and effective. What this means in relation to land to the east of the Abbey Line (including allocation MU07) is as follows:

- The policy must recognise that residential development and any associated infrastructure requirements such as a location for a primary school is very unlikely to happen during the lifetime of the emerging local plan. However, the wording of the policy should maintain flexibility to allow for these as part of a mix of uses if the cement batching plant relocates and adjacent landowners change their approach to the renewal of industrial units. This flexibility is required due to the clear environmental constraints that have been identified in respect of the cement batching plant remaining in-situ, proposals that are underway for the renewal of older industrial units and ongoing retention of industrial / storage uses i.e. land that has not been promoted for redevelopment.
- It should be clear in the emerging local plan that the uses identified as appropriate for Canada Life's site through allocation MU07 can come forward as solus or mixed uses i.e. it can be redeveloped for a single type or mix of employment uses and does not have to deliver a mixed-use scheme which includes residential use. The opportunity for a mixed residential and employment scheme will only be possible if the batching plant relocates and adjacent landowners also seek a compatible mix of uses. While this opportunity may arise longer term, it is now clear that if a residential led mixed-use scheme was to happen it would be towards the end of the new local plan period or, more likely, beyond. Development before then for beneficial solus or mixed employment uses cannot be fettered if the policy was interpreted as only allowing a development if it includes a mix of uses (including residential).
- Key principles / physical interventions for unlocking and putting in place infrastructure to pave the way for the longer term regeneration of the area can be set by policy now. However, these principles and in particular physical interventions, need to be refined to make best use of existing routes to avoid splitting development sites unnecessarily (making them unviable for redevelopment), losing existing employment land, and doubling up on infrastructure costs (see below for further discussion on this point).
- The construction of a MSCP with sustainable travel hub and pedestrian / cycle bridge to the station on land to the east of the Abbey Line and to the south of Clive Way is considered to be the main infrastructure and catalyst to further regeneration that will be deliverable during the lifetime of the emerging local plan.

At bullet point 3 we refer to the need to look again at what should constitute key infrastructure within the area to the east of the Abbey Line during the lifetime of

the plan, essentially putting in place key building blocks for longer term regeneration (or sooner if there is a substantial change in the current constraining factors identified through landowner discussions). Our conclusion, alongside that of Network Rail is as follows:

- Clive Way must be protected and extended through to Network Rail and Canada Life's land to the south of the east of the Abbey Line SDA area (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding as an extension to Clive Way). This is the most appropriate route to bring mixed vehicular traffic (alongside active travel options) through to a new MSCP and sustainable travel hub without unnecessarily sterilising substantial areas of developable land which would reduce the viability of projects seeking an uplift in employment densities.
- Canada Life will safeguard land at the end of a link from Clive Way for the construction of a MSCP / sustainable travel hub and linking bridge to the station and will continue to collaborate with Network Rail. As part of this approach the concrete batching plant traffic can be slightly re-routed, but still use the existing road through to Orphanage Road, without then needing costly re-routing to Imperial Way as suggested by Policy ST11.2. This is fundamental to cost effectively unlock land between the Main Line and the Abbey Line for high density redevelopment. Furthermore, it is fundamental to alleviating the severe congestion experienced in the town centre due to all existing station parking being located in one area.
- In the longer term, a pedestrian and cycle bridge from Penn Road to allow further east west permeability for pedestrians and cyclists may be delivered. With the batching plant retained, this new link could effectively be routed just to the north of the batching plant and linked to the existing pedestrian infrastructure along Imperial Park.

We do not support a safeguarding policy objective to create a further, segregated vehicular link through the Canada Life site to the Network Rail to the south / rerouting of batching plant traffic to Imperial Way via an extension of Imperial Way. This is not needed following further investigatory work with Network

Rail, would double up on routes to the same point, and the associated costs of doing so would leave the Canada Life site undevelopable for employment uses

(including industrial) during the emerging local plan period. This is not acceptable to Canada Life and would lead to their withdrawal of support for the Masterplan

Area if it was to be maintained as a policy requirement (see additional representation in response to Policy ST11.2 and P202 of the Local Plan document).

The above analysis demonstrates that the current strategy for the Watford Gateway SDA needs to be amended for land to the east of the Abbey Line. Without amendments to respond to the evidence that has emerged through the consultation and ongoing landowner discussions, the policy is not justified. This is

because it would not take into account the reasonable alternatives based on proportionate evidence that has been set out in these and other representations.

In addition, it would not be effective because Canada Life and Network Rail would not be in a position to safeguard land for an MCSP / sustainable travel hub on

land to the east of the Abbey Line. This is because the current strategy of extending Imperial Way / re-routing the batching plant traffic to Imperial Way would substantially and unnecessarily sterilise developable land within allocation MU07, where Class E(g), B2 and B8 employment uses are delivered, by splitting the site and putting active travel users in conflict with secure yard areas etc. As stated previously, it is now considered that employment uses will be the most

likely form of development on land to the east of the Abbey Line during this local plan period. These uses are required due to the very high, objectively assessed

levels of need for employment uses, including industrial development, within the borough.

The text of Site Allocation MU07 should be amended as follows: "Timescale: Windfall"

Full text:

-

Change suggested by respondent:

Development requirements and considerations

• This site is considered suitable for solus employment uses, mix of employment uses or mixed-use development, including residential and employment uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Result in no net loss of employment floorspace on site (unless the existing employment use is shown to be unviable);
- Seek to work collaboratively with the landowners of sites MU06 and EM05, which are located adjacent to the east and south of the site respectively, to maximise the benefits of development;
- Demonstrate that safe pedestrian and cyclist access to the site has been provided;
- Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land (in conjunction with MU06) required to help facilitate the delivery of a multi storey car park and sustainable travel hub (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding);
- Take account of the potential risk of contamination on site;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required ~~due to the scale of the~~ if new dwellings are to be provided as part of a mixed-use development; and
- In the case of residential development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of sensitive noise receptors."

In addition to the changes to allocation MU07 outlined above, it will be necessary to include amendments to site allocation EM05 to ensure Clive Way is maintained and any redevelopment proposals accommodate the retention of Clive Way for vehicular and active travel uses through to a new MSCP with sustainable transport hub.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

## 1984

## Comment

Respondent: Solum Regeneration

Agent: Daniel Watney

Summary:

7.1 During the consultation on the first draft of the Local Plan, Solum Regeneration submitted a representation to, in part, raise that the red line boundary for the allocation at 'Land at Watford Junction' did not correlate with the full extent of Network Rail's ownership. It was subsequently confirmed by the Council that the site boundary and area has been amended to reflect the ownership extent.

7.2 The Final Draft version of the Local Plan has not been correctly amended to reflect the updated red line boundary. It is requested that this error be corrected to reflect the correct ownership extent.

Full text:

Form received via email

Change suggested by respondent:

That the error be corrected to reflect the true ownership extent.

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft

Appear exam: Not specified

Attachments: Solum - document - <https://watford.oc2.uk/a/n9>

Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

1995

Object

Respondent: Telereal Trillium  
Agent: Newsteer

## Summary:

MU14 'Land at the car park, Wellstones'

Concerns regarding indicative yield in plan. See original letter. Relates to Policy HO3.2 & QD6.5 as well.

## Full text:

Form and letter received by email

## Change suggested by respondent:

With due consideration to the above, it is therefore recommended that the 'indicative yield' is either removed from the site allocation, changed to read 'baseline scenario' or a clearer explanation is provided to demonstrate that this is not considered to be the 'capacity' of the Site but is provided as a baseline figure to assist with WBC's wider assessment of housing supply.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: We submitted Reps to the First Draft Consultation which expressed similar concern around density restrictions.

Appear exam: Not specified

Attachments: Newsteer on behalf of Telereal Trillium\_Redacted - <https://watford.oc2.uk/a/n4>

2000

Comment

Respondent: JLL  
Agent: JLL

## Summary:

Cortland is pleased that the allocation of both Phase 2 parcels - Land to the west of and parallel to Ascot Road (MU19) and Land to the East of Ascot Road (MU20) remain as allocated mixed-use sites. It should be noted, the timescale of the MU20 allocation aligns more closely with 1-5 years rather than 6-15 years given both allocations are to come forward for planning this year. We consider the indicative residential yields (60 dph) on the allocated sites to be extremely low in relation to Ascot Road Phase 1 which was granted permission in 2017 with a density of 307 units per hectare, setting a precedent for the area. Our client promotes the Borough's desire to optimise sites through a design-led approach and the provision of a minimum dwellings per hectare requirement as set out in HO3.2. As such, we do not believe that the site allocation's density is justified and consistent with the rest of the Draft Local Plan's direction. Further to this, Policy QD6.1 notes the Council's support for a gentle uplift in the density of 'Established Areas'. Ascot Road is also designated as a Local Centre (Figure 5.1) within this Draft Local Plan which indicates the Council's awareness of the sustainability of the area. Therefore, it is considered that the density for both the allocations MU19 and MU20 should be increased significantly to appropriately reflect the Council's need for housing and Local Centres designation.

## Full text:

Form received via email

## Change suggested by respondent:

Therefore, it is considered that the density for both the allocations MU19 and MU20 should be increased significantly to appropriately reflect the Council's need for housing and Local Centres designation.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>  
Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2001

Object

Respondent: Brasier Freeth LLP

## Summary:

As drafted MU 13 identifies an indicative yield for the site of 220 no. dwellings. It is not clear where the figure of 220 no. dwellings originates from. The Watford Tall Buildings Study (January 2021) identifies the potential for up to 8 storeys of development in this location alongside 10 storey elements and provides a broadbrush yield of 300 no. new dwellings and 3,388 sq m of commercial space. Analysis undertaken by Daejan Watford Limited indicates the potential for 400 no. dwellings and that has been discussed with both the local planning authority and their consultants Allies and Morrison. Against the background of the above the National Planning Policy Framework notes at paragraph 16 (d) that the plan should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Similarly, the National Planning Practice Guidance is explicit that “the local plan should make it clear what is intended to happen over the life of the plan, where and when this will occur and how it will be delivered” (Reference ID 12-002-20140306). For these reasons it is clear the Local Plan should identify a real life indicative yield in order to guide development and make the best use of previously developed land in line with the objectives of the Framework. Unless the Plan is modified to address this it is neither justified, nor effective, nor consistent with national policy as is required by paragraph 35 of the Framework and cannot therefore be considered to be sound.

## Full text:

-

## Change suggested by respondent:

The indicative yield should be identified as a minimum of 400 no. dwellings – See comments above. Daejan (Watford) Limited are otherwise supportive of the allocation for redevelopment.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Housing and Economic Land Availability Assessment (Letter to Tom Dobrashian dated 2 October 2020 and accompanying HELAA forms.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Daejan (Watford) Ltd\_Redacted - <https://watford.oc2.uk/a/zw>

2005

Object

Respondent: Asda

Agent: Newsteer

## Summary:

Concerns regarding indicative yield on site MU23 'Land at Asda, Dome Roundabout'. Also relates to policies HO2.3 & QD6.5. See full letter for details.

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore recommended that the 'indicative yield' is either removed from the site allocation, changed to read 'baseline scenario' or a clearer explanation is provided to demonstrate that this is not considered to be the 'capacity' of the Site but is provided as a baseline figure to assist with WBC's wider assessment of housing supply.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Newsteer on behalf of Asda\_Redacted - <https://watford.oc2.uk/a/n3>

Respondent: Mineral Products Association  
Agent: Mineral Products Association

Summary:

See also policies CDA2.1, CC8.5 and ST11.2

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

Full text:

Form received by email

Change suggested by respondent:

The Plan should accurately identify the Orphanage Road site (rail depot and concrete batching plant) on the Policies Map so the area that is safeguarded and to which safeguarding policy applies is clear. It should ensure that any allocations or proposals for development in the Watford Junction area are required to ensure that the site and operations at the rail depot and concrete batching plant are safeguarded. This should clearly set out how this is to be achieved including through not permitting noise-sensitive development in close proximity to the site unless it can be demonstrated that sensitivity can be mitigated, and so potential adverse effects and prejudicing of the operation of the site is avoided. The supporting text for Site Allocations MU06 and MU07 should specifically include reference to safeguarding of the site, including the need to consult the Minerals Planning Authority on development within the MCA, the Agent of Change principle and that this may be applied through design, layout, orientation and fabric of new development to ensure that sensitivity to noise is mitigated and avoided. Policy ST11.2 and supporting text should also make clear that if the access to the rail depot and concrete batching plant is to be re-routed this must not result in any disruption to operations and exports from the site, which needs to be reflected in the text in Site Allocations MU06 and MU07. The boundaries of MU06 should be amended to exclude the sidings and access road that serve the facility, or the text is amended to ensure re-routing does not prejudice operations including export of material.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>

2035

Comment

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

We understand from the Final Draft Local Plan that the site has been included as an allocated site suitable for mixed use – reference TC019/MU11. The draft allocation has however only suggested an allocation for 72 residential units which considered to be extremely low for such a prominent and accessible site within the Core Town Centre area and a Highly Sustainable Area. This number of housing would be below the Council's average dwelling per hectare (dph) density for a site in the high sustainability areas which range from 95 – 350 dph. Based on the creation of 72 new homes in this location (given the land constraints of the borough outside the town centre) this would generate only 175 dph which is considered to be a sub-optimal approach to housing delivery in the most sustainable location and contrary to the aims and objectives of Paragraph 8 and Chapter 11 of the NPPF. Throughout our pre-application discussions with the LPA (ref 19/01468/PREAPP), it has been demonstrated that in principle, this site could accommodate a high density tall building scheme seeking to deliver between 200 – 300 new homes. It is noted from the Council's HELAA (2021) that only 14 sites were put forward during the call for sites. Our site was one of these and we are disappointed that given this low level of interest that our site was not considered to offer more potential and contribution towards the overall housing targets of the Borough. Section 3 of the HELAA sets out the methodology for the numbers that have been arrived at in each site allocation taking an average of the density ranges between each accessibility area and the site area. On the basis that our site has an area of 0.41 ha and lies in the highest suitability area within the town centre it would fall into the highest density range which has an average of 220 dph. Based on this calculation the site would generate a density average of 90 homes not 72 homes. Notwithstanding this, the Council have a significantly increased housing target of 793 units per annum compared to the existing 378 units per annum which has not been met over the last three years (or the last 12 years as admitted by the LPA in their HELAA) as confirmed by the 2020 Housing Delivery Test Results which means the NPPG paragraph 11 Presumption in Favour of Sustainable Development has been engaged. We note the Council's paragraph 4.4 of the HELAA which states, "This indicative housing numbers allocated for each site provided in Appendix A are not the required housing figures for an application that may come forward on these sites. The indicative yields are only to give a reasonable approximation of the capacity of the borough to meet the OAN, and is based on the density calculations described in Section 3." We recognise that the Council have only presented indicative density levels in order to meet their OAN however, where there is a clear case to increase the density of suitable and sustainable sites this should be recognised by the LPA.

## Full text:

Forms received via email

## Change suggested by respondent:

It is our strong opinion that further consideration is required by the Council to demonstrate they are able to achieve their new housing targets which may mean the consideration of further housing sites and increasing densities in key accessible and sustainable locations such as that at The Parade. As it stands we do not consider that the Final Draft Plan can be found to be positively prepared, justified or consistent with national policy on the basis of deliverability and with the NPPF. The intention is to create a taller building behind The Parade frontage to accommodate a high level of residential development alongside other suitable town centre uses and officers have confirmed within pre-application written responses that there is potential for a taller building on this site. We had previously requested that reference to the site being suitable for a taller building should be included within any future allocation for the site however this has not been put forward. We again request, based on officers pre-application advice, that specific reference is included within the draft allocation for a taller building subject to further design and townscape assessment.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2052

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

MU02 Land at 501 St Albans Road  
Hertfordshire County Council (HCC) as landowner supports the allocation of the site for mixed use including residential and community uses.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>

HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>

HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>

HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>

HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2054

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

MU19 Land to the west of and parallel to Ascot Road  
Hertfordshire County Council (HCC) as landowner supports the allocation of the site for residential led mixed use development.

## Full text:

Form received via email

## Change suggested by respondent:

-  
Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

#### Summary:

Site MU06 Land at Watford Junction

5.9 Given the importance of fully safeguarding the Orphanage Road facility, the requirements of the NPPF and the adopted and emerging Minerals Plan – appropriate and sufficiently detailed development requirements and considerations are required to ensure the WLP is 'sound'. It is acknowledged and welcomed that the final bullet point has been added to draft allocation MU06 – in response to representations previously made. This provides a good start and the retention of this text is supported.

5.10 The policy as currently drafted does helpfully include reference to needing to ensure that the layout of the scheme is designed to minimise any potential adverse impacts. The policy indicates that this may include 'locating non-residential floorspace at lower storeys'. Whilst this may be helpful along vehicular routes in particular not to have residential uses at ground floor level – it is important to note that higher level residential development if orientated toward the safeguarded facility could have uninterrupted views of the batching plant/rail unloading and aggregate storage areas and increased potential for noise disturbance. Changes are required to address this issue.

5.11 The proposed additions seek to additionally deal with the issue of the potential re-routing of the vehicle access to the safeguarded site on which the Site Allocation is entirely silent. This will require collaborative working with other surrounding landowners and the operator of the depot. Until that can be secured – appropriate access from Orphanage Road will need to be maintained which will by necessity traverse Site Allocation MU07.

#### Full text:

Form received via email

#### Change suggested by respondent:

The following changes are required with regard to the mapping of Site Allocation MU06:

- The boundary of Site Allocation MU06 should be amended to exclude the rail sidings which provide rail access to the safeguarded Orphanage Road rail aggregates depot.

- The boundary of the allocation site should be amended to exclude the current road access to the site - unless additional text is provided detailing what is required with regard to potential re-routing of the access which will require collaborative working with other land owners.

- Required changes to the 'Development requirements and considerations' are as follows:

The site is considered suitable for mixed-use development, including residential...

Development proposals should:

- Support the wider objective....

- Facilitate the timely delivery of...

- Support the delivery of required...

- Demonstrate that safe access has been provided to the site

- Have regard to the safeguarded rail aggregates depot and concrete batching plant located in and adjacent to the north east

- boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;

- Ensure the layout of the scheme has been planned, laid out and designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the 'agent of change' principle. This may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and/or providing buffer development between the sensitive uses and the safeguarded facility;

- Seek to work collaboratively with the landowners of sites MU07 and EM05, which are located adjacent and to the north east of the site, and the operator of the safeguarded rail aggregates depot and concrete batching plant to facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;

- Seek to work collaboratively with the landowners of sites MU05 and MU07, which are located adjacent to the site, to maximise the benefits of development;

- Avoid significant harm to the setting of...

- Avoid significant adverse impacts on...

- Take account of potential impact on ...

- Take account of potential risk of....

- Be informed by a site specific Flood Risk Assessment...

- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant locate in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>



2077

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

Site MU07 Land and Buildings at Astral House

5.13 The changes required to the 'Development requirements and considerations' for Site Allocation MU07 mirror those required in respect of Site MU06. Similarly to Site Allocation MU06, it is acknowledged and welcomed that some reference has been made to the safeguarded facility and this text (final bullet point in the Draft Site Allocation) is supported. Other text provided for Site Allocation MU06 has not been reflected in MU07 and should be included both for consistency and to ensure a robust policy framework to support the safeguarding of the mineral infrastructure site.

## Full text:

Form received via email

## Change suggested by respondent:

Required changes to the 'Development requirements and considerations' are as follows:

The site is considered suitable for mixed-use development, including residential and employment uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Result in no net loss of employment...
- Have regard to the safeguarded rail aggregates depot and concrete batching plant located adjacent to the north west boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications.
- Ensure the scheme has been planned, laid out and designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the 'agent of change' principle. This may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and providing buffer development or screening between the sensitive uses and the safeguarded facility;
- Seek to work collaboratively with the landowners of sites MU06 and EM05, which are located adjacent to the south and east of the site, to maximise benefits of development. This should include working collaboratively with these landowners, and the operator of the safeguarded rail aggregates depot and concrete batching plant, to facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way;
- Demonstrate that...
- Facilitate the timely delivery....
- Take account of the potential impact...
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>  
Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2209

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU05 Land and buildings at 94-98 St Albans Road

5.201 Children's Services (School Place Planning). Planning permission was granted on this site in November 2020 for 1,214 units, along with the signing of an associated Section 106 legal agreement that requires the developer to provide a 2fe primary school on land to the north of Penn Road. The primary school will cater for the pupil yield arising from the 1,214 units on this site. The county council has worked closely with the developer and the LPA to ensure the delivery of this primary school, along with an on-site multi-use games area and the use of a detached playing field, on land off Leavesden Road. Therefore, the requirement for a primary school to be located on this site, as stated within the supporting text, continues to be supported.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2210

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU06 Land at Watford Junction

5.202 Children's Services (School Place Planning). The requirement for a primary school to be located on this site, as stated within the supporting text, is supported. At Regulation 19 stage, the county council would expect to see a site identified for a new 3fe primary school within this allocation, in order to ensure deliverability. Although it is recognised that masterplanning has not progressed sufficiently to identify a site for a new primary school, the county council considers that subject to a masterplan being developed, the requirement for a new primary school is sufficiently covered within Strategic Policy CDA2.1: Watford Gateway Strategic Development Area, to deliver it (subject to the modifications that have been suggested to the policy).

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2211

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU16 Land at Tesco, Lower High Street

5.203 Children's Services (School Place Planning). The requirement for a primary school to be located on this site, as stated within the supporting text, is supported. At Regulation 19 stage, the county council would expect to see a site identified for a new 3fe primary school within this allocation, in order to ensure deliverability. Although it is recognised that masterplanning has not progressed sufficiently to identify a site for a new primary school, the county council considers that subject to a masterplan being developed, the requirement for a new primary school is sufficiently covered within Strategic Policy CDA2.3: Colne Valley Strategic Development Area, to deliver it (subject to the modifications that have been suggested to the policy).

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2212

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU21 Land at Riverwell

5.204 Children's Services (School Place Planning). Outline planning permission was granted on this site in January 2015, along with the signing of an associated Section 106 legal agreement that set aside land within the site for a new 2fe primary school. Subsequent Section 106 agreements that have been signed, show the primary school site being within the south-eastern corner of Riverwell. As the site continues to be developed, with a number of units now constructed and occupied, the requirement for a primary school to be located on this site, as stated within the supporting text, is still required and continues to be supported.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

2213

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU23: Land at ASDA, Dome Roundabout

5.205 Children's Services (School Place Planning). It is requested that a site is allocated for a 3fe primary school within this mixed use allocation, in the light of the need to cater for a potential shortfall that has been identified in the county council's comments to the education section in Chapter 10 of the final draft local plan.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

## Table 13.3: Employment sites 1928

## Comment

**Respondent:** GERALD EVE LLP

**Summary:**

Draft Site Allocation EM05

We have previously had correspondence with the place shaping team at the borough council in terms of the emerging Local Plan, which allocated this site for medium / high density employment led, mixed use development as part of the Watford Junction Strategic Development Area. The Site is also included within the Housing and Economic Land Availability Assessment (HELAA, September 2019) as a mixed-use site which has the ability to accommodate employment or housing growth.

LaSalle supports the principle of future growth in this sustainable location and considers that the Watford Gateway Strategic Development Area policy has been positively prepared. However, the railway line and nearby land uses act as a major physical barrier which currently prevents this land from being opened up to the nearby railway station and town centre without significant infrastructure investment, to which there are no known financial sources to meet these high capital strategic infrastructure costs.

Owing to the significant constraints faced in unlocking the bridge access across the railway line, it is considered unlikely that development at this side of the railway tracks will be achievable within the short term and that this is more realistic towards the end of the plan period (11-15 years +). LaSalle does support the aspirations of the Watford Gateway Strategic Development Area and the inclusion of its land within this, however, in the short term, it will likely need to redevelop the employment generating buildings to sustain its investment for the pension fund. Once it is clear how the new bridge crossing will be funded it could be considered suitable for larger scale mixed use development.

The draft allocation confirms that "this site is considered suitable for industrial uses". Given the wider industrial estate and the fact that the delivery of the wider regeneration area will take many years, LaSalle is currently progressing proposals for new, improved industrial buildings. It is therefore necessary for the policy to recognise this major infrastructure and funding constraint and to enable appropriate existing employment development to come forward within the next 1-5 years whilst it remains unclear how the infrastructure will be afforded to unlock the wider regeneration area.

The Watford Employment Land Review (2019) sets out that the wider industrial estate is the largest employment site in the borough and that vacancy rates are particularly low, at around 2%. Overall, the study found that there is scope across the borough for employment intensification at existing sites and the level of vacant floorspace across the borough is 5.22%, which is lower than the recommended market vacancy rates.

Based on the above we consider that in the short term there is a strong, identified need for the Site's continued allocation for employment use which supports the redevelopment of improved, energy-efficient industrial units that are suitable for modern occupiers but that this wouldn't prejudice the inclusion of the site for wider larger scale mixed use development in either the short or longer term.

Discussions have been held with the landowners of adjacent sites, including in relation to MU07 (Land and buildings at Astral House). We will continue to work with all local stakeholders to seek to deliver the longer-term development aspirations but this needs to be balanced against the needs of businesses now that make an important contribution to local employment opportunities and investment.

**Full text:**

Please see accompanying Covering Letter.

**Change suggested by respondent:**

On the basis of the above we would request the following amendments to the wording of draft policy allocation EM05:

- That the timescale provided for suitable industrial development is 1-5 years;
- That the second bullet point is supplemented to refer to wider redevelopment of the area later in the plan period (6-15 years) once the necessary infrastructure is in place which would enable this: "This site is considered suitable for mixed use development, including residential and employment uses..."

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Raise LPA:** Yes

**Raise LPA Why?:** We have made representations to both iterations of the plan preceding this version.

**Appear exam:** Not specified

**Attachments:** 210318 Watford BC Local Plan representation.pdf - <https://watford.oc2.uk/a/kq>

1977

Object

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

Summary:  
EM05

We have made representations to the following elements of the Local Plan:

- Para 2.14 - 2.22 and Policy CDA2.1
- Para 3.5 and Appendix B
- Para 11.15 and Policy ST11.2
- Allocation MU07
- Appendix C: transport Infrastructure Requirements, page 202

The comments made in respect of these elements of the plan provide evidence that justifies the requirement for the emerging local plan to safeguard a route via

Clive Way to facilitate access to a new Eastern Mobility Hub. The route for safeguarding is annotated on enclosed Plan SK08.

Full text:

-

Change suggested by respondent:

“Development requirements and considerations

This site is considered suitable for industrial uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Seek to work collaboratively with the landowner of site MU07, which is located adjacent to the west of the site, to maximise the benefits of development;
- ~~Not compromise Clive Way as a vehicle and active travel access route to a new eastern mobility hub which will include a multi-storey car park and bridge across the Abby Line to the station;~~
- Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the 'agent of change' principle;
- Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations; and
- Take account of the potential risk of contamination on site.”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

2053

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

MU04 453 St Albans Road  
Hertfordshire County Council (HCC) as landowner supports the allocation of the site for mixed use including residential.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Not specified

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2078

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

EM05 Land at Colonial / Clive Way  
5.15 The changes proposed to the 'Development requirements and considerations' mirror those required in respect for Site MU06 and MU07 with regard to road access re-routing.

## Full text:

Form received via email

## Change suggested by respondent:

Required changes to the 'Development requirements and considerations' are as follows:  
The site is considered suitable for mixed-use development, including residential and employment uses.  
Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Seek to work collaboratively with the landowner of site MU07, which is located adjacent to the west of the site, to maximise the development benefits of development.
- Seek to work collaboratively with the landowners of sites MU07 and MU06, which are located to the south and south west of the site, and the operator of the safeguarded rail aggregates depot and concrete batching plant which is located the west of the site to facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way.
- Demonstrate that safe pedestrian....
- Facilitate the timely delivery of ....
- Take account of.....
- Take account of....
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located ~~in and adjacent to the west of the site~~. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>  
Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

## Table 13.4: Education facilities[10]

1819

Comment

Respondent: Sport England

## Summary:

No objection is made to this allocation on the basis of the development requirement that the loss of the disused playing fields on this former school site would be mitigated in accordance with the action plan in the Council's Playing Pitch Strategy.

## Full text:

No objection is made to this allocation on the basis of the development requirement that the loss of the disused playing fields on this former school site would be mitigated in accordance with the action plan in the Council's Playing Pitch Strategy.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2055

Object

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

ED01 Former Meriden School

Hertfordshire County Council (HCC) as landowner does not support the allocation of the whole of this site for education. Only the land allocated for the detached playing field for Park Gate Junior School is available for this use. The 1.22 hectares shown on plan EM14096 is not available as it is being developed for a housing scheme with Herts Living Limited and Watford Community Housing Trust.

## Full text:

Form received via email

## Change suggested by respondent:

The removal of the land shown on plan EM14096 from the allocation. The policy wording should be amended as shown in Document 1 included with these representations:

ED01 Former Meriden School Site

The site is considered suitable for the development of an education facility.

Development proposals should:

- Provide appropriate mitigation for the ~~separated~~ detached playing field for Park Gate Junior School in line with the Playing Pitch Strategy (2020);
- Have regard to the Colne Way Waste Transfer Station, which is located directly west of the site. Mitigation for any negative impacts arising from the site's proximity to the waste site should be provided in line with the 'agent of change' principle;
- Complete a review of transport impact and safety as part of a full Transport Assessment which will include mitigation for pupils crossing the A41.

Pedestrian and cycle access should be taken from The Meadows to the north;

- Explore the potential for a pedestrian and cycle link across Meriden Park between the site and Garsmouth Way;

- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and

- Be accompanied by a Preliminary Ecological Appraisal.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2056

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

ED02 Former Bill Everett Centre  
Hertfordshire County Council (HCC) as landowner supports the allocation of this site for education.

## Full text:

Form received via email

## Change suggested by respondent:

-  
Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2057

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Land adjacent to Orchard Primary School  
Hertfordshire County Council (HCC) as landowner considers that the land adjacent to Orchard Primary School shown on Plan EM 14370 should be included for education use. This land was acquired by HCC to enable the school to expand from 2 to 3 forms of entry.

## Full text:

Form received via email

## Change suggested by respondent:

The site should be allocated for education use in Table 13.4 and on the Proposals Map.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>



2214

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: ED01 Former Meriden School Site

5.206 Children's Services (School Place Planning). The allocation of this site for the development of an education facility is supported. The site is considered to be suitable for a new 3fe primary school, subject to detailed feasibility that will accommodate some of the additional pupil yield arising from the proposed site allocations that are contained within the final draft local plan. Prior to submission of the plan, additional dialogue is required with regard to the extent of the site.

5.207 Minerals and Waste Planning. Reference to the site's close proximity to the Colne Valley Waste Transfer Station is supported, including references to the 'agent of change principle' which is outlined in the NPPF.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2215

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: ED02 Former Bill Everett Centre

5.208 Children's Services (School Place Planning). The allocation of this site for the development of an education facility is supported. The site is considered to be suitable for a new 3fe primary school, subject to detailed feasibility that will accommodate some of the additional pupil yield arising from the proposed site allocations that are contained within the final draft local plan.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Appendix A: Draft Monitoring Framework

1820

Object

Respondent: Mr Richard Foskett

## Summary:

The plan has "targets". Some need to be mandatory requirements. Especially those around environment and sustainability. Some may be mutually opposed. e.g more development in flood zones. Where is the sacrificial flood land zone ? Ownership of the target is not mentioned, nor sanctions for non achievement. Some of the targets are not quantified. Just say "reduce"  
A good plan needs a risk assessment. What are they, how will they be mitigated, etc.

## Full text:

The plan has "targets". Some need to be mandatory requirements. Especially those around environment and sustainability. Some may be mutually opposed. e.g more development in flood zones. Where is the sacrificial flood land zone ? Ownership of the target is not mentioned, nor sanctions for non achievement. Some of the targets are not quantified. Just say "reduce"  
A good plan needs a risk assessment. What are they, how will they be mitigated, etc.

## Change suggested by respondent:

Add columns for

- "stretch target" - useful where more is better e.g. building insulation standards.
- Requirements. move key targets into the requirement column
- ownership/ responsible for target achievement.
- sanctions available for missed target/requirement

Add a section on risk of frustration by developers/central government . e.g. where local plan is over-ruled to detriment of the targets. Please add.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

## Appendix B: Housing Trajectory

1918

Support

Respondent: Three Rivers District Council

## Summary:

The housing trajectory is supported subject to the following comments:

A separate table clearly setting out the 5 Year Housing Supply from adoption would be useful, as the Plan needs to be able to demonstrate a 5 year supply of deliverable housing to be found sound. The figures demonstrate that this would be achieved, however a separate table would add clarification.

A windfall allowance has been included in the trajectory from year 4 of the plan period where as planning practice guidance indicates that windfall should only be included for years 6-15 of the plan period.

## Full text:

The housing trajectory is supported subject to the following comments:

A separate table clearly setting out the 5 Year Housing Supply from adoption would be useful, as the Plan needs to be able to demonstrate a 5 year supply of deliverable housing to be found sound. The figures demonstrate that this would be achieved, however a separate table would add clarification.

A windfall allowance has been included in the trajectory from year 4 of the plan period where as planning practice guidance indicates that windfall should only be included for years 6-15 of the plan period.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1973

Object

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

## Summary:

Paragraph 3.5 identifies that the delivery of new homes over the plan period is set out in the housing trajectory (Appendix B) which forecasts the anticipated delivery of new homes each year to 2036. Further to our response to paragraphs 2.14 – 2.22 and Policy CDA2.1, which explains the need for an alternative and more flexible approach to redevelopment of land to the east of the Abbey Line within the SDA, it will be necessary for the trajectory to be amended. The amendment to the trajectory should only count residential development for MU07 under potential windfalls. This is because following landowner discussions, we no longer consider that MU07 will be in a position to guarantee housing delivery at a point in the plan period which can be defined. That is not to say that the opportunity for housing should be excluded from the site allocation, but it can only be capable of consideration if the batching plant is relocated or subject to significant environmental improvements and there is a wider mixed-use development forthcoming with adjacent landowners. In advance of these circumstances aligning, redevelopment for solus employment uses, while safeguarding space to the south of allocation MU07 (in conjunction with MOU6) for a MSCP and sustainable transport hub, is now the most appropriate approach to defining development for MU07.

## Full text:

-

## Change suggested by respondent:

The alterations to the site allocation for MU07 are set out as a separate representation.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

2093

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

See letter for details  
The Plan therefore as currently prepared in not sound with respect of:  
a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and  
b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls;

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

The housing trajectory in appendix B would need to be revised taking on board the 116 dpa windfall allowance

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>  
North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>  
North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

## Appendix C: Transport Infrastructure Requirements

1934

Comment

Respondent: Cassiobury Residents' Association

## Summary:

The proposed crossing improvements at the Hempstead Road / Stratford Way junction to improve connectivity for cyclists should not be at the expense of pedestrian convenience or safety; there are potential blind corners in this proposal and pedestrian amenity and safety should be given the first priority.

## Full text:

The proposed crossing improvements at the Hempstead Road / Stratford Way junction to improve connectivity for cyclists should not be at the expense of pedestrian convenience or safety; there are potential blind corners in this proposal and pedestrian amenity and safety should be given the first priority.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1935

Comment

Respondent: Cassiobury Residents' Association

## Summary:

re proposed: Enhanced cycle infrastructure along Hempstead Road: such should not be to the detriment of residents' amenity or safety. This is a tree-lined road, with several blind corners at intersections, and the introduction of any cycle infrastructure must not compromise either pedestrians' safety and well-being, or that of residents using their driveways from their homes to access the main road.

## Full text:

re proposed: Enhanced cycle infrastructure along Hempstead Road: such should not be to the detriment of residents' amenity or safety. This is a tree-lined road, with several blind corners at intersections, and the introduction of any cycle infrastructure must not compromise either pedestrians' safety and well-being, or that of residents using their driveways from their homes to access the main road.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Appendix F: Marketing Requirements

1856

Comment

Respondent: CAMRA (Watford &amp; District Branch)

## Summary:

This sentence is ambiguous:

"Where the premises are in poor condition or have been partially demolished, the exercise should be limited to marketing of the site as a potential redevelopment site to reflect the existing use."

Does it mean that, for example, a pub that is in poor condition or partially demolished must nevertheless be marketed for redevelopment as a pub ("to reflect the existing use")? CAMRA would applaud that because our concern is that pubs could be 'run down' deliberately to make them seem unviable in the eyes of the planning authorities and therefore more suitable for redevelopment.

## Full text:

This sentence is ambiguous:

"Where the premises are in poor condition or have been partially demolished, the exercise should be limited to marketing of the site as a potential redevelopment site to reflect the existing use."

Does it mean that, for example, a pub that is in poor condition or partially demolished must nevertheless be marketed for redevelopment as a pub ("to reflect the existing use")? CAMRA would applaud that because our concern is that pubs could be 'run down' deliberately to make them seem unviable in the eyes of the planning authorities and therefore more suitable for redevelopment.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1857

Comment

Respondent: CAMRA (Watford &amp; District Branch)

## Summary:

In the Press Advertisement section, the draft plan states that adverts for small community facilities should be placed and maintained in the local newspaper. Public houses of all sizes are normally advertised for sale in specialist publications (e.g., the Morning Advertiser) and through specialist agents. The advert would risk not being seen by relevant potential buyers if it were only advertised in the local newspaper. Therefore, we recommend that this bullet point is modified so it's clear that public houses of all sizes should be advertised in the relevant specialist media.

## Full text:

In the Press Advertisement section, the draft plan states that adverts for small community facilities should be placed and maintained in the local newspaper. Public houses of all sizes are normally advertised for sale in specialist publications (e.g., the Morning Advertiser) and through specialist agents. The advert would risk not being seen by relevant potential buyers if it were only advertised in the local newspaper. Therefore, we recommend that this bullet point is modified so it's clear that public houses of all sizes should be advertised in the relevant specialist media.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: It was raised in our representation to the draft Watford Plan in November 2019.

Appear exam: Not specified

Attachments: None

1858

Comment

Respondent: CAMRA (Watford &amp; District Branch)

## Summary:

The appendix in the draft states that properties should be marketed for 12 months, but we would like properties to be marketed for 24 months, as CAMRA's Model Planning Policy recommends.

The value of the property should result from independent professional valuation. We recommend that the wording is changed as follows:

- Guide Price - this should be commensurate with the current market price for comparable premises. It is expected that the value of the property will be derived from an independent expert RICS registered value or independent accredited member of RICS (Royal Institute of Chartered Surveyors).

## Full text:

The appendix in the draft states that properties should be marketed for 12 months, but we would like properties to be marketed for 24 months, as CAMRA's Model Planning Policy recommends.

The value of the property should result from independent professional valuation. We recommend that the wording is changed as follows:

- Guide Price - this should be commensurate with the current market price for comparable premises. It is expected that the value of the property will be derived from an independent expert RICS registered value or independent accredited member of RICS (Royal Institute of Chartered Surveyors).

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: We raised it in our representation to the draft plan in November 2019.

Appear exam: Not specified

Attachments: None

**Appendix A:**  
**Representations received after 18 March 2021**

2219

Comment

**Table 13.2: Mixed use sites****Respondent:** National Grid [470]**Agent:** National Grid (Matt Verlander) [3866]**Date received:** 29/03/2021 via Email**Summary:**

Proposed development sites crossed or in close proximity to National Grid assets:

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.

Details of the sites affecting National Grid assets are provided below.

Strategic Development Site MU18

Asset Description: ZC ROUTE (TWR 116A - 142): 275Kv Overhead Transmission Line route: ELSTREE - WATFORD SOUTH 1 33Kv Underground Cable route: ELSTREE 400KV S/S Electrical Substation: BUSHEY TRACKSIDE 25KV

ZC ROUTE (TWR 116A - 142): 275Kv Overhead Transmission Line route: ELSTREE - WATFORD SOUTH 1

A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

**Full text:**

Submission received after close of consultation

**Change suggested by respondent:**

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

<https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Raise LPA:** Not specified**Appear exam:** Appearance at the examination**Oral exam why:** n/a**Attachments:** National Grid\_Redacted - <https://watford.oc2.uk/a/yc>National Grid Plan\_Redacted - <https://watford.oc2.uk/a/yc>

2220

Object

**Policy VT5.3: Local Centres****Respondent:** Kentucky Fried Chicken (Great Britain) Limited [4140]**Agent:** Kentucky Fried Chicken (Great Britain) Limited (Mr Steve Simms, Director) [4139]**Date received:** 24/03/2021 via Paper

**Summary:****POSITIVELY PREPARED**

1. The draft policy is not based on any objectively assessed development requirement, but instead implies that no hot food takeaways (HFTs) will be required in locations that happen to be within 400 metres of the entrance of primary schools over the Plan Period. It does this without evidence of: (a) existing numbers of HFTs in such areas or the wider district, (b) the effect of the policy on numbers such areas or the district, (c) any link between obesity incidence and proximity of HFTs to primary schools or (d) any particular distance at which incidence increases or is harmful.
2. No mapping is provided or other assessment made to establish the areas or population affected the distance chosen has the effect of banning HFTs from a large majority of the district. Because no assessment has been made of the number of HFTs that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts.
3. The policy is an area-based blanket ban and is negative in its assumption that all HFTs offer little choice and serve food of the same nutritional value. This is unfair to those that engage positively to offer healthy choices and therefore acts as a disincentive to do so where established businesses compete negatively.
4. Increasingly, district and local centres depend upon the presence of experiential (that is, difficult or impossible to replace online) or 'serendipitous' uses (that is, unlikely to generate a specific trip) to draw in and maintain the footfall to support remaining non-experiential uses.
5. An inability to operate such uses will result in not only their loss and resulting additional and longer trips by car, but also the loss of the remaining convenience stores and other non-experiential uses close by.

Each zone covers 50 hectares, containing typically around 1,000 households. This amounts to a significant spend lost and car journeys caused.

**JUSTIFIED**

1. Neither the supporting text nor the evidence base provide any information to show that the incidence of overweight or obesity in the district is above average or increasing.
2. Consequently, it is difficult to draw any conclusions from the evidence as to the effect of particular land uses or their proximity to others on the attainment of healthy diet and weight. Clearly, diet is a key determinant both of general health and obesity levels, but its predictors are far more complex than the environment around schools.
3. Whilst some HFTs, together with restaurants, pubs and shops are a source of cheap, energy dense and nutrient poor foods, not all of them are, and the planning system is ineffective in distinguishing between those that are and those that are not. Indeed, in some respects, pubs and restaurants can often be worse (Robinson et al, 2018).
4. Planning Inspectors at appeal (APP/P4415/A/11/2159082) have found that refusing HFTs within 400 metres of primary schools cannot be justified. This is because such policies tend to be justified as countering the vulnerability of unaccompanied children to making poor diet choices. However, primary school children are rarely unaccompanied.
5. Sometimes, local evidence can demonstrate a correlation between the density of food and drink uses in a given geography and incidence of overweight or obesity. Policies related to limiting over-concentration of these uses within a specified area might be justified, but the evidence on proximity specifically as a factor is weak and conflicting.
6. Typically, where similar policies have been adopted elsewhere in the United Kingdom, it has been as a result of very high and increasing incidence coupled with proliferation of the use controlled, together outweighing limited evidence of effectiveness. It is also often the case that, where adopted, no objections have been made.

**EFFECTIVE**

1. In the past, systematic reviews (Williams et al, 2014) have found very little evidence for an effect of the retail food environment surrounding schools on food purchases and consumption, so it is at best unclear whether an effort to attain healthy diets and weights based on refusing HFTs within 400 m of primary schools could ever work.
2. As discussed in Williams et al (2004), the methods for defining and measuring the food environment vary widely between studies and few consistent findings emerge. The premises studied rarely, if ever, map across to actual use classes or specific land uses, making it near-impossible to conclude whether HFTs

are a particular problem.

3. The specific focus on primary schools is very unlikely to be effective, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are properly the responsibility their parents or guardians.

4. In such a relatively small district with numerous primary schools, the area affected is a significant proportion of the Borough, so it is hard to see how the effectiveness of its extent could be monitored.

Would poor or negative achievement against the objective result in reduction or expansion of the zones?

What other corrective action might be taken short of their withdrawal?

5. Exercise is also a key determinant that must be considered for a complete picture. Access to open space, sport and recreation facilities is a longstanding and achievable output of the planning system.

Directing resources to this and targeted lifestyle interventions would likely be a far more effective strategy for reducing childhood obesity.

**CONSISTENT WITH NATIONAL POLICY**

1. The National Planning Policy Framework (NPPF) recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to open space, sport and recreation facilities and health services, and ensuring developments are within walkable distance.
2. The NPPF requires policies to be sound, assessed against tests, including justification (which requires evidence that there is problem that can be solved by planning policy) and effectiveness (which requires at least reasonable correlation and a potential mechanism of action between the thing controlled and outcome sought).
3. The NPPF requirements are not overridden by Planning Practice Guidance (PPG) paragraph 4 of part 53, which suggests consideration of a list of issues, including high incidence of obesity and overconcentration of certain uses (implicitly food and drink, not necessarily HFTs) in proximity to locations where children and young people gather.

**REFERENCES**

Robinson E, Jones A, Whitelock V, Mead BR, Haynes A, (Over)eating out at major UK restaurantchains: observational study of energy content of main meals. BMJ 2018; 363: 4982

Williams J, Scarborough P, Matthews A, Cowburn G, Foster C, Roberts N and Rayner M, A systematic review of the influence of the retail food environment around schools on obesity-related outcomes. Obes Rev 2014; 15: 359-374

**Full text:**

Form received via post after close of consultation

**Change suggested by respondent:**

Delete part (f) of the policy and amend or provide evidence for part (g).

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Raise LPA:** No

**Appear exam:** Appearance at the examination

**Oral exam why:** n/a

**Attachments:** KFC\_Redacted - <https://watford.oc2.uk/a/yw>



Part A

**Report to:** Council

**Date of meeting:** Monday, 19 July 2021

**Report author:** Group Head of Democracy and Governance

**Title:** Review of Parliamentary Boundaries

## 1.0 Summary

1.1 The Boundary Commission for England has published its initial proposals for new Parliamentary constituency boundaries for England. There is an 8 week consultation period which ends on 2 August 2021.

1.2 Council is asked to consider if it wishes to respond to the consultation.

## 2.0 Risks

### 2.1

Nature of risk	Consequence	Suggested Control Measures	Response (treat, tolerate, terminate or transfer)	Risk Rating (combination of severity and likelihood)
The Council makes no response	There is the potential that the responses of others may have a knock on effect on the proposal for the Watford constituency	Make a submission	treat	3

## 3.0 Recommendations

3.1 That Council responds to the consultation by supporting the proposals for the Watford Parliamentary Constituency.

**Further information:**

Carol Chen

carol.chen@watford.gov.uk

Tel: 01923 278350

#### 4.0 Detailed proposal

4.1 The Boundary Commission for England has published its initial proposals for new Parliamentary constituency boundaries for England. There is an 8 week consultation period which ends on 2 August 2021.

Full details of the proposals can be found here [www.bcereviews.org.uk](http://www.bcereviews.org.uk).

4.2 With regard to Watford it is proposed that the Watford constituency no longer includes any wards from Three Rivers District. Instead it contains the whole of the Borough of Watford plus the Hertsmere Borough of Bushey North taken from the existing Hertsmere constituency. The Boundary Commission acknowledge that this creates what they call an 'orphan ward'. However, they say it is necessary to bring the constituency within the electoral range and consider the ward has good road links with Watford.

4.3 Other changes in South West Hertfordshire include the reconfiguration of the existing South West Hertfordshire constituency into 2 new constituencies which they say is necessary to limit further change elsewhere in the County. They intend to add a new constituency called Harpenden and Berkhamsted with an east-west configuration so it will include Tring, through Berkhamsted to Harpenden and include the 2 Dacorum wards of Watling and Ashridge. The Hemel Hempstead constituency will have Watling, Ashridge and Kings Langley removed from it but will have Bovingdon, Flaunden and Chipperfield added which is currently in the South West Hertfordshire constituency. The other new constituency created from South West Hertfordshire is a new Three Rivers constituency which will have Kings Langley ward from Dacorum but will otherwise be totally coterminous with the Three Rivers District Boundary.

4.4 In addition to losing Bushey North to Watford the Hertsmere constituency will gain the Welwyn and Hatfield Ward of Northaw and Cuffley.

4.5 St. Albans constituency remains unchanged other than realigning with the new local government boundaries to the west of the constituency.

4.6 Members are asked if they wish the Council to make a submission in relation to the proposals. Officers would advise that if the current proposals are supported that a submission is made stating that to be the case as if others in Hertfordshire, even other areas within the Eastern Region object to proposals affecting them, changes could be made which might have an impact on the current proposed boundary of the Watford Constituency as a knock on effect.

## 5.0 **Implications**

### 5.1 **Financial**

5.1.1 The Shared Director of Finance comments that there are no financial implications in this report

### 5.2 **Legal Issues** (Monitoring Officer)

5.2.1 The Group Head of Democracy and Governance comments that it will ultimately be for the Boundary Commission and Parliament to decide on the final Parliamentary Constituencies.

## **Background papers**

No papers were used in the preparation of this report.

# Agenda Item 13

Part A

**Report to:** Council

**Date of meeting:** Monday, 19 July 2021

**Report author:** Democratic Services Manager

**Title:** Neighbourhood Locality Fund Annual Report 2020/21

## 1.0 Summary

1.1 This document provides the annual report for the Neighbourhood Locality Funds in accordance with the fund's protocol. It includes information about the overall budget and types of projects the wards have supported during 2020/21.

## 2.0 Risks

2.1 There are no identified risks as a result of this report.

## 3.0 Recommendations

3.1 That the Neighbourhood Locality Fund annual report be noted.

### **Further information:**

Sandra Hancock  
sandra.hancock@watford.gov.uk  
Tel: 01923 278377

**Report approved by: Group Head of Democracy and Governance**

## 4.0 Detailed proposal

4.1 In 2020/21 each ward was allocated a budget of £3,000. This was the same amount as in the previous year. In response to the Covid 19 pandemic, it was agreed that any unspent funds from 2019/20 could be exceptionally carried forward into 2020/21.

4.2 The wards spent a combined total of £40,993.06, equating to 93.8% of the overall budget. Wards spent within a range of 84% to 100% of the budget available to them following carry-forwards, an average of £3,416.09 each. This is broken down by ward as follows:

Ward	Starting budget	Number of projects	Expenditure
Callowland	£4,750.00	5	£4,121.37
Central	£3,089.00	4	£2,936.97
Holywell	£3,989.78	8	£3,989.78
Leggatts	£6,000.00	13	£5,975.49
Meriden	£3,000.00	2	£2,500.00
Nascot	£3,100.00	3	£2,730.00
Oxhey	£4,595.00	3	£3,900.00
Park	£3,080.00	3	£2,848.03
Stanborough	£3,000.00	4	£3,000.00
Tudor	£3,041.42	3	£3,041.42
Vicarage	£3,000.00	2	£2,950.00
Woodside	£3,068.21	6	£3,000.00

4.3 The full breakdown of expenditure by ward is available on the [council's website](#). The different types of expenditure have been reviewed to identify the most popular, including the amount spent and the percentage this equated to in relation to the overall budget. The breakdown of the expenditure into different categories is as follows:

- Donations to Watford and Three Rivers Trust (W3RT) for emergency funding for groups responding to the Covid 19 pandemic: (£13,500 equalling 31% of the budget).
- Environmental improvements (£11,643.51 equalling 27% of the budget).
- Charities and charitable donations (£4,160.00 equalling 10% of the budget).
- Local community groups and organisations (£3,399.97 equalling 8% of the budget).
- Schools and play groups (£3,036.42 equalling 7% of the budget).
- Highways improvements (£1,742.46 equalling 4% of the budget).
- Residents' groups (£1,000.00 equalling 2% of the budget).
- Culture and heritage (£684.30 equalling 2% of the budget).
- Youth groups including scouts (£750 equalling 2% of the budget).
- Community clean up and skips (£826.40 equalling 2% of the budget).
- Faith groups (£250.00 equalling 1% of the budget).
- Sports groups (£0 equalling 0% of the budget).
- Monies not spent (£2,720.35 equalling 6% of the budget).

Percentages have been rounded to the nearest whole number.

#### 4.4 Comparison of expenditure with 2019/20

4.4.1 The impact of the pandemic and the additional funds available had a significant impact on expenditure patterns in 2020/21. Most notably, 31% of the budget was allocated directly to W3RT to use as part of the Covid 19 emergency response fund.

A number of wards also allocated funds directly to borough-wide organisations to support them in their response to the pandemic. These organisations included Watford Food Bank, Watford Women's Centre and Disability Watford. This represented a further 10% of the budget. Donations to similar organisations in 2019/20 represented 5% of the budget.

4.4.2 The second largest area of allocations for funds was environmental improvements, the majority of which was tree planting representing 27% of the budget. This is comparable with the 27% of the budget spent on such projects in 2019/20.

4.4.3 There were reductions in expenditure in a number of areas; sports clubs received no funding this year having been allocated 6% in 2019/20, youth groups (including scouts) received 9% of the budget in 2019/20 compared to 2% in 2020/21, community clean ups and skips reduced from 6% of the budget in 2019/20 to 2% in 2020/21.

#### 4.5 **Audit of the funds**

4.5.1 At the beginning of 2021, the Shared Internal Audit Service (SIAS) carried out an audit of the Neighbourhood Locality Funds. The audit returned an overall 'Satisfactory' assurance. Within this rating, the auditor was satisfied with the council protocol, procedure rules and guidance for members applying for funding and officers administering the scheme. These areas received 'Good' assurance. However the evaluation process for members after completion of their projects received 'Limited' assurance. The combined results provided an overall assurance rating of 'Satisfactory'.

4.5.2 In its final report, the auditor set out two recommendations:

- 1) that members are reminded of the importance of completing an evaluation form for every project they have sponsored.
- 2) that the annual report commentary is amended to detail the number of projects sponsored per ward and the number of evaluation forms returned in comparison.

4.5.3 On 30 June 2021, the Democratic Services Manager emailed all members to advise them of the audit's findings. Members were advised that they should complete the project evaluation forms on receipt of the automatically generated email – subsequent reminder emails would be sent if forms were not completed. Information detailing the number of evaluation forms returned by members is set out below.

4.5.4 Progress on the implementation of the auditor's recommendations will be monitored by Audit Committee.

#### 4.6 Evaluation forms

4.6.1 In response to the recommendation made by the auditor, the number of projects sponsored per ward and the corresponding number of evaluation forms is set out below. Evaluation forms were completed for 50% of the projects.

Ward	Number of projects	Evaluation forms received
Callowland	5	1
Central	4	1
Holywell	8	0
Leggatts	13	11
Meriden	2	1
Nascot	3	2
Oxhey	3	1
Park	3	3
Stanborough	4	1
Tudor	3	2
Vicarage	2	1
Woodside	6	4

4.6.2 Over the next year, it is proposed that officers will endeavour to work with ward councillors to improve completion levels.

#### 5.0 Implications

##### 5.1 Financial

5.1.1 The Interim Head of Finance comments that expenditure has been incurred within budget and has been legitimately spent in accordance with the fund's protocol.

##### 5.2 Legal Issues (Monitoring Officer)

5.2.1 The Group Head of Democracy and Governance comments that there are no legal implications. All Neighbourhood Locality requests are seen by the Group Head of Democracy and Governance.

##### 5.3 Equalities, Human Rights and Data Protection

5.3.1 There are no risks associated with equalities or human rights as a direct result of this report.

##### 5.4 Staffing

5.4.1 There are no staffing implications as a direct result of this report.

## 5.5 **Accommodation**

5.5.1 There are no accommodation implications as a direct result of this report.

## 5.6 **Community Safety/Crime and Disorder**

5.6.1 There are no community safety or crime and disorder implications as a direct result of this report.

## 5.7 **Sustainability**

5.7.1 There are no sustainability implications as a direct result of this report.

## **Appendices**

None.

## **Background papers**

- Applications and expenditure sheets for the individual wards and projects.
- Shared Internal Audit Service (SIAS) audit of Watford Borough Council's Neighbourhood Locality Funds (15.03.21)



Part A

**Report to:** Council

**Date of meeting:** 19 July 2021

**Report author:** Senior Democratic Services Officer

**Title:** Scrutiny annual report 2020-21

## 1.0 Summary

1.1 The constitution requires that a report be presented to Council annually on the work of scrutiny during the preceding year. This report describes the work and process of the council's scrutiny committees and task groups during 2020-21.

## 2.0 Risks

2.1 There are no risks identified from this report.

## 3.0 Recommendations

3.1 That Council notes the annual scrutiny report for 2020-21.

### **Further information:**

Ishbel Morren

democraticservices@watford.gov.uk

Tel: 01923 278375

**Report approved by: Group Head of Democracy and Governance**

## 4.0 Scrutiny at Watford Borough Council in 2020-21

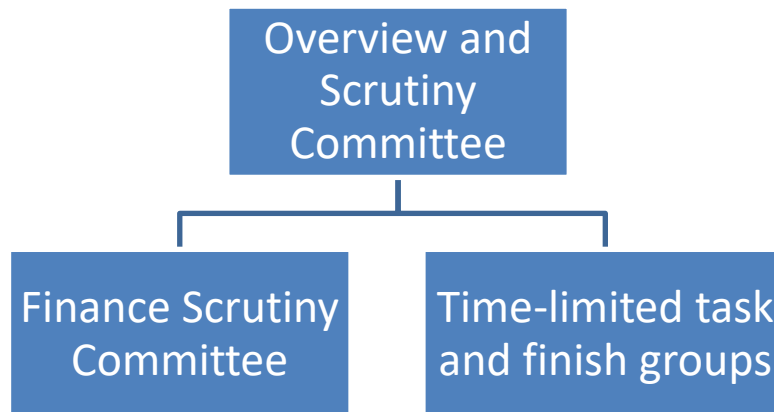
### 4.1 Purpose and structure of scrutiny at Watford Borough Council

4.1.1 Scrutiny is part of Watford Borough Council's democratic structure. It is led by non-executive councillors who check and challenge decision making to ensure that it is carried out in the best interests of Watford's residents. With a focus on optimising services for the local community, scrutiny members undertake three key areas of work:

- Reviewing and developing council policies to help shape the delivery of public services

- Scrutinising decisions made by Cabinet to check that the actions being taken are correct and that services are operating effectively
- Examining external partners providing services which impact on the local community.

4.1.2 Watford Borough Council has two main committees: Overview and Scrutiny Committee and Finance Scrutiny Committee. In addition there is provision for up to three time limited task and finish groups per year:



4.1.3 During 2020/21, as a result of the Covid 19 pandemic, all scrutiny and task group meetings, including evidence-gathering sessions with witnesses, were held virtually. Members' commitment to this new way of working enabled meetings to continue to the agreed schedule and a full scrutiny work programme was carried out over the year. Indeed, streaming statistics for meetings show an increased engagement in scrutiny's work than in previous years, with significantly greater numbers following both live and on-demand after the event.

## 4.2 Scrutiny in numbers

4.2.1 During 2020-21:

- 18 out of the 30 non-executive councillors attended at least one scrutiny meeting or one of the two scrutiny task and finish groups
- 9 attendances by portfolio holders to a scrutiny committee or task group meeting to respond to questions on behalf of the Executive
- 22 substantive issues were scrutinised by members
- 20 public scrutiny meetings were held
- 2 in-depth task and finish groups were completed
- 26 partners and stakeholders provided evidence to scrutiny
- In excess of 150 hits were made to the website to view part or all of a scrutiny meeting, representing a substantial increase in engagement in scrutiny's activities.

### 4.3 Scrutiny training

- 4.3.1 Scrutiny training is compulsory for councillors sitting or substituting on scrutiny committees, or participating in scrutiny task and finish groups. It must be repeated every two years.
- 4.3.2 Nine councillors attended the training session run by the Senior Democratic Services Officer in June 2020. In addition, the Head of Finance held a bespoke training session on the role of the Finance Scrutiny Committee ahead of its first meeting.
- 4.3.3. External training on chairing skills for scrutiny meetings was also offered to scrutiny chairs and vice chairs, including those who had recently or were currently chairing scrutiny task and finish groups.

### 4.4 Overview and Scrutiny Committee

#### 4.4.1 Membership

The council's overarching scrutiny committee comprised nine councillors:

Councillor Maggie Parker (Chair)

Councillor Jagtar Singh Dhindsa (Vice chair)

Councillors Dawn Allen-Williamson, Keith Crout, Peter Jeffree, Rabi Martins, Bilqees Mauthoor, Glen Saffery and Matt Turmaine

The portfolio holders for Community, Councillor Collett, Resources and Customer Service, Councillor Watkin and Client Services, Councillor Williams, also attended meetings in the course of the year.

#### 4.4.2 Committee's work programme for 2020/21

Overview and Scrutiny Committee met on nine occasions during the year. No Executive key decisions were called in. The following summarises discussions on the substantive items considered by the committee:

- **Community Safety Partnership 2019/20 and 2020/21.** The purpose of this review was to evaluate the 2019-20 plan and consider objectives for 2020/21. Responding to the Community Safety Coordinator's commentary, Overview and Scrutiny Committee explored the effects of Covid 19 on local community safety priorities, particularly in regard to local youth violence rates and thefts from vehicles. Members questioned and provided feedback on the long-term strategy for rough sleepers in the town, issues relating to the Black Lives Matter protests and measures to counter anti-social behaviour in the town's parks.

Scrutiny returned to the Community Safety Partnership later in the year to evaluate the 2020/21 plan and review the objectives for 2021/22. Noting the ongoing impacts of Covid 19, members welcomed the significant 22% reduction in crime in Watford. Overview and Scrutiny Committee agreed the continued need to focus on youth violent crime in 2021/22. In addition, the Community Safety Coordinator agreed to investigate concerns raised by scrutiny members about organised doorstep fraud in the borough.

- **Council performance updates.** Overview and Scrutiny Committee undertook quarterly reviews of the council's performance against a range of indicators in order to monitor and challenge results. Following scrutiny members' feedback, additional metrics were added to the updates and clarifications made to the explanatory notes to aid the transparency of the council's reports published on the public website.
- **Council's Strategic Framework.** In July 2020, Watford Borough Council agreed a new Council Plan 2020-24 and Delivery Plan 2020-22; Organisational Development Strategy 2020-24 and Delivery Plan; and Covid-19 Road to Renewal Plan. Scrutiny members undertook regular reviews of this strategic framework with the aim of checking progress and providing feedback. Members closely examined measures to support staff wellbeing, particularly in regard to mental health. As a result of Overview and Scrutiny Committee's recommendation, mental health awareness training was introduced for all managers. The offer of training was also extended to councillors.
- **Mayor's Small Grants Fund in 2019-20 and 2020-21.** The purpose of this review was to scrutinise expenditure in the two years specified. Prompt scrutiny of the 2020-21 expenditure was possible because applications had been invited earlier than previously to respond to the coronavirus emergency. Members were particularly interested to establish that there had been equitable allocation of funds to groups supporting Watford's Black, Asian and Minority Ethnic (BAME) communities and, following a request for information, a detailed analysis was provided to satisfy this concern.
- **Voluntary Sector Commissioning Framework (End of 1 Year Report – 2019-2020).** Overview and Scrutiny Committee considered the performance of the framework in providing a range of leisure and community services delivered by voluntary sector organisations on behalf of the council. Members sought to determine whether there had been sufficient monitoring of, and engagement with, under-represented and BAME communities in the town. Officers provided additional information to the committee to highlight the actions which had been undertaken. Scrutiny members expressed a wish to keep these issues under review.

- **Leisure Centre Management Contract (SLM/EA) (End of Year 2 Report – 2019-2020).** The purpose of this review was to examine the operation of the leisure centres in the previous year. It was noted that the last few weeks of the contract year had been significantly impacted by the national lockdown. Mindful of the effects of Covid 19 on the leisure centres, members focussed both on the practical steps being taken by SLM to ensure that the centres could reopen safely and the financial support being provided by the council. This included questions to the Portfolio Holder for Client Services about the financial arrangements which had been agreed with the leisure centre operator.
- **Watford 2020 Transformation Programme.** Scrutiny members undertook a final review of the council’s transformation programme, including the ongoing financial savings to the authority. Commenting on the closure report, the Portfolio Holder particularly acknowledged the constructive challenge and oversight provided by Overview and Scrutiny Committee throughout the life of the programme.
- **Streets and Parks Contract (Veolia).** Overview and Scrutiny Committee invited Veolia to attend one of its meetings to answer questions on three key service areas: road sweeping during leaf fall season, street trees and street cleaning. A particular focus of members’ questions was the planting and maintenance of street trees in the borough and how different wards might increase their tree coverage to improve the local street scene. Veolia agreed to consider this question when reviewing the planting priorities for 2021/22. Scrutiny members also queried Veolia’s street cleaning schedules and plans for deep cleans and how this information was relayed to residents to ensure adequate access for operatives.
- **Scrutiny task and finish groups.** Overview and Scrutiny Committee established and oversaw completion of two significant task and finish groups reviewing issues relating to:
  - Watford Borough Council’s relationship with Watford and Three Rivers Trust during the Covid-19 pandemic
  - Responding to the impacts of Covid 19 on Watford’s BAME communities and the council’s street naming policy.

In addition, following the cancellation of the final meeting in 2019/20 due to the coronavirus pandemic, Overview and Scrutiny Committee considered the final report and recommendations of the Health Services for the Deaf Task Group from the previous scrutiny year. Progress on this task group’s recommendations was also reviewed during the year.

Further details are provided below.

- **Watford Community Housing Task Group recommendations update.** Scrutiny members examined progress on the outstanding recommendations from the February 2019 task group questioning representatives from Watford Community Housing (WCH) to challenge a number of areas. The committee agreed that the tasks group's recommendations had been implemented in full and, as a result of the task group, the concerns of residents had been progressed and WCH's processes and procedures improved. It was further agreed that Overview and Scrutiny Committee had a continued role to play in ensuring that the council's relationship with WCH worked well and that the trust provided the best possible service to its residents.
- **Mental Health Task Group recommendations update.** Overview and Scrutiny Committee reviewed progress on the recommendations of its October 2019 task and finish group. Members welcomed the considerable work undertaken by the council's Health and Wellbeing Forum on this prescient issue. This had enabled momentum and direction to meet the growing challenge of mental health concerns – exacerbated by the pandemic – both in the council and local community. Since the task group's recommendations had been fully implemented, it was agreed that future oversight should remain with the Health and Wellbeing Forum.
- **Health Services for the Deaf Task Group update.** Scrutiny members examined progress on the task group's recommendations from March 2020, which had been accepted by Hertfordshire County Council's Health Scrutiny Committee (as the lead authority on health matters). County Councillor Quilty, Chair of the county's Health Scrutiny Committee had written to the elected Mayor welcoming the task group's recommendations which he considered would improve the lives of residents with hearing impairment. He also forwarded the report to NHS organisations with whom the HCC's Health Scrutiny Committee engaged. The council's subsequent [press release](#) was translated into BSL to maintain the profile of the task group's work and improve accessibility to its progress for stakeholders.
- **Executive Decision Progress report.** In order to maintain transparency, scrutiny members regularly received details of all proposed and pending Executive key decisions, including information about any consultations with the Chair of Overview and Scrutiny Committee.
- **Hertfordshire County Council's Health Scrutiny Committee.** The Chair updated the committee on the work carried out by the county's Health Scrutiny Committee, including in regard to progress on the recommendations of the Health Services for the Deaf Task Group. This proved slower than hoped and in March 2021, prompted by the Chair of Overview and Scrutiny

Committee, the Mayor approached Watford General Hospital directly to expedite one of the recommendations.

Full details of the Health Scrutiny Committee are available on the [County Council's website](#).

- **Updates from Finance Scrutiny Committee.** Verbal updates were provided as required from the Finance Scrutiny Committee chair in response to questions from members of Overview and Scrutiny Committee.
- **Work programme reviews.** Regular reviews of the rolling work programme enabled members to add items to the forward programme and to amend sequencing to meet with changing priorities. As a result, a number of changes were made to the work programme during the year and several items were added to the 2021/22 scrutiny programme.

The reports and minutes for Overview and Scrutiny Committee are available on the [council's website](#).

#### 4.5 Finance Scrutiny Committee

The scrutiny committee comprised:

Councillor Matt Turmaine (Chair)

Councillor Peter Kloss (Vice chair)

Councillors Dawn Allen-Williamson, Nigel Bell, Asif Khan, Jennifer Pattinson, Glen Saffery, Bill Stanton and Darren Walford

The portfolio holder responsible for Resources and Customer Services, Councillor Mark Watkin, also regularly attended meetings.

Finance Scrutiny Committee met on five occasions during the year. The following items were discussed:

- **The final outturn for 2019/20.** Noting that this report largely reflected the situation before the onset of Covid 19, Finance Scrutiny Committee considered in particular: the revised net revenue budget, projects requiring funds to be carried forward to 2020/21 and the council's reserves. The minutes of the discussion were forwarded to Cabinet.
- **Croxley Business Park.** Scrutiny members reviewed the performance of the Croxley Business Park after the council's acquisition the previous year. Particular attention was paid to vacancy rates, sectors occupying the park, debt issues and maintenance. It was agreed that additional metrics and reports would be produced in the future to assist members' scrutiny.

- **Property Investment Board.** The committee received a presentation on the current activities of the Property Investment Board. Members were particularly interested to understand Lambert Smith Hampton Investment Management’s view of the long term impact of the pandemic on the council’s business park investment in Croxley. A further Part B discussion was arranged to consider the work of the Property Investment Board more closely.
- **Impact of the Covid 19 pandemic.** Members closely monitored the council’s finances as a result of Covid 19. Updates were provided on the evolving situation as it affected the council’s income and expenditure in order to assist the committee’s scrutiny of the authority’s finances. The committee requested detailed responses to a number of pertinent questions relating to the financial impact of the pandemic to address areas of particular importance. Officers also provided members with a broader perspective on the similar pressures facing other local authorities and on feedback received from the Ministry of Housing, Communities and Local Government.
- **Financial planning.** Members considered details of service level expenditure, funding and council tax levels for the medium term 2021/22 to 2023/24, including the use of reserves and the 2021/22 Council Tax calculations. Finance Scrutiny Committee’s comments were forwarded to Cabinet. The Chair also tabled a number of expenditure suggestions to the committee for consideration.
- **The Finance Digest Budget Monitor** was reviewed regularly by the committee who sought clarification on various issues, including those relating to the council’s commercial income, capital investments and local housing issues. Members noted that business rates and council tax receipts had not been as affected by the pandemic as anticipated.
- **Work programme.** Finance Scrutiny Committee’s work programme was agreed at the start of the year, but remained open for new suggestions from members.

Details of the committee’s agendas and minutes are available [here](#).

#### 4.6 Task Groups

During the year, two task and finish groups were set up. One considered Watford Borough Council’s relationship with the Watford and Three Rivers Trust (W3RT). A second looked at the response to the impact of Covid-19 on Watford’s BAME communities and later reviewed the council’s street name policy.



#### 4.6.1 **Watford Borough Council's relationship with Watford and Three Rivers Trust during the Covid-19 pandemic task group**

Following a scrutiny proposal from Overview and Scrutiny Committee, a cross-party task group met between August and October 2020 to review how well the community and voluntary sector were supported during the council's response to the Covid 19 pandemic and to establish whether there were areas for improvement. Membership comprised Councillors Dawn Allen-Williamson, Amanda Grimston, Jennifer Pattinson, Glen Saffery (Chair) and Jagtar Singh Dhindsa.

The task group was keen to gather a wide range of views. To this end a series of witness sessions were held in September to hear from:

- Key representatives from Watford and Three Rivers Trust (W3RT)
- Officers from WBC and Three Rivers District Council involved in the councils' regular engagement with W3RT, as well as those seconded to help with the work of coordinating the local response to Covid19
- Voluntary sector organisations, including recipients of the Community Fund
- Watford Chamber of Commerce
- Hertfordshire County Council.

In parallel to these witness sessions, a survey of all those who had applied to the Community Fund, and other local voluntary groups, was undertaken to understand the experience of the application process and to ascertain if and where improvements might be made. The task group focussed both on the immediate term – in anticipation of a second wave of COVID-19 impacting the local community, and on the future – to harness the positive lessons learnt during lockdown in order to optimise the community and voluntary service for local residents.

The task group worked alongside a specially appointed Voluntary Sector Specialist who was undertaking a review of how the council interfaced with W3RT and the voluntary sector more widely. Some areas included in the initial terms of reference were captured in her review.

Drawing its conclusions, the task group grouped its recommendations into five key areas: W3RT's reach and profile in the community, fundraising, volunteering, working relationships and its interface with Watford Borough Council. The final report and recommendations were presented to Overview and Scrutiny Committee at its meeting in October 2020. It was forwarded to Cabinet, which accepted the task group's recommendations in full.

#### **4.6.2 Responding to the impacts of Covid 19 on Watford's BAME communities and street name policy review task group**

Overview and Scrutiny Committee proposed this task group, following two separate motions to Council from Councillors Ezeifedi and Khan. Membership comprised Councillors Dawn Allen-Williamson, Favour Ezeifedi (Chair), Peter Jeffree, Asif Khan and Jennifer Pattinson.

Beginning work in September 2020, the task group divided its investigation into two work streams; firstly focussing on the particular impact of Covid 19 on Watford's BAME residents and secondly looking at the council's street name policy.

In addition to drawing on the opinion of expert witnesses including the Director of Public Health at Hertfordshire County Council, the task group was particularly keen to understand the lived experiences of representatives from local BAME communities and the voluntary sector. A series of well-attended virtual town hall meetings were held. In addition, the views of all councillors were invited drawing on their interactions with Watford's residents as part of their ward work.

Concluding this part of its review, the task group made a series of recommendations addressing equalities issues, including the proposal that a council-led equalities forum should be established to promote engagement with Watford's diverse communities. The task group also referenced councillors' community roles, underlining their importance in promoting the take-up of Covid 19 vaccines as well as promoting wider health screening programmes.

Addressing the second work stream, the task group reviewed the policy documentation for street naming in the borough. The task group considered the council's existing policy guidance, an early draft for a full policy document and the priorities for renaming streets.

In drawing together its recommendations, the task group underlined the importance of promoting education and understanding around local street names which, it was suggested, should form the focus of a future exhibition at the Watford Museum. The task group also proposed a new street naming policy providing a better framework for considering street names in the future.

The task group's final report and recommendations were agreed in full by Overview and Scrutiny Committee in January and subsequently by Cabinet in March 2021.

#### **4.6.3 Implementation of the two task groups' recommendations will be monitored by Overview and Scrutiny Committee during 2021/22.**

## 5.0 Implications

### 5.1 Financial

5.1.1 The Shared Director of Finance comments that there are no financial implications as a result of this report.

### 5.2 Legal Issues (Monitoring Officer)

5.2.1 The Group Head of Democracy and Governance comments that there are no legal implications in this report.

### 5.3 Equalities, Human Rights and Data Protection

5.3.1 There are no equalities, human rights or data protections implications as a result of this report.

### 5.4 Staffing

5.4.1 There are no staffing implications as a result of this report.

### 5.5 Accommodation

5.5.1 There are no accommodation implications as a result of this report.

### 5.6 Community Safety/Crime and Disorder

5.6.1 The council has a statutory duty to scrutinise the local crime and disorder partnership. Due to the cancellation of the final meeting of Overview and Scrutiny Committee in March 2020, the Community Safety Partnership in 2019/20 and 2020/21 were both considered during the last year.

### 5.7 Sustainability

5.7.1 There are no sustainability implications as a result of this report.

## Appendices

None

## Background papers

The following background papers were used in the preparation of this report.

- Reports and minutes of scrutiny committees, panels and task groups (all are available on the [council's website](#))