



**WATFORD
BOROUGH
COUNCIL**



COUNCIL MEETING

17 October 2022

7.30 pm

Town Hall, Watford

Contact

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Publication date: 7 October 2022

7 October 2022

Councillor

You are hereby summoned to attend a meeting of the Council of the Borough of Watford to be held on Monday, 17 October 2022 starting at 7.30 pm at the Town Hall, 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 19 July 2022 to be submitted and signed.

4. Official Announcements

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

Report from Mayor Taylor

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. Appointment of Chair to Overview and Scrutiny Committee (Pages 10 - 12)

11. Watford Local Plan (Pages 13 - 418)

12. Council Scheme of Delegation (Pages 419 - 506)

Report of the Group Head of Democracy and Governance

13. Motions submitted under Council Procedure Rule 13.0

1. The following motion has been proposed by Councillor Watling and

seconded by Councillor Bell –

This council resolves that the Mayor write to Watford's MP Dean Russell to speak up on behalf of his residents on issues such as the cost of living crisis, the disastrous effects the mini budget has had on the pound and the huge profits made by energy companies whilst his constituents' bills & mortgage costs continue to rise.

2. The following motion has been proposed by Councillor Turmaine and seconded by Councillor Khan –

Motion to Council: Warm Banks in Watford

This Council also notes that:

Many individuals and families will not be able to warm their homes this winter due to the cost of energy, despite the government's deferred payment energy unit price cap. Increasingly, councils like Watford are creating 'Warm Bank' schemes, to give residents a place to stay warm and keep the cost of bills at home down after school and during evenings and weekends.

This Council believes that:

No one should go cold in Watford. Fuel poverty in the United Kingdom is disgraceful and a shaming indictment of the policies of the Conservative government. People should be able to affordably warm their own homes

This Council resolves:

That Watford Council will develop an emergency plan for the use of 'Warm Banks' across the borough. This includes the opening of community centres, leisure centres and other suitable buildings to provide support.

To work closely and provide extra funding for charities that are combating poverty such as food banks, children's and pensioners poverty charities.

Work with local businesses across Watford this winter so that they too, can help with dealing with the emerging fuel crisis.

That Watford Council will write to Dean Russell, Watford's MP, to demand the government does more in dealing with fuel poverty in the town by providing funding to councils to cope this winter.

3. The following motion has been proposed by Councillor Stotesbury with a seconder to be advised –

Council notes with concern recent reports that all 980 staffed ticket offices

in England could be closed, following discussions between the Department for Transport and the Rail Delivery Group and changes to the Government's guidance relating to ticket office opening hours.

Council believes that ticket offices provide a vital service to residents in Watford. Having a clearly sign-posted place in the station for people with ticket enquiries provides certainty and confidence for customers who may struggle to otherwise locate station staff.

Not all residents are able to use station ticket machines, or have the means to book a ticket in advance. Complicated journeys involving connections are likely to require human assistance to ensure customers purchase the most appropriate and cheapest tickets, and do not incur penalties from mis-booked tickets.

Council is concerned the closure of ticket offices will disproportionately affect elderly and disabled residents in Watford – as well as those with poor literacy and IT skills. Council also notes the possible implications for current station staff and the concerns that have been raised over possible staff redundancies.

Council therefore resolves:

That the Mayor to write to write to the Secretary of State for Transport, and the Government Railways Minister, expressing Council's opposition to the possible closure of staffed rail ticket offices – and in particular the office at Watford Junction.

That the Mayor to write to London North Western Railway expressing the Council's opposition to any plans to close the staffed ticket office at Watford Junction.

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

Donna Nolan, Chief Executive

Elected Mayor's Report October 2022

Introduction

As I write my report, the cost of living crisis is continuing to cause problems for residents across Watford. Although the council has been successful in ensuring that all those entitled to £150 support received it and the government has announced help with the cost of energy going forward, residents will still see a rise in their energy and other bills. This will be exacerbated by ongoing food inflation and the consequences of the government's budget announcement increasing the cost of borrowing and mortgages. My administration continues to provide support for the most vulnerable both through the direct provision of services, providing funding for the community and voluntary sector and through signposting to other relevant services.

Since my last report, we have witnessed the sad death of Her Majesty Queen Elizabeth II. The response in Watford is set out in more detail below but I want at the outset to thank the officers at Watford Borough Council who worked tirelessly over that difficult period to deliver a fitting tribute to the queen and support the borough to mourn the loss of Her Majesty properly.

Death of Queen Elizabeth II

Along with the whole of Watford I was shocked and saddened by the passing of Her late Majesty Queen Elizabeth II. She dedicated her life to our country and the Commonwealth, and played such a huge role in our lives for over 70 years as monarch.

As with the death of any significant figure in public life a number of protocols had to be followed, some of which changed throughout the days between The Queen's death and the end of the period of mourning. I am truly grateful to the team of officers at the council who went above and beyond during that period to ensure that all protocols were followed, including those around communication, which allowed the town to grieve in an appropriate way.

In the days following the death, the council arranged for members of the public to be able to pay their respects to the queen by leaving a floral tribute at the Peace Memorial. On behalf of the council flowers were laid by myself, the Chairman of the Council and the Chief Executive. A book of condolence was also opened at the Town Hall and the Watford Museum. I am grateful for the staff at the museum for working with the council to ensure that as many residents as possible were able to sign the book and I would also like to thank the Lord Lieutenant of Hertfordshire for all the work he did, including opening an online book of condolence to widen the opportunities for residents to sign.

On the eve of Her Majesty Queen Elizabeth II's funeral, a multi-faith service of commemoration took place at St Mary's Church in Watford. The service was very moving and included a one minute silence to coincide with the national silence. It was powerful to know that at that time across the country, millions of people were paying respects to the memory of someone who had done so much for the country.

I and the Council Chairman also took part in the ceremony for the public proclamation of the accession to the throne of His Majesty King Charles III. It was such an honour to be part of this ceremony, which has a history stretching back hundreds of years. I was able at that ceremony to extend to our new king our best wishes for a long and successful reign

Standing up for Watford

Watford General Hospital

The future development of Watford General Hospital and improvements to other local hospitals is an important issue to residents in Watford and the surrounding area. The hospital provides a great service to residents and is valued in the community. However, for the hospital to be fit to serve residents into the future, it is vital that the modernisation and redevelopment takes place and that we receive the funding from the government's hospital building programme. Following the appointment of the new Prime Minister Liz Truss, I wrote to her to ask for reassurance that this funding would be guaranteed despite any other policy priorities. A response is yet to be received but I am hopeful that one will be received soon.

Housebuilding targets

The new Prime Minister has made announcements that she intends to reform planning laws to increase housebuilding across the country. As a longstanding critic of the previous housebuilding targets for Watford I will be monitoring any upcoming policy announcements in this area and will continue to challenge the current unrealistic targets set by government.

In recent months, consultation on the South West Herts Joint Strategic Plan has taken place. This has been created by Watford Borough Council as well as St Albans City and District Council, Dacorum Borough Council, Hertsmere Borough Council and Three Rivers District Council and is supported by Hertfordshire County Council. The plan has been developed following a consultation in early 2020 and has used this feedback to create a single vision for the region that will make it an even better place to live, work and visit. This plan will be particularly important for Watford as it will allow us to ensure that we have the right infrastructure to provide high quality services for residents and make long term decisions that allow the town to grow sustainably. It is also important to give local residents their say on how the town is shaped in the future rather than dictated centrally from government

Watford – Croxley link

In my manifesto I committed to working with Hertfordshire County Council to press for the disused Croxley link to be brought back in to use to improve transport links in the town. I am pleased to report that significant progress towards this commitment has been achieved.

Three leading travel and transport consultancies were commissioned to explore a wide range of proposals to bring the disused stretch of railway back in to use. The project is a partnership between Watford Borough Council and Hertfordshire County Council, Three Rivers District Council and Network Rail. It is our hope that this process will create a shovel-ready proposal that can be costed and submitted to government for funding when opportunities arise.

The benefit of this scheme will be that it will improve connectivity within the area and link important areas of Watford such as the town centre, hospital, Watford FC and provide connections between Croxley Green and Watford Junction and the travel network beyond. The project could unlock huge potential for economic growth in the area as well as contribute to our commitments to reduce congestion, provide alternative, greener methods of travel and contribute to a zero carbon future.

Cost of living emergency

The cost of living emergency continues to cause significant problems for residents in Watford. In the last full council meeting, Watford Borough Council declared a cost of living emergency and called on the government to instigate a windfall tax to pay for energy help and to provide extra support for those on low incomes and benefits. In response to that council motion I wrote to the then Secretary of State for Work and Pensions to ask her to meet these demands. A reply was received from David

Rutley MP, the then Minister for Welfare Delivery. He stated that there are no plans to reinstate the temporary uplift to Universal Credit and summarised the support that had been given up to that point for households struggling with bills.

In response to the cost of living crisis, the council have convened a forum of local organisations to work together to understand and coordinate the support available to local people facing financial difficulties. The forum will also bring together data and information to build understanding of the extent of the crisis within Watford and make sure Watford is coordinating with county, regional and national support and campaigns.

One issue raised with me by a number of residents, local charities, and community organisations is the cost of school uniform. With the cost of living crisis this could push many more families into serious financial difficulty. Last year, the government provided guidance to schools asking them to limit the number of branded items and find ways of reducing the cost of uniforms. Local charities and community organisations asked me to raise this issue with the local education authority, Hertfordshire County Council to find out what had been done with local schools to ensure they are following the guidelines and keeping prices low.

Police in Watford Town Centre

Following a number of high profile incidents in the High Street, I have become increasingly concerned with the low level of police resources deployed on the High Street and surrounding area.

There are a number of ways in which the council work with the police to keep crime low and support victims including taking a lead in the use of the community trigger but I still feel that the number of police need increasing to deal with crime and anti-social behaviour effectively. I want to work closely with the Police and Crime Commissioner and make the case for prioritising resources where they are needed most and will continue to push for this going forward.

Tree planting schemes have been a success

Two years ago, the council unveiled its ambitious Tree and Woodland Strategy, which included the goal of planting 20,000 trees over the next four years and increasing the town's tree canopy cover from 18% to 20% - which is above the national average - over the next ten years. Over the last few months a number of initiatives to increase the number of trees have been launched.

The first allows residents to identify areas in our town where they would like trees to be placed. The online system allowed residents to select places either where trees had been previously or areas that had not had trees before. The deadline for the consultation was 30th September and all suggestions will be reviewed over October to allow planting of trees during the planting season between November and March. Other suggestions received after the deadline will instead be assessed for the planting season next year.

The second, run in partnership with Hertfordshire County Council is aimed at helping individual residents to claim free trees as part of the 'Your Tree Our Future' scheme. Across Hertfordshire 100,000 trees will be given away over the next four years with 4000 trees available to Watford residents this year. Residents can choose from 8 native species or select a hedgerow pack on a first come, first served basis. Take up has been positive so far and it is encouraging to see so many local residents playing their part in the fight against climate change.

Riverside Road development wins Award

I am proud to report that the Riverside Road Development has won the prestigious Richard Feilden Award at the Housing Design Awards. Riverside Road was developed by the council and designed by Bell Phillips Architects and provides high quality, energy efficient homes for local families.

The homes are designed to meet levels of BRE's Home Quality Mark, an independently assessed certification scheme for new homes. This has been achieved with high levels of insulation, PV panels on the roof which produce energy to power electrical appliances and an air source heat pump which ensures the homes are well heated and warm in the colder months. The new homes are also well connected to local schools, public transport and other key infrastructure, which encourages use of more sustainable modes of transport.

Beryl Bike update

I am pleased that last month Watford's Beryl Bikes scheme hit another milestone. Since the scheme was introduced, over a quarter of a million journeys have been taken with them, covering over 750,000km. The Beryl Bikes were one of my key manifesto commitments and they are playing key part in making Watford a carbon-neutral town.

The scheme currently has 200 pedal bikes and 100 e-Bikes available from 76 bays located at key points around the town. Since its inception, the scheme is estimated to have saved 27 tonnes in carbon emissions. 86% of residents within the service area are now within a five minute walk from a Beryl bay and further bay locations are under review. A number of promotions to encourage more Beryl bike usage have taken place since last full council including for car free day on 22nd September. Another free ride promotion is planned for the day of Watford's Centenary celebrations.

News and Events

Star of Herts

One of the honours of my role is attending events to celebrate the great people who make our town the place it is. That was particularly true at the **Star of Herts event**, organised by West Hertfordshire Teaching Hospitals NHS Trust.

The event was held at the Watford Palace Theatre and was an opportunity to thank individuals and teams from across the local health service for their incredible service. It was also humbling to see the extent to which they celebrated the success of each other and were positive despite the difficult and stressful jobs they undertake to keep us happy and healthy.

Most residents, if not all, in Watford have benefitted from the skill of everyone who works or volunteers for Watford General Hospital and other hospitals and services across the Trust and I pay tribute to the hard work of all staff.

Watford Fringe

The Watford Fringe was a success yet again this year with over 70 performances at 10 venues across Watford.

The Fringe is packed full of great theatre, music, comedy, dance, magic and family fun-filled shows. The headline act this year was the award-winning comedian Rosie Holt who performed a great show. It is testament to the ambition of the council and local arts venues that Watford is able to attract this level of talent annually.

I was lucky enough to open the Fringe at the launch at the Watford Palace Theatre which featured amongst others, the fantastic Watford Rock Choir which also highlighted how events such as the Watford Fringe provide opportunities for local talent to get exposure to large audiences and be successful.

Fundraising walks

Since the last meeting I have taken part in a number of fundraising walks to raise money for local charities.

On 10th September, I took part in the 25km Thames Bridges Trek to raise money for New Hope, the Watford-based charity supporting people currently experiencing homelessness in the town. Tackling homelessness is a priority of mine and New Hope play a large role in helping to help those who are rough sleeping or in danger of becoming homeless.

I also took part in the Great Big Walk for Herts on Saturday 24th September to raise money for Playskill, a local charity which supports children with physical delays and disabilities and their families. I was joined for the 15.4 mile long route with the founder and director of Playskill, Andrea Clarke and a team of other volunteers. She and her team do excellent work and are an example of the brilliant voluntary sector that support local residents and provide extra help above that which is otherwise available.

Ukraine Day

Ukraine celebrated its national day on 24th August and I was proud to raise the Ukrainian flag at the town hall to commemorate the day. As the war in Ukraine continues it is important for the town to show solidarity with the Ukrainian people as they defend their country and stand up for the values of democracy, self-determination and rule of law.

Merchant Navy Day

On 3rd September I raised the red ensign at the town hall to commemorate Merchant Navy Day. The merchant navy are often unfairly forgotten by many but played a huge part in both world wars and in modern life.

Merchant Navy is run by The Seafarers' Charity and honours those who kept the UK supplied in wartime and the merchant seafarers who sacrificed their lives to keep the country safe. In World War 1 and 2 over 50,000 merchant seafarers died. It also celebrates the modern Merchant Navy, who are still responsible for over 90% of UK imports.

Herts Pride

We were proud to host Herts Pride, Hertfordshire's largest LGBTQ+ festival, for another year in Cassiobury Park. I attended the event, as did a number of Councillors from all parties and I raised the Pride flag at the Town Hall during the weekend of the event. The event was a success but would not have been so if it wasn't for the work of all the volunteers who helped organise it or took part in it.

Agenda Item 10

Part A

Report to: Council

Date of meeting: Monday, 17 October 2022

Report author: Democratic Services Manager

Title: Appointment of Chair to Overview and Scrutiny Committee

1.0 Summary

1.1 Council is requested to approve the appointment of the Chair of Overview and Scrutiny Committee as detailed below.

1.2 In addition, Council is asked to approve the change of appointment for the Hertfordshire County Council Health Scrutiny Committee.

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)
Appointment to HCC Health Scrutiny Committee is not agreed	Watford Borough Council would not be represented on the Health Scrutiny Committee and not be involved in scrutinising health services that affect Watford residents.	Council approves the nominated councillor.	Treat	1

3.0 Recommendations

3.1 that Councillor Tom Osborn be appointed as Chair of Overview and Scrutiny Committee for the remainder of 2022/23 or until Councillor Simon Feldman returns.

3.2 that Councillor Tom Osborn be appointed to the Hertfordshire County Council Health Scrutiny Committee for the remainder of 2022/23 or until Councillor Simon Feldman returns.

Further information:

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Report approved by: Carol Chen, Group Head of Democracy and Governance

4.0 Detailed proposal

- 4.1 At Annual Council on 24 May 2022 Council agreed the appointment of Councillor Simon Feldman as Chair of Overview and Scrutiny Committee and as the council's representative to the Hertfordshire County Council Health Scrutiny Committee.
- 4.2 At the end of July Democratic Services was informed that Councillor Feldman needed to take a period of extended leave in accordance with the Members' Leave Policy which was approved by Council at its meeting on 24 January 2022. It is currently not yet known when Councillor Feldman will be able to return. Officers are in regular contact with Councillor Pattinson, the Liberal Democrat Group Leader, to ensure they are aware of the latest position.
- 4.3 At Overview and Scrutiny Committee on 21 September 2022 it had been agreed that Councillor Osborn would chair that particular meeting in the absence of Councillor Feldman. However, Council is required to appoint members to the position formally. In accordance with the leave policy both Councillors Feldman and Osborn are entitled to receive the Special Responsibility Allowance that is attached to the role of Chair.
- 4.4 The appointment to the Hertfordshire County Council Health Scrutiny Committee requires the council's representative to be a member of one of the council's scrutiny committees, therefore they would not be a member of the Executive. In addition, the appointed representative must not be employed by the County Council or have any other conflict of interest, for example employed by one of the health trust's scrutinised by the Health Scrutiny Committee. Officers have contacted Councillor Osborn for confirmation he has no interest. It has been agreed that Councillor Osborn will attend the next Health Scrutiny Committee as a substitute for Councillor Feldman, as it was due to take place prior to Council. Council is required to formally appoint the council's representative.
- 4.5 Council is therefore requested to formally appoint Councillor Tom Osborn to the role of Chair of Overview and Scrutiny Committee and as the council's representative on the Hertfordshire County Council health Scrutiny Committee.

5.0 Implications

5.1 Financial

5.1.1 The Shared Director of Finance comments that there are no financial implications arising directly from this report.

5.2 Legal Issues (Monitoring Officer)

5.2.1 The Group Head of Democracy and Governance comments that appointments to chairs and vice chairs of committees and council appointed outside bodies is done by council. Failure to appoint a replacement for Councillor Feldman would mean the vice chair chairing overview and scrutiny committee until his return.

Appendices

None

Background papers

The following background papers were used in the preparation of this report. If you wish to inspect or take copies of the background papers, please contact the officer named on the front page of the report.

- Members Leave Policy
- Establishment of Committees and Appointment of Chairs and Vice Chairs report to Council on 24 May 2022
- Appointment of representatives of the Council on outside organisations 2022/23 report and appendix
- Emails

Report to: Council
Date of meeting: 17 October 2022
Report of: Spatial Planning Manager
Title: Watford Local Plan

1.0 Summary

- 1.1 The Watford Local Plan is a statutory planning document to guide decision-making when considering development proposals in the borough. It sets out the growth strategy to 2038, includes planning policies used to determine planning applications and identifies development sites that will enable growth needed in the borough.
- 1.2 The Watford Local Plan was subject to an Examination in Public which commenced on 6 August 2021. This began with the submission of the Local Plan to the Planning Inspectorate and concluded on 20 September 2022 when the Council received the Inspector’s final report. The public hearing sessions into the Council’s Local Plan took place between 18 January 2022 and 9 February 2022.
- 1.3 Following consultation on the ‘Main Modifications’ arising from the hearing sessions, the Inspectors report concludes that, subject to the main modifications being made, the Watford Local Plan is sound and provides an appropriate basis for guiding development in the borough using up to date planning policies.
- 1.4 Once adopted, the new Watford Local Plan, including the planning policies and site allocations within it, will supersede Watford’s Local Plan Part 1 - Core Strategy 2006-31 (adopted January 2013) and saved policies in the Watford District Plan 2000 (adopted December 2003).

2.0 Risks

2.1

Nature of risk	Consequence	Suggested Control Measures	Response	Risk Rating
Plan not adopted	Out of date planning policies. Reliance on national planning policies reducing the weight given to local circumstances when	Adopt the Local Plan. Continued engagement with members and officers.	Treat	6 (2 x 3)

	<p>determining planning applications. Increase of planning appeals. Uncoordinated and poorly designed development sites coming forward. Further officer time and financial resources required detracting from other work in the Service Plan.</p>			
Change to national planning guidance	Local Plan policies not implemented as effectively as intended.	Respond to any relevant consultation released by the Government on proposed changes. Depending on the significance of any change, consider review of the Local Plan, or affected parts of.	Treat	6 (2 x 3)
Alignment with SW Herts Joint Strategic Plan	Uncertainty could delay the Joint Strategic Plan and setting out growth needs in the borough with a local strategy as to how this will be achieved.	Adopt the Local Plan. Continued engagement with members and officers.	Treat	1 (1 x 1)
Legal challenge within six weeks of adoption	Potential delay to Local Plan adoption.	Ensure all legal processes are followed.	Tolerate	3 (1x3)

3.0 Recommendations

3.1 That, Council:

- a) Adopt the Watford Local Plan as attached as appendix A in accordance with S23(3) of the 2004 Planning and Compulsory Purchase Act (as amended);
- b) That delegated authority be given to the Associate Director of Planning, Infrastructure and Economy in consultation with the Portfolio Holder for Strategic Partnerships and Planning to undertake revisions to formatting of the Local Plan.

Contact Officer:

For further information on this report please contact:

Jack Green

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Report approved by:

Ben Martin, Associate Director of Planning, Infrastructure and Economy

4.0 Detailed Proposal

4.1 Background – Preparation of the Local Plan

4.2 The Local Plan sets out the strategy to support growth in Watford. This includes the scale of growth that needs to be planned for in the borough, where this should be located and how this is expected to be delivered.

4.2 Supported by an [evidence base](#) of studies and strategies, the Local Plan set outs the planning policies that will be used to determine planning applications and identifies site allocations where development is to take place. The Local Plan is supplemented by the Policies Map (attached at appendix B) which shows the spatial coverage of policies in the Local Plan that are more specific than being borough-wide. Note, the Policies Map is a PDF document, however, online, it is available as an interactive map where information layers can be ‘turned on and off’ to make it easier to use.

4.3 The Government requires Local Plans to be kept up to date and reviewed every five years. Since the Core Strategy was adopted in 2013, national planning guidance has changed significantly and alongside this Watford has been subject to increasing development pressure reflective of its proximity to London and excellent transport connections to the city. The effect of this was demonstrated by the withdrawal of Watford Local Plan Part 2 (Site Allocations and Development Management Policies) in 2017 which was intended to support the Core Strategy.

4.4 During the preparation of the Local Plan, several stages of public consultation were undertaken. Each stage was compliant with the Council’s [Statement of Community Involvement](#).

- 4.5 The first step towards preparing a new Local Plan was to identify the planning issues facing the borough. In September 2018, the Council consulted on Issues and Options that should be addressed in the new Local Plan (Regulation 18). Approximately 420 people responded to the consultation survey and provided about 8,430 survey responses and comments.
- 4.6 The first draft Local Plan was consulted upon in September 2019 for six weeks (Regulation 18). The consultation utilised a variety of consultation methods which reflected the more in-depth and detailed nature of the consultation document. 842 responses were received from 223 respondents.
- 4.7 The Council published the final draft Local Plan (Regulation 19). This is a formal stage and final opportunity for stakeholders and members of the public to support or challenge the content of the draft Local Plan. This consultation took place in January 2021 for six weeks. 438 comments were received from 82 respondents.

4.8 **Background – Submission for Examination in Public**

- 4.9 On 19 July 2021, Council approved the draft Watford Local Plan to be submitted to the Planning Inspectorate for Examination in Public. Planning Inspector Mr William Fieldhouse was appointed by the then Secretary of State for Housing, Communities and Local Government, to examine the Local Plan. Details of the Examination and documentation associated with it can be viewed on the Council's Watford Local Plan webpage watfordlocalplan.co.uk. Important milestones during the Examination include:

- Submission: 6th August 2021
- Examination hearings: 18 January to 9 February 2022
- Proposed Main Modifications proposed by the Council in response to questions from the Inspector, representations & discussion at the hearings put forward on 30 May 2022
- Consultation on the Main Modifications (Minor Modifications also made available for comment): 9 June 2022 to 21 July 2022
- Inspectors final report (attached at Appendix C), including a recommendation for the Council to adopt the Local Plan subject to the proposed modifications set out in the appendix to the report being included, was received closing the Examination in Public on 20 September 2022

4.10 **Inspectors Report and Main Modifications**

- 4.11 The Inspector's report concludes that the Watford Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications are made to make it sound. For a Local Plan to be sound it is required to be: positively prepared; justified; effective; and, consistent with national policy (these definitions are set out on page 12 of the [National Planning Policy Framework](#), 2021).
- 4.12 The Main Modifications to the submitted Local Plan (as agreed by Council on 11 July 2021) are set out in full in Appendix C but the main points can be summarised as follows:
- Amend the plan period from 2018-2036 to 2021-2038.
 - Change the minimum housing requirement from 793 homes per year to 784 homes per year (13,328 between 2021 and 2038) and exclude an annual buffer.

- Clarification that at least 158 homes per year will come forward as windfall development, in addition to a total of 11,112 on existing commitments and site allocations, if the minimum housing requirement is to be met.
- Changes to policy CDA2.1 and relevant allocation requirements to achieve sustainable development and transformation of the Watford Gateway Strategic Development Area.
- Amendments to policies CDA2.2, VT5.1 and VT5.2 and relevant allocation requirements to achieve sustainable development and promote the vitality and viability of Watford town centre.
- Changes to policy CDA2.3 and relevant allocation requirements to achieve sustainable development and transformation of the Colne Valley Strategic Development Area including through the preparation of a masterplan supplementary planning document for Lower High Street.
- Amendments to policies HO3.5 and HO3.10 to meet the housing needs of the elderly and those with special needs.
- Changes to policy HO3.11 to secure the provision of shared private outdoor amenity space in new apartment blocks.
- Clarification of employment provision in the Local Plan and this relates to strategic requirements across SW Herts.
- Removal of Reach Printing Services Limited from a designated industrial area.
- Amendments to various policies to set out a positive strategy for the conservation and enjoyment of the Borough's historic environment.
- Environmental requirements such energy efficiency to be no higher than national guidance or legislation.
- Clarification of the requirements for site allocations.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

4.13 Relationship between the new Local Plan and the Core Strategy

- 4.14 The new Local Plan will supersede the Core Strategy 2006-2031, adopted in 2013, and the saved policies in the Watford District Plan 2000. This will be effective immediately upon adopting the new Local Plan and issuing the Adoption Statement which follows. The Adoption Statement is a formal notification that Watford Borough Council has adopted the new Local Plan.
- 4.15 From the date of adoption, policies in the new adopted Local Plan will be used to determine planning applications and planning appeals. Policies in the Core Strategy will no longer have weight in this regard.
- 4.16 The new Local Plan will form a part of the statutory development plan for the Borough, alongside the Hertfordshire Minerals Local Plan, Hertfordshire Waste Local Plan and any future adopted neighbourhood plans.

4.17 Post-adoption of the Local Plan

4.18 The Local Plan and Policies Map will be published on the Council website alongside the Adoption Statement (attached as Appendix E) and Sustainability Appraisal Report. The Local Plan Examination pages will also continue to be available on the Council's website.

4.19 Following adoption there is a six week period during which any person who is aggrieved by the adoption of the Watford Local Plan may make an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004 on the grounds that:

- the document is not within the appropriate power; and/or
- a procedural requirement has not been complied with.

4.20 Implementation of the Local Plan will be monitored and reported on as part of the Authority Monitoring Report (AMR). The monitoring framework is set out in the appendices to the Local Plan.

5.0 Implications

5.1 Financial

5.2 The cost of preparing the Local Plan is covered within the Place Shaping budget. Further expenditure on the Local Plan document after adoption will be minimal. Post-adoption implementation will require financial support, however, this will be identified through other defined projects and will be subject to a business case and budgetary approval.

5.3 Adoption of the Local Plan will place Watford Borough Council in stronger position to attract economic investment because of the certainty it provides and the overall growth strategy set out. New development will generate funds through the Community Infrastructure Levy and indirectly can be used to support funding bids to aid economic development and unlock development sites.

5.4 Legal Issues

5.5 The Group Head of Democracy and Governance comments that as stated in the body of the report once adopted by Council the Plan is subject to a six week challenge period. Failure to formally adopt the Plan as recommended will be as stated in the risks section of this report.

5.6 Equalities/Human Rights

5.7 An Equalities Impact Analysis (attached as Appendix D) was undertaken in the early stages of preparation of the Local Plan and reviewed/updated as necessary as the Local Plan progressed a copy of it can be viewed here (or attach as a further appendix).

5.8 Staffing

5.9 Following adoption of the Local Plan officer time will be required to monitor its implementation, maintain the Policies Map and facilitate updates to the Local Plan webpage as required. Implementation of the Local Plan will require the input from all officers and will contribute towards the delivery of objectives set out in the Council Plan.

5.10 Accommodation

5.11 N/A

5.12 Community Safety/Crime and Disorder

5.13 The Local Plan includes policies on design intended to deliver high quality places for people to use. An element of this relates to creating an environment that increases the sense of safety and inclusiveness.

5.14 Sustainability

5.15 The Local Plan sets out an approach to growth that is underpinned by sustainability. This is reflected in planning policy requirements.

5.16 As the Local Plan was prepared, it was subject to a Sustainability Appraisal. This considered different elements of sustainability as they relate to planning: economic, environmental and social. These were applied to policies and site allocations to understand how they perform individually and cumulatively (the whole as a whole).

5.17 In addition to the policies and site allocations in the Local Plan, alternative growth options and policy options were tested to establish the most appropriate approach to development in Watford.

5.18 The Local Plan was subjected to a Habitats Regulations Assessment. This considers how the Local Plan could impact upon protected European sites. The assessment concluded there would be no significant impact on any protected sites in the area.

6.0 Appendices

6.1 Appendix A: Watford Local Plan

6.2 Appendix B: Local Plan Policies Map

6.3 Appendix C: Inspector's Report

6.4 Appendix D: Equality Impact Analysis

6.5 Appendix E: Adoption Statement

6.6 Background Papers

- 6.7 Statement of Community Involvement (SCI)
- 6.8 Sustainability Appraisal (SA)
- 6.9 Habitats Regulations Assessment (HRA)

A Sustainable Town

Watford Local Plan 2021-2038



**WATFORD
BOROUGH
COUNCIL**

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



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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.

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.

	Chapter 3: Homes for a Growing Community	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, and those with disabilities.
	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	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.
	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.

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.

The diagrams covering the borough at the beginning of each chapter are included to provide context to the strategic objectives of the Local Plan and opportunities to consider when development comes forward. This also applies to the schematic diagrams for each of the three Strategic Development Areas. The strategic maps are not intended to demonstrate policy requirements and are indicative only. Where specific areas and sites within the borough are covered by particular policies, these are defined on the Policies Map.



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.

Table 1.1: Planning structure around the Watford Local Plan

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.

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 to 2038 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.

Preparation of the Local Plan and stakeholder engagement

1.5 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



South West Hertfordshire Joint Strategic Plan

1.6 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.

1.7 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.

A brief portrait of Watford

- 1.8 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.
- 1.9 There are around 96,700 people (Office for National Statistics (ONS), 2019) living in the approximate eight square miles of the borough. 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.
- 1.10 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.

- 1.11 Watford is adjacent to North London and 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.
- 1.12 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

1.13 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 sustainability objectives for Watford: economy, society and environment

1.14 Watford will see a lot of change in the 17 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.

1.15 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 2038. 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 Council Plan and the Sustainability Strategy.

1.16 The following highlights the key economic, social and environmental characteristics of Watford now, and where the Council wants it to be in 2038.



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 are 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 2038 - the sustainability 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 that many people cannot afford a home of their own (the affordability ratio is 11.1 times the median average income (ONS, 2020)).
- 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 in some wards.
- 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.

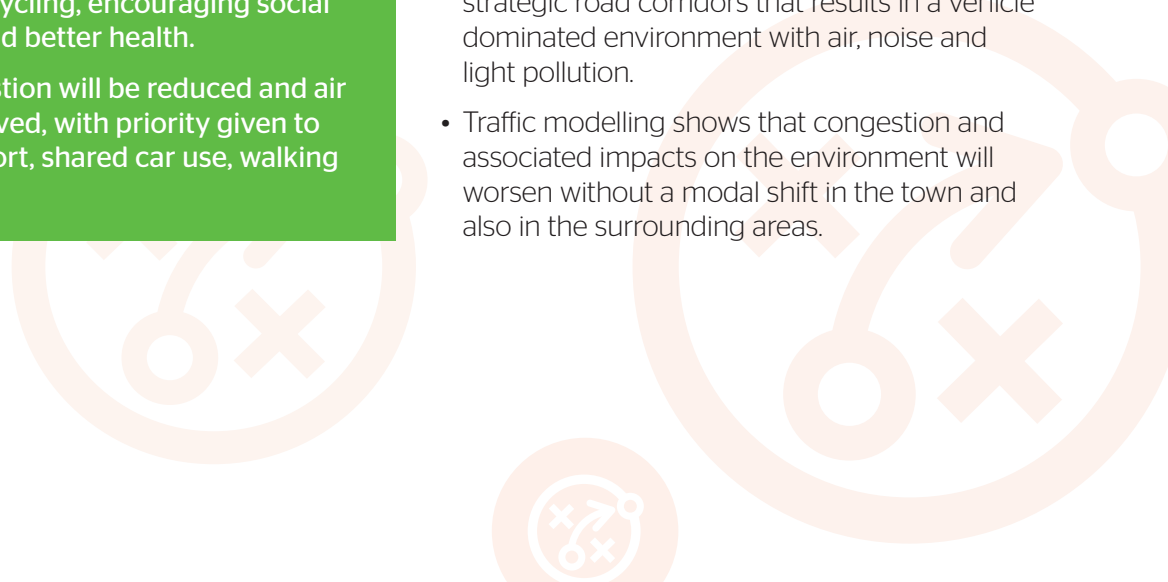


Watford's society in 2038 - the sustainability objectives

- New development will have met the needs of a population projected to increase to 97,156 people in 2038 (ONS, 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 2038 - the sustainability 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 greenspaces and conservation areas will have been protected and the historic environment enhanced.



Helping to make Watford a better place for everyone

1.17 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.

1.18 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.

1.19 The Local Plan is a roadmap of where we want to be, and when looking ahead to 2038, 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 2038: 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 greenspaces whilst 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 2038, 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

- 1.20 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.
- 1.21 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.
- 1.22 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).
- 1.23 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.
- 1.24 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

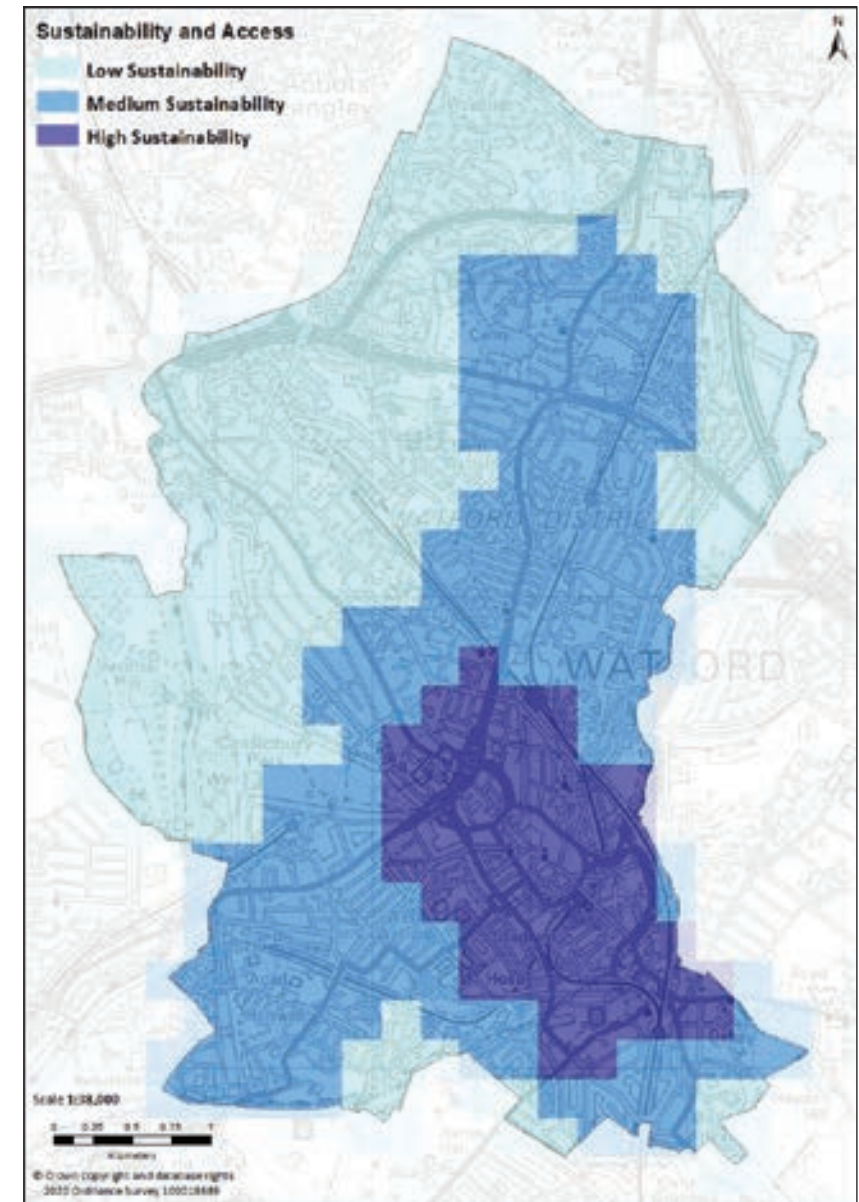
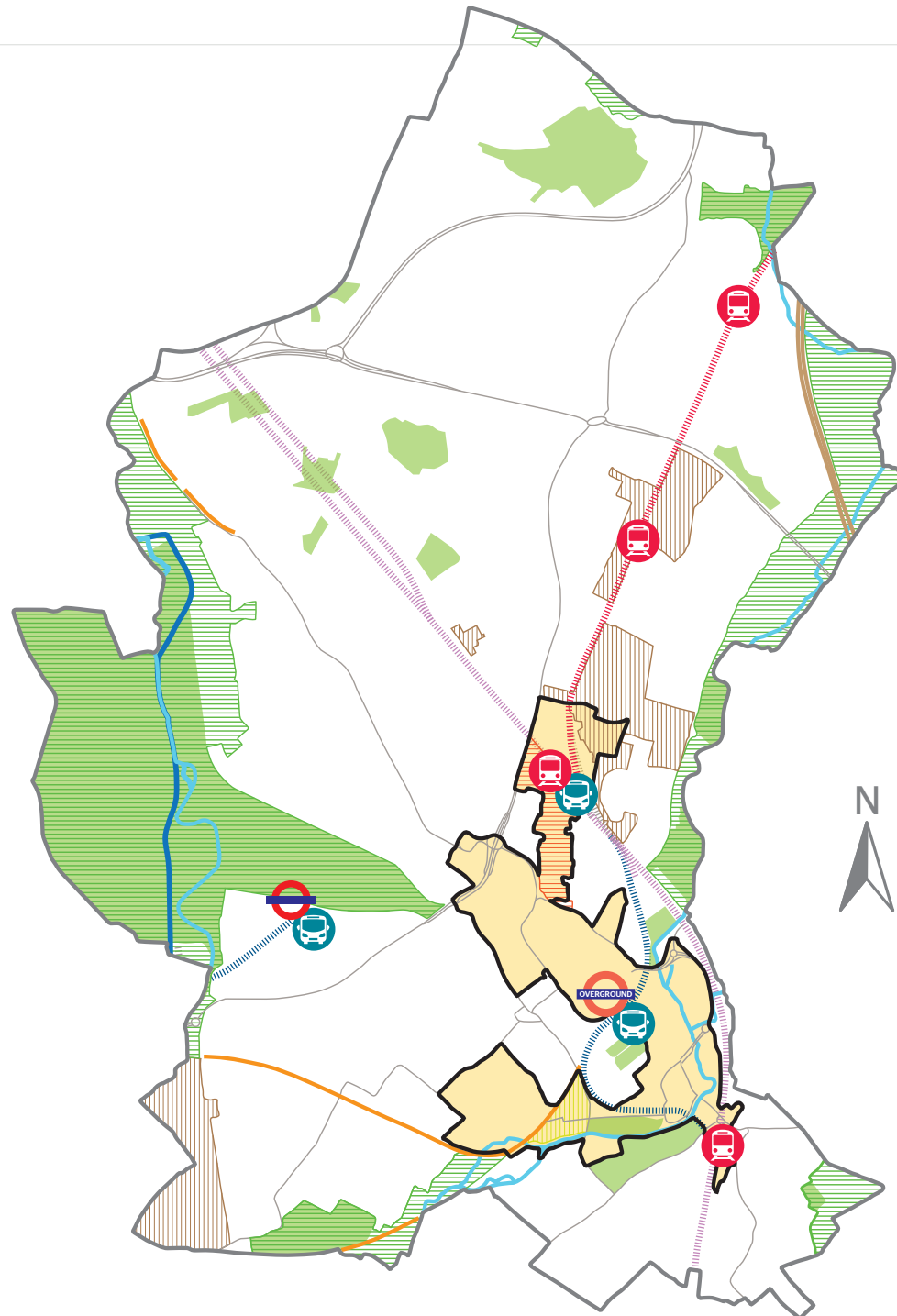
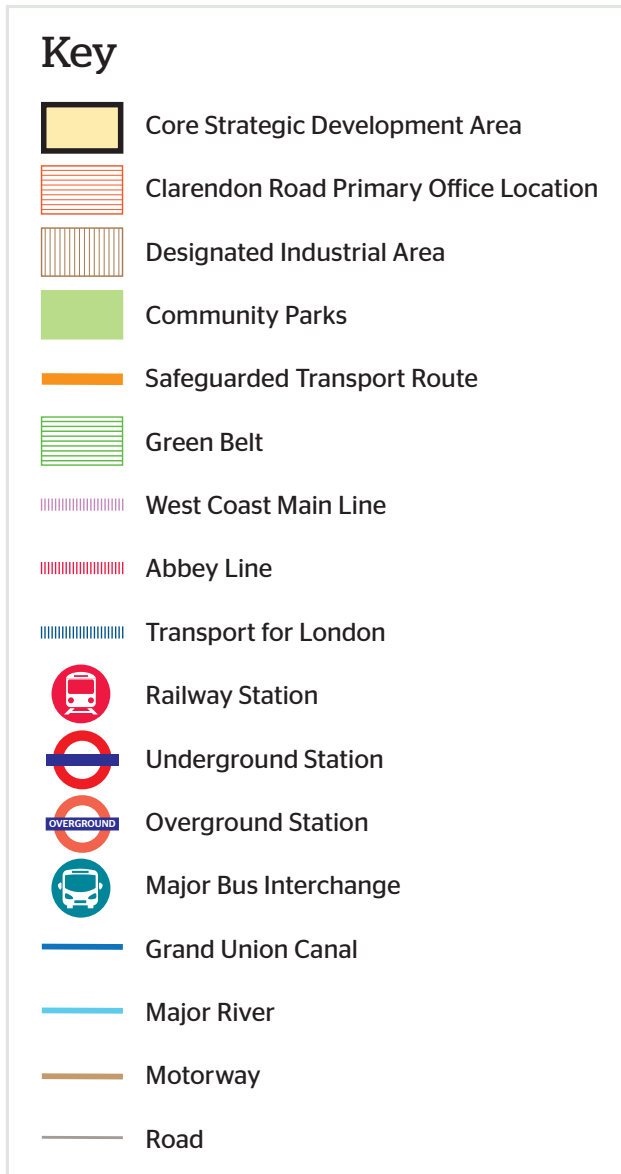


Figure 1.2: Key Diagram



A sustainable development strategy for Watford

- 1.25 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.
- 1.26 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.

- 1.27 To successfully achieve sustainable development, a wide variety of factors need to be balanced and delivered. One of the most important 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.
- 1.28 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 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.
- 1.29 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 the perception of a place and in turn health and wellbeing.

The Spatial Strategy

- 1.30 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.
- 1.31 This will enable a greater number of people to live 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.



1.32 Creating sustainable neighbourhoods in this way has multiple benefits. New development can attract investment to the area as a business cluster, creating local jobs and providing opportunities for new skills and training through apprenticeships. New employment opportunities bring workers into Watford, which in turn, increases demand for ancillary goods and services supporting local businesses, particularly in the Town Centre and at the key employment areas. 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. Alongside this growth the inclusion of measures, such as improvements to the green infrastructure network, will benefit people and biodiversity while making better use of resources and helps to create high quality places and habitats.

Collaborative working

1.33 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.



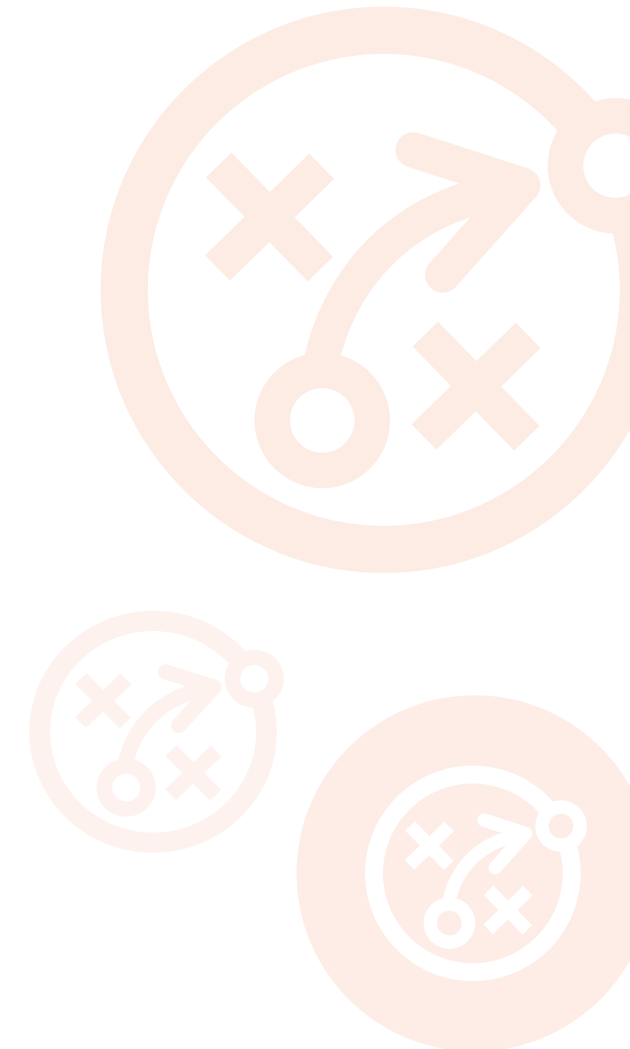
Monitoring the Local Plan

1.34 Monitoring of the Local Plan is important to determine the effectiveness of planning policies and whether they impact on Development Management decisions and contribute towards achieving the Council's objectives and targets. The Local Plan will be monitored to ensure they are being successfully implemented and that 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

1.35 Watford forms part of the South West Hertfordshire Housing Market Area and Functional 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 is 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.

1.36 Should 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



From 2021 to 2038, the Local Plan makes provision for 13,328 net additional homes and 110,514 sqm of net employment floorspace consisting of 25,206 sqm of industrial uses as classified by the B2, B8, E(g)(ii) and E(g)(iii) Use Classes and 85,488 sqm of office uses as classified by the E(g)(i) Use Class between 2021 and 2038, along with supporting infrastructure and facilities. Proposals for new development will be supported, where they demonstrate that they will contribute towards the Local Plan's economic, social and environmental objectives.

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 2038. 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 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.

Inappropriate development, as defined in national planning policy, in the Metropolitan Green Belt will not be approved except in very special circumstances.

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.

The Core Development Area is defined on the Policies Map.

WATFORD
RIVERWELL



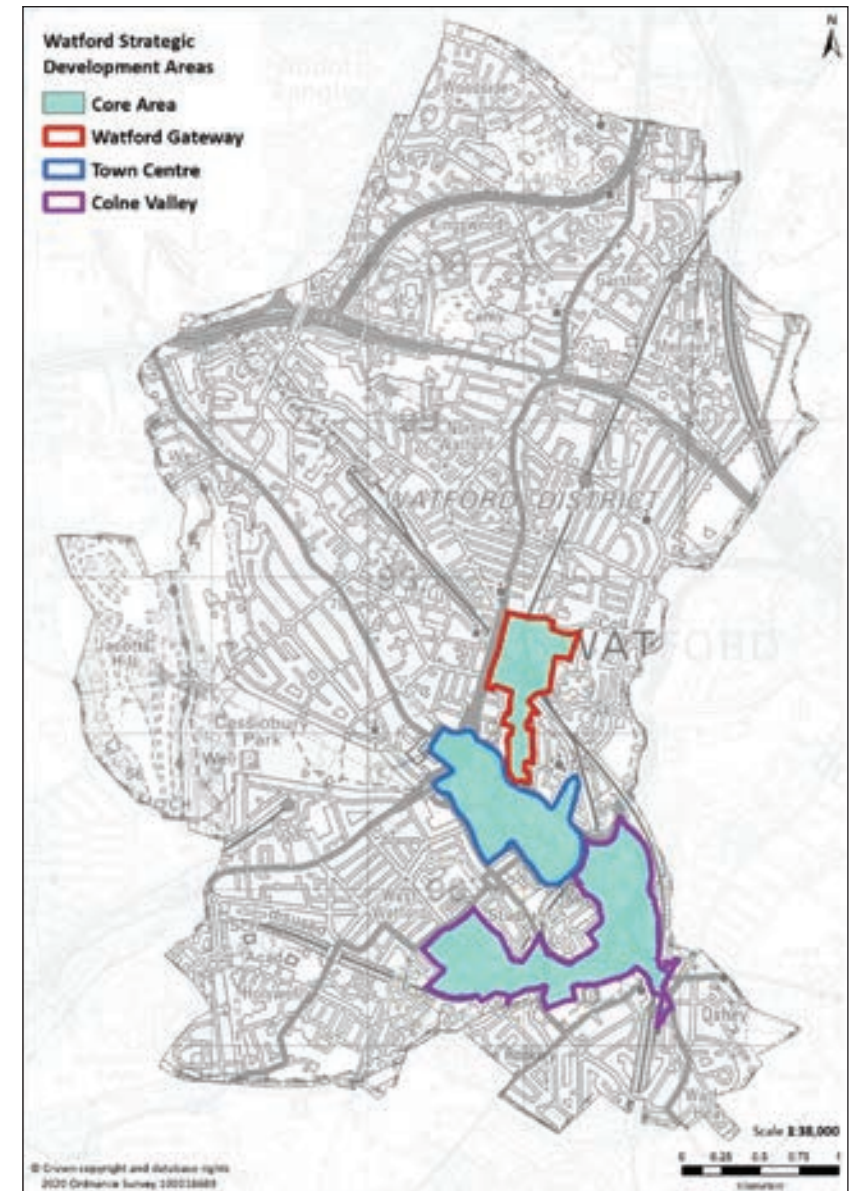
Chapter 2

Core Development Area

Core Development Area

- 2.1 The Core Development Area constitutes 8% of the built area of Watford (2,150 hectares). It is an area where significant revitalisation and transformative change are expected to bring new investment into the town. The information set out in Figure 2.1 reflects these areas as defined on the Policies Map.
- 2.2 The Core Development Area comprises three distinct areas. These are 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 (Figure 2.1).
- 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 in the borough is located; and
 - **The Colne Valley**, which encompasses the out-of-town retail area, hospital and football 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

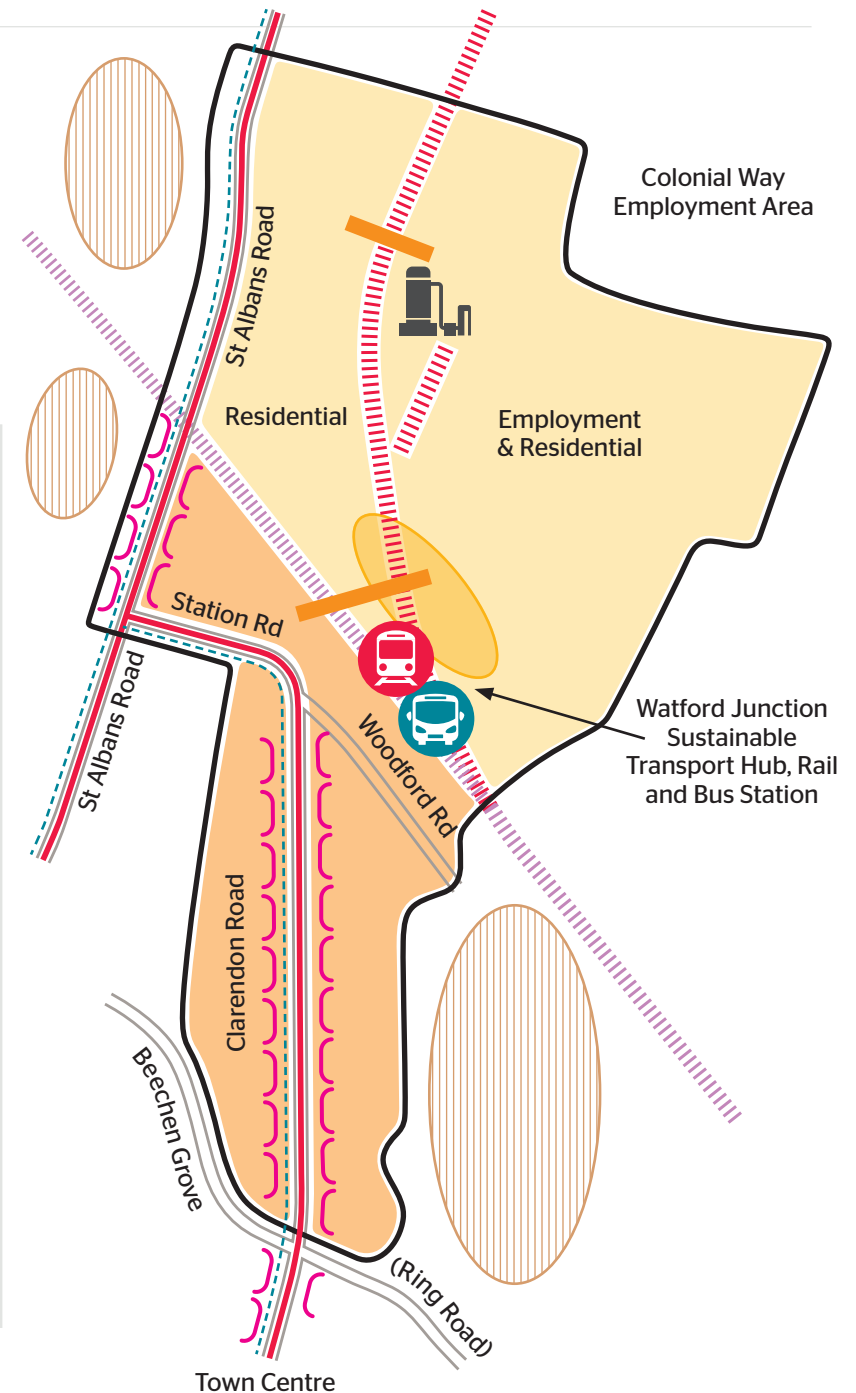
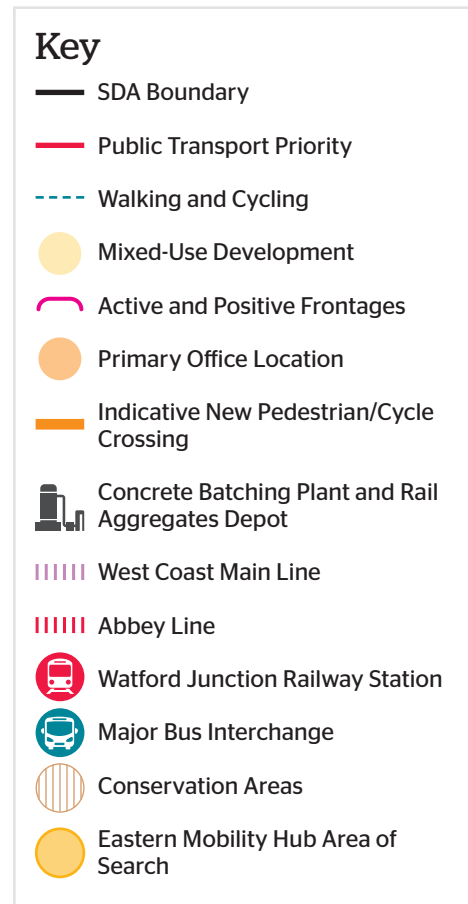
2.6 The Watford Gateway Strategic Development Area encompasses 31 hectares of land north of the Town Centre and comprises two key locations in the town: the Watford Junction railway and bus station, surrounding retail and employment land; and Clarendon Road, which is the primary business district in the area (Figure 2.2). Figure 2.2 is a schematic diagram to provide context for the area and is not to be interpreted as policy.

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

Watford Junction Station area

2.8 The Watford Junction 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, Illustrative Concept Diagram



Eastern Mobility Hub

- 2.9 The area to the east of the Abbey Line will support the delivery of the Eastern Mobility Hub. As part of a long-term objective to support active transport, this will include a new multi-storey car park and access for coaches and taxis. This could relieve the pressure on the entrance to Watford Junction rail and bus stations (the Sustainable Transport Hub) located on the west side of the West Coast Main Line. The bridge over the railway line will facilitate movement for pedestrians and cyclists between the two transport hubs.
- 2.10 The railway 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.
- 2.11 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

- 2.12 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.

- 2.13 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 are proposed close to adjacent low lying residential areas, they will need to be 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 elements of a scheme should be located closer to areas characterised by lower building height.
- 2.14 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

- 2.15 Land east of Watford Junction Station and the 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.

- 2.16 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. This will likely come forward in phases as infrastructure is delivered and development opportunities present themselves.
- 2.17 In the first part of the plan period, proposals for the redevelopment of employment floorspace with either replacement or alternative forms of employment uses will be supported. Mixed-use development that may include residential uses that contribute towards the long-term vision of the area will be supported and in such circumstances the loss of employment floorspace may be acceptable. The compatibility of new and existing uses will need to be carefully considered, particularly where when residential uses are proposed in the area as the 'agent of change' principle will need to be addressed.

- 2.18 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. Re-location of the facility will be challenging to achieve and will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria.
- 2.19 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.
- 2.20 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. Large areas of scattered car parking throughout the Strategic Development Area should be avoided. Proposals for car parking that come forward will not be supported where they could compromise the road network or infrastructure

for alternative forms of active travel, such as cycling and walking. A new multi-storey car park will be provided as part of the Eastern Mobility Hub east of the Abbey Line. Any proposals that come forward which include the loss of the existing multi-storey car park and surface parking will need to demonstrate how the replacement facility will be delivered.

- 2.21 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 with 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

- 2.22 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.

- 2.23 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.
- 2.24 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

2.25 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.

2.26 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.

Delivery and managing development

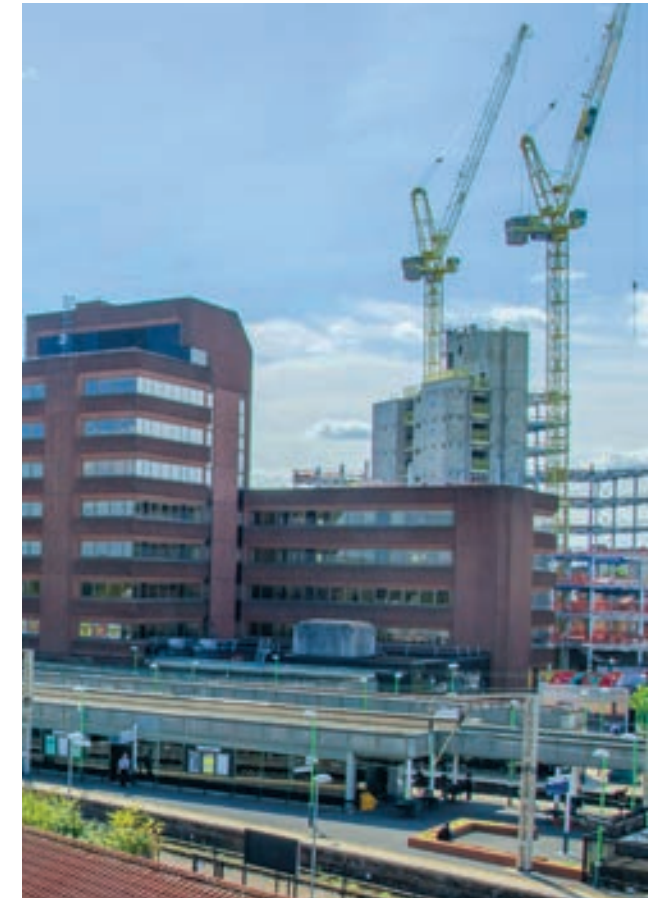
2.27 The Watford Gateway Strategic Development Area consists of two constituent parts; land around Watford Junction Station and the area of Clarendon Road.

- East of Watford Junction Station and west of the Abbey Line, site MU05 is a high density development with planning consent to be delivered over several phases to 2031. Site MU06 is located adjacent to the south and will come forward in phases across the plan period. The existing car park is expected to be re-provided as part of the Eastern Mobility Hub.

This will help to unlock the central part of site MU06 and support the delivery of a mixed-use quarter in the later stages of the plan period. Road access to the facility will be from Clive Way and a pedestrian/cycle crossing over the West Coast Mainline will provide access to Watford Junction Station, which itself will be improved to increase capacity. The crossing may be delivered in either a single phase across both the West Coast Mainline and Abbey Line or in two phases with a crossing over the West Coast Mainline in the first part of the plan period alongside site MU06, followed with an extension to the crossing that would enable access to land east of the Abbey Line in the later stages of the plan period. If the latter, the crossing will need to be designed so that it may be adapted to support an extension at a later time.

- While sites MU07 and MU24 are likely to be redeveloped for industrial uses in the first part of the plan period, delivery of the aforementioned facilities will support redevelopment for mixed-use development on land located east of the Abbey Line in the latter stages of the plan period. With the crossing over the West Coast Mainline in place along with the Eastern Mobility Hub, a pedestrian/cycle crossing over the Abbey Line will be delivered to improve access from the east side of Watford Junction Station and reduce the pressure associated with access via the west entrance located opposite Clarendon Road. This will be supported by enhancements to the station, including the forecourt, in the early part of the plan period and ongoing improvements to Clarendon Road.

- Clarendon Road is well established as a commercial office district and is subject to an increasing number of proposals for higher density development. Much of the area is unallocated and proposals are anticipated to come forward as windfall as redevelopment opportunities arise. As the area continues to intensify, it is envisaged that further investment interest will be secured in the area reflecting the objectives for this part of the Strategic Development Area.





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 primary school within site MU05 'Land and Buildings at 94-98 St Albans Road', and a site for a new 3 form entry primary school within Site MU06 'Land at Watford Junction', to meet demands generated by development;
- d) Provision of a circa 1,300sqm of healthcare floorspace;
- e) A high quality Sustainable Transport Hub located at Watford Junction connecting rail, bus, taxi, cycle and pedestrian facilities;
- f) New development should contribute towards, and not compromise the delivery of the Eastern Mobility Hub to be located east of the Abbey Line;
- g) New walking, cycling and public transport infrastructure will be required to contribute towards the Local Transport Plan and supporting strategies;
- h) Prior to the implementation of a planning permission which includes residential uses on land east of the West Coast Mainline, a pedestrian and cycle bridge for commuters and residents from the east side of the Abbey Line to Watford Junction Station must be agreed. Development proposals will need to be designed to ensure they do not compromise delivery of the bridge;
- i) As part of a comprehensive mixed-use redevelopment of the area in the second part of the plan period, a route for a pedestrian and cycle bridge that will enable access to Watford Junction station via Penn Road must be shown to be feasible and achievable when redevelopment proposals are submitted;
- j) The land east of the West Coast Mainline will support a mix of uses including replacement car parking, new homes and employment uses;
- k) On land east of the West Coast Main Line and within the Strategic Development Area, redevelopment of existing employment floorspace for replacement or other employment uses will be supported in the first part of the plan period. Where it is demonstrated that proposals for residential-led mixed-use development will contribute towards the delivery of the wider objectives of the Watford Gateway Strategic Development Area, and the proposed use will not undermine existing uses through the 'agent of change' principle, the loss of employment floorspace may be acceptable;



Strategic Policy CDA2.1: Watford Gateway Strategic Development Area



- l) If a proposal is to include the loss of a child care facility, a replacement facility should be reprovided as part of the commercial floorspace;
- m) 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;
- n) A new multi-storey car park as part of the Eastern Mobility Hub will be provided on land to the east of the Abbey Line. Proposals that include the loss of the existing multi-storey car park will be required to set out how the replacement facility will be delivered, including delivery phases, as part of the planning application;
- o) New development will not compromise vehicle access from Clive Way via Colonial Way into the area and access to the Eastern Mobility Hub;
- p) Future development in the Strategic Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area and where prepared for individual sites;
- q) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessments for all sites to be submitted prior to the determination of any application;
- r) 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.

The Watford Gateway Strategic Development Area is defined on the Policies Map.



A thriving Town Centre

- 2.30 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. 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 venues.
- 2.31 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.
- 2.32 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; 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

- 2.33 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.
- 2.34 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.
- 2.35 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'.

- 2.36 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.
- 2.37 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 2038, 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

- 2.38 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.
- 2.39 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.
- 2.40 The Civic Core Conservation Area encompasses several listed buildings, including the Town Hall and Watford library. A number of cultural facilities are also located within the Conservation Area including the Colosseum, leisure centre and West Herts College. Development in this area will seek to deliver a variety of facilities reflecting the cultural and heritage value of the area.

Development proposals will need have regard to the Heritage Impact Screening Assessment and other heritage-related Supplementary Planning Documents and undertake a full Heritage Impact Assessment of the proposals. 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.

- 2.41 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.
- 2.42 Development around Albert Road South will 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

- 2.43 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.
- 2.44 The east side of the High Street is dominated by the indoor shopping centre, atria Watford, 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.
- 2.45 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.
- 2.46 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.



2.47 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.

2.48 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

2.49 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.

2.50 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.

2.51 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 provides opportunities to improve local transport with connections to a future Mass Rapid Transit System being supported. Where necessary the Council may use land assembly powers to secure proposals that are of high quality.

Improving connectivity

- 2.52 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 'Transforming Travel in Watford'. 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.
- 2.53 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

- 2.54 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.
- 2.55 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.

- 2.56 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

- 2.57 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 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, although this may not always be achievable on sites in close proximity to heritage assets. Proposed buildings taller than this will need to satisfy the requirements set out in Policy QD6.5 'Building Height'.

Delivery and managing development

- 2.58 The Town Centre has an established character and dispersed redevelopment opportunities identified in the Local Plan reflect the evolving nature of the Strategic Development Area. It is envisaged that windfall redevelopment opportunities will come forward on unallocated

sites during the plan period and it is important that these are coordinated and contribute positively towards the area. To support the delivery of new development that will enhance the Town Centre, planning guidance such as a Supplementary Planning Document will be prepared. This should be applied in conjunction with other planning tools, such as the Council's 3-D visualisation model, to inform the preparation of development proposals and best understand the impact new development may have on the townscape and heritage assets and assist with decision-making.





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, proposals will need to have regard to Supplementary Planning Documents and strategies supporting redevelopment and enhancements to the Town Centre. These are intended to guide the co-ordinated delivery of development that will contribute towards achieving the objectives for the area and provides greater detail about specific proposals in the Local Plan that may be relevant. 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 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 onto the ring road and contribute towards transforming the environment into one that is inclusive by supporting pedestrians and cyclists alongside other transport modes will be a priority. This will help to support the use of the new Sustainable Transport Hub at the southern end of the High Street;
- 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 are located in key parts of the Strategic Development Area such as the High Street and the areas around St Mary's Church and the Town Hall. They are a key component of the character of this area and proposals for new development should respond to these assets, enhancing their character and setting;



Strategic Policy CDA2.2: Town Centre Strategic Development Area



i) Future development in the Strategic Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area and where prepared for individual sites;

j) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessments for all sites to be submitted prior to the determination of any application;

k) Proposals must demonstrate the provision of innovative waste management and recycling storage and collection systems, to reduce the need for service vehicles along the High Street;

l) 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.

The Town Centre Strategic Development Area is defined on the Policies Map.



Colne Valley Strategic Development Area

Context

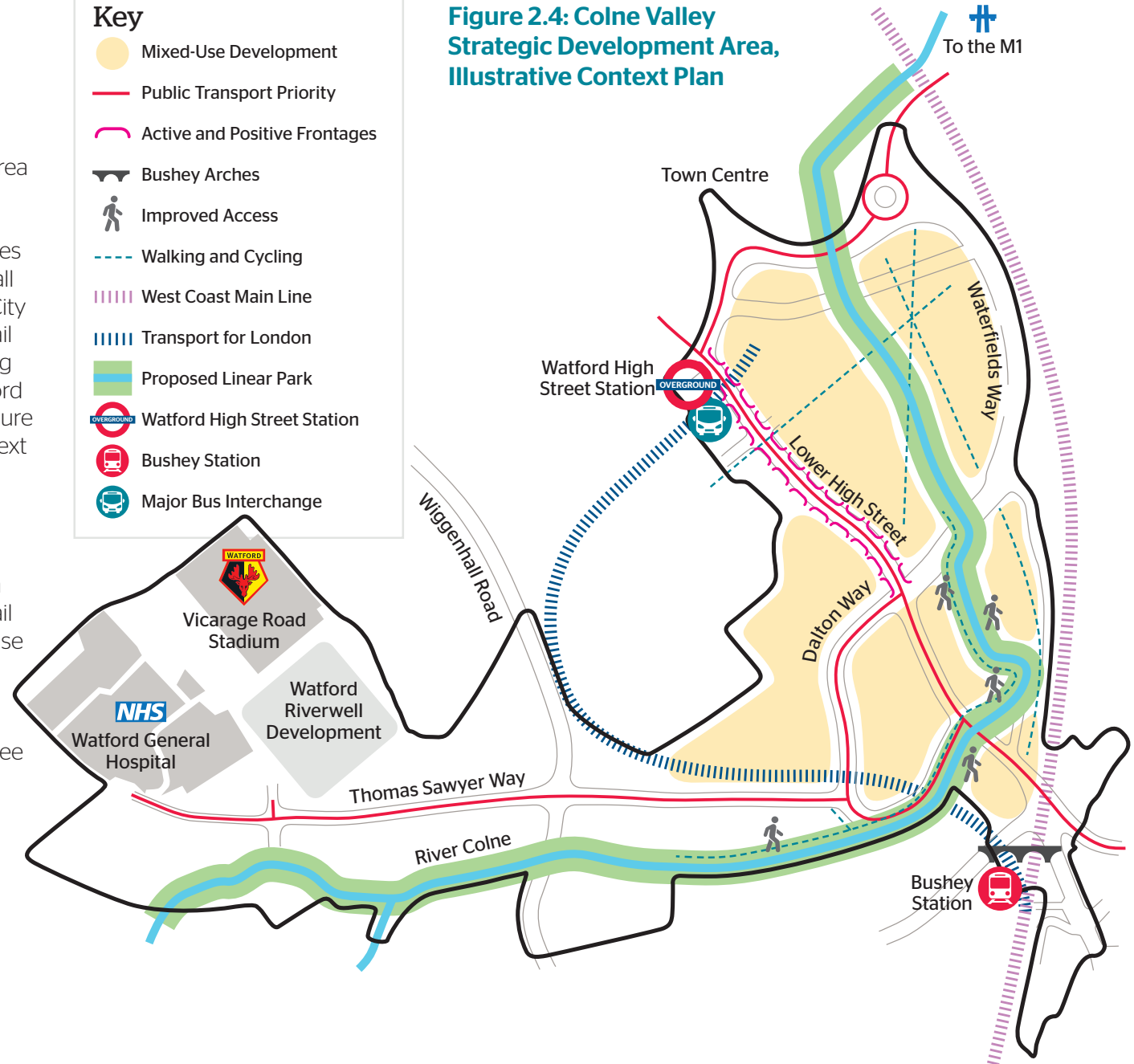
2.59 The Colne Valley Strategic Development Area encompasses 83 hectares in the southern part of the Core Development Area. The defining feature is the River Colne. It includes destinations such as Vicarage Road Football Stadium, Watford General Hospital, Trade City employment area and a distribution 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). Figure 2.4 is a schematic diagram to provide context for the area and is not to be interpreted as policy.

2.60 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.

Key

- Mixed-Use Development
- Public Transport Priority
- Active and Positive Frontages
- Bushey Arches
- Improved Access
- Walking and Cycling
- West Coast Main Line
- Transport for London
- Proposed Linear Park
- Watford High Street Station
- Bushey Station
- Major Bus Interchange

Figure 2.4: Colne Valley Strategic Development Area, Illustrative Context Plan



2.61 Located in an area of high sustainability, there are 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 focused on people and high quality place-making. Proposals 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.

2.62 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.

2.63 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.

2.64 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 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.

2.65 Major development proposals should have regard to Supplementary Planning Documents, masterplans and strategies related to the Strategic Development Area. Applicants will be expected to demonstrate how they have maximised local opportunities for development of appropriate densities, to improve the public realm and increase access to services and facilities. Applicants will also be expected to demonstrate that proposals would contribute to the co-ordinated delivery of development and that it would not compromise future development opportunities within the Strategic Development Area.

River Colne area

2.66 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.

2.67 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 consider the location of other green spaces and community facilities in the wider area that the community will use.

2.68 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.

2.69 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.

2.70 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. The Colne Valley provides an opportunity to improve the natural environment and increase the recreational value for local people.

2.71 A key objective of the Strategic Development Area, informed by the Watford Green Infrastructure Strategy, 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

2.72 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.

2.73 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.

2.74 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 the 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.



2.75 The hospital is adjacent to the existing 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.

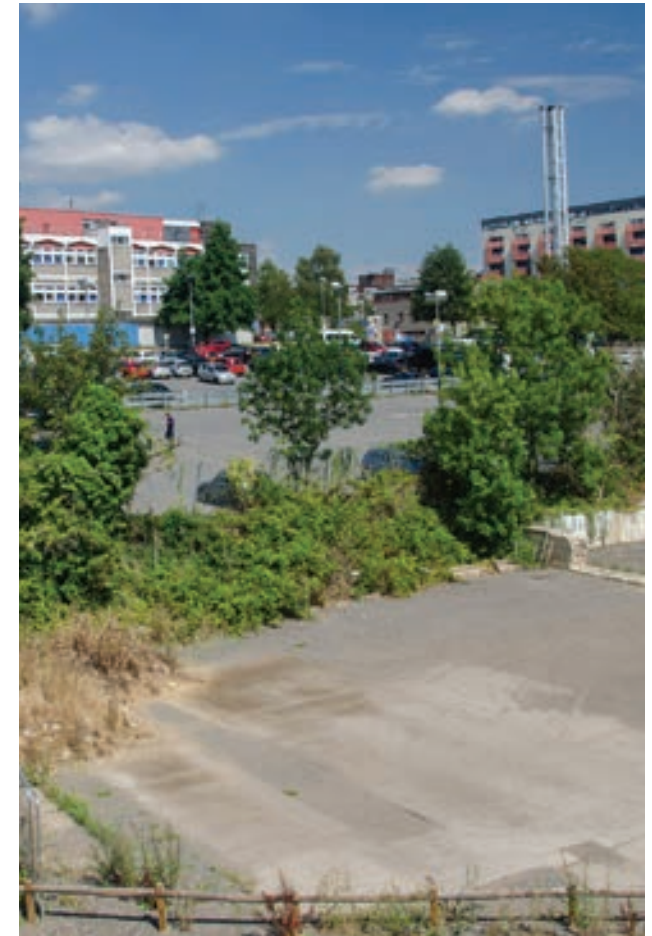
2.76 Part of the site includes the disused former Croxley Rail Line, a route safeguarded by Policy ST11.2 'Protecting and Enhancing Future Public Transport routes and Watford Junction Station Area as a Transport Hub'. This route will form part of a Mass Rapid Transport System linking Watford High Street 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.

Delivery of managing development

2.77 The constituent parts of the Colne Valley Strategic Development Area including the Lower High Street, Riverwell and the hospital/ stadium areas, will together contribute towards the wider regeneration of the Colne Valley. To support the coordinated delivery of development and achieving the objectives for the area the following mechanisms are either in place or will be prepared in the future:

- Riverwell will continue to deliver new homes and community facilities guided by an existing masterplan for the area developed by the Council in partnership with the private sector.
- The Lower High Street area extending from Watford High Street Overground Station to Bushey Overland Station consists of a mix of allocated sites and land that remains unallocated. A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Once adopted, development proposals will need to have regard to the masterplan. Applicants will be expected to demonstrate that their proposals will contribute towards the coordinated delivery of development, do not inhibit the delivery of other sites and do not compromise future development opportunities that could make a positive contribution towards the objectives for the area.

- The proposed new hospital is a distinct area within the Strategic Development Area that has outline planning permission. Once delivered, the existing hospital site will be able to support the delivery of new homes in the later part of the plan period. The Council will prepare appropriate guidance for the redevelopment of the surplus land.



Community infrastructure

2.78 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.

2.79 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.

2.80 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

2.81 Informed by the Tall Buildings Study, the base future building height in the area is up to five or 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 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, Lower High Street 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.

A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Once adopted, development proposals will need to have regard to the masterplan. Applicants will be expected to demonstrate that their proposals contribute towards the co-ordinated delivery of development, infrastructure and improvements to the public realm. Proposals should be designed to not inhibit the delivery of other sites or compromise future development opportunities that could make a positive contribution towards the objectives for the area.

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-use development. Where retail use is re-provided, this should not exceed the existing net retail floorspace on site;
- b) 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;

- c) A multi-storey car park with a capacity of approximately 1,450 car parking spaces located east of the existing Watford General Hospital car park;
- d) 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;
- e) 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;
- f) 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;
- g) 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;



Strategic Policy CDA2.3: Colne Valley Strategic Development Area



- h) 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;
- i) A new pedestrian and cycle crossing or underpass at Waterfields Way should be provided as part of the linear park along the River Colne;
- j) The Lower High Street should be prioritised for improved public transport and the creation of a shared surface route;
- k) Priority systems at junctions and crossings to improve access and permeability in the wider area for public transport, pedestrians and cyclists;

- l) Future development in the Core Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area, and where prepared, for individual sites;
- m) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessment for all sites to be submitted prior to the determination of any application.

The Colne Valley Strategic Development Area is defined on the Policies Map.





Chapter 3

Homes for a Growing Community



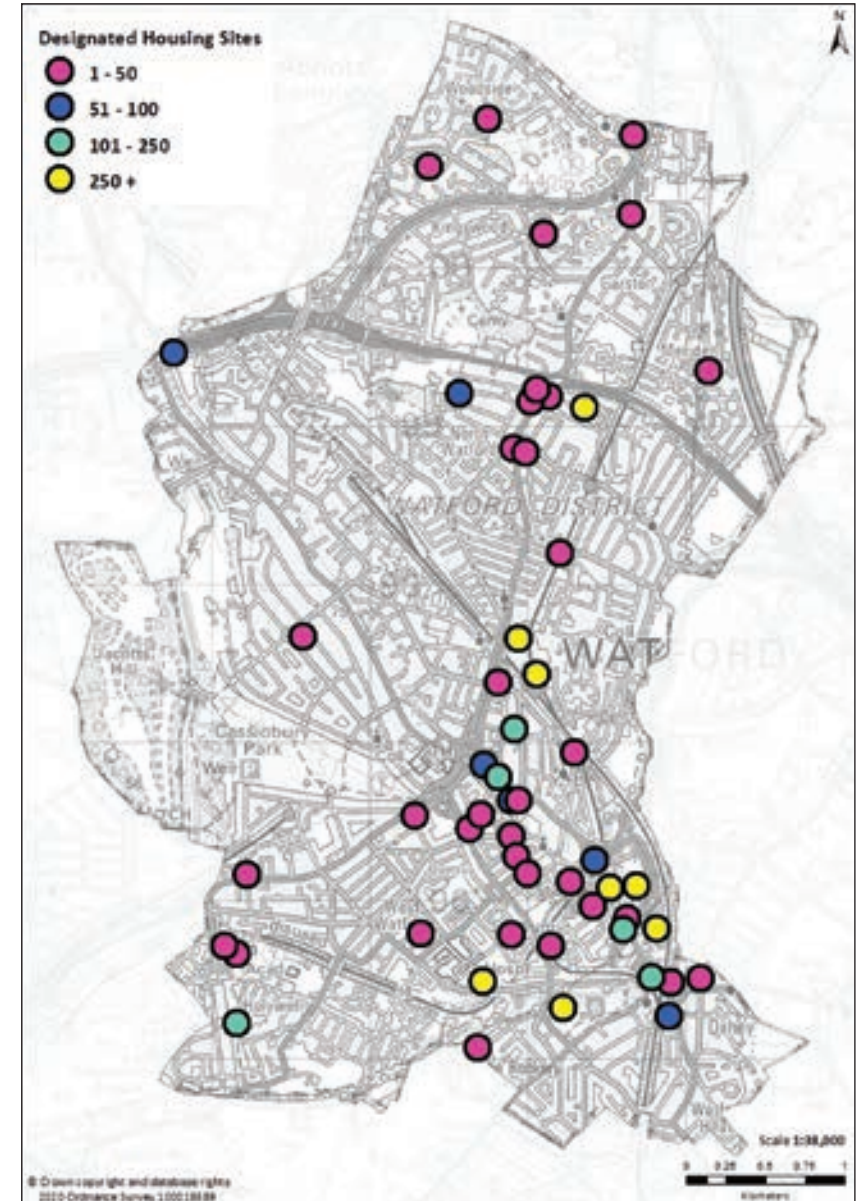
Homes for a Growing Community

- 3.1 The Spatial Strategy seeks to deliver at least 13,328 net additional new homes between 2021 and 2038. This is equivalent to the delivery of at least 784 new homes each year and forms the baseline figure to calculate the five year housing supply. The figures that make up the housing supply in the Local Plan is set out in Figure 3.1. Figure 3.2 provides an overview of site allocations for residential use and their distribution across the borough. For more detailed information about these sites, refer to Table 13.1 and for site boundaries refer to the Policies Map.
- 3.2 The Housing and Economic Land Availability Assessment (2021) 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 sites identified for development and 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.
- 3.3 The number of homes to be delivered on site allocations during the plan period is 8,604 units. This figure is the sum total of the indicative yields for all of the allocations as listed in Chapter 13 which are derived from the size of each site and standard density assumptions depending on its location. As of 1 April 2021, a total of 1,218 units on site allocations have been granted planning consent. These units are not included in the maximum of 2,507 units that could come forward on sites with extant planning permission as represented in Figure 3.1.

Figure 3.1 Housing figures in the Local Plan



Figure 3.2: Housing sites in the Local Plan



- 3.4 As part of the housing to be provided to 2038, a total of 2,217 homes are included in the housing supply as windfall. 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, 158 new homes per year over the plan period with the windfall contribution as part of the housing trajectory from 2024/25.
- 3.5 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.
- 3.6 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 2038 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.

- 3.7 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.
- 3.8 The commitments figure of 2,507, as quoted in Figure 3.1, assumes that all sites with planning permission on 1 April 2021, which are not site allocations in the Local Plan, will be developed. This means that any permissions which are not implemented will lead to a reduction in this source of supply. Since the adoption of the Core Strategy in 2013, the Council has seen an average annual lapse rate of 15%. If this rate was to be replicated across all permissions as of 1 April 2021, this supply of 2,507 dwellings would be reduced by 376 dwellings to 2,131 dwellings.



Strategic Policy HO3.1: Housing Provision



To meet housing need, at least 13,328 net additional homes, equivalent to at least 784 new homes per year, will be delivered, in Watford between 2021 and 2038. 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.

Site allocations for housing and mixed-use, where residential use would be supported, are defined on the Policies Map.



Housing mix, density and optimising use of land

Design-led schemes and housing density

3.9 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.

3.10 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

3.11 A 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.

3.12 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. This 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.

3.13 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.

3.14 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 of five dwellings or more 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

- 3.15 Affordable housing can refer to rented or sale properties and is defined by the National Planning Policy Framework (Annex 2). To best reflect affordable housing as a proportion of the total number of homes completed on a site, the requirement will be measured by habitable rooms. Applicants are encouraged to partake in pre-application discussions to determine the affordable housing mix early in the planning process.
- 3.16 The number of affordable housing units provided does not have to be equivalent to 35% of the total number of housing units proposed. The housing mix, in terms of size of units of the market and affordable elements of the scheme, can be varied so long as the number of habitable rooms provided as affordable accommodation is equivalent to 35% of the total number of habitable rooms in the proposed development.
- 3.17 Habitable rooms in affordable and market elements of a scheme should be of comparable size when averaged across the whole development. Applicants should present affordable housing figures as a percentage of total residential provision by habitable rooms and units to enable comparison as part of the housing schedule.



3.18 The distribution of habitable rooms can help deliver the type of affordable homes needed in the borough more effectively and contribute towards providing 20% family sized homes across the scheme as set out in Policy HO3.2 'Housing Mix, and Optimising use of Land'. Applicants are encouraged to engage with the Local Authority at an early stage to determine the housing mix of the affordable housing element of the scheme.

Type and size of affordable housing

3.19 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.

3.20 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'.

3.21 The National Planning Policy Framework requires a proportion of the total number of residential units to be provided for affordable home ownership. Therefore, the delivery of other types of affordable housing, including social rent, are to be applied once this threshold has been achieved.

3.22 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

3.23 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, of 10 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.

Where a viability assessment, undertaken in accordance with national planning policy and guidance, demonstrates particular circumstances that mean the affordable housing requirements set out in this policy cannot be met, 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 that a higher number of affordable units can be achieved on site, 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

3.24 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

3.25 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. To meet housing need, the proportion of affordable housing to be provided as Discounted Market Rent should be the same as required in Policy HO3.3 'Affordable Housing' (by habitable rooms). The minimum discount on the market rent units should be at least 20%, as required by Planning Practice Guidance. A discount greater than 20% will only be applied if demonstrated to be deliverable through an update to the Local Housing Needs Assessment.

3.26 In particular circumstances, a viability assessment may be acceptable to demonstrate that the Discounted Market Rent requirement is not achievable. Viability Assessments submitted as part of a planning application will be made publically available and robustly scrutinised by the Local Planning Authority.



3.27 Discounted Market Rent units should be fully integrated into the development, with no differences between these units and the market units, tenure blind.

3.28 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; and

f) Providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits in advance.

3.29 Discounted Market Rent units that are provided as affordable housing will be allocated to eligible households on Watford Borough Council housing register. Discounted Market Rent properties should be allocated in a manner agreed between the operator and the Local Authority.

Clawback agreements

3.30 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.

3.31 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 properties 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 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.

3.32 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. The discount on the market rent should be at least 20% having regard to the most up to date Local Housing Market Needs Assessment or other relevant evidence.

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; and
- 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.

Specialist care and supported living

3.33 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; and
- Residential care homes and nursing homes.

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 any special requirements should be incorporated into the design of a new building.





Policy HO3.5: Specialist Care and Supported Living



Proposals for new specialist care and supported living accommodation, as defined in the Glossary, will be supported.

Proposals that result in the loss of existing residential accommodation that provides specialist care and supported living will be resisted unless:

- 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; or
- c) Redevelopment would provide improved quality of specialist housing and facilities.

Proposals should be designed to include pick-up and drop-off facilities close to the principal entrance, that are able to accommodate specialist transport vehicles. To aid mobility, development should provide space for the storage of mobility scooters.

Should a proposal for new specialist care and supported living accommodation fall within Use Class C3, the proposals will be required to provide affordable housing consistent with Policy HO3.3 for that proportion of the scheme. This requirement will not be applied to proposals for new specialist care and supported living accommodation classified as being within Use Class C2.

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

3.34 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.

3.35 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.

3.36 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.

3.37 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

3.38 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 allocations and windfall sites, and proposals that include 50 or more non-flatted homes (excluding affordable housing) will be required to provide 10% of plots for such development.

3.39 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 on the open market, including those registered on the Council's Self-build Register.



Policy HO3.7: Self-build and Custom Housebuilding



Residential proposals for 50 non-flatted homes or more (excluding affordable homes) will be supported where they provide one self-build plot for every 10 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 a plot has been offered to people on the Council's Self-build Register and the open market and marketed for a minimum of 12 months from the commencement of development on the site and has not been sold, then the plot will be returned to the developer.



Gypsies and Travellers

3.40 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.

3.41 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.

3.42 The assessment found that 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.

3.43 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

3.44 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

3.45 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.

3.46 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 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 10% 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 into 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

3.47 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

3.48 New housing is an opportunity to improve 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

3.49 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.

3.50 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.

3.51 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.



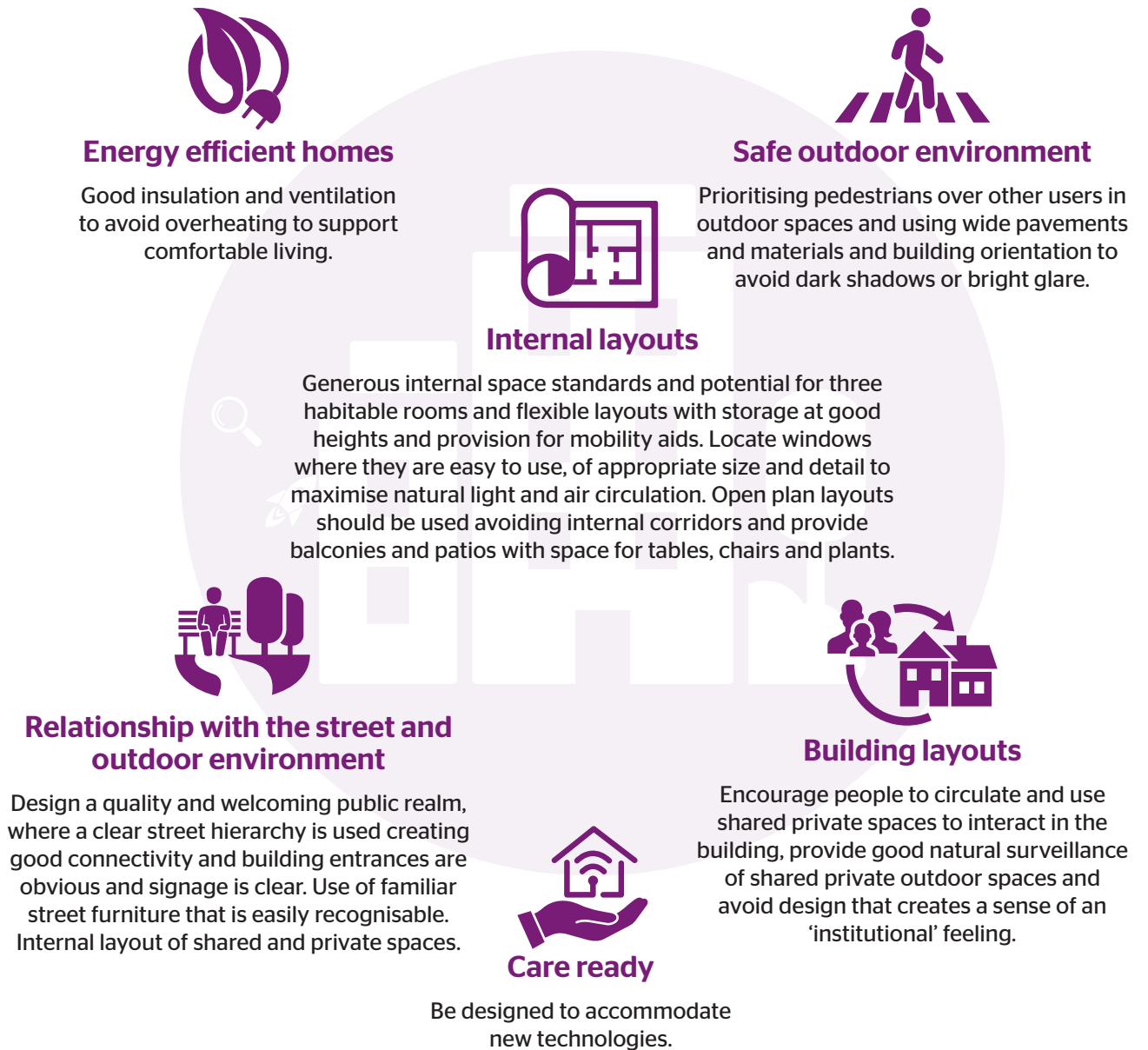
Dementia Friendly homes

3.52 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 2038. This is recognised locally by Watford Borough Council, having declared their intention to be a 'Dementia Friendly Town' in 2019.

3.53 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 Design Standards for Healthy, Accessible and Adaptable 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 4% 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 are to be designed to support someone living with dementia by having regard to the 'Dementia Friendly design principles' set out in Figure 3.3.

Homes designed to be M4(3) compliant can also be designed to be 'dementia friendly'. Where such homes are provided, they will contribute towards both the M4(3) and 'dementia friendly' home requirement.

Private and communal open space

Private open space

3.54 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.

3.55 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.

3.56 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.

Shared private amenity space

3.57 While private amenity space in the form of balconies provides space for residents of the property, these will be small and generally not suitable for gatherings of people or recreational use. Shared private amenity space on site can enhance the quality of a scheme and support residents by providing areas to socialise and use for recreation purposes.

3.58 Apartment schemes should provide high quality shared private amenity space on-site that is accessible to all residents unless it would not be possible or appropriate to do so. The use of roof areas, including podiums and courtyards for additional private or shared amenity or garden space is supported and should be considered in the wider context of the scheme, in terms of the opportunities and constraints of a site.

3.59 Where shared private amenity space is provided, it should be designed to be accessible to all residents and provide places to sit, play and exercise. Where provision is catering for families in the development, informal play space, and as appropriate, equipped play space should be integrated into the shared space. 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, shared private amenity space should be designed into the scheme so as not to be overshadowed or suffer low levels of daylight.



Policy HO3.11: Private and Shared Private Amenity Space



Private Amenity Space

All new homes should be provided with private outdoor amenity space that meets the following minimum standards:

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

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.

Shared Private Amenity Space

The provision of shared private outdoor amenity space, including roof and terrace space, will be supported. Residential development comprising 10 or more flats should provide shared private outdoor amenity space that is high quality and accessible to all residents unless it would not be possible or appropriate to do so.





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 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. Figure 4.1 reflects designated employment areas as defined on the Policies Map. For information about site allocations for employment uses, or that have an element of employment use, refer to Tables 13.2 and 13.3 in Chapter 13.
- 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. For Watford, the study suggested there was a need for 37,600sqm of office floorspace and 98,400sqm of industrial floorspace. Reflecting the strengths and opportunities across South West Hertfordshire and Watford to contribute towards this requirement, Watford has planned for 85,488sqm of office floorspace and 25,206sqm 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 The Council will continue to work with neighbouring authorities in the South West Hertfordshire Functional Economic Market Area to deliver the shortfall of industrial that cannot be provided in Watford over the plan period.

Figure 4.1: Areas designated for office and industrial uses

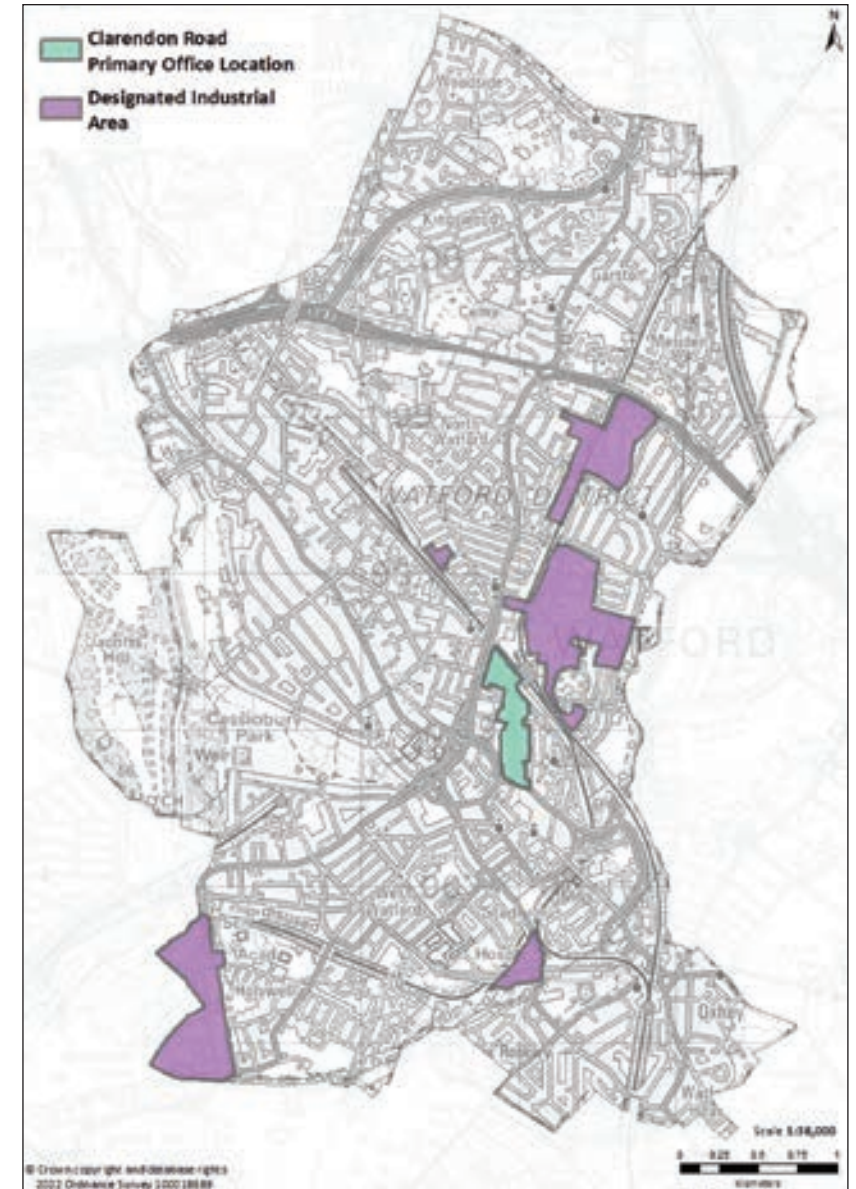
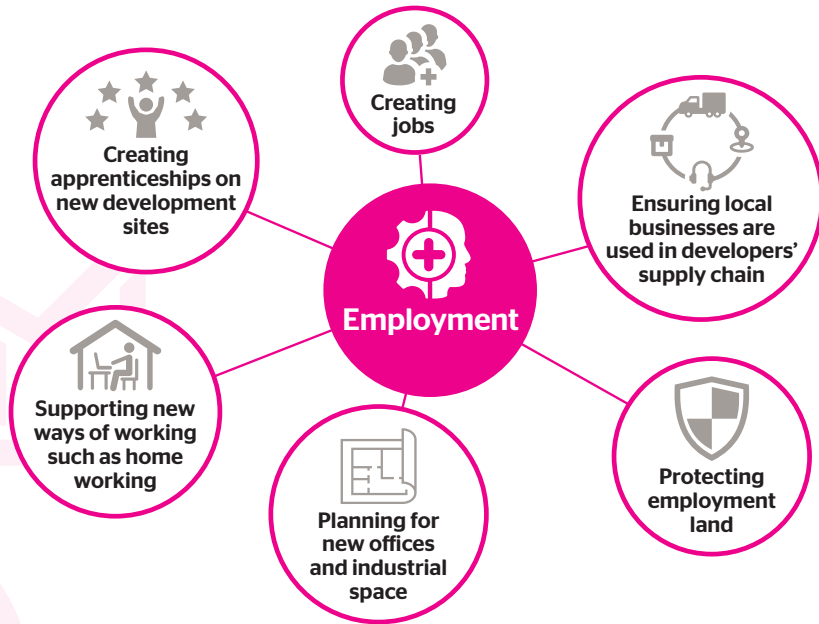


Figure 4.2: Role of employment policies



- 4.6 Providing more office floorspace than required for Watford can support our neighbouring authorities in meeting their need, provide high quality office floorspace to replace ageing 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.
- 4.7 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).
- 4.8 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 the employment needs in Watford and contribute towards the strategic employment requirements of South West Hertfordshire, the Local Plan makes provision for 25,206sqm net additional industrial floorspace (Use Classes B2, B8, E(g)(ii) and E(g)(iii) and 85,488sqm of net additional office floorspace (Use Class E(g)(i)). To meet these targets, the Local Plan will seek to prevent the net loss of 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.

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.

Site allocations for employment and mixed-use development, where employment uses would be supported, are defined on the Policies Map.

Designated industrial areas

4.9 Watford contains five industrial areas hosting 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 2038.

4.10 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.

4.11 While any new industrial floorspace could be dispersed across the borough, the co-location 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.

4.12 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.

4.13 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.

4.14 Development should also have regard to the Hertfordshire 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

Summary of industrial floorspace provision 2021-2038	Floorspace provision (sqm)
South West Hertfordshire requirement	481,500
Watford requirement	97,400
Provision through site allocations	12,799
Provision on sites with planning permission	12,407
Total industrial floorspace provision in the Local Plan	25,206



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. Proposals that would incur a net loss of industrial floorspace will be resisted unless the new use would avoid compromising the industrial activities in the area, and:

- 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

- 4.15 The professional service industry is the largest sector of employment in Watford and accounts for 14% of jobs, with these types of businesses often being office based.
- 4.16 The majority of Watford's offices are clustered around Clarendon Road, which functions as Watford's Primary Office Location. 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.
- 4.17 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.

- 4.18 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.

Table 4.2: Future office floorspace supply

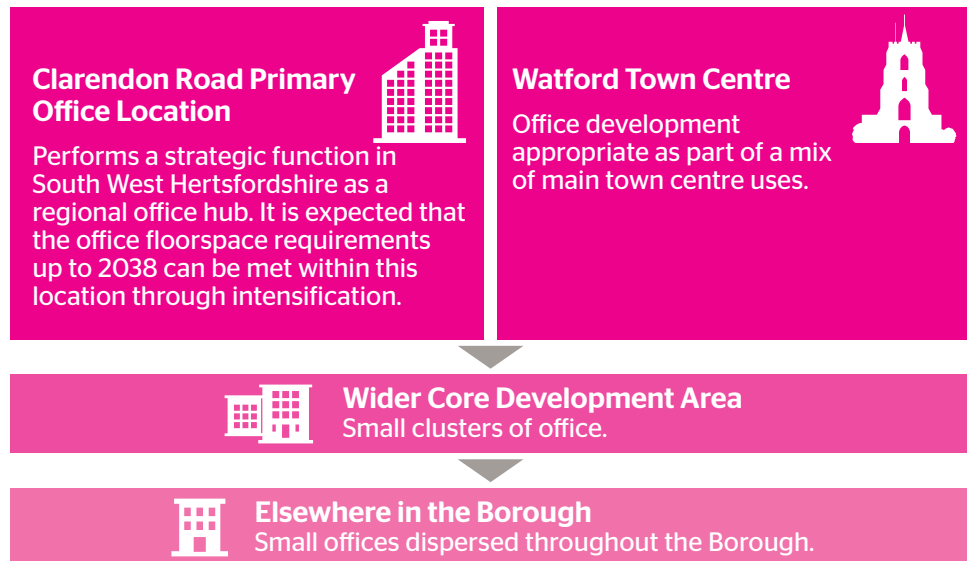
Summary of office floorspace provision 2021-2038	Floorspace provision (sqm)
South West Hertfordshire requirement	188,000
Watford requirement	37,600
Provision through site allocations	19,428
Provision on sites with planning permission	66,060
Total office floorspace provision in the Local Plan	85,488



4.19 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 employment function.

4.20 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 and the town centre, followed by the wider Core Development Area. 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, defined within the office Use Class E(g)(i), 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 they safeguard the commercial role and character of the Clarendon Road Primary Office Location, and:

- 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 and other uses that are consistent with the type of development and the objectives for the area, will be supported where there is no net loss of office floorspace and a predominantly active commercial frontage is maintained onto Clarendon Road that reinforces the commercial character of the area.

Proposals for development of new office uses outside the Clarendon Road Primary Office Location must support the Office Development Hierarchy. Proposals are also 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

4.21 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 Rights 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.

4.22 In the first instance, new offices should be directed to the Clarendon Road Primary Office Location and the Town Centre, 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.

4.23 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;**
- 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;**
- 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

4.24 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.

4.25 Small and medium-sized enterprises (SMEs) dominate the working base in South West Hertfordshire and account for 99.6% of all private 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.

4.26 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

4.27 It is important that when new development comes forward, it benefits local people. Developer contributions are sought to ensure that the required infrastructure is provided 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.

4.28 There are high levels of deprivation in parts of the borough, including the fifth most deprived area 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.

4.29 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.

4.30 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

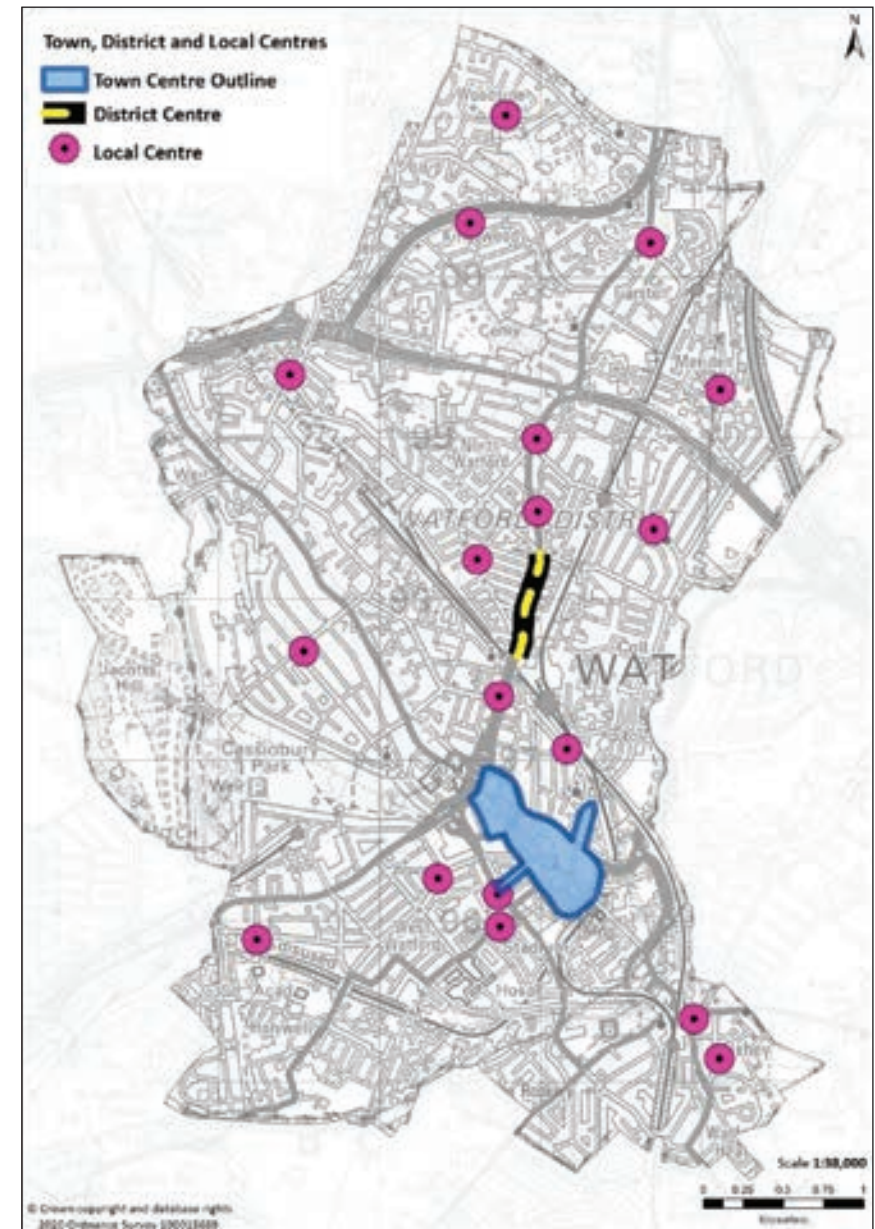
A Vibrant Town



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 reducing the need for people to travel.
- 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. Figure 5.1 indicatively shows where the Town Centre, District Centre and Local Centres are located in the borough. For more detailed information such as the spatial coverage of these designations, refer to the Policies Map where these are defined.
- 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 the 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 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.

- 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 floorspace 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 retail, leisure, entertainment, arts, culture, office and other main Town Centre uses (as defined in the NPPF) 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 Watford Town Centre, the Council will apply sequential tests for the main Town Centre uses, and require impact assessments for retail and leisure developments over 2,500sqm, in accordance with national planning policy.

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, impacts 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.

The Town Centre, District Centre and Local Centres are defined on the Policies Map.



Figure 5.2: Components of a vibrant town



Retail Hierarchy

5.11 The Retail Hierarchy focuses on 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
Town Centre	Watford Town Centre	Watford Town Centre performs a role as a sub-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.



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 (Use 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; planning 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, planning 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) Retain a separation of at least four units between each hot food takeaway unit; and
- g) Protect the amenity of surrounding properties.

The District Centre and Local Centres are defined on the Policies Map.





Chapter 6

An Attractive Town

An Attractive Town

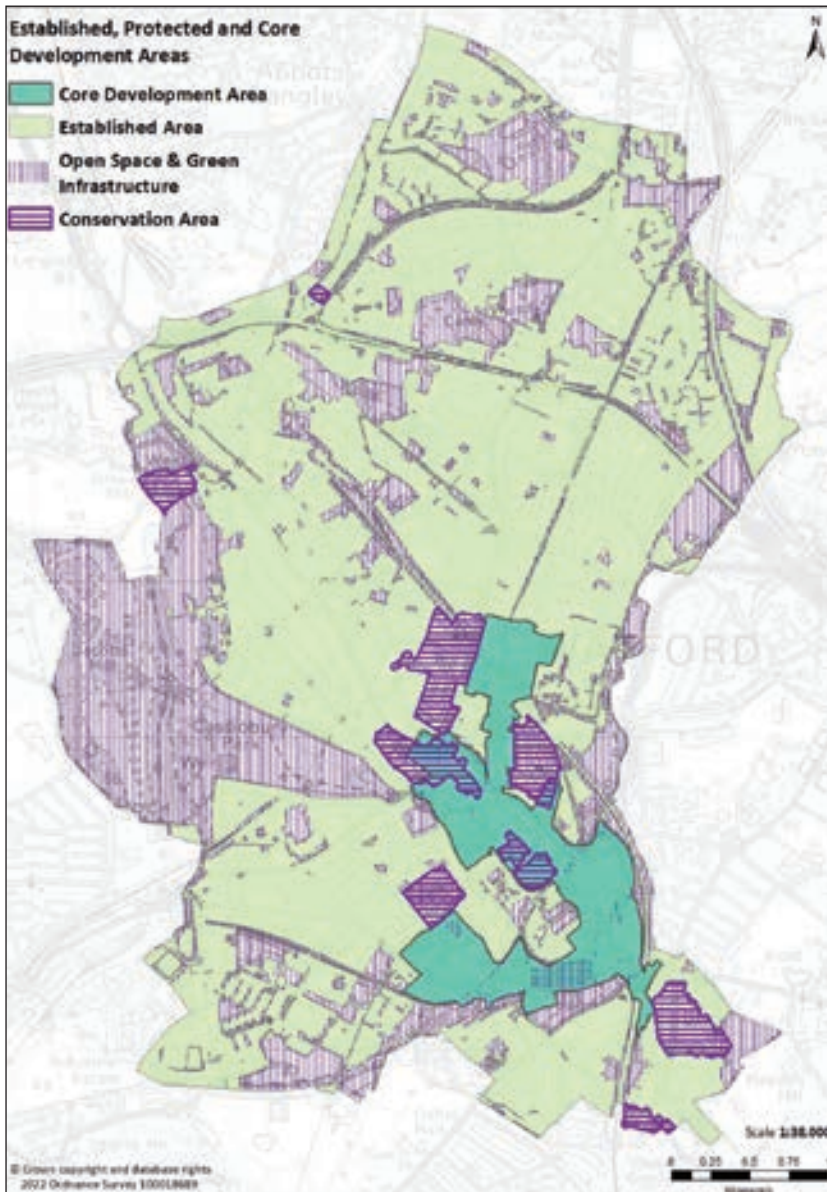
- 6.1 The Spatial Strategy identifies areas of the town where transformational change is appropriate, areas where the scale of change is lower and some areas where very little change is expected. Within Watford's urban fabric there are existing areas of distinctive and high quality character, which should 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 also take account of Supplementary Planning Documents and 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.



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). These maps are to provide context about Policy QD6.1, however, they are not intended to set out policy requirements. Areas identified are defined on the Policies Map and this should be referred to as part of the decision-making process.





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 outstanding 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

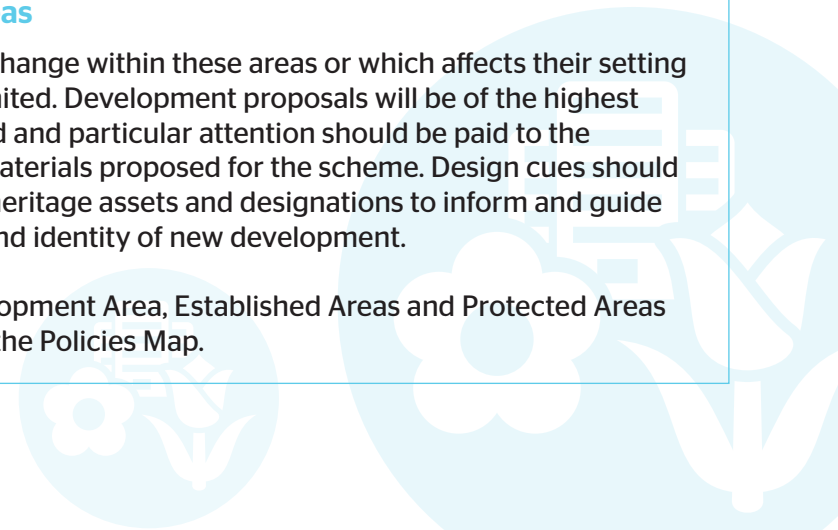
This includes all areas that lie outside the Core Development Area and the Protected Areas. The degree of change will be more limited than in the Core Development Area but is expected to result in a gentle uplift in the density of the area. Development proposals in these areas should be led by the existing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

The Core Development Area, Established Areas and Protected Areas are defined on the Policies Map.



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 and 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 the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document or any subsequent replacement document that sets out important local views.





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 greenspaces.



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



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.



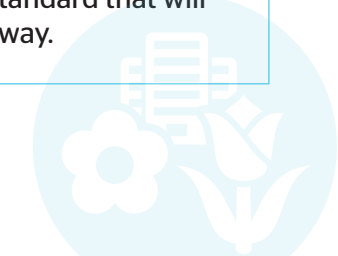
Movement and connectivity

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, having regard to the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document or equivalent future guidance. 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 outstanding standard that will improve the distinctiveness of Watford in a positive way.



Public realm

6.9 A 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 with 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.

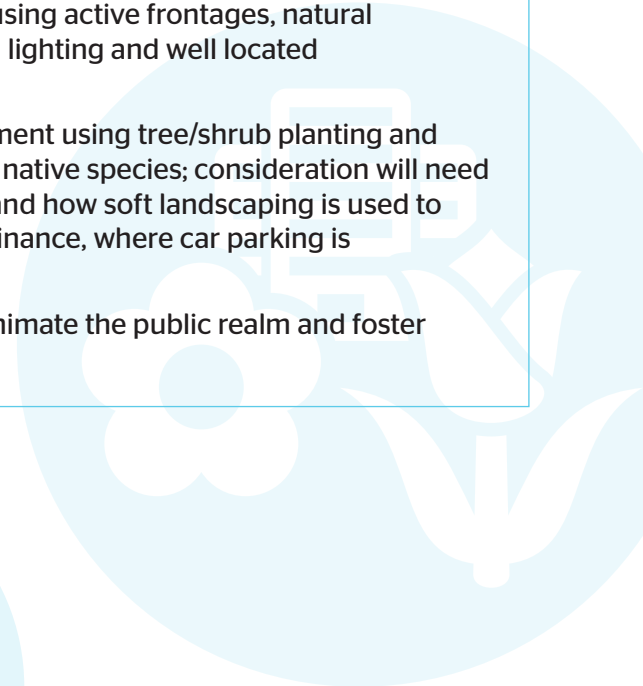


Policy QD6.3: Public Realm



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 façades 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 overlooked 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. Planning applications for new 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 building 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 building, visible from the building 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 Shared Private 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 that 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.

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.;

i) Buildings should be designed to promote the use of stairs through locating the stairwell in a prominent and easily accessible location within the entrance core of the building, providing a well-lit and spacious internal space which allows social interaction as well as being comfortable for residents to walk up and down and to pass one another.

j) Secure cycle parking should be provided in easily accessible and convenient 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:

k) 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;

l) 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;

m) Secure provision for parcel receipt and storage should be provided on site; and

n) The location of drainpipes, gutters and pipes for services and utilities should be integrated into the wider design, to avoid a cluttered appearance.



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 be designed so that the primary access for each individual unit is directly on to 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;

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;

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 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.
- 6.25 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 to development and excellent access to public transport; strengthening the role of Clarendon Road as a gateway to 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 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 Tall Buildings Study:

• **Suitability:** Proposals should demonstrate their suitability in relation to excellent public transport and cycling accessibility, proximity to town centres or local facilities, access to greenspaces 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 'Conserving and Enhancing the Environment') and sustainable transport (Chapter 11 'Sustainable 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').

Outstanding 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 outstanding design quality, high quality living environments and public benefits for the town and community.

6.29 To ensure taller buildings are of outstanding 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.



6.30 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. Proposals should be able to demonstrate that these benefits 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) Enhanced provision of affordable housing and a good mix of dwelling sizes which reflect the identified housing needs;
- b) Enhanced provision of infrastructure, including public transport, cycling and walking infrastructure and social infrastructure to support community 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 and reinforce positive elements of local character and deliver a recognisable and distinctive local 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 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 (Figure 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

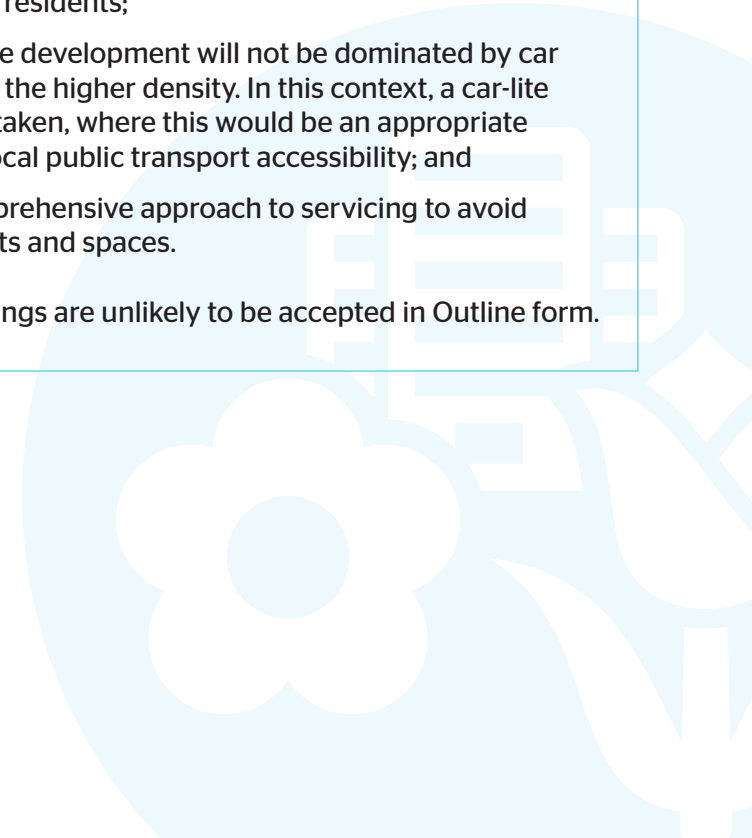


Proposals for buildings that exceed the base building height set out in Table 6.1 will be classified as a taller building.

Proposals for taller buildings should clearly demonstrate:

- a) Outstanding 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, as set out in paragraph 6.30, 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 having regard to Skyline: Watford's Approach to Tall Buildings Supplementary Planning Document or any subsequent replacement document;
- 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; and
- 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 provides an overview of where heritage assets are located in the borough. This map is for context purposes and for more detailed information about specific areas and sites covered by policies refer to the Policies Map. Some key elements of the town's heritage include:

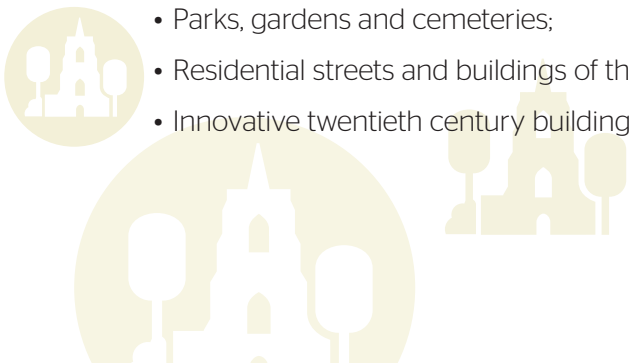
- Surviving buildings from the medieval core of the town (St Mary's Church, Almshouses, Fuller Free School);
- 18th Century town houses (Frogmore House , 97 High Street, Little Cassiobury and Watford Museum);
- Industrial heritage;
- Parks, gardens and cemeteries;
- Residential streets and buildings 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 that protect and enhance the significance, character and setting of heritage assets that may be affected by the development will be supported.



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

- Conservation Areas Management Plan;
- Conservation Area Character 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 that are allowed under Permitted Development Rights and which would erode the significance of those assets.
- Extensive Urban Survey Project Assessment Report (Hunns for HCC) 2000;
- List of Freestanding Assets.

7.6 Proposals for new development that involve heritage assets or their setting should be accompanied by supporting material that 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 they 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 improve 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 that 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 structures 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



When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the conservation of the asset. Any harm to, or loss of, significance will require clear and convincing justification in accordance with national policy.

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 that are not formally designated as heritage assets. The National Planning Policy Framework identifies these as non-designated assets.
- 7.17 Non-designated assets include a range of buildings, monuments, sites, places, areas or landscapes which have heritage value and should be considered in determining planning applications. These can either be identified as part of the planning process, through neighbourhood plans, conservation area appraisals, be on the Watford Local List or other documents identified in paragraph 7.5.
- 7.18 Many of these are identified in the List of Buildings of Local Interest, which includes freestanding structures, and many places, areas and landscapes in the town are included in conservation areas and are therefore, considered as designated assets.
- 7.19 Non-designated assets that are not yet identified and that come to light during the preparation of proposals for a site will be taken into account following guidance set out by Historic England so that proportionate weight can be given in the decision-making process. Other assets that are identified through processes such as neighbourhood plans or

local history research will be reviewed and recognised as non-designated assets.

- 7.20 Watford's Local List identifies historic buildings and features that are valued by the local community. When planning permission is required for any proposal that 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. As part of a planning proposal, applicants should provide an explanation regarding the social and historic context of the heritage asset and how the proposal has responded to this. This should follow guidance set out in the National Planning Policy Framework and guidance provided by Historic England.
- 7.21 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 that are logged on the Historic Environment Record database.
- 7.22 Proposals should be of a design and scale that preserves or enhances the features that 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.

Archaeology

- 7.23 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.
- 7.24 Where a development 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.
- 7.25 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.
- 7.26 Arrangements should be made to store a copy of any reports and other materials that arise from archaeological investigations in relation to development proposals in a location agreed with local planning authority that is publicly available.



Policy HE7.3: Non-designated heritage assets



To preserve and enhance the character, appearance and setting of non-designated heritage assets, all planning applications that affect non-designated assets 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.
- c) Monuments with heritage value will be protected and proposals should consider how they will respond to the retention and enhancement of the structure and its setting in situ or as appropriate.
- d) Identified sites with places and landscapes with heritage value will be protected, and proposals will be required to demonstrate how they are positively contributing towards the heritage value to enhance local distinctiveness. Assets which come to light during the course of an application will need to be properly assessed and recommendations reflected in the details of the proposal.

Where other non-designated assets that 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.



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 and secured through planning conditions.



Chapter 8

A Climate Emergency

Sustainable construction and resource management

- 8.1 The Climate Emergency Declaration made 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).
- 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, particularly those located within the Core Development Area, that could benefit from the scale and density of development anticipated to take place during the plan period, should maximise opportunities to do so. This may include low-carbon and renewable energy schemes that could be integrated into a development and consideration of how the design and management of a scheme could make effective use of materials and reduce waste.
- 8.4 To be most effective, minimise costs and avoid time delays, applicants should consider sustainable principles from the start of the design process.





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. New development will need to demonstrate how it is contributing positively towards:



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.



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.



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 should aim 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 should 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.



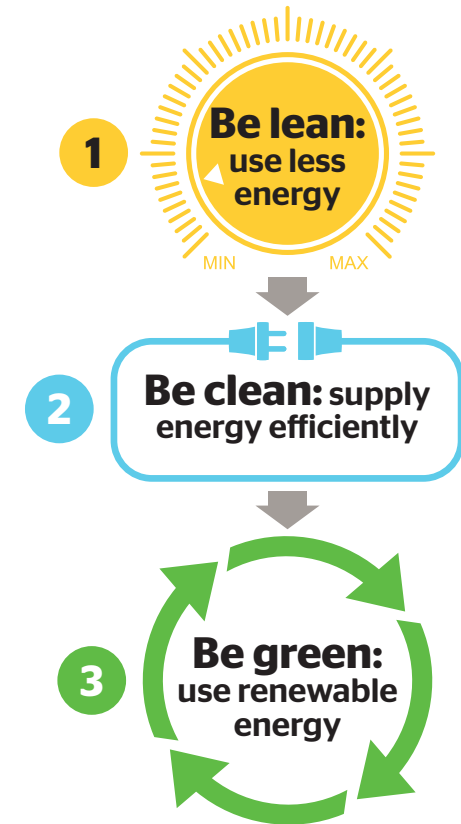


Policy CC8.2: Sustainable Construction Standards for Non-residential Development

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 aim to achieve BREEAM excellent standard.

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, residential developments should:

- a) Be designed so they can be adapted to be carbon neutral;
- b) Avoid overheating and use passive ventilation when possible; and
- c) Achieve a 19% improvement for carbon emissions over the target emission rate (TER) as set out in National Building Regulations Part L (2013), or any updated government standards, whichever results in a higher target.

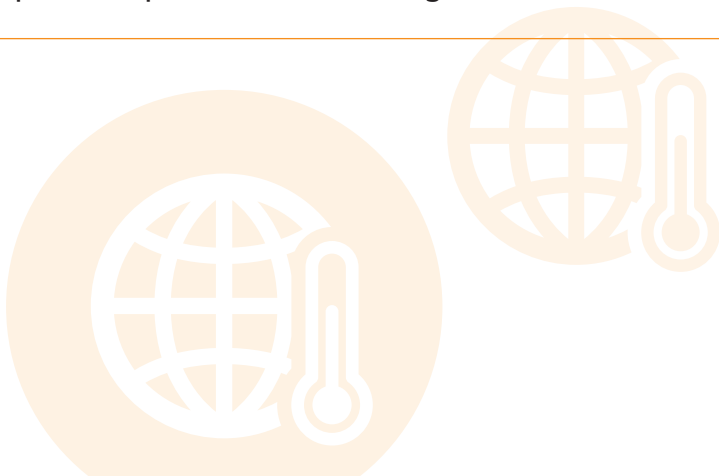
Proposals that do not meet the energy efficiency target will only be supported if it is unfeasible and a financial contribution is made towards the Carbon Offset Fund to provide equivalent carbon savings off site.

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.



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, supported living and health facilities. Air pollution also has potential to have increased impact 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 possible impact of new development upon air quality is 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 minimises emissions that would contribute towards a worsening of existing air quality and 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.

All major developments and other forms of development that are considered to be at risk of impacts resulting from significant emissions or pollutants will need to consider air quality. 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. Proposals will be required to consider the cumulative impacts in conjunction with other developments in the vicinity and include mitigation measures where necessary.

- a) Where 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;
- 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 '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, 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

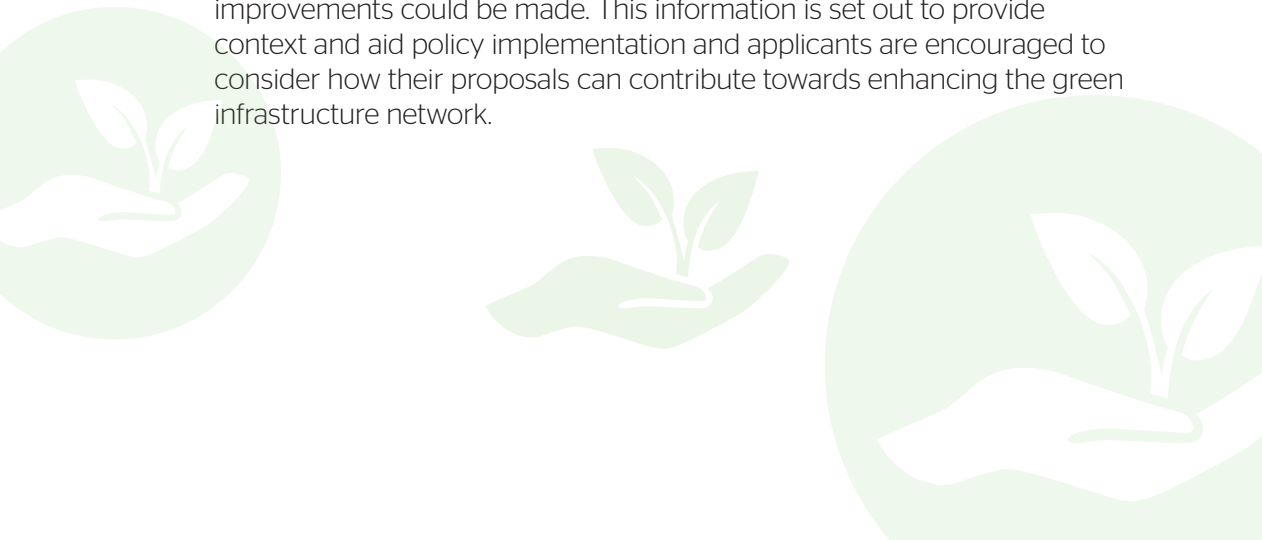
Conserving and Enhancing the Environment



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.
- 9.3 The content of Figure 9.1 reflects the green infrastructure and open space network as defined on the Policies Map. The opportunity areas and strategic/local links demonstrate how important elements of the green infrastructure network are connected and help to show where improvements could be made. This information is set out to provide context and aid policy implementation and applicants are encouraged to consider how their proposals can contribute towards enhancing the green infrastructure network.

Figure 9.1: Green and Blue Infrastructure in Watford





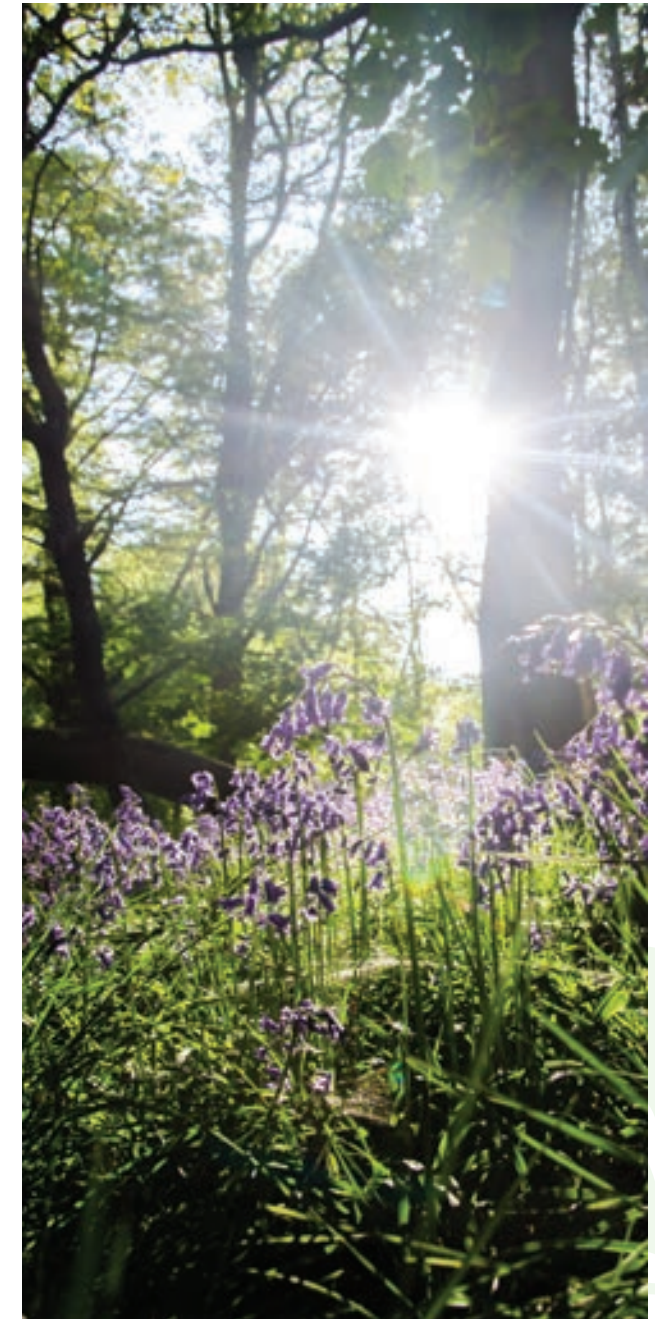
Strategic Policy NE9.1: The Natural Environment



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 development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, following the 'Mitigation Hierarchy' of avoidance, mitigation or compensation;
- 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;
- e) Reducing the risk of flooding, including surface water flood risk;
- f) Bettering access to open space across the borough where there is an identified need and delivering new greenspaces as part of new development;
- 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) Improving the quality of Watford's existing open spaces through development contributions;
- i) Ensuring that protected species and their habitats are a material consideration when determining planning applications;
- j) Protecting trees and encouraging native planting on new development; and
- 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.

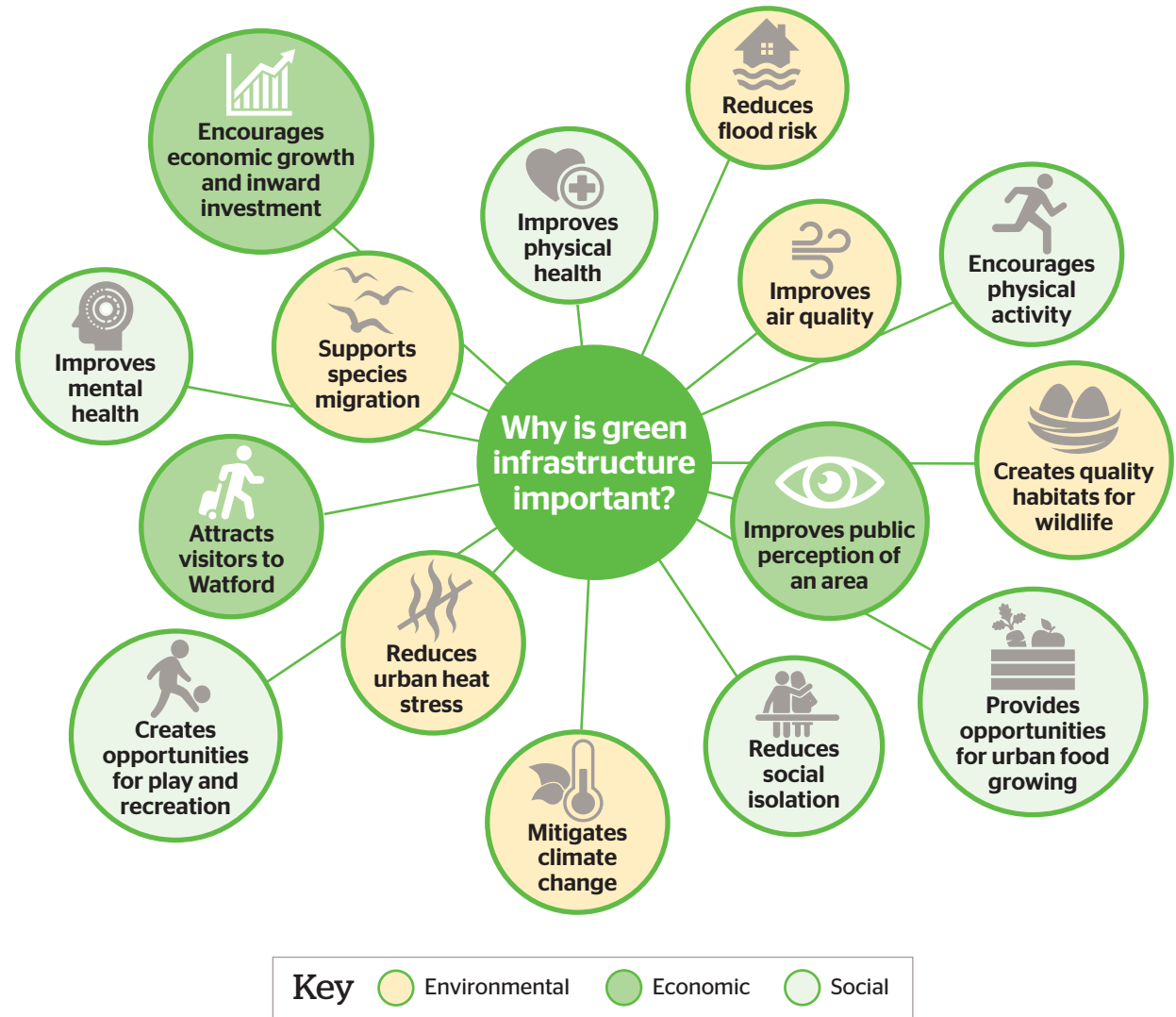


The green infrastructure network

9.4 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.

9.5 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 greenspaces, 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



9.6 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.

9.7 Trees also make an important contribution to biodiversity and should be protected where possible to support the government’s emerging England Tree Strategy (Department for Environment, Food and Rural Affairs 2020). 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.

Existing trees, woodlands and hedgerows should be retained wherever possible. If loss is demonstrated as being unavoidable, appropriate replacement or compensation will be required with native species being prioritised.

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

Green infrastructure as defined on the Policies Map will be protected.



The blue infrastructure network

9.8 The Grand Union Canal, the River Gade and the River Colne all flow through Watford and form the borough's blue infrastructure network. The rivers 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 (European Parliament & Council, 2000) also sets an objective to improve these watercourses to 'good' status by 2027.

9.9 During the plan period, there is expected to be new development occurring close to watercourses in Watford. 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 in creating successful places.

9.10 New development also presents an opportunity to enhance the quality of watercourses, to support them achieving the 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.

9.11 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.

9.12 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 (Environment Agency, 2021). Culverts also contribute to an increased risk of blockage, which in turn, increases flood risk. As new development comes forward, it is important that de-culverting and 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.

9.13 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. Proposals should be accompanied by a management plan;
- b) Conserve and enhance the biodiversity value of the watercourse and its corridor by including Water Framework Directive action measures within the proposal. Action measures could include but are not limited to, in-channel enhancements, the creation of priority wetland habitats, addressing misconnections and the eradication and management of Invasive Non-Native Species;
- c) Enhance the role of 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 Water Framework Directive assessment should be submitted as part of proposals and should include an assessment of the works needed to prevent future flooding, in addition to how the proposal will impact Water Framework Directive 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 Zones 2 and 3 are defined on the Policies Map.



Flood risk and groundwater management

9.14 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

9.15 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.

9.16 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 their 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

9.17 The River Colne basin is designated as Groundwater Source Protection Zone 1, the 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 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

9.18 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.

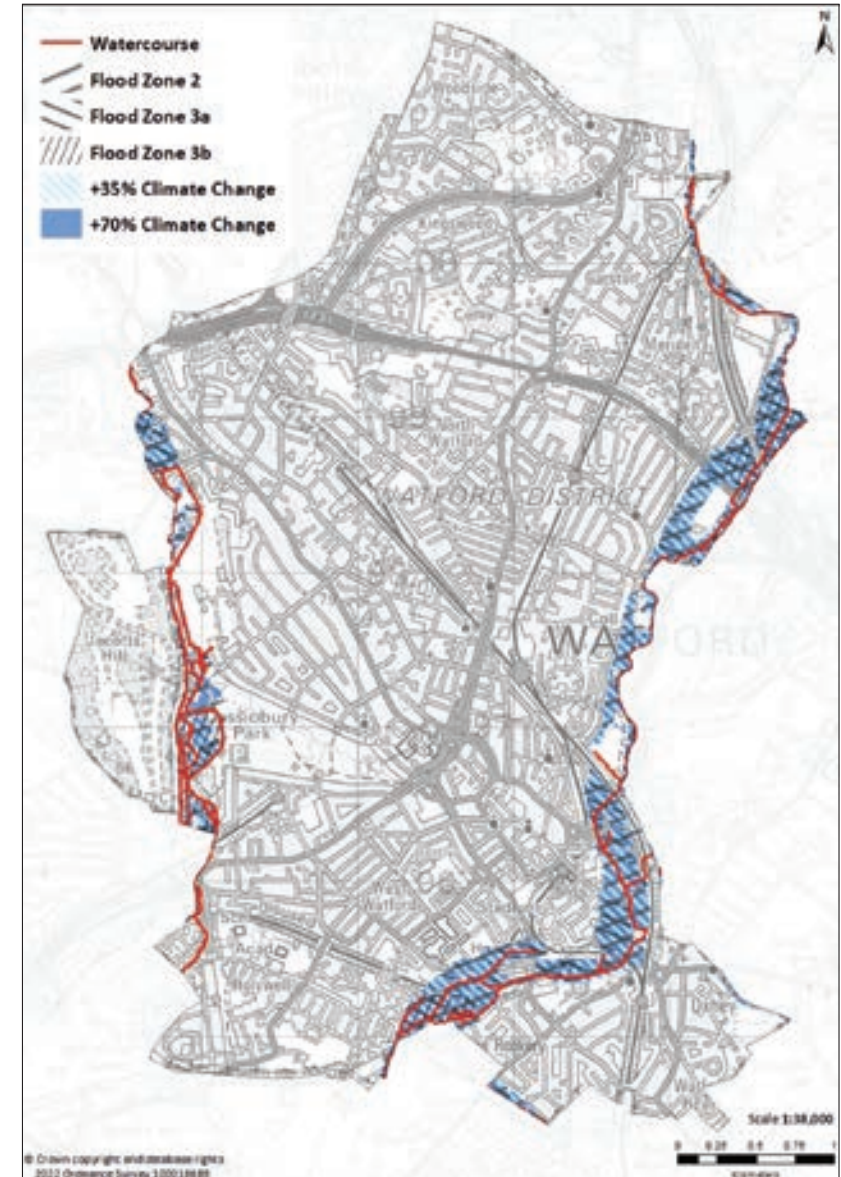
9.19 Developments located in Flood Zones 2 or 3 are encouraged to have early and ongoing discussions with the Environment Agency (EA) and Lead Local Flood Authority to ensure proposals comply with their requirements. New residential developments should be designed to withstand a 1-in-100 year flood, 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

9.20 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.

9.21 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.

Figure 9.3: Flood Zones with climate change allowances in Watford





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 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 demonstrate that suitable flood compensation storage 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 eight 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 eight 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 must be maintained, repaired or replaced by the developer for the lifetime of the development. For any development within eight 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), 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. Certain discharges into the ground may require an Environmental Permit.

Surface water management

9.22 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).

9.23 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

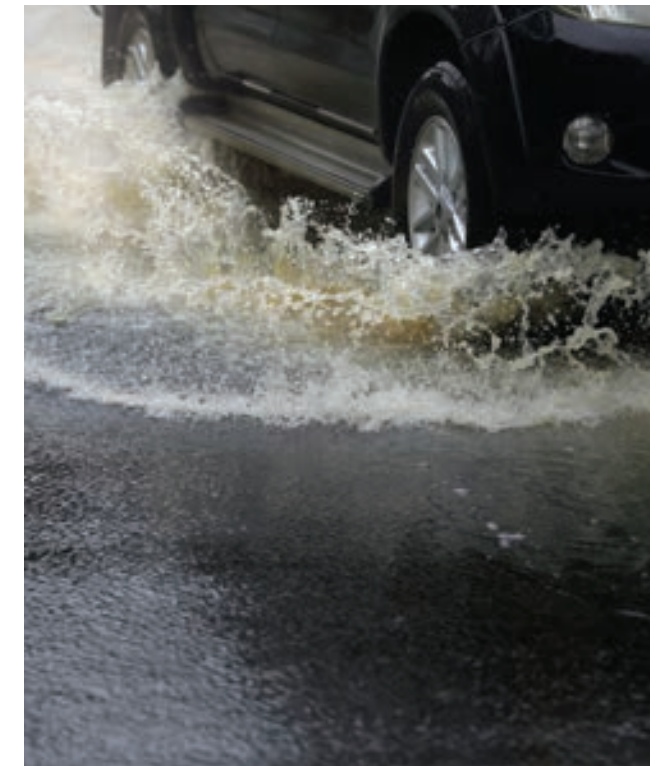
necessary to ensure Sustainable Drainage Systems are effectively designed, maintained and monitored.

9.24 The quality and effectiveness of 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. This hierarchy was prepared by Greater London Authority. From preferable, to least preferable:

- a) store rainwater for later use;
- b) use 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.

9.25 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.

9.26 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.





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.

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 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

9.27 Watford's open spaces are a great source of pride for local communities. The award-winning parks are not the only types of greenspaces that Watford's residents can enjoy, as the borough contains a wide variety of facilities. From allotments to playing pitches, they each 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, along with contributing towards flood risk management schemes and Sustainable Drainage Systems.

9.28 Everyone living, working in and visiting Watford should have access to high quality open space and sports and recreation facilities. The types of facility provided and protected through new development should reflect locally identified needs. This can help to avoid deficiencies in different facilities, and to ensure that sites are being effectively used. Watford's open spaces are not evenly distributed across the borough with some communities deficient and in need of improved access to recreational areas. Alternatively in some neighbourhoods there may be opportunities where alternative typologies 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 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.

Open space and ancillary facilities used for leisure and recreation, as defined on the Policies Map, will be protected.

Providing new open space

9.29 As new development comes forward, there may be opportunities to provide new publically accessible open space on site. The different types of publically accessible open space have been defined in the Watford Green Spaces Strategy and include the following:

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

9.30 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 typology. Where a development does not lie within the catchment distance of an open space, it will be imperative that, wherever possible, this is provided on site to reverse the deficiency.

9.31 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.

9.32 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 typologies such as allotments or semi-natural areas, where opportunities exist to enhance the green infrastructure network and support local residents.

9.33 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 major development 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 obligations.

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

9.34 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.

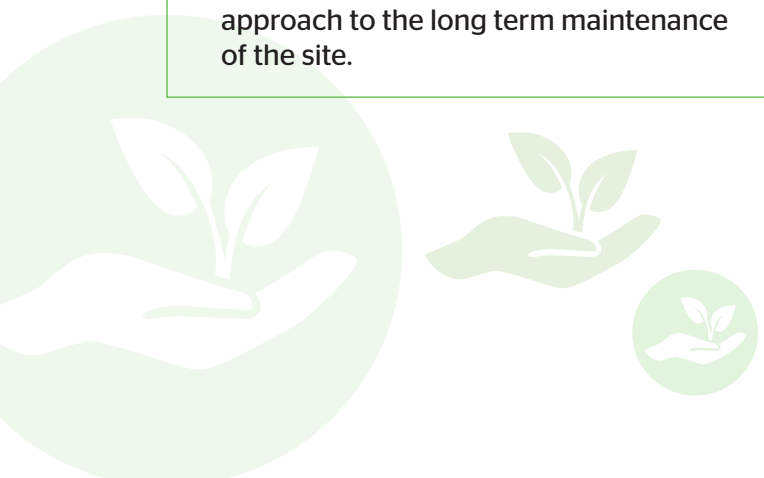
9.35 The sustained loss of green infrastructure and the breaking up of its networks can have a damaging effect on ecosystems in Watford. Inappropriate development could threaten the future of different species through habitat fragmentation and the loss of habitats. Given development pressures, it will be 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.

9.36 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.

9.37 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

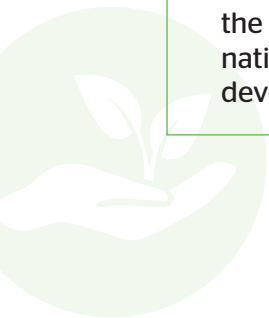


New development should seek to achieve an overall net gain in biodiversity. This must be measured through the use of the latest Defra Biodiversity Metric. The Biodiversity Metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.

Development should apply the Mitigation Hierarchy to 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 a protected species or habitat is found to be 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 this 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 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 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, 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:

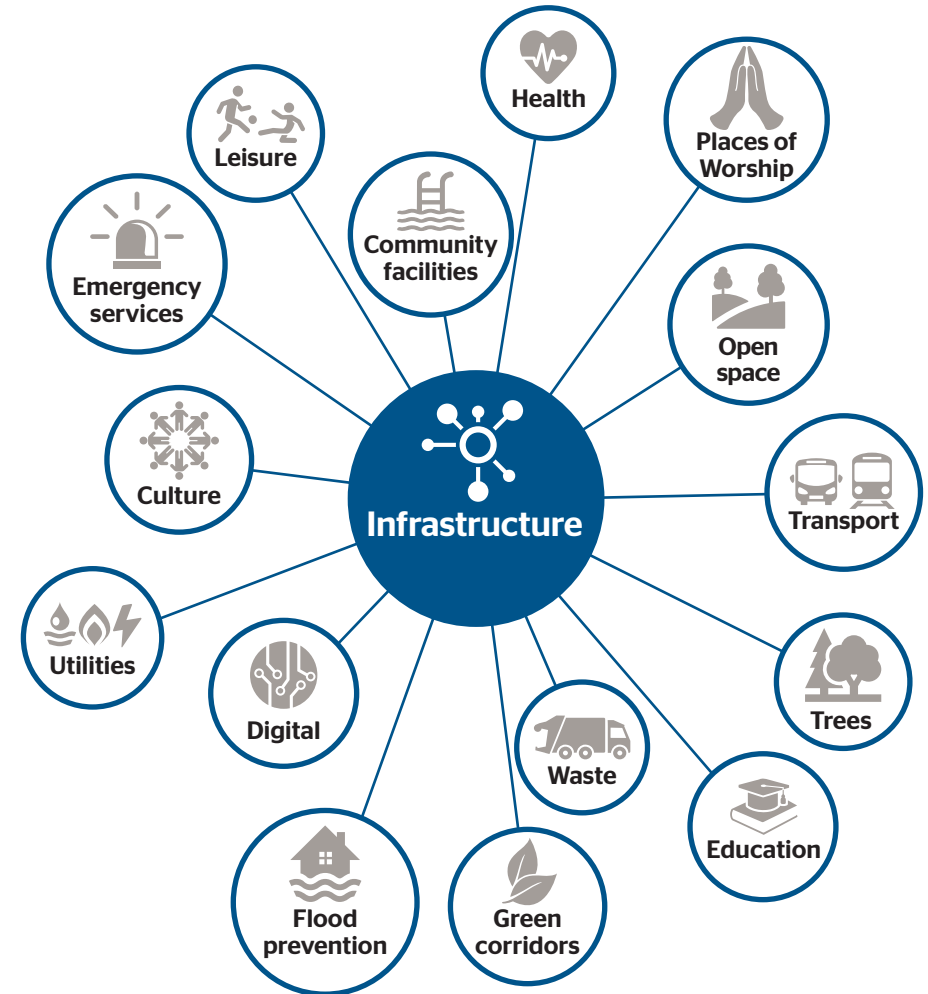
- a) Contributes appropriately and proportionately towards required infrastructure, having regard to the latest Watford Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan;
- b) Where applicable, connects to area-wide infrastructure and enables future connections;
- c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the site allocations and / or other policies in the Local Plan;
- d) Is appropriately designed so that it complements and does not unduly restrict development on adjacent or connected sites.

Developers will be expected to participate in early pre-application engagement 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 healthcare 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 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 'Transforming Travel in Watford'.

Former Croxley Rail Line

10.13 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 the opportunity for a walking and cycling link and a potential future route for Mass Rapid Transit. 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 Croxley Line - Safeguarding for Mass Rapid Transit Technical Report and reflected on the Policies Map.





Quality communications

- 10.14 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.
- 10.15 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.
- 10.16 Future-proofed, high quality digital infrastructure, such as fibre optic cables for high-speed internet, 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



All non-householder development will be expected to demonstrate that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the 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 should be made in accordance with relevant requirements set out in this Local Plan; have regard to the latest Watford Infrastructure Delivery Plan; 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 with appropriate providers, and how this could be future-proofed, 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 residential and employment uses should demonstrate that provision is made for high speed internet infrastructure as part of the application.

Development contributions

10.17 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 place-making. 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.

10.18 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 it. 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.

10.19 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.

10.20 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.

10.21 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.

10.22 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 planning obligations to provide affordable housing and mitigate the impacts of the development, in accordance with national policy and, having regard to any relevant Supplementary Planning Documents or other local 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



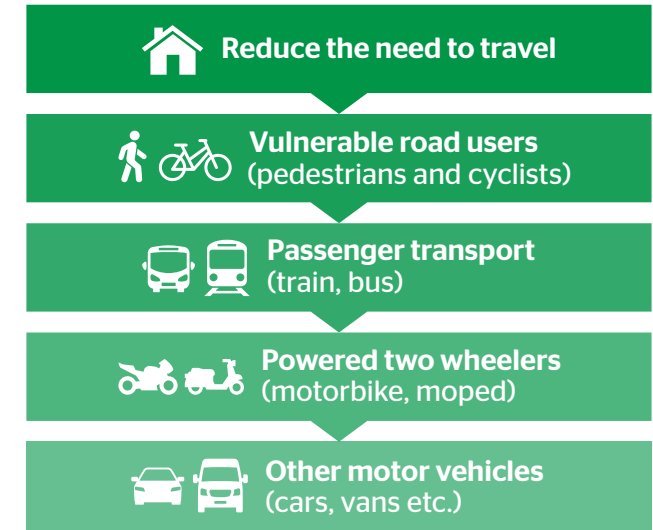
A Sustainable Travel Town

- 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), whilst the town also has the highest levels of deaths attributed to air pollution in Hertfordshire.
- 11.2 Working collaboratively with transport providers including Hertfordshire County Council as the Local Highway Authority, National Highways, and both bus and rail operators, the importance of a strategic direction to developing transport options for Watford is reflected in the Sustainable Transport Strategy Transforming Travel in Watford. This strategy 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.
- 11.3 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

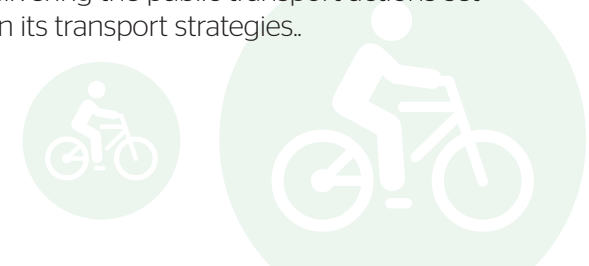
one and three miles. This highlights the opportunity for more active travel if people have access to routes that get them to where they want to be in a way that is safe, efficient and enjoyable.

- 11.4 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.
- 11.5 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), Rail Strategy (2020), the Speed Management 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



- 11.6 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.



11.7 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.

11.8 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.

11.9 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 2038, 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;
- g) Supporting a mobility Hub within the Town Centre that serves as a focal point for multiple modes and links to the High Street Station; and
- 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 Sustainable Transport Hub

- 11.10 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.
- 11.11 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 Croxley Line – Safeguarding for Mass Rapid Transit Technical Report.
- 11.12 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.

- 11.13 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.
- 11.14 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.
- 11.15 Hertfordshire County Council is developing plans for a new, Mass Rapid Transit system to significantly increase connectivity across the county. This will bring substantial benefits to Watford, and it is expected that proposed routes for this system will not be compromised by new development.
- 11.16 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 as part of the comprehensive redevelopment of the area.

- 11.17 One of these bridges 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 should be between Penn Road and Colonial Way. Links to these should accommodate both pedestrians and cyclists, be accessible to non station users 24 hours a day, maximise the permeability of the area, provide a connection to the Eastern Mobility Hub and not compromise any future re-routing of vehicle access to the concrete batching plant and rail aggregates depot.
- 11.18 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.
- 11.19 A further element to the re-development of the area is a new Sustainable Transport 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.
- 11.20 Improvements to the road network will 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 Junction Sustainable Transport Hub. The potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot should also be facilitated.



Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Sustainable 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, developers will need to have regard to the following Safeguarded Transport Routes to ensure designs would not compromise their ability to prioritise public transport and active travel routes:

- a) The disused former Croxley Rail Line, including access points and routes on the existing road network, as set out in the Croxley Line – Safeguarding for Mass Rapid Transit Technical Report;
- b) The current Ebury Way cycle path and access to it; and
- c) The Abbey Line.

Additionally, proposals should have regard to:

- d) Existing and planned cycle routes identified in the Local Cycling and Walking Infrastructure Plan;
- e) Any future planned Mass Rapid Transit routes identified by Hertfordshire County Council.

The Safeguarded Transport Routes are identified on the Policies Map and represented in Figure 11.3.

The role of Watford Junction as a multi-modal Sustainable Transport 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 from the existing and new road networks;
- g) Bus and rail access that also provides for the use of cycles, electric vehicles, drop-off movements, taxis, coaches and any future Mass Rapid Transit access;
- h) Pedestrian and cycling access from Colonial Way (or Imperial Way as part of a comprehensive redevelopment of the area) that will provide a connection to the Eastern Mobility Hub and access to the station and not compromise potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot; and
- 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

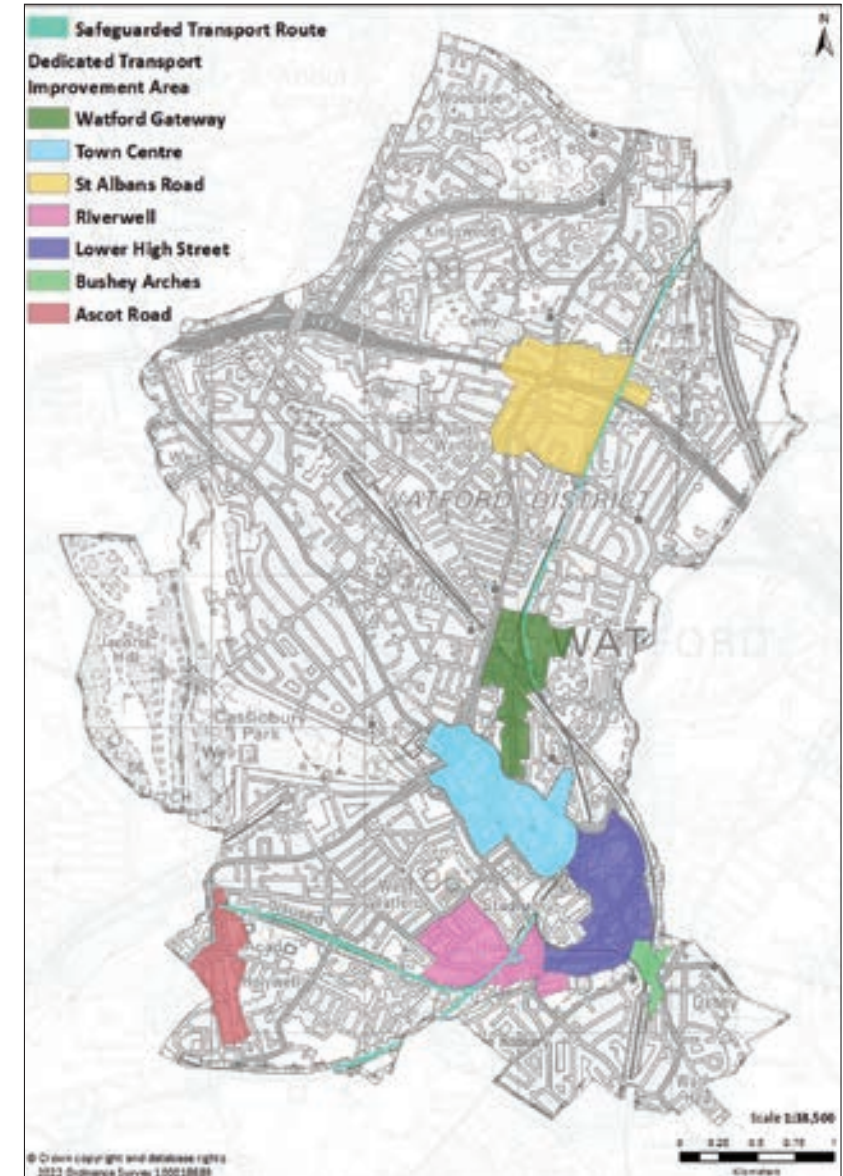
11.21 A number of areas within the town are anticipated to experience significant levels of development within the Local Plan timescales or are located around major transport infrastructure. These areas are shown in Figure 11.3 and are representative of the Transport Improvement Areas as defined on the Policies Map. 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

11.22 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.

11.23 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 disused former Croxley Rail Line on Wiggenhall Road.

Figure 11.3: Areas for transport improvements in Watford, and routes to be safeguarded



11.24 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, and being a key walking and cycling route for the site.

11.25 To enhance bus services, introducing bus priority measures on the ring road should also be supported. Ensuring access for people walking and cycling should also be considered as part of development in the area. This should include 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

11.26 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 Bushey Arches gyratory road network, as well as a number of further links, including Pinner Road, being over capacity. It is 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.

11.27 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 road network. Bus priority measures around the gyratory and connecting to a Lower High Street sustainable transport corridor should also be supported.

Watford Riverwell

11.28 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.

11.29 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.

11.30 Land should also be safeguarded to provide access to the disused former Croxley Rail Line safeguarded transport corridor (and a potential station area).

Ascot Road

11.31 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.





- 11.32 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.
- 11.33 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.
- 11.34 New development in the Ascot Road Area should preserve the opportunity for providing Mass Rapid Transit and walking and cycling on the disused former Croxley Rail line, including safeguarding land for a potential terminus.

St Albans Road

- 11.35 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.

- 11.36 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

- 11.37 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, 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, with car-free development encouraged, and contributions made to the enhancement of public transport and active travel infrastructure in the town centre.

- 11.38 This should include bus priority interventions along and in the vicinity of the ring road, which in the future could potentially contribute towards a Mass Rapid Transit system. 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.
- 11.39 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

- 11.40 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'.

Transport Improvement Areas and Safeguarded Transport Routes are defined on the Policies Map.

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 safeguarded disused former Croxley Rail Line. 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

11.41 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 objectives within the Local Transport Plan promoting Watford as a Walking and Cycling Infrastructure Improvement Town.

Local Cycling and Walking Infrastructure Implementation Plan

11.42 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.

11.43 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

11.44 Consideration of the needs for cycle 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.

11.45 In designing cycle 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 with regard to the Watford Cycle Parking Supplementary Planning Document.

Cycle parking in residential developments

11.46 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 cycle hangar on the highway in a location agreed with the Council.





Cycle parking in non-residential developments

- 11.47 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.
- 11.48 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

- 11.49 All major 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

- 11.50 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.
- 11.51 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 these bays is specified in the cycle parking standards in Appendix D. To preserve the ability to enhance 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

- 11.52 Controlling car parking and providing alternatives to personal vehicle ownership have been found to be some of the most effective methods for managing demand. It can help to address issues such as the perception of a car-dominated environment, congestion, unreliable journey times, diminished air quality and higher carbon emissions. 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.
- 11.53 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. The requirements in Policy ST11.5 will also support Watford becoming a Sustainable Travel Town (Policy ST11.1 'Sustainable Travel Town') by encouraging modal shift away from private car trips and thus reducing the impact of transport on the environment.

Car parking standards

- 11.54 New development in all areas of the borough should provide car parking that is reflective of the needs of its location and that encourages a greater proportion of people to use alternative sustainable transport modes in the long term.
- 11.55 Car parking standards are set out in Appendix E and have been set in consideration to the Core 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.
- 11.56 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

- 11.57 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

11.58 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 and users will therefore be exempt, or subject to restriction, from obtaining permits for existing Controlled Parking Zones.

Parking for disabled persons

11.59 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.

11.60 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

11.61 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 using them as an alternative to car ownership, and reduce instances of illegal parking that often obstruct footways. Guidance on designing for powered two wheeled vehicles is available from the Institute of Highway Engineers and motorcycle industry groups.

Electric vehicles

11.62 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.

11.63 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.



11.64 The parking standards require consideration for the provision of 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.

11.65 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

11.66 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.

11.67 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.

11.68 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.

11.69 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

- 11.70 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.
- 11.71 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.
- 11.72 All Transport Assessments, Statements and Travel Plans should follow the Transport User Hierarchy, as outlined in the Hertfordshire Local Transport Plan.
- 11.73 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: Highway Design Guide (2011)

- 11.74 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.
- 11.75 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

- 11.76 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 Travel Plan Guidance (2020). Where the travel behaviour of the end user is unknown at the time of the planning application submission, applicants 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.
- 11.77 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.
- 11.78 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.

- 11.79 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.
- 11.80 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 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 and 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 on a variety of issues, and the way people go about their everyday life. 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 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. Non-householder developments should promote active design having regard to relevant guidance, including that from 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 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.

12.5 Hertfordshire County Council has adopted a Health Impact Assessment Position Statement which sets out when a Health Impact Assessment should be undertaken and frameworks to use for each stage of the Health Impact Assessment process. 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. 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 and improve the design of a scheme 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 Rapid Transit System along the disused 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 or 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 Policy HC12.3 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 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;
- b) In accordance with Appendix F, 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 community uses; or
- c) 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



Site allocations and new development

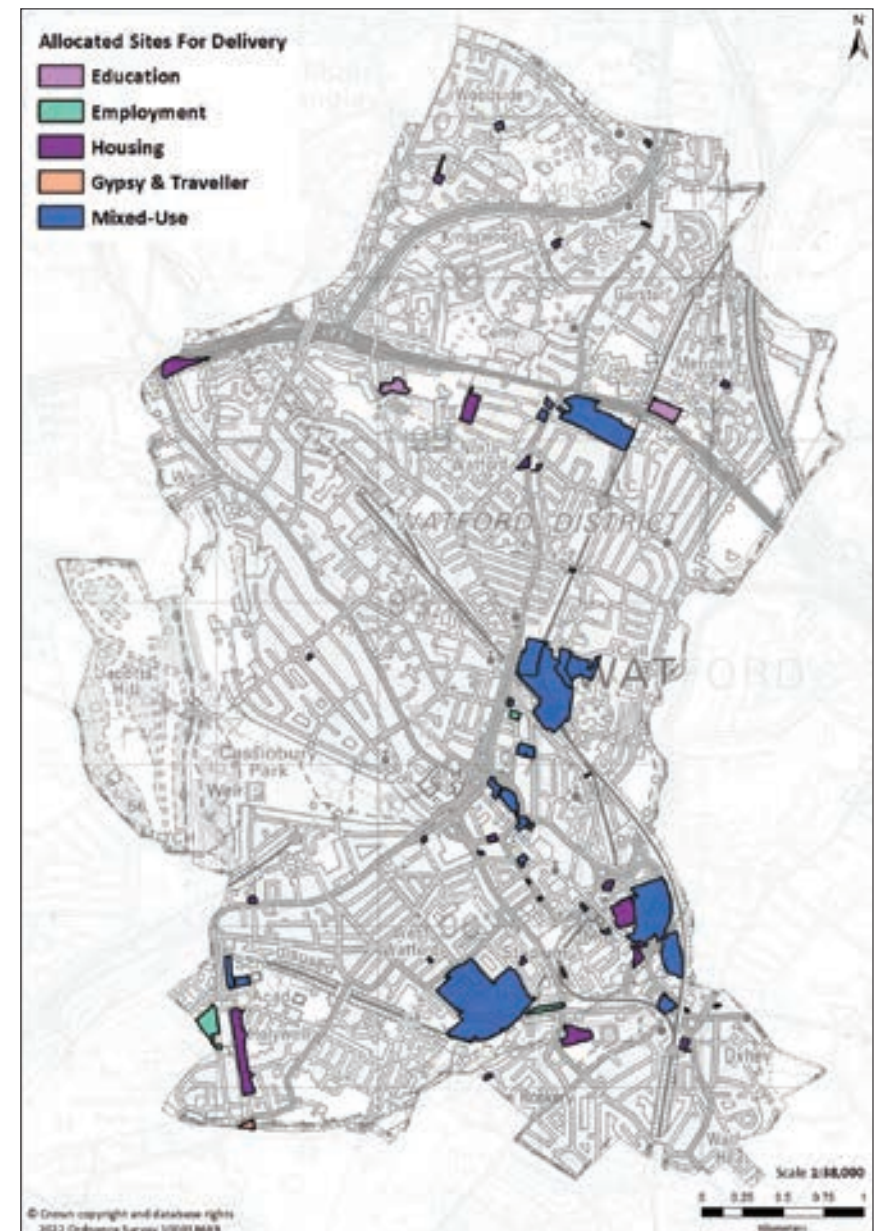
13.1 Demographic pressures, a national housing shortage and unbalanced regional development on a national level create significant demand for housing in Watford and the South East more generally. The borough's proximity to London (with high housing costs in the city pushing people out into the surrounding areas) has resulted in challenging housing targets over the plan period.

13.2 There is a 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 13,328 units over the plan period, with current estimates indicating a 784 units per annum requirement.

13.3 These sites are defined on the Policies Map and set out in Figure 13.1. The policy is applicable to those sites identified in Tables 13.1 (housing), 13.2 (Gypsies and Travellers), 13.3 (mixed-use), 13.4 (employment) and 13.5 (education) 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)

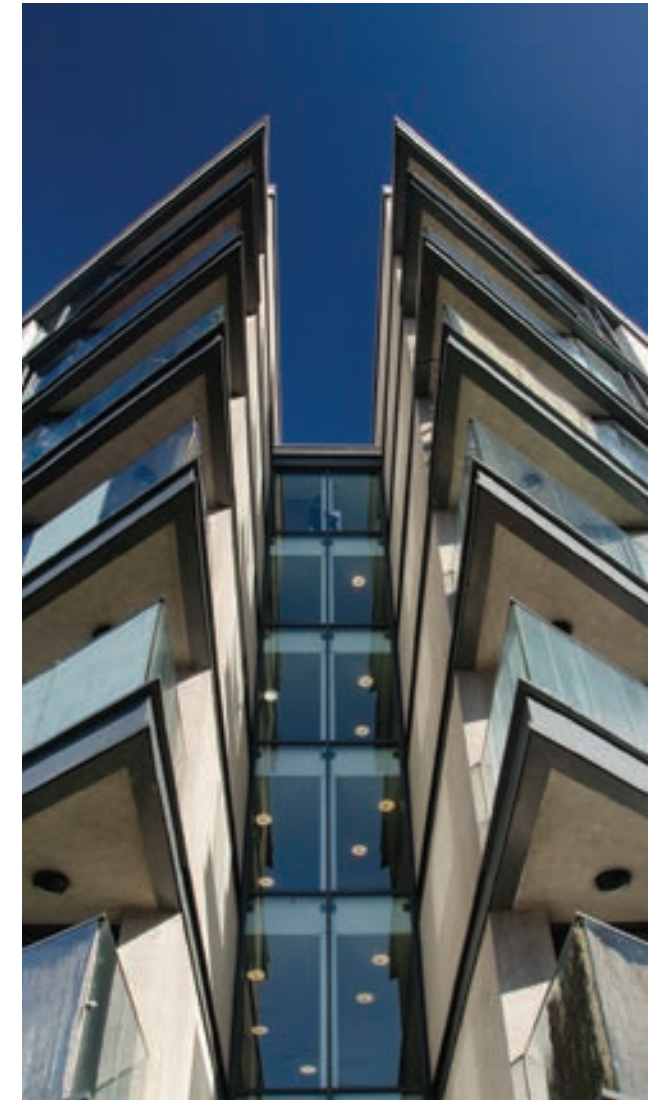
Figure 13.1: Allocated sites for delivery



- 13.4 The process for calculating the indicative yields of the site has been set out in the Housing and Economic Land Availability Assessment, 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, character and any heritage sensitivities which may affect the site, 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 For each site allocation, the types of uses that are considered appropriate have been set out. Proposals for uses classified as sui generis will be supported where these are consistent with the uses set out in Tables 13.1 to 13.5, support the wider objectives for the area, particularly on sites that are located within a Strategic Development Area, and will make a positive contribution towards achieving these. Where proposals include an ancillary use that is not within a Use Class set out in a site allocation, applicants should demonstrate how this is consistent with the allocation and the positive contribution it will make to the area.

Where there is a potential negative impact, applicants should demonstrate how this will be appropriately mitigated.

- 13.6 In addition to meeting the requirements set out in a site allocation, proposals will need to be prepared in accordance with policies in the Local Plan. For sites located within a Strategic Development Area, they will need to comply with policies set out in Chapter 2 'Core Development Area'.
- 13.7 The development requirements and considerations detailed in Tables 13.1, 13.2, 13.3, 13.4 and 13.5 are not exhaustive. Accompanying the development considerations for each site allocation is an outline map of the site. This information reflects the spatial extent of the allocation as defined on the Policies Map. They consist of a mix of requirements for on site provision and considerations to aid scheme design by identifying key constraints and are 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 'Allocated sites for housing development', 13.2 'Allocated site for Gypsies and Travellers', 13.3 'Allocated sites for mixed-use development', 13.4 'Allocated sites for employment development' and 13.5 'Allocated sites for education development' are defined on the Policies Map.



Appropriate types of development or land uses are identified for each site allocation. Where mixed-use development is proposed, this may refer to specific identified uses and also consist of one or more of the uses set out in Table 13.3. Other ancillary uses and sui generis will be acceptable where they are compatible and positively contribute towards the objectives of the area, particularly where a site is located within a designated Strategic Development Area.

Planning Permission will be granted for proposals that:

- a) Accord with the policies in the Local Plan;
- b) Have regard to any Supplementary Planning Document, masterplan or development brief that affects the site;
- c) Deliver the uses identified and 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.

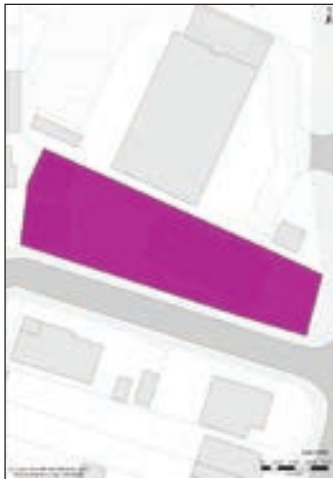


Table 13.1: Allocated sites for housing development

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>Development requirements and considerations</p> <p>The site is allocated for residential development, Use Class C3.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> a) Retain access to the garages not allocated in the Plan; b) 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; c) Take account of the potential risk of contamination on site; and d) Be accompanied by a parking survey to avoid any adverse impacts on parking in the area. 		
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>Development requirements and considerations</p> <p>The site is considered suitable for residential development, Use Class C3.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> 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; b) Demonstrate that safe access has been provided to the site; c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site; d) Take account of the potential risk of contamination on site; and e) Be accompanied by a Preliminary Roost Assessment. 		

Site: HS03 Land and garages adjacent to 1 Lavinia Avenue

Size (ha): 0.08	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 5 units
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Development requirements and considerations

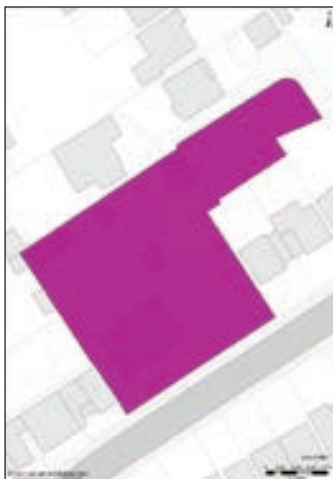
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Take account of the potential risk of contamination on site;
- b) Avoid any significant adverse impacts on the locally listed building, Garston Bus Garage, located directly opposite the site; and
- c) Be accompanied by a Preliminary Roost Assessment.

Site: HS04 Land and buildings at 5 Sheepcot Drive

Size (ha): 0.17	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 9 units
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Development requirements and considerations

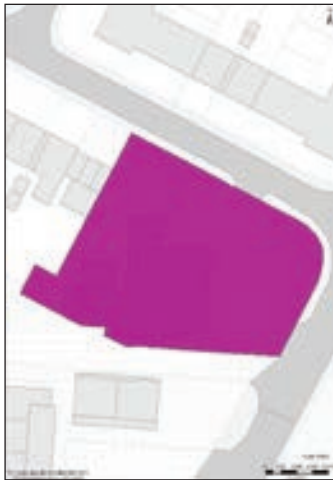
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Be accompanied by a Preliminary Ecological Appraisal; and
- b) 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

Size (ha): 0.15	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 9 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

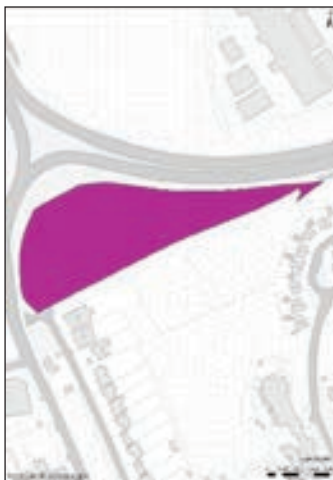
Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.

Development proposals should:

- a) Be accompanied by a Preliminary Roost Assessment; and
- b) 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

Size (ha): 1.61	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 93 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Demonstrate that safe access has been provided to the site;
- 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;
- c) 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; and
- d) 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

Size (ha): 1.3	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 98 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Be accompanied by a Preliminary Ecological Appraisal;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site; and
- c) 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

Size (ha): 0.27	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 17 units
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Development requirements and considerations

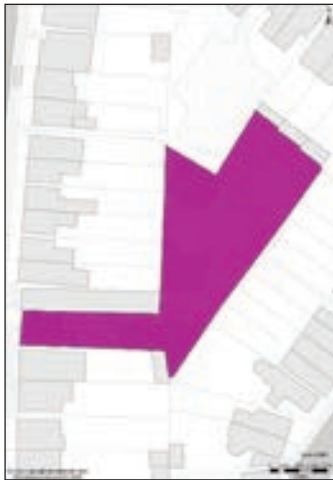
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Be accompanied by a parking survey to ensure that an appropriate level of car parking for the local shopping parade is retained;
- b) Avoid any significant adverse impacts on the locally listed buildings, 91-111 Longspring, located directly opposite the site;
- c) Be accompanied by a Noise Assessment and provide the appropriate mitigation for noise associated with the road network; and
- d) Take account of the potential risk of contamination on site.

Site: HS09 Land and buildings at 420-420a St Albans Road

Size (ha): 0.12	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 9 units
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Development requirements and considerations

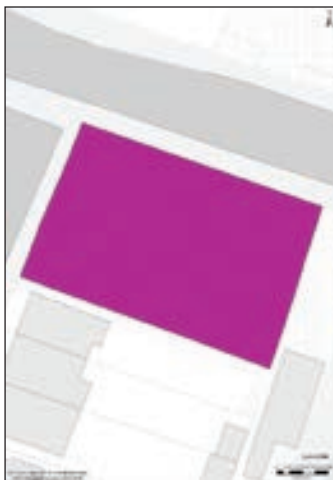
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Demonstrate that safe access has been provided to the site;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent 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; and
- e) Be accompanied by a Preliminary Roost Assessment.

Site: HS10 Land at Balmoral Road

Size (ha): 0.06	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 5 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Be accompanied by a Preliminary Roost Assessment;
- 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
- c) Take account of the potential risk of contamination on site.

Site: HS11 Land to the rear of 53 Langley Way

Size (ha): 0.09	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 7 units
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Development requirements and considerations

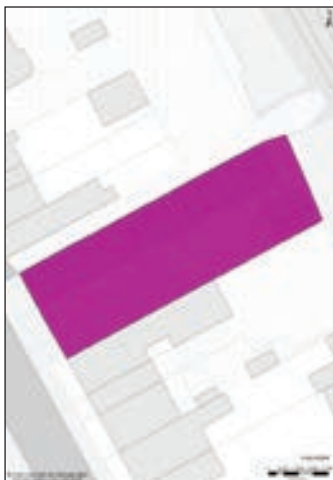
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Demonstrate that safe access has been provided to the site;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings and shopping parade adjacent to the site; and
- c) Take account of the potential risk of contamination on site.

Site: HS12 Land and garages between 139 and 149 Queens Road

Size (ha): 0.05	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 5 units
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Development requirements and considerations

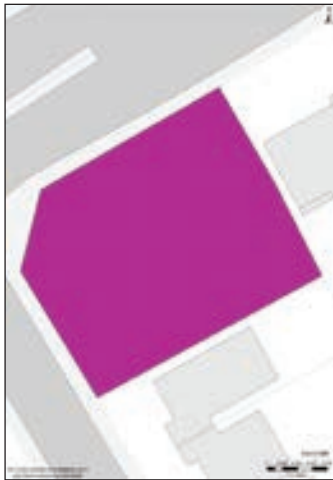
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Avoid significant harm to the setting of the Estcourt Conservation Area;
- b) Seek to enhance the setting and safety of the public footpath to the north west of the site;
- c) Take account of the potential risk of contamination on site;
- d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line directly adjacent to the site;
- e) Be accompanied by a parking survey to avoid any adverse impacts on parking in the area; and
- f) Be accompanied by a Preliminary Roost Assessment.

Site: HS13 Corner of Park Avenue and Rickmansworth Road

Size (ha): 0.1	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 9 units
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Development requirements and considerations

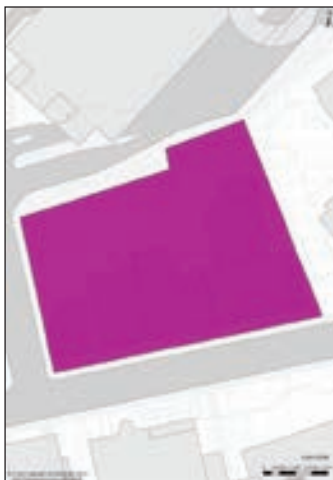
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Avoid significant harm to the setting of Cassiobury Registered Park, located north of the site; and
- b) 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

Size (ha): 0.22	Location: CDA	Timescale: 6-15 years	Indicative yield = 48 units
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Development requirements and considerations

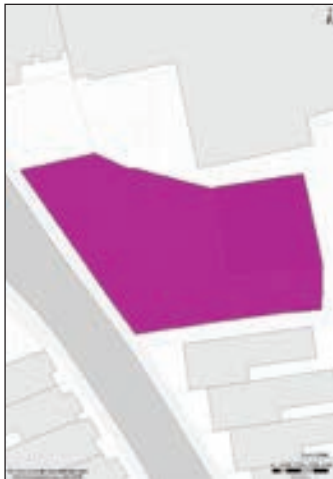
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Future development proposals for HS14 will take account of the findings and recommendations of the Council's Heritage Impact Assessment;
- b) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- c) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- d) Take account of the potential risk of contamination on site.

Site: HS15 Land at 80 Cassio Road

Size (ha): 0.08	Location: CDA	Timescale: 6-15 years	Indicative yield = 17 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Demonstrate that safe access has been provided to the site;
- c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the south of the site;
- d) Take account of the potential risk of contamination on site; and
- e) Future development proposals for HS15 will take account of the findings and recommendations of the Council's Heritage Impact Assessment.

Site: HS16 Land and buildings at 176-186 Rickmansworth Road

Size (ha): 0.16	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 12 units
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Development requirements and considerations

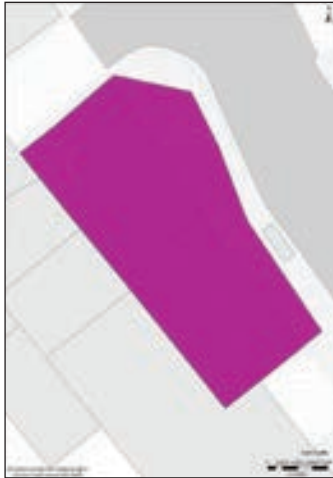
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Avoid any significant adverse impacts on the locally listed buildings, 195-199 Rickmansworth Road located directly opposite the site;
- b) Demonstrate that safe access has been provided to the site via Queen Mary's Avenue;
- 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
- d) Take account of the potential risk of contamination on site.

Site: HS17 120-122 Exchange Road

Size (ha): 0.05	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 5 units
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Development requirements and considerations

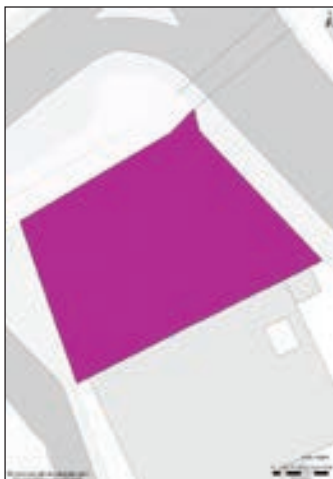
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- 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;
- b) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- c) Be accompanied by a Preliminary Roost Assessment.

Site: HS18 Car park at Vicarage Road / Exchange Road

Size (ha): 0.05	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 5 units
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Development requirements and considerations

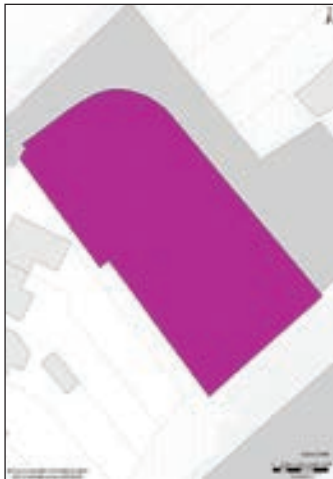
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Be designed to ensure safe pedestrian and cyclist access to and from the site;
- b) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- c) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- e) Take account of the potential risk of contamination on site; and
- f) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

Site: HS19 Crown Passage car park

Size (ha): 0.1	Location: CDA	Timescale: 1-5 years	Indicative yield = 18 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. Development proposals should:

- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Avoid significant harm to the High Street and King 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) Future development must demonstrate that any negative impacts on the significance of the designated or non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application; and
- h) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

Site: HS20 Land at Lower Derby Road

Size (ha): 0.27	Location: CDA	Timescale: 1-5 years	Indicative yield = 59 units
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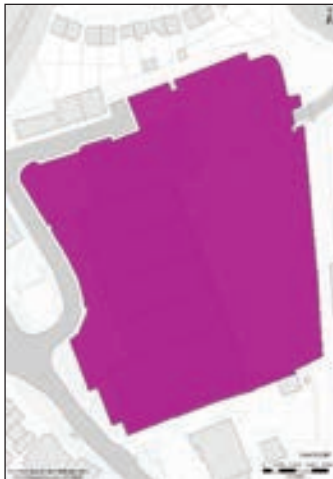
Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. An improved replacement skate park has been completed at Oxhey Park North. Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Retain the current access to the site from Lower Derby Road;
- c) Future development at HS20 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application; and
- e) 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): 1.89	Location: CDA	Timescale: 6-15 years	Indicative yield = 414 units
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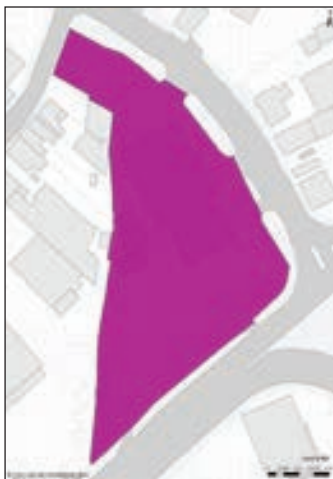
Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Seek to engage with the landowners of sites MU16, located adjacent to the site, to maximise the benefits of development;
- c) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the north of the site;
- d) Retain significant trees on site wherever possible, including those with a Tree Protection Order;
- e) Future development at HS21 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design; and
- g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application.

Site: HS22 Land and buildings at 252-272 Lower High Street

Size (ha): 0.5	Location: CDA	Timescale: 1-5 years	Indicative yield = 110 units
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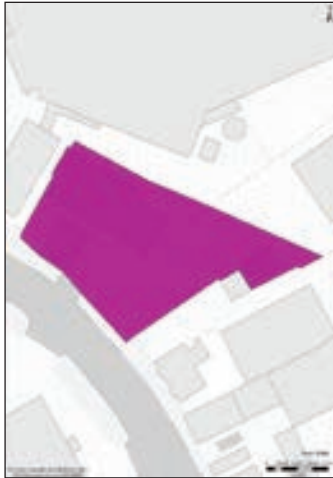
Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Future development at HS22 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- e) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the west of the site;
- f) Demonstrate that safe access has been provided to the site;
- g) Consider how the scheme contributes to the pedestrian and cyclist experience in the area and retain the footpaths adjacent;
- h) 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;
- i) 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
- j) Take account of the potential risk of contamination on site.

Site: HS23 Land and buildings at 247 Lower High Street

Size (ha): 0.14	Location: CDA	Timescale: 6-15 years	Indicative yield = 31 units
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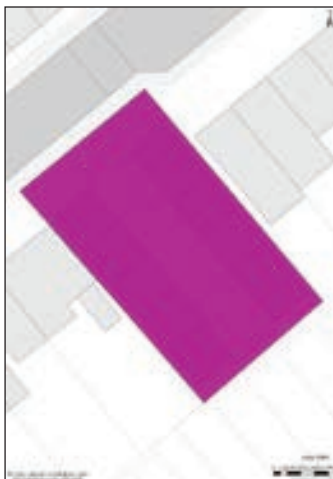
Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Seek to engage with landowners of sites MU16, located adjacent to the site, to maximise the benefits of development;
- c) Future development at HS23 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- d) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- 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 risk of contamination on site; and
- h) Be accompanied by a Preliminary Roost Assessment.

Site: HS24 Land and garages between 41 and 61 Brightwell Road

Size (ha): 0.05	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 5 units
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Development requirements and considerations

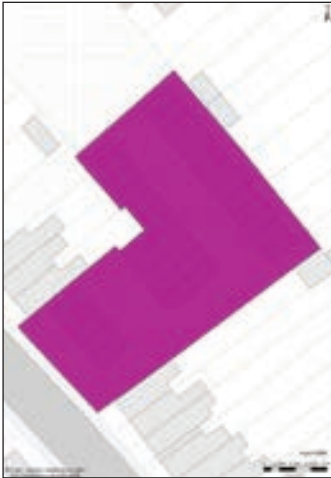
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Take account of the potential risk of contamination on site;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site; and
- c) 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): 0.12	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 11 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Take account of the potential risk of contamination on site;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the site;
- c) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area; and
- d) Be accompanied by a Preliminary Ecological Appraisal.

Site: HS26 Land and garages to the rear of 2-24 Elfrida Road

Size (ha): 0.08	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 8 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

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.

Site: HS27 Land at Croxley View

Size (ha): 3.2	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 240 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Enhance the green corridor and high quality cycle and walking route, which provides a key link between the Ebury Way and Cassiobury Park;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the east of the site; and
- c) Be accompanied by a Preliminary Ecological Appraisal.

Site: HS28 Wiggenhall Depot

Size (ha): 1.5	Location: CDA	Timescale: 6-15 years	Indicative yield = 330 units
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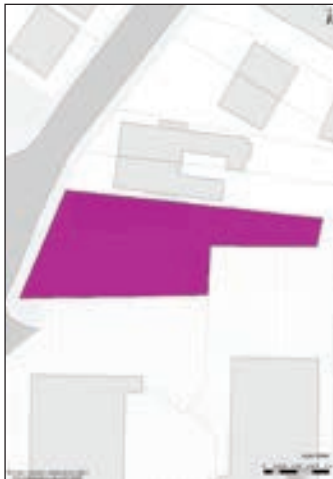
Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. Re-provision of the depot and waste transfer station is required. Development proposals should:

- a) Enhance the setting of the River Colne and be designed to minimise impact on wildlife habitats;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the west of the site;
- c) Future development at HS28 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- d) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate design;
- e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for the site, to be submitted prior to the determination of any application;
- f) New development proposals for the site should retain the locally listed buildings on the site. If this cannot be achieved the loss of these assets must be strongly justified and the replacement scheme must be of extremely high quality;
- 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;
- h) Take account of the potential risk of contamination on site; and
- i) Be accompanied by a Preliminary Roost Assessment.

Site: HS29 41 Aldenham Road

Size (ha): 0.05	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 5 units
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Development requirements and considerations

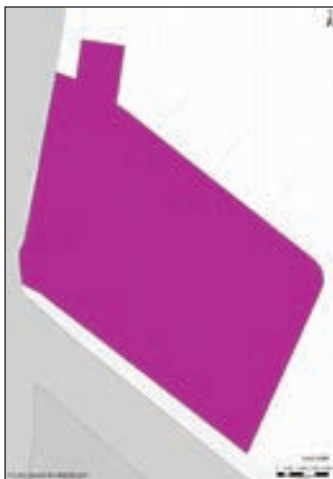
The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Avoid any significant adverse impacts on the locally listed building, Bushey Baptist Church, adjacent to the site;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the north of the site; and
- c) 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): 0.04	Location: CDA	Timescale: 6-15 years	Indicative yield = 9 units
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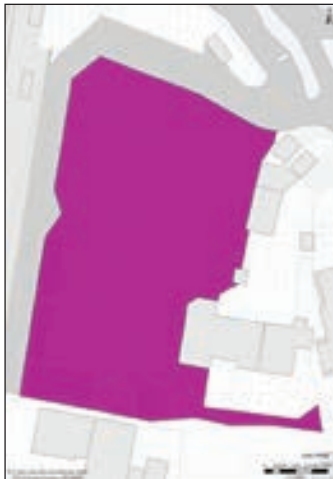
Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. 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.

Site: HS31 Land at Bushey Station

Size (ha): 0.31	Location: CDA	Timescale: 6-15 years	Indicative yield = 68 units
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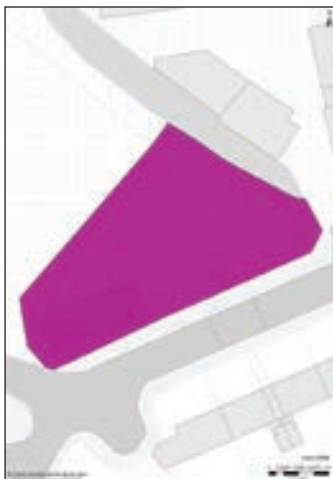
Development requirements and considerations

The site is considered suitable for residential development, Use Class C3. Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Ensure the scheme is designed to provide high quality connections to Bushey Station for pedestrians and cyclists;
- c) Take account of the Pinner Road Air Quality Management Area, located to the north east of the site;
- d) Future development at HS31 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- e) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- f) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for the site, to be submitted prior to the determination of any application;
- 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.

Site: HS32 Riverside Road and garages

Size (ha): 0.1	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 5 units
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Development requirements and considerations

The site is considered suitable for residential development, Use Class C3.

Development proposals should:

- a) Take account of the potential risk of contamination on site;
- 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;
- c) Be accompanied by a Preliminary Roost Assessment; and
- d) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

Table 13.2: Allocated site for Gypsy and Travellers




Site: GT01 Land at Tolpits Lane, south of Epsom Road			
Size (ha): 0.31	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 2 Gypsy and Traveller Pitches
	<p>Development requirements and considerations</p> <p>The site is considered suitable for the provision of Gypsy and Traveller pitches.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> a) Have regard to criteria a-f of Policy H03.8 ‘Gypsies and Travellers’; b) Ensure that the plots are protected for Gypsy and Traveller use exclusively unless it can be demonstrated that they are no longer required in accordance with Policy H03.8; c) Retain and enhance the walking and cycle route immediately adjacent to the eastern boundary of the site; d) Provide quality landscaping along the frontage with Tolpits Lane and the path along the eastern boundary of the site; e) Be accompanied by a Preliminary Ecological Assessment; and f) Incorporate compensatory measures for the loss of Green Belt into the scheme. 		

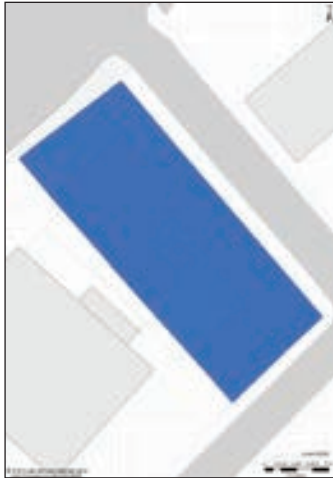


Table 13.3: Allocated sites for mixed-use development

Site: MU01 Land at Woodside Community Centre			
Size (ha): 0.2	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 12 units
	<p>Development requirements and considerations</p> <p>This site is considered suitable for mixed-use development, including one or more of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for 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"> a) Take account of the significant ground level change to the south of the site; and b) Be accompanied by a Preliminary Roost Assessment. 		
Site: MU02 Land at 501 St Albans Road			
Size (ha): 0.21	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 13 units
	<p>Development requirements and considerations</p> <p>This site is considered suitable for mixed-use development, including one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential, E(e) medical facilities and F2(b) meeting places for community use. 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"> a) Avoid significant adverse impacts on the locally listed building, North Watford Library, located opposite the site; b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the north west of the site; c) Demonstrate that safe access has been provided to the site; d) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and e) Be accompanied by a Preliminary Roost Assessment. 		

Site: MU03 Land at the Lemarie Centre

Size (ha): 0.1	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 7 units
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Development requirements and considerations

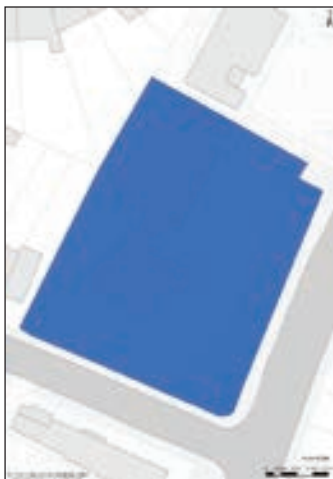
This site is considered suitable for mixed-use development, including one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community use. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.

Development proposals should:

- a) Seek to work collaboratively with the landowner of site MU23, which is located adjacent to the east, to maximise the benefits of development;
- b) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and
- c) Avoid significant adverse impacts on the locally listed building, North Watford Library, located adjacent to the site.

Site: MU04 453 St Albans Road

Size (ha): 0.3	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 18 units
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Development requirements and considerations

This site is considered suitable for mixed-use development, including one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community use. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.

Development proposals should:

- a) Avoid significant adverse impacts on the locally listed building, North Watford Library, located opposite the site; and
- b) 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 C3 Residential units
295sqm of E(g)(i) office floorspace
2,050sqm of E(a), E(c) commercial floorspace
2,910sqm of F1(a) education floorspace



Development requirements and considerations

This site is considered suitable for mixed-use development for C3 residential, E(g)(i) office floorspace and a F1(a) primary school.

In addition, one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: C2 residential institutions, E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace, F1(a) education facilities and F2(b) meeting places for community uses.

Development proposals should:

- a) Support the wider objectives of the Watford Gateway Strategic Development Area;
- b) Ensure that retail re-provision on site will not exceed the existing retail floorspace;
- c) Provide a new primary school;
- d) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;
- e) 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 and to ensure that the development proposals consider the cumulative impacts of development, including heritage;
- f) Future development at MU05 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- g) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- h) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- i) 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;
- j) 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 cyclists, pedestrians and vulnerable users; and
- k) 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 C3 residential
20,998sqm of E(g)(i) office floorspace**



Development requirements and considerations

This site is considered suitable for mixed-use development, C3 residential, E(g)(i) office floorspace, a replacement E(f) childcare facility and a F1(a) primary school.

Development proposals should:

- a) Support the wider objectives of the Watford Gateway Strategic Development Area, including the necessary improvements to the station and its operation;
- b) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including measures to improve bus priority around the station;
- c) Provide a new 3 form entry primary school;
- d) Provide a replacement childcare facility;
- 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 the site, to maximise the benefits of development and to ensure that proposals consider the cumulative impacts of development, including heritage;
- f) Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded mineral site via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided;
- g) Development will not compromise Clive Way as a safe, high quality active travel route to the Watford Junction Sustainable Transport Hub;
- h) In collaboration with the landowners of sites MU05, MU07 and MU24, support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides access to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;
- i) Support the delivery of a second crossing point from Penn Road across the railway lines in the latter part of the plan period, when comprehensive mixed-use redevelopment is proposed;
- j) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;

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Site: MU06 Land at Watford Junction

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- k) Have regard to the safeguarded concrete batching plant and rail aggregates depot 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 taken into account in the consideration of any applications;
- l) Ensure the scheme has been planned, laid out and designed to minimise 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;
- m) Future development at MU06 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- n) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- o) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- p) 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;
- q) Take account of the potential risk of contamination on site;
- r) 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
- s) For all noise sensitive 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 located largely within 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.

Site: MU07 Land and buildings at Astral House

Size (ha): **1.32**

Location: **CDA**

Timescale: **1-5 years (industrial development)**
6-15 years (long-term transitional mixed-use development)

Indicative yield = **6,600sqm of B2, B8 industrial floorspace**



Development requirements and considerations

This site is considered suitable for mixed-use development including one or more of the uses, or a mix thereof, defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development and E(g)(iii) industrial processes.

In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: E(e) health facilities, E(f) crèche/nursery, E(g)(ii) research and development, E(g)(iii) industrial processes, C2 residential institutions, C3 residential, and C4 houses in multiple occupation.

Development proposals should:


- a) Support the wider objectives of the Watford Gateway Strategic Development Area;
- b) Result in no net loss of employment floorspace on site unless the office use is replaced with industrial uses;
- c) Seek to work collaboratively with the landowners of sites MU06, MU24 and the operator of the concrete batching plant and rail aggregates depot located adjacent to the site, to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage;
- d) Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided;
- e) Development will not compromise Clive Way as a safe, high quality active travel route to the Watford Junction Sustainable Travel Hub;
- f) In collaboration with the landowners of sites MU05, MU06 and MU24 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Mainline and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;

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Site: MU07 Land and buildings at Astral House

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- g) Future development at MU07 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- h) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- i) Support the delivery of a second crossing point from Penn Road across the railway lines in the latter part of the plan period when comprehensive mixed-use redevelopment is proposed;
- j) Take account of the potential risk of contamination on site;
- k) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required if new residential dwellings come forward;
- l) 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 adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;
- m) 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
- n) For all noise sensitive 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 located 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.

Site: MU08 22-28 Station Road			
Size (ha): 0.12	Location: CDA	Timescale: 1-5 years	Indicative yield = 21 units C3 residential 480sqm of E(g)(i) office floorspace
	<p>Development requirements and considerations</p> <p>This site is considered suitable for mixed-use development, of C3 residential and/or E(g)(i) office floorspace.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> 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; e) Future development at MU08 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design; and g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application. 		

Site: MU09 Land at Watford Police Station

Size (ha): **0.68**

Location: **CDA**

Timescale: **1-5 years**

**Indicative yield = 120 units C3 residential
2,770sqm of E(g)(i) office floorspace**



Development requirements and considerations

This site is considered suitable for mixed-use development, of C3 residential and/or E(g)(i) offices.

Development proposals should:

- a) Support the wider objectives of the Watford Gateway Strategic Development Area and the Clarendon Road Primary Office Location;
- b) Building heights along the Westland Road elevation should have regard to the building heights of existing properties on Westland Road opposite the site;
- c) 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;
- d) Future development at MU09 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- f) Retain the trees on the Clarendon Road frontage;
- g) 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;
- h) 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
- i) 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 C3 residential



Development requirements and considerations

The site is considered suitable for mixed-use development, including C3 residential. One or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use would be supported to provide active ground floor frontages.

Development proposals should:

- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings and shopping parade surrounding the site;
- c) Provide a quality, active ground floor frontage and landscaping along The Parade and Albert Street South;
- d) Seek to engage with the landowners of site MU13, located adjacent to the east, to maximise the benefits of development;
- e) Future development at MU10 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application.



Site: MU11 23-37 The Parade

Size (ha): **0.41**

Location: **CDA**

Timescale: **1-5 years**

Indicative yield = 72 units C3 residential

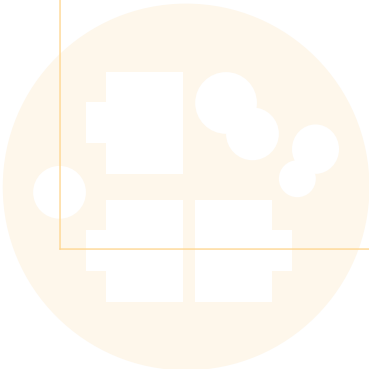


Development requirements and considerations

The site is considered suitable for mixed-use development including C3 residential. One or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use would be supported to provide active ground floor frontages.

Development proposals should:

- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Future development at MU11 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- e) Provide a quality, active ground floor frontage and landscaping along The Parade;
- f) Seek to engage with landowners of site MU12 located adjacent to the west to maximise the benefits of development;
- g) 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;
- h) Provide high quality pedestrian connections between Beechen Grove and the Parade; and
- i) Enhance the public realm along Beechen Grove.



Site: MU12 19-21 Clarendon Road

Size (ha): **0.08**

Location: **CDA**

Timescale: **1-5 years**

Indicative yield = 14 units C3 residential



Development requirements and considerations

The site is suitable for mixed-use development, including C3 residential and one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use to provide active ground floor frontages.

Development proposals should:

- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Seek to engage with landowners of site MU11 located adjacent to the west to maximise the benefits of development;
- c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application; and
- e) 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 C3 residential



Development requirements and considerations

The site is suitable for mixed-use development, including C3 residential and one or more, or a mix, of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use to provide active ground floor frontages.

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) Future development at MU13 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- h) Provide no additional retail floorspace above the existing on site provision;
- i) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- j) Take account of the potential risk of contamination on site; and
- k) 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.

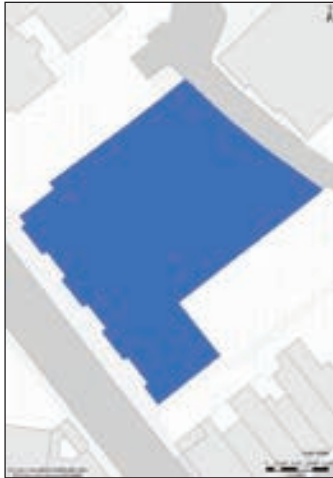
Site: MU14 Land at the car park, Wellstones

Size (ha): **0.23**

Location: **CDA**

Timescale: **1-5 years**

Indicative yield = 40 units C3 residential



Development requirements and considerations

The site is suitable for residential led, mixed-use development including C3 residential and one or more of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use are possible on the ground floor to maintain an active frontage.

Development proposals should:

- a) Support the wider objectives of the Town Centre Strategic Development Area;
- b) Future development at MU14 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application. However, due to the significance of the heritage assets which form the Holy Rood complex (Grade I church and Grade II ancillary buildings) the building height, scale and massing of any new proposals on the Exchange Road frontage should have regard to the heights, scale and massing of the Holy Rood Complex;
- e) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site;
- f) Take account of the potential risk of contamination on site; and
- g) Be accompanied by a parking survey to avoid any significant adverse impacts on parking in the area.

Site: MU15 18 Watford Field Road

Size (ha): **0.11**

Location: **CDA**

Timescale: **1-5 years**

Indicative yield = 19 units C3 residential



Development requirements and considerations

The site is suitable for mixed-use development, including C3 residential and F2(b) meeting places for community uses.

Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Be designed to maximise the outlook across Watford Field Recreation Ground;
- c) Future development at MU15 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
- d) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design; and
- e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application.

Site: MU16 Land at Tesco, Lower High Street

Size (ha): 7.6

Location: CDA

Timescale: 6-15 years

Indicative yield = 1,338 units C3 residential



Development requirements and considerations

The site is considered suitable for mixed-use development, including C3 residential, and a F1(a) primary school.

In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: C2 residential institutions, E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation.

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) Future development at MU16 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- i) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;

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Site: MU16 Land at Tesco, Lower High Street

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- j) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- k) New proposals should seek to incorporate the locally listed coal duty marker into the new scheme; proposals which seek to relocate the monument will need to justify why this is appropriate and that the new location provides an enhanced setting and interpretation of the monument;
- l) Adequately address the level changes on site;
- m) Have regard to the high pressure pipeline that traverses the site;
- n) 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;
- o) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;
- p) 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;
- q) Take account of the potential risk of contamination on site;
- r) 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
- s) Retain significant trees on site wherever possible, including those with a Tree Protection Order.

Site: MU17 Land at Colne Valley Retail Park

Size (ha): **2.65**

Location: **CDA**

Timescale: **6-15 years**

Indicative yield = 466 units C3 residential



Development requirements and considerations

The site is considered suitable for mixed-use development, including C3 residential. In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use on the ground floor.

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;
- c) Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;
- d) Provide no additional retail floorspace above the existing on site provision;
- e) Future development at MU17 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- h) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;
- i) 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;

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Site: MU17 Land at Colne Valley Retail Park

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- j) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;
- k) Have regard to the high pressure pipeline that traverses the site;
- l) Have regard to the overhead electricity transmission lines that traverse the site;
- m) 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;
- n) 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
- o) Take account of the potential risk of contamination on site.

Site: MU18 Land to the west of and parallel to Ascot Road

Size (ha): 0.71	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 43 units C3 residential
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Development requirements and considerations

The site is considered suitable for mixed-use development, including C3 residential and transport improvements. In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: C2 residential institutions, C3 residential, E(f) crèche or nursery. Development proposals should:

- a) Demonstrate that an appropriate amount of land has been safeguarded for the future provision of a mass transit route and station;
- b) Enable improvements to the contraflow cycle lane to provide a two way cycle lane;
- c) Enhance the green infrastructure network by enhancing the link between the Ebury Way and Cassiobury Park;
- d) Avoid any significant adverse impacts on the locally listed monument, the Former Sun Printer’s Clock Tower, located adjacent to the site; and
- e) Take account of the potential risk of contamination on site.

Site: MU19 Land east of Ascot Road

Size (ha): 0.45	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 27 units C3 residential
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Development requirements and considerations

The site is considered suitable for mixed-use development for C3 residential use.

In addition one or more, or a mix thereof, of the uses defined within the following Use Classes: E(c)(i) financial services, E(c)(ii) professional services and E(c)(iii) other appropriate services in a commercial, business or service locality use would be supported, 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.

Site: MU20 Land at Riverwell and Watford General Hospital

Size (ha): **18.1**

Location: **CDA**

Timescale: **1-15 years**

Indicative yield = 1,383 units C3 residential



Development requirements and considerations

The site is considered suitable for mixed-use development, for C3 residential, a F1(a) primary school, a new hospital and associated car park.

In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: C1 Hotels, C2 residential institutions, E(e) medical or health facilities, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation.

Development proposals should:

- a) Support the wider objectives of the Colne Valley Strategic Development Area;
- b) Complete a review of transport impact and safety as part of a full Transport Assessment;
- c) A clearly legible, continuous pedestrian route, suitable for all users including those with mobility issues, should be provided from Vicarage Road to Thomas Sawyer Way along the west side of the existing hospital;
- d) Cycle infrastructure to be provided along Thomas Sawyer Way and Willow Lane;
- e) Pedestrian and cycle connections to the disused former Croxley Rail Line adjacent to the south boundary of the site should be provided;
- f) Enhance the public realm through the provision of a new public square;
- g) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan;
- h) Future development at MU20 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment, recognising the former workhouse within the site boundary is a nationally listed building;
- i) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- j) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application. Any taller elements of a proposed scheme should be located on the sections of the site farthest away from the heritage assets and buildings heights should step down towards the heritage assets to reflect the height of the assets;
- 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;
- l) Take account of the potential risk of contamination on site; and
- 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, including the sewerage pipe traversing the site near the existing hospital.

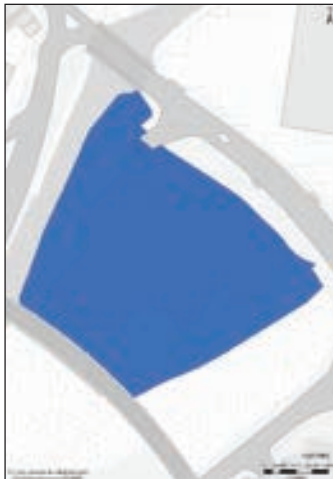
Site: MU21 Land at Colne Bridge Retail Park

Size (ha): **0.8**

Location: **CDA**

Timescale: **6-15 years**

Indicative yield = 141 units C3 residential



Development requirements and considerations

The site is considered suitable for mixed-use development, including C3 residential.

In addition one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c) commercial floorspace and F2(b) meeting places for community use would be supported 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) Future development at MU21 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;
- f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment, or any subsequent fieldwork assessment, have been avoided and if this is not possible, minimised through appropriate masterplan design;
- g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- h) Provide no additional retail floorspace above the existing on site provision;
- i) 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;
- 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;
- k) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;
- l) Take account of the potential risk of contamination on site; and
- m) Take account of the Pinner Road Air Quality Management Area, located to the north-west and south-east of the site.

Site: MU22 Land at Asda, Dome Roundabout

Size (ha): **7.03**

Location: **Outside of CDA**

Timescale: **6-15 years**

Indicative yield = 422 units C3 residential



Development requirements and considerations

The site is considered suitable for mixed-use development, including C3 residential.

In addition, one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: E(a) retail sale of goods other than hot food, E(b) food and drink for consumption (mostly) on the premises, E(d) indoor sport, recreation or fitness, F1(a) education and F2(b) meeting places for community use.

Development proposals should:

- a) Avoid significant adverse impacts on the locally listed buildings, the North Watford Library and Former Odhams Press Hall, located adjacent to the site;
- b) Provide no additional retail floorspace above the existing on site provision;
- c) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;
- d) Be informed by a Surface Water Drainage Strategy as the site is subject to surface water flood risk;
- e) 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;
- f) Retain significant trees on site wherever possible, including those with a Tree Protection Order;
- g) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road and employment land adjacent to the site; and
- h) Take account of the potential risk of contamination on site.

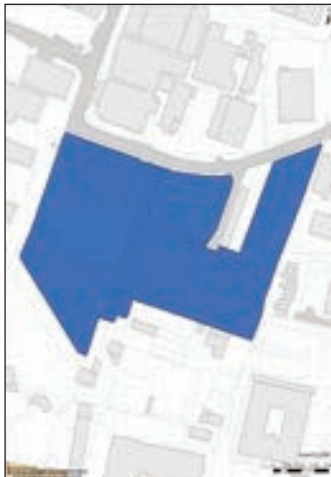
Site: MU24 Land at Colonial / Clive Way

Size (ha): **1.98**

Location: **CDA**

Timescale: **1-5 years (short-term industrial redevelopment)**
6-15 years (long-term transitional mixed-use development)

Indicative yield = **8,215sqm of industrial floorspace**



Development requirements and considerations

This site is considered suitable for mixed-use development including one or more, or a mix thereof, of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development and E(g)(iii) industrial processes.

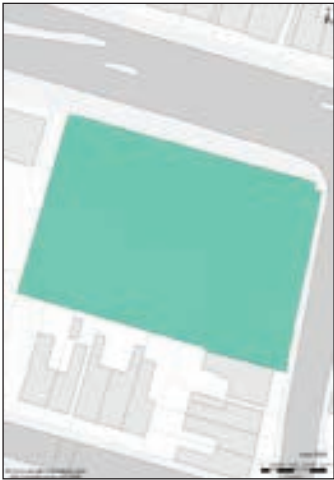

In addition, one or more of the uses defined within the following Use Classes would be supported: E(e) health facilities, E(f) crèche/nursery, C2 residential institutions, C3 residential and C4 houses in multiple occupation.

Development proposals should:

- a) Support the wider objectives of the Watford Gateway Strategic Development Area;
- b) Seek to work collaboratively with the landowners of sites MU06 and MU07 and the operator of the concrete batching plant and rail aggregates facility located west of the site, to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage;
- c) 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;
- d) Whilst seeking to maximise the benefits of development, consideration will be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided;
- e) New development will not compromise Clive Way as a safe, high quality active travel route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;
- f) In collaboration with the landowners of sites MU05, MU06 and MU07 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;

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Table 13.4: Allocated sites for employment development

Site: EM01 Cassiobury House, 11-19 Station Road			
Size (ha): 0.24	Location: CDA	Timescale: 1-5 years	Indicative yield = 5,153sqm of office and commercial floorspace 6,165sqm of hotel floorspace
	<p>Development requirements and considerations</p> <p>This site is considered suitable for office-led development including one or more, or a mix thereof, of the uses defined within the following Use Classes: E(g)(i) offices and C1 hotels. Development proposals should:</p> <ul style="list-style-type: none"> a) Support the wider objectives of the Watford Gateway Strategic Development Area and the Clarendon Road Primary Office Location; b) Contribute towards the sustainability principles of the Plan while acknowledging that BREEAM ‘Excellent’ standards are not achievable; c) Future development at EM01 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment; d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application; and e) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings adjacent to the south of the site. 		
Site: EM02 Land to the South of Wighenhall Industrial Estate			
Size (ha): 0.58	Location: CDA	Timescale: 1-5 years	Indicative yield = 5,800sqm of B2, B8, E(g)(ii), E(g)(iii) industrial floorspace
	<p>Development requirements and considerations</p> <p>This site is considered suitable for industrial uses and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> a) 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; b) Ensure that a safe access to the site has been provided; c) Be designed to enable access from the disused former Croxley Rail Line to Thomas Sawyer Way; and d) Take account of the potential risk of contamination on site. 		

Site: EM03 Gateway Zone

Size (ha): 1.7	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 6,935sqm of industrial floorspace
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Development requirements and considerations

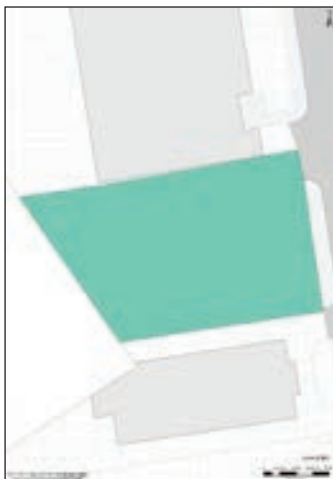
This site is considered suitable for industrial uses and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.

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;
- b) Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the ‘agent of change’ principle; and
- c) Take account of the potential risk of contamination on site.

Site: EM04 Land Between 14-18 Greenhill Crescent

Size (ha): 0.09	Location: Outside of CDA	Timescale: 1-5 years	Indicative yield = 900sqm of industrial floorspace
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Development requirements and considerations

This site is considered suitable for industrial uses and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.

Development proposals should:

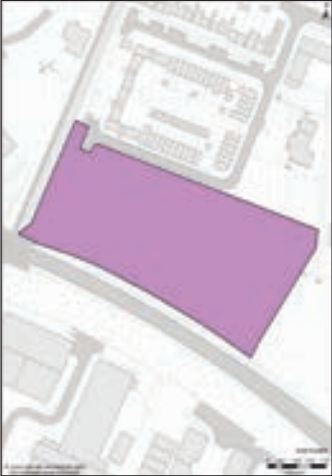
- a) Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the ‘agent of change’ principle; and
- b) Take account of the potential risk of contamination on site.

Site: MU24 Land at Colonial / Clive Way

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- g) 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;
- h) Future development at MU24 will take into account the results and recommendations of the Council's Heritage Impact Assessment;
- i) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
- j) Take account of the potential risk of contamination on site;
- k) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required if new dwellings come forward; and
- l) For all noise sensitive 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 located 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 operation due to the introduction of noise receptors.

Table 13.5: Allocated sites for education development¹¹

Site: ED01 Former Meriden School Site		
Size (ha): 1.74	Location: Outside of CDA	Timescale: 6-15 years
	<p>Development requirements and considerations</p> <p>The site is considered suitable for the development of an education facility.</p> <p>Development proposals should:</p> <ol style="list-style-type: none"> a) Provide appropriate mitigation for the detached playing field for Park Gate Junior School in line with the Playing Pitch Strategy (2020); 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; 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; d) Explore the potential for a pedestrian and cycle link across Meriden Park between the site and Garsmouth Way; e) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and f) Be accompanied by a Preliminary Ecological Appraisal. 	

¹¹ 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**

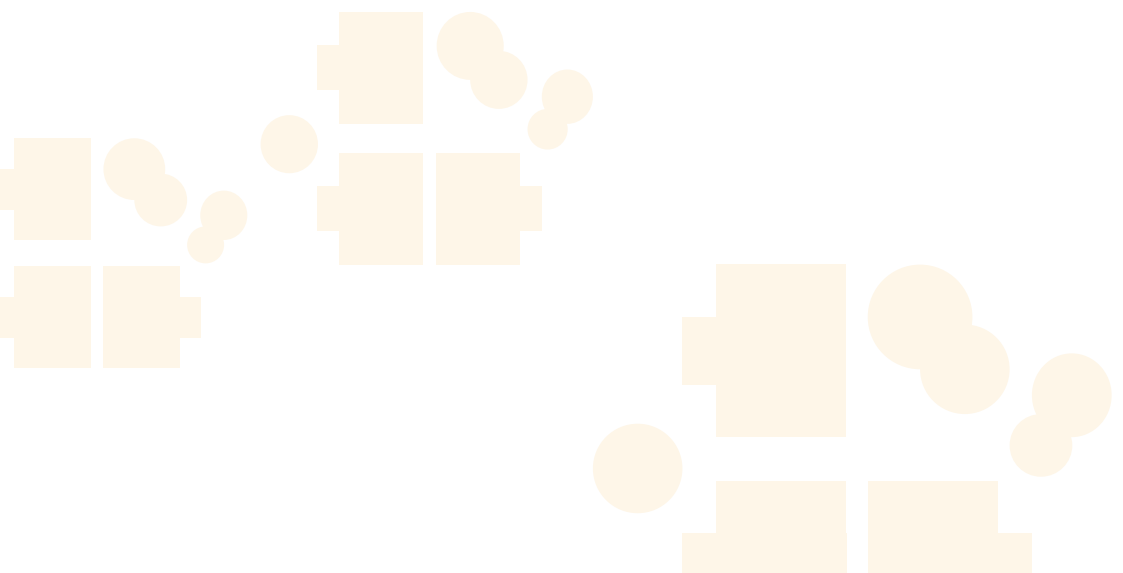


Development requirements and considerations

The site is considered suitable for the development of an education facility.

Development proposals should:

- a) Establish clear connections and desire lines with the residential areas to the north;
- 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;
- c) Pedestrian and cycle access should be taken from Leggatts Way with potential for an additional access via Broad Road;
- d) Demonstrate suitable off site playing field arrangements with consideration to safeguarding and land ownership and in consultation with Hertfordshire County Council;
- e) Ensure appropriate separation or buffers between development and the Harebreaks Wood Local Nature Reserve directly south of the site; and
- f) Be accompanied by a Preliminary Roost Assessment.









Chapter 14




Appendices









Appendix A: Monitoring Framework



Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 Chapter 1: A Spatial Strategy for Watford	Policy SS11: Spatial Strategy	Percentage of completions on previously developed land	90% employment, 80% residential	Planning applications
		Number of residential completions within the Core Development Area/ Rest Of Town	Not applicable	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 homes completed within each Strategic Development Area	Increase the number of homes	Planning applications
		Net additional office and industrial floor space within each Strategic Development Area	Increase the amount of office / industrial floor space	Planning applications
 Chapter 3: Homes for a Growing Community	Policy HO3.1: Housing Provision	Number of dwellings granted planning permission and net residential completions	13,328 net additional dwellings between 2021 and 2038, equivalent to 784 homes per year	Planning applications and site visits
		Number of residential permissions that have lapsed without implementation	Not applicable	Planning applications
	Policy HO3.2: Housing Mix, Density and Optimising Use of Land	Density of new residential developments (dph)	At least 95+ dph within the Core Development Area and 45+ dph elsewhere in the town	Planning applications
		Percentage of family sized units within new residential developments	At least 20% of all new homes to be family sized (three bedrooms or more)	Planning applications
	Policy HO3.3: Affordable Housing	Percentage of new residential units that are classified as affordable housing	At least 35% of all residential units on sites of 10 or more dwellings to be affordable	Planning applications

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 Chapter 3: Homes for a Growing Community	Policy HO3.4: Build to Rent	Number of discounted market rent units on build to rent developments	35% of all residential units on build to rent schemes (on sites of 10 or more dwellings) to be affordable	Planning applications
	Policy HO3.5: Specialist Housing and Care Homes	Number of specialist care and supported living bed spaces completed	No net loss of bed spaces	Planning applications
	Policy HO3.6: Student and Co-Living Housing	Number of student bed spaces completed	Not applicable	Planning applications
	Policy HO3.7: Self-Build and Custom Housebuilding	Number of self-build plots provided and completed	Provide a self build plot for every 10 dwellings on sites of 50 or more non-flatted homes	Planning applications
	Policy HO3.8: Gypsies and Travellers	Number of pitches granted planning permission	Fulfil the identified need for Gypsy and Traveller pitches	Planning applications
	Policy HO3.9: Residential Conversions	Number of conversions refused planning permission based on exceeding 10% exceeding threshold	Not applicable	Planning applications
		Number of planning permissions granted for Houses in Multiple Occupation where existing residential conversions exceed 10%	Not applicable	Planning applications
		Number of conversions of residential units into smaller units	Not applicable	Planning applications

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 Chapter 3: Homes for a Growing Community	Policy HO3.10: Building Standards for New Homes	Number of dwellings delivered that comply with M4(2) and M4(3) standards	All new homes to comply with M4(2) standard, and on developments of 10 homes or more, 4% to comply with M4(3) standard	Planning applications
		Number of dwellings designed to be dementia friendly	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 B2, B8 or E(g)(ii) class floorspace	No net loss	Planning applications
	Policy EM4.3: Office Development	E(g)(i) class office floorspace	No net loss	Planning applications
	Policy EM4.4 Economic Development Outside Designated Employment Locations	Loss of E(g)(i), B2 and B8 class floorspace (outside designated areas)	No net loss	Planning applications
 Chapter 5: A Vibrant Town	Policy VT5.1: Supporting Vibrant Retail Centres	Maintain percentage of ground floor units, within a defined Town, District or Local Centre in a Main Town Centre Use	Not applicable	Planning applications Land Use Surveys
	Policy VT5.2 Watford Town Centre	No net loss in active ground floor uses within the defined Town, Centre boundary	No net loss	Land Use Surveys
	Policy VT5.3 Local Centres	No net loss in active ground floor uses within the defined Town, District and Local Centre boundaries	No net loss	Land Use Surveys

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 Chapter 6: An Attractive Town	Policy QD6.2 Design Principles; Policy QD6.3 Public Realm; Policy QD6.4 Building Design	Number of planning applications refused on design grounds	Not applicable	Planning applications
	Policy QD6.5 Building Height	Number of buildings granted and refused planning permission that exceed the base building height	Not applicable	Planning applications
 Chapter 7: The Historic Environment	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 Heritage at Risk Register Number of conservation areas that are considered to be in the “at risk” category as set out by Historic England	Reduce number of buildings/structures on the Heritage at Risk Register. No Conservation areas should be in the “at risk” category	Heritage at Risk register
		Number of applications granted planning permission contrary to advice from Historic England	None	Planning applications
 Chapter 8: A Climate Emergency	Policy CC8.1 Mitigating Climate Change and Reducing Carbon Emissions	Percentage of carbon reduction since 2008	Reduction in Carbon emissions above 2018 baseline	UK local authority and regional carbon dioxide emissions national statistics
	Policy CC8.2 Sustainable Construction Standards for Non-Residential Development	Percentage of major non-residential developments which meet BREEAM standards	100% of major non-residential developments meeting BREEAM excellent standard	Planning applications
	Policy CC8.3 Sustainable Construction and Resource Management	Number of new residential developments which meet carbon emission reduction standards	19% energy efficiency above Part L of the Building Regulations (2013) or any updated government standard, whichever results in a higher target.	Planning applications and post completion certificates

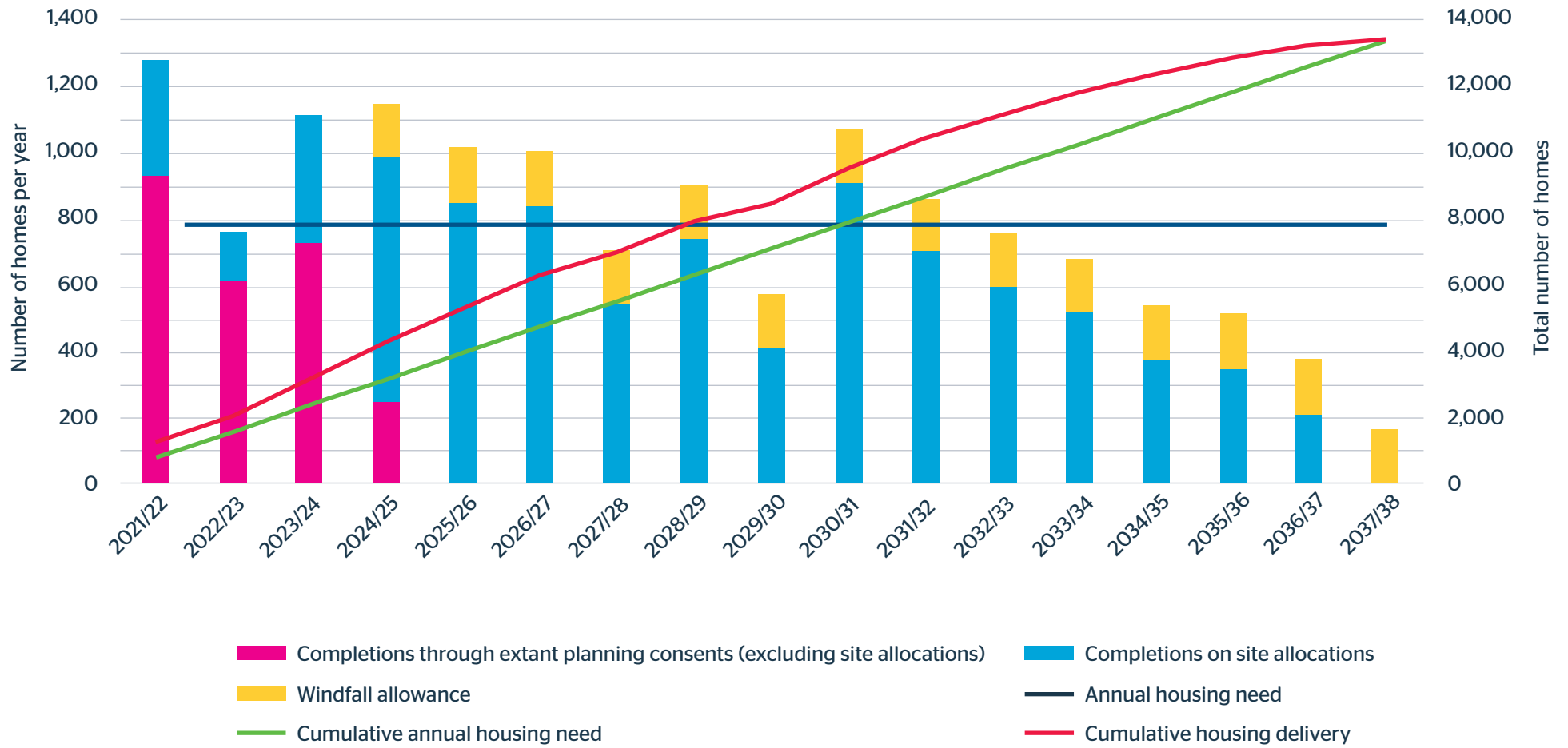
Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 Chapter 8: A Climate Emergency	Policy CC8.3 Sustainable Construction and Resource Management	New homes achieving 110 litres per person per day	100% of new homes	Planning applications
	Policy CC8.4 Managing Air Quality	Number of Air Quality Monitoring Areas	Reduction in the number of Air Quality Management Areas	Planning applications
	Policy CC8.5 Managing the Impacts of Development	Number of planning permissions refused on pollution or disturbance grounds	Zero refusals	Planning applications
 Chapter 9: Improving the Natural Environment	Policy NE9.2 Green Infrastructure Network; Policy	Gains and losses to the areas of designated green infrastructure	No net loss	Planning applications
	Policy NE9.3 Blue Infrastructure Network; Policy NE9.4 Flood Risk and Mitigation; Policy NE9.5 Surface water management	Number of applications granted planning permission contrary to Environment Agency advice	No planning permissions granted contrary to the advice of the Environment Agency on flooding and water quality grounds	Planning applications
	Policy NE9.6 Protecting Open Space; Policy NE9.7 Providing New Open Space	Gains and losses to Open Space	No net loss	Planning applications
	Policy NE9.8 Biodiversity	Biodiversity net gain as per DEFRA biodiversity metric	10% net gain	Planning applications
 Chapter 10: Infrastructure	Policy IN10.1 Integrated Infrastructure Delivery; Policy IN10.2 Providing Infrastructure to Support New Development	Delivery of infrastructure set out in the Infrastructure Delivery Plan	Not applicable	Planning applications and Infrastructure Funding Statements
	Policy IN10.3 Development Contributions	Developer contributions paid on new developments	Not applicable	Planning obligations and agreements, planning applications and infrastructure Funding Statements

Chapter	Relevant Policies	Monitoring Indicator	Target	Source
 Chapter 11: A Sustainable Travel Town	Policy ST11.1 Sustainable Travel Town	Percentage of new housing within 400m of a bus stop or railway station	100%	Planning applications
	Policy ST11.4 A Walking and Cycling Infrastructure Improvement Town	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	Improvement 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	Improvement on baseline levels	Department for Transport
		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	
 Chapter 12: A Healthy Community	Policy HC12.2: Health Impact Assessments	Number of qualifying planning schemes with Health Impact Assessments completed	All schemes over 100 dwellings	Planning applications
	Policy HC12.3: Built Cultural and Community Facilities	Number of community facilities	Not applicable	Land Use Survey

Appendix B: Housing Trajectory

Year	Commitments (completions and extant permissions)	Housing Completions from site allocations	Windfall allowance	Annual housing completions	Cumulative housing completions
2021/22	925	344	0	1,269	1,269
2022/23	609	144	0	753	2,022
2023/24	725	374	0	1,099	3,121
2024/25	248	732	158	1,138	4,259
2025/26	0	848	158	1,006	5,265
2026/27	0	835	158	993	6,258
2027/28	0	540	158	698	6,956
2028/29	0	735	158	893	7,849
2029/30	0	407	158	565	8,414
2030/31	0	905	158	1,063	9,477
2031/32	0	703	158	861	10,338
2032/33	0	590	158	748	11,086
2033/34	0	515	159	674	11,760
2034/35	0	374	159	533	12,293
2035/36	0	347	159	506	12,799
2036/37	0	211	159	370	13,169
2037/38	0	0	159	159	13,328
Total	2,507	8,604	2,217	13,328	139,663

Housing Trajectory 2021-2038



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.

Infrastructure	Description
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	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
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 Mobility Hub and Station Bridge	The Eastern Mobility Hub, located east of the railway lines 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 via an extended link from Clive Way through to Orphanage Road. Improved access to the Eastern Mobility Hub through upgrade works along the existing route of Imperial Way, Clive Way and Reeds Crescent / Orphanage Road.
Watford Junction Sustainable Transport Hub, Railway Station and Bus Station Upgrades	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 and cycle bridge over the Abbey Line to connect Penn Road with land to the east of the Abbey line, improvements to the station access for vulnerable users, and 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 (employee/resident)
C2 Residential Institutions	1 space per 5 staff	1 space per 20 units	1 space per 8 staff	N/A
C3 Dwelling House 1 Bed C3 Dwelling House 2+ Bed	1.25 spaces per unit 2.00 spaces per unit	1 space per 20 units	1.25 spaces per unit 1.75 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
	Maximums	
Residential		
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
Non-Residential		
B2 General Industrial (spaces per 150sqm)	0.5	1
B8 Storage and Distribution (spaces per 150sqm)	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
Maximums		
Non-Residential		
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 or 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, 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 met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Affordable housing for rent:

Meets all of the following conditions: (i) the rent is set in accordance with the government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (ii) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not

be a registered provider); and (iii) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) Starter homes:

Is as specified in sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

c) Discounted market sales housing:

Is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) Other affordable routes to home ownership:

is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market.

It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to government or the relevant authority specified in the funding agreement

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).

Archaeological Written Scheme of Investigation

A document which outlines proposed archaeological works to be undertaken including fieldwork and post-excavation.

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.

Appendix G: Glossary

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.

Biomass

Living matter within an environmental area, for example plant material, vegetation, or agricultural waste used as a fuel or energy source.

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.

Circular Economy

A model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible. In this way, the life cycle of products is extended. In practice, it implies reducing waste to a minimum. When a product reaches the end of its life, its materials are kept within the economy wherever possible.

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

Development contributions is a collective term mainly used to refer to the Community

Infrastructure Levy (CIL) and Planning Obligations (commonly referred to as 'Section 106' or 'S106' obligations after Section 106 of the Planning Act). These are planning tools that can be used to secure financial and non-financial contributions (including affordable housing), or other works, to provide infrastructure to support development and mitigate the impact of development.

East of England Forecasting Model

This is a computer model developed by Oxford Economics to project economic, demographic and housing trends in a consistent fashion across the East of England and beyond, and is used by local authorities.

Employment Land Areas of Search

Areas identified within the Hertfordshire County Council Waste Site Allocations document, as being compatible with waste management uses but currently have little potential for redevelopment.

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.

Functional Economic Market Area (FEMA)

An area that is not constrained by administrative boundaries but takes account of how the economy works in a local area. This takes account of the relationships between where people live and work and how the regional economy links together.

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.

Heat Pumps

A device which can transfer thermal energy to capture existing heat and move it inside to heat a home or building using electricity.

Hectare (ha)

A unit of measurement commonly used to measure land. 1 hectare = 10,000 square metres = 2.5 acres.

Houses in Multiple Occupation

A property rented out to people who are considered to be at least three separate households and who have shared facilities such as kitchen and bathroom.

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.

Main Town Centre Uses

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).

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 Described Space Standards

Government defined standards set out in Building Regulations for the Gross Internal (floor) Area of new dwellings of any tenure at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.

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.

Permitted Development Rights

Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order.

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.

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.

Specialist Care and Supported Living Accommodation

This includes the following forms of housing:

- **Age-restricted general market housing:** This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

- **Retirement living or sheltered housing:**

This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on site assistance (alarm) and a warden or house manager.

- **Extra care housing or housing-with-care:**

This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available.

There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

- **Residential care homes and nursing homes:**

These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

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.

Standard Methodology

The methodology set out by the government to identify the annual, minimum number of homes to be planned for.

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.

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 2021-2038

Watford District Plan 2000 Policies

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

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

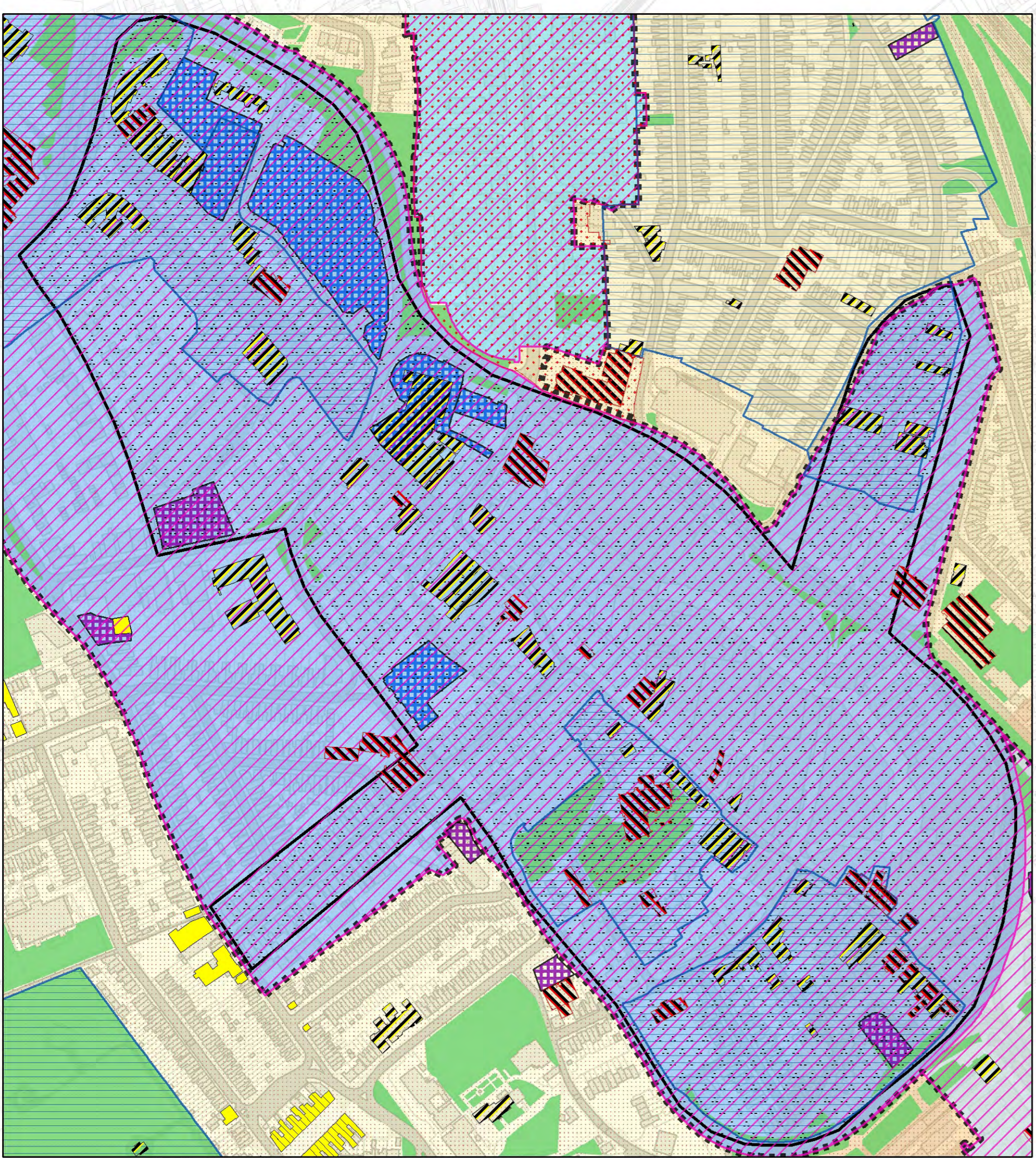
Policy No.	Title
TLC1	Town Centre Development
TLC2	Neighbourhood Centres
HS1	Housing Supply and Site Selection
HS2	Housing Mix
HS3	Affordable Housing
HS4	Gypsies and Travellers
EMP1	Economic Development
EMP2	Employment Land
T1	Regional Transport Node
T2	Location of New Development
T3	Improving Accessibility
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



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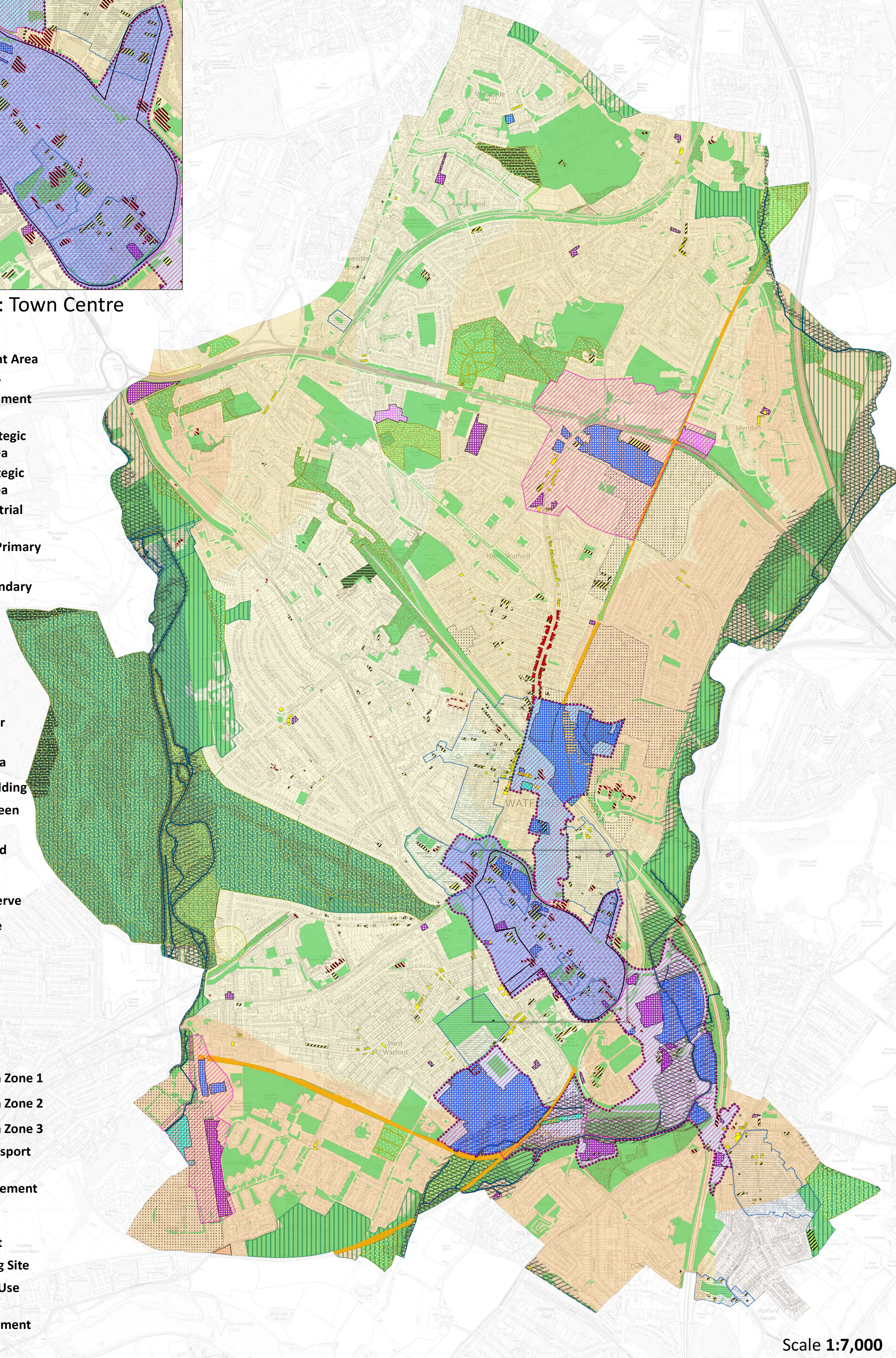
Watford Local Plan 2021-2038 Policies Map

Bricket Wood

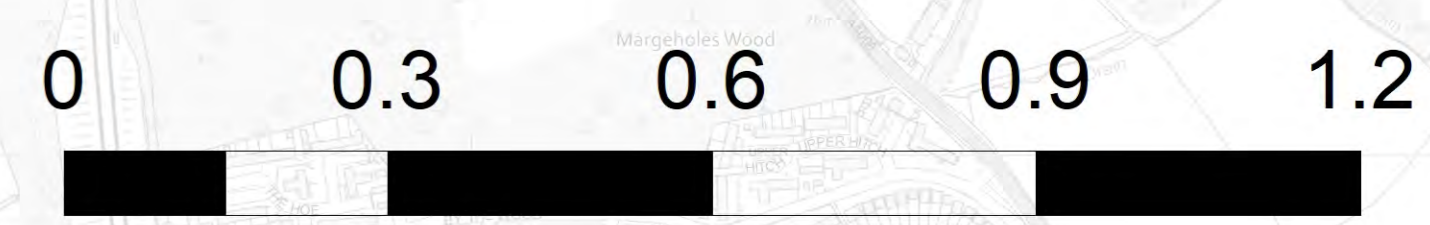


Inset Map: Town Centre

- Core Development Area
- Watford Gateway Strategic Development Area
- Town Centre Strategic Development Area
- Colne Valley Strategic Development Area
- Designated Industrial Area
- Clarendon Road Primary Office Location
- Town Centre Boundary
- District Centre
- Local Centre
- Established Area
- Nationally Listed Building
- Registered Park or Garden
- Conservation Area
- Locally Listed Building
- Open Space & Green Infrastructure
- Ancient Woodland
- Green Belt
- Local Nature Reserve
- Local Wildlife Site
- Priority Habitat
- Watercourse
- Flood Zone 2
- Flood Zone 3a
- Flood Zone 3b
- Source Protection Zone 1
- Source Protection Zone 2
- Source Protection Zone 3
- Safeguarded Transport Route
- Transport Improvement Area
- Safeguarded Rail Aggregates Depot
- Allocated Housing Site
- Allocated Mixed-Use Site
- Allocated Employment Site
- Allocated Education Site
- Allocated Gypsy and Traveller Site



Scale 1:7,000



Report to Watford Borough Council

by William Fieldhouse BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Date: 20 September 2022

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Watford Local Plan 2018-2036

The Plan was submitted for examination on 6 August 2021

The examination hearings were held between 18 January 2022 and 9 February 2022

File Ref: PINS/Y1945/429/7

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Schedule of Main Modifications Appendix

Abbreviations used in this report

The 2004 Act	The Planning & Compulsory Purchase Act 2004 (as amended)
The 2012 Regulations	The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
The Council	Watford Borough Council
NPPF	National Planning Policy Framework (July 2021)
The Plan	The Watford Local Plan 2018-2036
PPG	Planning Practice Guidance
sqm	Square metres

Evidence and Examination Documents

All of the Council's supporting evidence submitted with the Plan along with documents that I issued, requested or accepted during the examination were published on the examination website. Each document has its own individual reference number such as SUB1, ENV4, EMP5, etc. Where appropriate, I refer to documents by their reference numbers in this report.

Non-Technical Summary

This report concludes that the Watford Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications are made to it. Watford Borough Council has specifically requested that I recommend any main modifications necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The main modifications were subject to public consultation over a six week period in June and July 2022. In some cases I have amended the detailed wording of the modification to take account of consultation responses and ensure soundness. I have recommended their inclusion in the Plan after considering the sustainability appraisal and all the representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Amend the plan period from 2018-2036 to 2021-2038.
- Change the minimum housing requirement from 793 homes per year to 784 homes per year (13,328 between 2021 and 2038).
- Clarification that at least 158 homes per year will be required on unallocated sites, in addition to a total of 11,112 on commitments and allocations, if the minimum housing requirement is to be met.
- Changes to policy CDA2.1 and relevant allocation requirements to achieve sustainable development and transformation of the Watford Gateway Strategic Development Area.
- Amendments to policies CDA2.2, VT5.1 and VT5.2 and relevant allocation requirements to achieve sustainable development and promote the vitality and viability of Watford town centre.
- Changes to policy CDA2.3 and relevant allocation requirements to achieve sustainable development and transformation of the Colne Valley Strategic Development Area including through the preparation of a masterplan supplementary planning document for Lower High Street.
- Amendments to policies HO3.5 and HO3.10 to meet the housing needs of the elderly and those with special needs.
- Changes to policy HO3.11 to secure the provision of shared private outdoor amenity space in new apartment blocks.
- Removal of Reach Printing Services Limited from a designated industrial area.
- Amendments to various policies to set out a positive strategy for the conservation and enjoyment of the Borough's historic environment.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Watford Local Plan 2018-2036 in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework ("the NPPF") makes clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that Watford Borough Council ("the Council"), the local planning authority, has submitted what it considers to be a sound plan. The Final Draft Watford Local Plan 2018-2036 Consultation Version ("the Plan"), submitted in August 2021¹, is the basis for my examination. It is the same document as was published in January 2021 for consultation under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations").

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications necessary to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. My report explains why the recommended main modifications are necessary. The main modifications are referenced in bold in this report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed main modifications and carried out sustainability appraisal of them. The main modifications schedule was subject to public consultation for six weeks in June and July 2022. I have taken account of the consultation responses in coming to my conclusions in this report and have made some amendments to the detailed wording of some of the main modifications. None of the amendments significantly alters the content of the modifications as published for

¹ SUB1.

consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted plan. In this case, the relevant document is the Final Draft Policies Map A0 Consultation Version that was submitted in August 2021².
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published main modifications to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
7. These further changes to the policies map were published for consultation alongside the main modifications: Policies Map: Suggested Modifications to Support the Schedule A Proposed Main Modifications (Fourth iteration)³.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Final Draft Policies Map A0 Consultation Version and the further changes published alongside the main modifications.

Context

The Borough and its surroundings

9. The Borough is in the south west part of Hertfordshire around 20 miles from central London. The Hertfordshire districts of Three Riv-

² SUB2.

³ ED54A.

ers, St Albans and Hertsmere lie to the west, north east, and east respectively. It is geographically the smallest district in England outside London, and largely built up. However, there are a number of community parks along with other areas of public open space, and the Metropolitan Green Belt covers around 19% of the Borough's land area. Over 90% of development in the last ten years or so has been on previously developed land.

10. The Borough has good accessibility by road and rail. There are four railway stations serving the mainline, London Overground and London Underground. The M1 motorway lies a short distance to the east of the town, and the M25 to the north of the Borough. The economy is diverse, with significant employment in professional services, retail, health care, manufacturing, construction and wholesale, although high numbers of residents commute into London. Watford town centre performs a sub-regional role, attracting trips from outside the Borough both to work and to access shops and other facilities. Existing industrial land has been redeveloped for other uses in recent years, and the built up nature of the Borough means that there is very limited land available for new industrial and warehouse development.

The statutory development plan

11. When adopted, the Plan will supersede all of the saved policies in the Watford District Plan 2000 and the Core Strategy 2006-2031. The Plan will then form the statutory development plan for the Borough along with the Hertfordshire Minerals Local Plan, Hertfordshire Waste Local Plan and any neighbourhood plans made in the Borough.

Public Sector Equality Duty

12. The Council carried out an Equalities Impact Analysis to inform the preparation of the Plan⁴.
13. I have had due regard to the three aims expressed in section 149(1) of the Equality Act 2010 and in particular considered how the Plan's policies and proposals are likely to affect people from groups with "protected characteristics"⁵. This has involved my consideration of several matters during the examination including those relating to different types of housing need, including for people with disabilities, the elderly, and travellers; achieving sustainable design; improving accessibility and infrastructure for public transport, walking and cycling; and protecting and providing education, health and other

⁴ SUB11.

⁵ *The Equality Act 2010* defines "protected characteristics" as: age; disability; gender reassignment; marriage and civil partnerships; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

community and social infrastructure. My findings in relation to those matters are set out in subsequent sections of this report.

Assessment of the Duty to Cooperate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
15. The Council's Duty to Cooperate Statement of Compliance and statements of common ground⁶ set out the cross boundary strategic matters that the Council considered during the preparation of the Plan and how it addressed them through working with other local authorities and relevant prescribed bodies. The strategic matters included housing, employment, transport, education, health, waste, minerals, and waste water infrastructure. The activities undertaken aimed at achieving effective cooperation included joint studies, working groups, ongoing liaison with statutory consultation bodies, and specific duty to cooperate meetings.
16. The policies and proposals in the Plan reflect the outcome of the joint-working on the strategic matters, and none of the prescribed bodies or other relevant organisations have indicated that they are dissatisfied with their liaison with the Council. Thus, whilst there are a number of soundness issues related to some strategic matters that I consider in subsequent parts of this report, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and complied with the duty to cooperate.

Assessment of Other Aspects of Legal Compliance

17. The Plan has been prepared in accordance with the Council's Local Development Scheme⁷.
18. The Council published a Statement of Community Involvement in July 2017 and updates in November 2019 and October 2020⁸. The Council's Regulation 22(1)(C) Statement and Consultation Summary⁹ set out how it has involved residents and other stakeholders in preparing the Plan, including through three consultation exercises

⁶ ED3 to ED8.

⁷ SUB13.

⁸ SUP2, SUP4 and SUP5.

⁹ SUB12 and SUB14.

relating to issues and options, first draft plan, and final draft plan. I am satisfied that the consultation carried out during preparation of the Plan and on the main modifications was legally compliant.

19. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under regulation 19¹⁰. The appraisal used a systematic framework and proportionate available data to assess emerging policies and potential allocations, along with reasonable alternatives, throughout the preparation of the Plan. Potential impacts, including cumulative impacts, on defined sustainability objectives and, where necessary, mitigation measures were identified. The findings of the appraisal were used by the Council to inform decisions about the content of the Plan. The appraisal was updated to assess the main modifications and a report was published for consultation¹¹.
20. The Council's Habitat Regulations Assessment Screening Reports¹² demonstrate that the Plan would not result in an adverse impact on the integrity of any relevant protected sites (the nearest of which is at least 19.5 km from the Borough) and therefore an appropriate assessment is not necessary.
21. The development plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the Borough. Those priorities are meeting housing needs within the Borough; retaining the town's pre-eminent economic role in the sub-region, both in terms of providing employment and main town centre uses; and delivering infrastructure to support high levels of household and employment growth.
22. The Plan's overall spatial strategy (policy SS1.1) and various specific requirements, including in policies CC8.1 to CC8.5, NE9.1 to NE9.8 and ST11.1 to ST11.6, ensure that the development plan, as a whole, includes policies designed to secure that the development and use of land in the Borough contribute to the mitigation of, and adaptation to, climate change.
23. Appendix H in the Plan identifies the policies in the Watford District Plan 2000 and the Core Strategy 2006-2031 that will be superseded

¹⁰ SUB3 to SUB9.

¹¹ ED58, ED58/1 and ED58A to ED58F.

¹² SUB10 and ED59.

by policies in the Plan when it is adopted as required by regulation 8(5).

24. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

25. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 15 main issues upon which the soundness of the Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Are the amounts of housing and economic development that the Plan aims to accommodate clearly expressed, justified and consistent with national policy?

Plan period

26. The submitted Plan covers the period 2018 to 2036. However, the start date needs to be modified to 2021 so that it is as up-to-date as possible on adoption and consistent with national policy and guidance relating to the standard method for establishing local housing need. Furthermore, to ensure that strategic policies look ahead over a minimum of 15 years from adoption as required by national policy, the end date needs to be modified to 2038 [**MM2 to MM11, MM14, MM38, MM59, MM60, MM77, MM88, MM156, MM248 and MM257**]. I deal with the implications of this for various aspects of the Plan, including housing and employment land needs and supply, below.

Household growth and housing requirement

27. Policy HO3.1 and paragraph 3.1 refer to 14,274 homes (793 per year) in the period 2018 to 2036 to meet local housing need as determined using the government's standard method. However, the standard method indicates that, when the Plan was submitted for examination in 2021, the annual need figure was 784 homes per year. National guidance expects housing need to be updated until the Plan is submitted. Policy HO3.1, and other parts of the Plan as

appropriate, therefore need to be modified to refer to a minimum housing requirement of 784 net additional homes per year which represents a total of 13,328 in the modified plan period of 2021 to 2038 [**MM13, MM56, MM62, MM172** and **MM246**].

28. Furthermore, to be justified and effective, policy HO3.1 also needs to be modified to delete reference to a buffer of 5% or 714 homes. This is because those figures are ambiguous in terms of their purpose and they do not reflect the latest evidence about housing land supply, an issue I return to later in this report [**MM56** and **MM62**].

Additional industrial, warehouse and office floorspace

29. Proportionate and up-to-date evidence¹³ indicates a need for a total of 188,000 sqm of additional office floorspace and 481,500 sqm of additional industrial and warehouse floorspace in South West Hertfordshire. Of that need, 37,600 sqm of office floorspace and 98,400 sqm of industrial and warehouse floorspace are required in Watford. In order to ensure that the Plan is justified, the reasoned justification to policy EM4.1 needs to be modified to refer to the floorspace requirements in Watford [**MM83**].

30. The Plan refers to the creation of 11,500 new jobs. However, the basis for that figure, the time period to which it relates, and its relationship with the identified need for additional office, industrial and warehouse floorspace are not clear. Furthermore, specifying a potential number of new jobs does not make clear how a decision maker should react to a development proposal. Policies SS1.1 and EM4.1 and Appendix A therefore need to be modified to delete reference to 11,500 jobs to ensure the Plan is effective and justified [**MM13, MM85** and **MM245**].

Conclusion

31. The modifications I have described above are necessary to ensure that the amounts of housing and economic development that the Plan aims to accommodate are clearly expressed, justified and consistent with national policy.

¹³ South West Hertfordshire Economic Study 2016 and Update 2019 [EMP3 and EMP4] and Employment Topic Paper [ED14].

Issue 2: Is the Plan informed by a proportionate and up-to-date assessment of viability and will the policy requirements not undermine deliverability?

32. The Council's Local Plan Viability Assessment 2021¹⁴ provides up-to-date and proportionate evidence about the economic viability of development that is consistent with national policy and guidance. The types of development tested reflect the allocations in the Plan and windfall proposals that are likely to come forward. Reasonable assumptions are made about development values and costs, including those associated with policy requirements in the Plan. Whilst an additional cost for providing electric vehicle charging points in residential developments was not factored in, this would not make a significant difference to the overall findings of the assessment that I describe below¹⁵.
33. The evidence shows that the majority of housing and mixed use allocations are likely to be viable assuming that all relevant policy requirements are met¹⁶. However, despite that, nearly 4,000 of the new homes proposed in the Plan are on allocations that the evidence indicates may not be viable unless fewer affordable homes are provided than required by policy HO3.3. I consider whether that policy is sound later in this report, but in summary I conclude that subject to a main modification it will be effective in securing the maximum amount of affordable housing whilst being flexible enough to avoid preventing schemes coming forward due to poor viability.

Conclusion

34. I therefore conclude that the Plan is informed by a proportionate and up to date assessment of viability and that the policy requirements will not undermine deliverability.

¹⁴ VIA1.

¹⁵ Oral evidence by the Council at the hearing session on 9 February 2022.

¹⁶ 42 out of a total of 55 housing and mixed use allocations [ED38].

Issue 3 – Is the spatial strategy set out in the Plan justified having regard to reasonable alternatives, and is the approach to Green Belt consistent with national policy?

The spatial strategy

35. The identified need for 784 additional homes per year compares with an historic average completion rate of under 380 homes per year. A number of spatial options to accommodate these homes, and economic development, were considered and assessed during the preparation of the Plan. However, the built-up nature of the Borough means that realistic opportunities for accommodating such a scale of development are extremely limited. This is exemplified by the fact that every site that was identified as being available and suitable is allocated in the Plan following a thorough process that involved consideration of all undeveloped land, including Green Belt, as well as opportunities on currently and previously developed land.
36. The spatial strategy is described as transformational in policy SS1.1 and illustrated on the Key Diagram (Figure 1.2). It aims to make efficient use of the limited sites that are available and maximise opportunities to use sustainable forms of transport by focussing 80% of development in the Core Development Area based on and around the town centre. Detailed proposals for the implementation of the strategy in the Watford Gateway, Town Centre, and Colne Valley Strategic Development Areas, that collectively make up the Core Development Area, are set out in policies CDA2.1 to CDA2.3 and the development requirements for allocated sites.
37. All of the allocated sites in the Core Development Area are brownfield, most being in active use comprising buildings of varying quality and/or surface car parks. The strategy requires high density development, including through new buildings that will be significantly taller than existing prevailing heights. Heritage Impact Assessments¹⁷ conclude that development of this nature can be designed such that there would be no, or less than substantial, harm to heritage assets. However, a number of modifications are needed to the policies relating to the three Strategic Development Areas and the development requirements for the relevant allocations so that the

¹⁷ ED32A to ED32K.

Plan is effective in that regard. I identify those modifications in subsequent sections of this report.

38. Outside the Core Development Area, identified development opportunities are more limited although there are 29 housing or mixed use allocations, most being for up to 50 homes. The density of new development is expected to be optimised, but significantly lower than in the Core Development Area.
39. In principle this is a sound spatial strategy for the Borough. However, whether it is effective in enabling the delivery of the amount and type of new homes and other development that is needed, creating well-designed places, protecting heritage assets, and achieving sustainable development in other respects are matters that I consider in subsequent sections of this report, including those relating to the three Strategic Development Areas.
40. Strategic policy SS1.1 provides a high level description of the spatial strategy and sets out some principles that are followed through in more detailed policies throughout the Plan. In most respects, the policy is sound. However, the requirement for all development to take place on brownfield land is not justified or consistent with national policy. Furthermore, it would not be effective in helping to facilitate sufficient development to meet identified needs as it would unnecessarily rule out opportunities that may become available on suitable greenfield sites. That part of the policy should therefore be deleted [**MM15**].

Green Belt

41. The detailed wording of policy SS1.1 needs to be modified so that it is consistent with national policy relating to inappropriate development in the Green Belt only being approved in very special circumstances [**MM15**].
42. The Council carried out a systematic two-stage Green Belt assessment during the preparation of the Plan to inform decisions about whether changes needed to be made to help meet development needs or for other reasons¹⁸. Based on that, and other site specific information, the Plan removes a limited amount of land from the Green Belt in five locations.

¹⁸ ENV4 and ENV5.

43. In three of those cases, the physical character of the land has changed significantly due to development that has taken place such that it no longer serves any Green Belt purpose. Furthermore, retaining the designation would not provide an effective policy approach for considering any proposals for further development that may come forward in those locations during the plan period.
44. Land at Tolpits Lane is now an established gypsy and traveller site. An adjoining area will form an extension to that site to ensure that the identified need for an additional two pitches can be met in a suitable location. National policy allows for limited alterations to the Green Belt to meet specific identified needs for traveller accommodation¹⁹.
45. Land to the north of the A41 on the Borough boundary now forms part of a large film studio complex. It no longer serves any Green Belt purpose. To the south of this is a small field that is essentially contained by the A41, Hempstead Road, and the existing urban area. It is available now and suitable for the development of around 90 dwellings and included in the Plan as housing allocation HS06 Russell Lane. Significantly, the site provides a rare opportunity for the development of new family homes with gardens, rather than high density flats. The proposal would be likely to have an overall low to moderate effect on Green Belt purposes. Subject to a modification, the development requirements for the site in chapter 13 would be effective and consistent with national policy with regard to securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt [**MM180**]. The harm that the development would cause would clearly be outweighed by the significant benefits that the proposal would bring in helping to meet housing needs. That is particularly so in light of my findings later in this report about the difficulties in fully meeting those needs due to land constraints.
46. To the south and south east of housing allocation HS06 Russell Lane is a school, woodland and recreation ground that are enclosed by the existing urban area and that allocation. None of that land would continue to serve a Green Belt purpose once the allocation is developed.

¹⁹ Planning Policy for Traveller Sites (2015) policy E.

47. The revised Green Belt boundaries in all of the locations are based on physical features that are readily recognisable and likely to be permanent.
48. For the above reasons, I am satisfied that there are exceptional circumstances to justify the changes to the Green Belt in five locations that are made in the Plan.
49. All of the other land in the Green Belt serves Green Belt purposes and much of it is also well-used public open space, has significant value for biodiversity, or is separated from the town by the M1 motorway. Other than allocation HS06, no sites that are available and suitable for housing or industrial development have been identified in the Green Belt.

Conclusion

50. Subject to the modifications that I have referred to above and elsewhere in this report, the spatial strategy set out in the Plan is justified having regard to reasonable alternatives, and the approach to Green Belt is consistent with national policy.

Issue 4 – Are the policies relating to, and the allocated sites in, the Watford Gateway Strategic Development Area justified and will they be effective in achieving sustainable development?

51. The Watford Gateway Strategic Development Area covers 31 hectares of land a short distance to the north of the town centre. It comprises Clarendon Road, which is defined as the Primary Office Location in the Borough, along with Watford Junction railway and bus stations, associated areas of car parking, a rail aggregates depot and concrete batching plant, and a variety of industrial and commercial uses.
52. Policy CDA2.1 aims to transform the Area over the plan period to create a mixed-use urban quarter of high quality design and place making with excellent connectivity and a mix of housing, employment and other subsidiary land uses and community orientated facilities. Seven sites are allocated on the basis that they are suitable and are, or will be, available for development. Collectively these are expected to provide around 2,500 homes, a primary school, a hotel, a significant amount of office floorspace, a multi-storey car park, and

new and replacement industrial floorspace. Connectivity within and to the area would be improved including through the provision of two new pedestrian and cycle bridges over the two railway lines that cross the Area.

53. Development of allocation MU05 St Albans Road, in the north west corner of the Area, is now underway following the granting of planning permission for 1,214 dwellings, a primary school, and nearly 2,500 sqm of commercial and office floorspace. Allocations MU08 Station Road and EM01 Cassiobury House also now have planning permission, and a scheme is being progressed for allocation MU09 Watford Police Station on Clarendon Road which is likely to be redeveloped in the next few years.
54. Allocations MU07 Astral House and EM05 Colonial Way/Clive Way, which are to the east of the two railway lines, are expected to remain in industrial use for the much of the plan period. Indeed, both sites are likely to be redeveloped with new industrial units in the short term. Whilst there is a possibility of these sites becoming available for mixed use redevelopment towards the end of the plan period, this would be dependent on various factors, not least the development of allocation MU06 Watford Junction immediately to the west.
55. Allocation MU06 Watford Junction comprises the railway station, a multi-storey car park, extensive surface level car parks, and the rail aggregates depot and concrete batching plant. The aggregates depot and concrete plant is an important facility of at least sub-regional significance which is safeguarded in the Hertfordshire Minerals Local Plan and expected to remain in situ throughout the plan period and beyond. Residential and commercial development nearby would be required to provide suitable mitigation through the agent of change principle in accordance with policy CC8.5 and national policy²⁰.
56. There are currently no specific proposals for developing allocation MU06 but it is supported by the landowners and they, the Council, and other relevant parties are working to deliver a scheme in the medium to longer term. Key will be the provision of a new multi-storey car park as part of a new "mobility hub" to the east of the railway lines with road access from the east and a new pedestrian and cycle bridge over the railways. This would allow high density residential and commercial development on the existing surface car

²⁰ NPPF 187.

parks between the railway lines and the development that is now underway on allocation MU05.

57. In light of the above, whilst it is clear that some of the allocations will deliver development in the next few years, the transformation of the whole Area into a mixed-use urban quarter of high quality design with excellent connectivity is likely to continue throughout the plan period and beyond. That said, such a transformation in this part of the Borough centred on the main railway and bus interchange close to the town centre would represent sustainable development and bring many benefits. The strategic policies and specific allocations in the Plan set out, in principle, a positive approach that will help to facilitate that transformation over the coming years and decades.
58. However, to be effective in that regard significant changes are required to policy CDA2.1, the reasoned justification, Appendix C, and the development requirements for the relevant allocations set out in chapter 13 of the Plan. Those modifications relate to various matters including the expected timing and nature of development in different parts of the Area; the protection of heritage assets; the provision of transport and other necessary infrastructure; and the relationship with the aggregates depot and concrete batching plant [**MM18 to MM35, MM199 to MM208, MM235, MM236, MM240, MM241, MM250 and MM251**]. There is no need to modify policy CDA2.1 to repeat national policy requirements relating to sequential tests and retail impact assessments.
59. Parts of the Area are not designated as allocations in the Plan. However, policy CDA2.1 and other policies provide a positive approach to consider any proposals that may come forward on unallocated sites in the Area, such as Apex House at Bridle Way. It is not, therefore, necessary to modify the Plan to allocate such a site that had not been identified as available and suitable during the preparation of the Plan.

Conclusion

60. The modifications that I have described above are necessary to ensure that the strategy for, and the allocated sites in, the Watford Gateway Strategic Development Area are justified and will be effective in achieving sustainable development.

Issue 5 – Are the policies relating to, and the allocated sites in, the Town Centre Strategic Development Area justified and will they be effective in achieving sustainable development and ensuring the vitality of the town centre?

61. The Town Centre Strategic Development Area covers 52 hectares focused on High Street running from the Town Hall in the north to High Street station in the south. It acts as a sub-regional centre for shopping, leisure, and service sector jobs. It includes two conservation areas and numerous nationally and locally listed buildings. Access to the centre for pedestrians and cyclists from the surrounding parts of the town is hindered by the surrounding ring road and other busy roads.
62. Policy CDA2.2 aims to intensify town centre uses, increase the number of residents, improve the public realm, and provide active frontages to the ring road to reduce vehicle dominance. Eight sites are allocated on the basis that they are suitable and are, or will be, available for development. Collectively these are expected to provide around 500 homes and new or replacement floorspace for a variety of main town centre uses. Most are likely to be developed in the first few years of the plan period, with the most notable exception being MU13 Sainsbury's which is expected to become available in the late 2020s for development of around 220 homes and new commercial floorspace. Given the nature of the area, it is likely that further opportunities for redevelopment will come forward on unallocated sites in the Area during the plan period.
63. Generally, policy CDA2.2 and the development requirements for the relevant allocations in chapter 13, provide a positive and effective approach. However, a number of modifications are required relating to the protection of heritage assets, improvements to transport infrastructure, and the use of supplementary planning documents and other guidance to ensure that development, including on windfall sites, is coordinated and helps to achieve the objectives for the Area [**MM36 to MM46, MM182, MM183 and MM209 to MM218**]. This will ensure the policy is effective and consistent with national policy.
64. Policies VT5.1 and VT5.2 aim to ensure the vitality and viability of the town centre by setting out a positive and flexible approach towards the full range of main town centre uses and ensuring that such uses

are controlled elsewhere. In most respects these policies are sound, although a number of changes are required to ensure effectiveness and consistency with national policy relating to main town centre uses [**MM97** to **MM101** and **MM256**].

Conclusion

65. Subject to the modifications that I have described above, the policies relating to, and the allocated sites in, the Town Centre Strategic Development Area are justified and will be effective in achieving sustainable development and ensuring the vitality of the town centre.

Issue 6 – Are the policies relating to, and the allocated sites in, the Colne Valley Strategic Development Area justified and will they be effective in achieving sustainable development?

66. The Colne Valley Strategic Development Area comprises 83 hectares to the south of the town centre and includes three distinct parts around Lower High Street in the east; the hospital, football ground, and Riverwell in the west; and the River Colne and Thomas Sawyer Way corridor running between them.

67. Policy CDA2.3 aims to transform the Area through co-ordinated change to produce a sustainable and mixed use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses. A number of sites are allocated for housing or mixed use development which collectively are expected to accommodate around 4,400 new homes in the plan period thereby making a significant contribution to meeting the Plan's housing requirement. Much of the land in the Area is not specifically allocated for development, although policy CDA2.3 allows for sites that become available to be developed for residential and other uses subject to the requirements of other relevant policies.

68. Development on allocation MU21 Riverwell in the western part of the Area is underway, and will continue in a number of phases which are expected to deliver nearly 1,400 homes along with a new primary school. However, to ensure effectiveness, a number of modifications are required to policy CDA2.3 and the development requirements set out in chapter 13 relating to MU21 Riverwell. These reflect the latest evidence, including that relating to the proposed redevelopment of

the hospital and provision of a new multi-storey car park, and address a number of other issues relating to transport infrastructure and the protection of heritage assets [**MM50, MM54** and **MM228** to **MM230**].

69. A total of around 2,400 of the new homes in the Area would be on a number of allocated sites in the eastern part of the area around Lower High Street, including HS21 Waterfields Retail Park (414 dwellings), MU16 Tesco (1,338 dwellings, a primary school and commercial and community floorspace), and MU18 Colne Valley Retail Park (466 dwellings and commercial and community floorspace).
70. Those allocations, and land and buildings around them, are in active use for mainly large-scale retail and commercial purposes along with extensive areas of surface level parking and access roads. Whilst the owners of the allocations have expressed support for the Plan's objectives for the Area and confirmed that the sites will be available, the indications are that they are likely to be brought forward for development at different times, and some not until the late 2020s or early 2030s.
71. As with the strategy for Watford Gateway, the transformation of the Colne Valley into a mixed use urban quarter of high quality design and place making with excellent connectivity and a diverse range of uses would represent sustainable development and bring many benefits. However, policy CDA2.3 does not include a mechanism to effectively plan and co-ordinate the delivery of the transformative change aspired for in the Area, in particular the allocated sites and other land around Lower High Street.
72. The development requirements for the allocations set out in chapter 13 of the Plan include references to supporting the wider objectives for the Area and, in some cases, engaging with the owners of another site. However, it is not clear how this would be effective if different sites (allocations, but also potentially windfalls) around Lower High Street are brought forward at different times, particularly in the absence of a clearer articulation of when and how that area is expected to change, the overall pattern of development in the long term, and the changes to the road network and public realm that would be required to achieve the transformation.

73. The Council carried out initial work in 2021 as a first step in the preparation of a masterplan for the Lower High Street area²¹. In order for policy CDA2.3 to be effective in helping to deliver the transformation of that area over the plan period and beyond, a modification is needed to refer to the Council preparing a Masterplan Supplementary Planning Document for the Lower High Street area. Proposals would be required to have regard to the masterplan and demonstrate how they contribute to the coordinated delivery of development, do not inhibit the delivery of other sites, and do not compromise future development opportunities that could make a positive contribution towards the objectives set out in policy CDA2.3 [**MM49, MM51 and MM53**]. The weight to be attached to the Masterplan Supplementary Planning Document would depend on its status in accordance with national policy; this does not need to be repeated in the Plan.
74. The Council advised during the examination that the preparation of a masterplan is a priority, and that it is likely to be adopted within two years. Given that the large allocations around Lower High Street, and potentially windfall sites, are expected to come forward in the medium and longer term the masterplan should be in place to effectively coordinate development along with the significant improvements to the built environment, public realm and connectivity for pedestrians, cyclists and public transport that will be required.
75. A number of other changes to policy CDA2.3, the reasoned justification, and the development requirements for the relevant allocations are needed. Those modifications relate to various matters including the protection of heritage assets and improvements to transport infrastructure [**MM47, MM48, MM52, MM55, MM185 to MM188, MM190, MM219 to MM221, MM223 to MM225, MM231, MM232 and MM237**]. This will ensure those policies are effective and justified.
76. Whilst, for commercial reasons, there may be no intention to redevelop the Tesco building in the foreseeable future, it is not necessary to amend the policies map to exclude that part of the site from allocation MU16. This is because circumstances may change in the medium or longer term and, irrespective of whether the building remains or is redeveloped, it would need to be taken into account in the design and layout of any schemes on other parts of the allocation and in the wider area. Nor does the indicative yield for the site need

²¹ A Vision for the Lower High Street Watford (draft June 2021) [ED49A].

to be modified as it is based on a consistent approach used for all of the allocations in the Plan.

77. There is no identified quantitative need for significant additional retail floorspace in the Borough. In that context, the requirements in policies CDA2.3, MU16 and MU18 for no additional retail floorspace in the Colne Valley (which is outside the town centre) are justified as they will help to ensure the Plan is effective in promoting the vitality and viability of the town centre in line with national policy. There is no need to modify those policies to repeat national policy requirements relating to sequential tests and retail impact assessments.

Conclusion

78. The modifications that I have described above are necessary to ensure that policy CDA2.3 and the allocated sites in the Colne Valley Strategic Development Area are justified and will be effective in achieving sustainable development.

Issue 7 – Does the Plan identify a sufficient supply and mix of sites to ensure that the identified need for additional homes in the Borough can be met?

79. Policy HO3.1 states that provision will be made for 14,988 new homes in the Borough between 2018 and 2036. Figure 3.1 indicates that this is expected to be delivered through 8,748 homes on allocated sites; 4,145 on completions 2018 to 2021 and commitments on 1 April 2021; and 2,095 on windfalls. Appendix B sets out a housing trajectory for the period 2018 to 2036.
80. I have already concluded that the Plan should be modified to set out a minimum housing requirement of 13,328 net additional dwellings for a modified plan period of 2021 to 2038 (784 per year). In order to be justified and effective, the housing supply figures in the Plan need to be updated to reflect the modified plan period and the latest evidence about the amount and timing of development expected on each site. The detailed implications of this are considered below.
81. The requirement for 784 net additional homes per year compares with an historic average completion rate of under 380 homes per year. Achieving this substantial increase in delivery will be

challenging, particularly given the highly built up nature of the Borough. In this context, I turn now to consider the supply assumed in the Plan from allocations, commitments, and windfalls.

Housing and mixed use allocations

82. As previously noted under main issue 3, every site that was identified as being available and suitable during the preparation of the Plan following a thorough site identification process over a number of years is allocated. The submitted Plan assumes that a total of 8,748 dwellings will be provided on the housing and mixed use allocations based on the indicative yields set out in chapter 13.
83. The indicative yield for each allocation is based on the site size and a density assumption that varies depending on its location. The assumed densities range from 220 dwellings per hectare for allocations in the Core Development Area to 55 dwellings per hectare for allocations in the less accessible parts of the Borough. These assumptions are reasonable, having regard to the types of developments brought forward in recent years, and consistent with national policy which aims to make effective use of land. However, paragraphs 3.2 and 13.4 of the Plan need to be modified to justify the indicative yields and ensure that relevant policies can be effectively implemented to optimise densities based on a design-led approach that achieves high quality development and protects heritage assets [**MM57** and **MM174**].
84. The latest evidence shows the total indicative capacity of the allocations to be 8,604 dwellings. This reflects the modification relating to MU07 Astral House in the Watford Junction Strategic Development Area which is no longer assumed to deliver 131 dwellings in the plan period, along with some minor changes to the capacities of a limited number of other sites. To ensure effectiveness, chapter 13, Figure 3.1 and the housing trajectory need to be modified accordingly [**MM58, MM172, MM189, MM204** and **MM247** to **MM249**].
85. I have concluded under previous main issues that the allocations in the three Strategic Development Areas are sound subject to a number of main modifications. The indicative yields for those allocations, based on high density development, are justified for the reasons already set out. Based on those yields, the Strategic

Development Areas are collectively expected to accommodate around 80% of the new homes needed.

86. There are 31 housing and mixed use allocations outside the Strategic Development Areas. Many of these are small to medium sized sites, although MU23 Asda and HS27 Croxley View are expected to deliver 422 and 240 dwellings respectively. The indicative yields for all of the allocations are based on density assumptions appropriate to their locations. All are suitably located with a reasonable prospect of being available at the point envisaged, subject to a limited number of modifications to reflect the latest evidence from prospective developers. Modifications are also needed to the development requirements for some of the allocations to ensure that the Plan is effective in achieving sustainable development with regard to various factors including relationship with a waste transfer station (HS01), and potential impacts on heritage assets (HS18 and HS19) and the road network (MU23) [**MM179, MM181, MM184, MM184A, MM191 to MM193, MM226, MM227, MM233 and MM234**].

Commitments

87. The Plan assumes that 2,507 additional homes will be built on sites with planning permission on 1 April 2021. This assumes that all of those permissions will be fully implemented. However, historically around 15% of dwellings with permission have not been built. If such a lapse rate were applied to the permissions at 1 April 2021 it would reduce the supply from that source by 376 dwellings to 2,131. In order to ensure that the Plan is justified and effective, this needs to be explained in the reasoned justification [**MM61**].

Windfalls

88. Paragraph 3.3 refers to an historic average windfall rate of 70 homes per year on sites of fewer than 5 units, and states that it is expected that windfalls will contribute 116 homes per year in future. However, the housing trajectory in Appendix B includes a windfall allowance of 139 homes per year from 2021. This ambiguity and inconsistency needs to be rectified by way of modifications which I describe below.
89. Subject to the main modification I have already recommended to policy SS1.1 to remove the restriction on greenfield development, the Plan allows residential development on non-allocated sites in all parts of the Borough subject to compliance with other policies such as

those protecting Green Belt, open space and biodiversity. On that basis, there is no reason that the historic average of 70 dwellings per year on sites of fewer than 5 dwellings will not continue.

90. Furthermore, whilst all available and suitable sites with capacity for 5 or more dwellings that were identified during the preparation of the Plan are allocated, the relatively strong market and high value of residential development mean that further brownfield sites will come forward during the plan period. This is particularly the case in the three Strategic Development Areas where policies CDA2.1 to CDA2.3 (as modified) set out a positive approach to encouraging development not just on specific allocations. As transformation of those Areas takes place, further opportunities for windfall developments will no doubt materialise.
91. Finally, there is compelling evidence that some of the allocations that do not have planning permission are likely to deliver a greater number of dwellings than assumed by the indicative yields. For example, allocation MU05 St Albans Road has planning permission for 1,214 dwellings whereas its indicative capacity, based on its size and the standard assumptions about density, would be around 550 units. Policies in the Plan require densities to be optimised and specify indicative minimum figures for different parts of the Borough. It is unlikely, therefore, that proposals will come forward for lower densities than assumed by the indicative yields.
92. I am, therefore, satisfied that there is compelling evidence that windfalls will provide a reliable source of supply and make a significant contribution to meeting housing needs. In the absence of any reliable data to quantify windfalls on brownfield sites of 5 or more dwellings and additional units on allocations, the submitted Plan includes a total windfall figure of 2,095 dwellings to increase the assumed supply from commitments and allocations to match the minimum requirement set out in policy HO3.1. In the particular circumstances of the Borough which I have described, this is a reasonable approach in principle, and such an assumption is not overly optimistic. I deal below with the detailed modifications that are required with regard to windfalls to ensure consistency with my other findings relating to the plan period, allocations and commitments.

Overall housing land supply for the plan period

93. I have already found that policy HO3.1 needs to be modified to set a minimum housing requirement of 13,328 additional dwellings between 2021 and 2038. Allocations are likely to deliver at least 8,604 dwellings, and commitments up to 2,507 dwellings. This leaves a shortfall of at least 2,217 homes against the minimum requirement for 13,328. The Plan needs to be modified to refer to these figures, and explain that a minimum of 158 dwellings per year will need to be provided on windfall sites from 2024/5 onward if the minimum housing requirement is to be met. This can then be monitored annually by the Council, along with the supply that materialises from allocations and commitments, in order to keep this element of the Plan under review [**MM58** and **MM59**]. These modifications ensure the Plan is effective and justified.
94. National policy requires local plans to identify specific, deliverable sites for years 1-5; and specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. I deal with the five year supply for years 1-5 (2021 to 2026) below. However, it is clear from the housing trajectory (as modified) that the Plan identifies more than sufficient specific, developable sites (allocations) for years 6-10. Plan policies, as modified, identify most of the Borough as being a broad location for growth, with a particular focus on the Core Development Area. For the reasons set out earlier, it is reasonable to assume that a total of at least 2,217 homes (additional to those assumed on commitments and allocations) will be provided on windfall sites in the period to 2038. It is not possible to identify further specific developable sites for years 11-15.
95. I am, therefore, satisfied that, subject to the modifications that I have described, the Plan identifies a sufficient supply of housing land to meet the minimum housing requirement consistent with national policy.

Five year housing land supply

96. The Council's latest evidence, as discussed above, indicates that the number of additional homes that are expected to be completed between 1 April 2021 and 31 March 2026 is as follows:

• Commitments (development commenced)	1,247
• Commitments (full permission, not commenced)	1,260
• Allocations with full planning permission	1,218
• Allocations without planning permission	1,236
• Windfalls (158 x 2)	316
• Total	5,237

97. There is no clear evidence to suggest that the numbers of dwellings in the first three categories are unlikely to be delivered in the timescales expected meaning that they should be considered deliverable in accordance with national policy. For the reasons set out earlier, a windfall allowance of 158 per year is justified, and applying that from 2024 onward avoids any significant double counting with commitments.
98. There is evidence to support the assumptions about completions on the 22 allocations without planning permission that collectively are expected to deliver 1,236 additional homes by 2026. That evidence clearly shows that there is a reasonable prospect of the number of homes assumed being delivered on each of those allocations, with a limited number of exceptions where development may start later than assumed by the Council. However, if that slippage did occur it would be unlikely to reduce the number of completions in the five year period by more than 200-300 dwellings. I am, therefore, satisfied that the Plan identifies a supply of deliverable housing land on 1 April 2021 that was more than sufficient to meet the five year requirement of 4,704 dwellings on that date²².
99. The housing trajectory, which is based on reasonable evidence and assumptions, shows that a five year supply of land is also likely to be available on adoption and in subsequent years.

Conclusion

100. Subject to the main modifications that I have described, the Plan identifies a sufficient supply and mix of sites to ensure that the need for additional homes in the Borough can be met in accordance with national policy.

Issue 8 – Are the policy requirements relating to residential development justified and consistent with national policy, and will the Plan be effective in meeting the housing needs of different groups in the community?

Affordable housing

101. Policy HO3.3 requires all residential development of ten or more homes to provide at least 35% affordable housing. Whilst this is expected to deliver over 4,000 new affordable homes, that would be

²² $784 \times 5 = 3,920 + 20\% = 4,704$.

significantly below the identified need for additional affordable housing. The viability evidence indicates that the 35% requirement can be met on most types of site in the central part of the Borough where around 80% of new homes will be provided. Some developments, particularly in the lower value areas, may not be able to meet the 35% requirement in full. That is reflected in policy IN10.3 relating to development contributions, and policy HO3.3 which sets out a late stage review mechanism aimed at securing the maximum number of affordable homes that can be viably delivered. However, to be effective, policy HO3.3 needs to be modified to clarify the circumstances in which that mechanism will be applied [**MM69**].

102. Policy HO3.3 expresses the 35% affordable housing requirement in terms of the number of habitable rooms. This provides flexibility and has the potential to increase the supply of affordable homes with three or more bedrooms to address the growing need amongst families with dependent children. However, for effectiveness, a modification is required to the reasoned justification to explain this element of the policy [**MM65**].
103. The requirement in policy HO3.3 for 60% of affordable homes to be for social rent reflects the identified need for that tenure of affordable housing whilst ensuring consistency with national policy relating to affordable home ownership²³. However, a main modification is required to the reasoned justification to clarify the approach [**MM66**]. Whilst the Plan was prepared prior to the introduction of national policy relating to First Homes, the tenure split in policy HO3.3 would allow such products to be brought forward along with other forms of affordable home ownership as appropriate.
104. Subject to the main modifications I have described, the Plan should be effective in securing the maximum amount of affordable housing to help meet identified needs in a way that is consistent with national policy whilst maintaining the viability of development.

Dwelling size

105. Around one third of households in the Borough have one or more dependent children and that proportion is expected to increase over the plan period²⁴. National policy expects the needs of families with children to be reflected in local plans, and the Plan should seek to achieve balanced communities in all parts of the Borough. There is

²³ NPPF 65.

²⁴ Council response to PQ21.

no overriding reason why, with good design, high density developments in and around the town centre cannot be suitable for families. The requirement in policy HO3.2 for at least 20% of new homes to have at least 3 bedrooms is, therefore, justified. However, to ensure effectiveness, the policy needs to be modified to clarify that it applies to sites of 5 or more dwellings [**MM64**]. Excluding development in the Strategic Development Areas from the requirement is not necessary and would significantly reduce the number of new family-sized homes.

106. Policy HO3.10 requires all new homes to meet or exceed the nationally described space standards. This carries forward a requirement previously set out in a supplementary planning document²⁵ that has been implemented successfully for a number of years. Given the Plan's reliance on high density development, much of which is expected to be in the form of apartment blocks with less outside space than detached and semi-detached houses, it is particularly important for the minimum internal space standards to be achieved to ensure satisfactory living conditions.

Private and shared outdoor amenity space, and publicly accessible open space

107. Policy HO3.11 requires the provision of private outdoor amenity space for all dwellings, ranging from a minimum of 5 sqm for one bedroom apartments to 25-40 sqm for four bedroom houses. The detailed wording and structure of this part of the policy need to be modified to ensure clarity and therefore effectiveness [**MM81**].
108. The last part of policy HO3.11 supports the provision of communal outdoor amenity space, including roof and terrace space. Such spaces provide important opportunities for socialising and recreation, including children's play, that private balconies do not. As the vast majority of residential development is expected to be in the form of apartment blocks, it is important that the Plan is effective in securing private shared outdoor amenity space that is high quality and accessible to all residents. To ensure this, policy HO3.11 and the reasoned justification need to be modified to set out a clear requirement in this regard [**MM80** and **MM81**].

109. Policy NE9.7 requires development to contribute to the provision, enhancement and maintenance of publicly accessible open space. In

²⁵ Residential Design Guide 2016 [LDD10].

areas where there is an identified deficiency, provision is required on site. Most allocations are not in areas where there is a deficiency. A modification is required to clarify that the policy relates to major residential development and to refer to planning obligations [MM150]. A modification is also required to the reasoned justification to clarify the different types of open space that may be required as identified in the Watford Green Spaces Strategy [MM149]. These modifications ensure that the policy is effective and justified.

Build to rent

110. Policy HO3.4 is supportive of build to rent homes provided that a number of criteria are met. In most respects the approach is consistent with national policy and associated guidance²⁶, although a number of changes need to be made to the policy and reasoned justification to ensure this is so. Those changes relate to the provision of affordable housing, including through discounted rents that are at least 20% below market rents having regard to the latest relevant evidence, and the use of site specific viability assessments in particular circumstances [MM70 to MM72]. The references to break clauses and covenants in the reasoned justification are not policy requirements and do not need to be modified to ensure soundness.

Custom and self build housing

111. Policy HO3.7 requires 10% of homes on sites of 50 or more dwellings (excluding affordable homes) to be provided as self-build plots. If the plots are not taken up within 12 months, they would be returned to the developer.

112. To be effective and justified, the policy needs to be modified to clarify that the requirement relates only to non-flatted developments. As the vast majority of new homes are expected to be in apartment blocks, the requirement will only apply to a limited number of developments meaning that the total number of self build plots that would be made available would not be disproportionate to the potential level of demand. However, to be effective, the policy needs to refer to plots being offered on the open market as well as to people on the self-build register, and specify that the 12 month period applies from the commencement of development [MM76]. The

²⁶ www.gov.uk/guidance/build-to-rent

reasoned justification needs to be modified accordingly [**MM68**, **MM74** and **MM75**].

Housing for the elderly and those with special needs

113. The evidence indicates that there will be a large rise in the number of households that include people with health issues including impaired mobility and dementia. The Council received over 300 applications to adapt existing homes in the last year or so. It is likely that there will be a significant increase over the plan period in the number of households that would benefit from having accessible and adaptable homes that meet the building regulation standard M4(2). The cost of meeting that standard was included in the viability assessment. The requirement in policy HO3.10 for all new homes to be designed and built to comply with the M4(2) standard unless they are built to comply with M4(3) (wheelchair user) is, therefore, justified by evidence relating to need and viability.
114. Policy HO3.10 requires developments of 10 or more homes to provide at least 10% to M4(3) standard. However, the evidence indicates a need for around 500 additional wheelchair user homes. This represents around 4% of the housing requirement. Policy HO3.10 needs to be modified accordingly so that it is justified by proportionate evidence [**MM78**].
115. The last part of policy HO3.10 requires 2% of homes on developments of 50 or dwellings to be designed to support someone living with dementia. In order to be effective and justified, the policy and reasoned justification need to refer to the design principles set out in Figure 3.3 and to clarify that wheelchair user homes can contribute to the requirement if appropriately designed [**MM79**].
116. Policy HO3.5 relates to specialist housing and care homes, and includes requirements relating to the protection of existing facilities and the provision of new facilities. Various changes need to be made to the policy and reasoned justification to ensure the policy is sound in all four respects.
117. Firstly, clarification is needed of the types of development that it applies to, consistent with national policy²⁷, including age-restricted market housing, retirement living or sheltered housing, housing with

²⁷ PPG ID:63-010-20190626.

care or extra care, residential care homes, and nursing homes. Secondly, it needs to clarify the criteria relating to proposals that would result in the loss of existing residential accommodation that provides specialist care and supported living. Thirdly, it needs to set out a positive approach towards development proposals that provide specialist housing and delete reference to all such development being within 400 metres of district or local centres and public transport. Finally, the requirement for the provision of affordable housing needs to be clarified so that it only applies to specialist care and supported living accommodation that fall within use class C3 (and not residential institutions such as care homes and nursing homes) [**MM67, MM73** and **MM255**].

Gypsy and traveller accommodation

118. Paragraph 3.35 in the Plan refers to a need for two additional pitches for gypsies and travellers up to 2036. This is based on an up-to-date and proportionate assessment²⁸. Paragraph 3.37 refers to a site being allocated adjacent to the existing site at Tolpits Lane to meet this need.

119. However, that allocation is not included in the lists of sites in Chapter 13 under policy SA13.1, nor is it defined on the policies map. Modifications are therefore required to refer explicitly to the allocation [**MM173, MM177** and **MM194**], and the policies map needs to be amended accordingly. Subject to this, the Plan will be effective in ensuring that the identified need for additional gypsy and traveller accommodation can be met. The evidence shows there is no identified need for accommodation for travelling showpeople in the Borough.

Conclusion

120. Subject to the main modifications that I have described, the various policy requirements relating to residential development are justified and consistent with national policy, and the Plan will be effective in meeting the housing needs of different groups in the community.

²⁸ Gypsy and Traveller Accommodation Assessment 2019 (ORS) [HOU5].

Issue 9 – Are the policies relating to industrial, warehouse and office developments justified and will they be effective in achieving sustainable development?

121. I have already found that there is an identified need for a total of 37,600 sqm of additional office floorspace and 98,400 sqm of additional industrial and warehouse floorspace in Watford. However, the evidence clearly shows that, whilst there are opportunities for a significant amount of additional office floorspace in and close to the town centre, the amount of land in the Borough suitable and available for industrial and warehouse development is extremely limited²⁹. The Plan aims to build on its sub-regional role in office provision, whilst protecting existing industrial areas and supporting the limited opportunities to provide new industrial and warehouse floorspace.

Designated industrial areas

122. The five main existing industrial areas in the Borough are indicated on Figure 4.1 and designated on the policies map. Policy EM4.2 aims to prevent the net loss of industrial floorspace in those areas unless there is up-to-date evidence to demonstrate that the site is no longer required for industrial use, or the property has been vacant for at least 12 months and there is clear marketing evidence that it cannot be reused or redeveloped for industrial uses in the medium term. In order to ensure the policy is effective in that regard, the detailed wording needs to be modified [**MM91**]. Subject to that, the approach to protecting existing industrial areas is justified with one exception.

123. Reach Printing Services Limited occupies a site alongside the A41 in the northern part of the Borough. It is physically separate from, and has no direct access to, other industrial and warehouse uses due to the presence of a large supermarket and associated car parks to the south and railway line to the east. Policy EM4.4, relating to existing employment uses outside designated industrial areas, provides an appropriate policy for considering any proposals that may come forward to redevelop the site in the plan period. Its inclusion as part of a designated industrial area subject to policy EM4.2 is not,

²⁹ EMP1 to EMP5.

therefore, justified and the policies map should be amended accordingly.

Additional industrial and warehouse floorspace

124. Table 4.1 summarises the amount of additional industrial floorspace that the Plan proposes be provided between 2018 and 2036 on sites with planning permission and three allocations. To be justified and effective, the figures need to be modified to reflect the modified plan period and the latest evidence about the availability and capacity of sites [**MM88** and **MM89**].

125. The modified total of 25,206 sqm of additional industrial and warehouse floorspace on commitments (12,407 sqm) and allocations (12,799 sqm) between 2021 and 2038 is significantly less than required in the Borough (97,400 sqm), but there are no further available and suitable sites. To ensure the Plan is justified, modifications are required to refer to the amount of floorspace proposed, acknowledge that this is insufficient to meet identified needs in the Borough, and state that the Council will continue to work with neighbouring authorities in South West Hertfordshire to address the shortfall. Reference to the latter point in policy EM4.1 needs to be deleted as it is not relevant to development proposals in the Borough [**MM84** to **MM86**].

Office development and allocations

126. Table 4.2 summarises the amount of additional office floorspace that the Plan proposes between 2018 and 2036 on sites with planning permission and allocations. To be justified and effective, the figures need to be modified to reflect the modified plan period and the latest evidence about the availability and capacity of sites [**MM90**]. The modified total of 85,488 sqm of additional office floorspace on commitments (66,060 sqm) and allocations (19,428 sqm) between 2021 and 2038 is significantly more than required in the Borough (37,600 sqm). This reflects the availability of suitable sites, the sub-regional role that the town performs, and recent evidence of strong demand for high quality office floorspace.

127. Most of the additional office floorspace is proposed at Clarendon Road which is close to the town centre and Watford Junction railway station, and defined in policy EM4.3 as the Primary Office Location in the Borough reflecting its existing role. This is justified by the

availability of suitable sites in a highly accessible location that is attractive to the local and sub-regional market. However, the requirement in policy EM4.3 for impact assessments for office developments outside the Clarendon Road Primary Office Location, including in the town centre, is not justified or consistent with national policy. To address this, the office development hierarchy defined in the Plan needs to be modified to give the town centre equal status to Clarendon Road, and the requirement for impact assessments for offices should be deleted [**MM92, MM93** and **MM96**].

128. In order to be effective, the detailed wording of policy EM4.3 needs to be modified to prevent the net loss of office floorspace at Clarendon Road unless the proposal would safeguard the commercial role and character of the Primary Office Location and meet a number of other defined criteria [**MM94** and **MM95**].

Conclusion

129. Subject to the main modifications that I have described, the policies relating to industrial, warehouse and office developments are justified and will be effective in achieving sustainable development.

Issue 10 – Will the Plan be effective in encouraging the use of sustainable modes of transport, ensuring safe and suitable access to development for all users, and mitigating the impacts of development on the transport network?

130. Managing transport in the Borough is a key challenge, not least because of the high levels of greenhouse gas emissions from the sector, poor health associated with air pollution, and the social and economic impacts of congested roads. The spatial strategy concentrates the majority of future development in the most accessible parts of the town³⁰ in order to minimise the need to travel and maximise opportunities to walk, cycle and use public transport. Chapter 11 in the Plan includes a number of policies and proposals aimed at creating a "sustainable travel town" and ensuring that development mitigates the impacts on the transport network. In most respects those policies and proposals are sound, although a

³⁰ As illustrated in Figure 1.1 in the Plan.

number of modifications are required to the detailed wording. I describe these below.

Development and improvements to transport infrastructure

131. Policy ST11.1 expects all development to contribute towards sustainable and active travel behaviour and sets out a number of specific requirements for contributions towards improving public transport and traffic demand management. To ensure effectiveness and consistency with other parts of the Plan, modifications are required to the policy and reasoned justification to refer to links to High Street Station and include an additional requirement for developments to enhance pedestrian and cycling facilities at key junctions with the ring road around the town centre [**MM158** and **MM159**].
132. Policy ST11.2 seeks to protect various existing and potential routes for public transport, walking and cycling, and sets out measures to protect and improve Watford Junction as a multi-modal transport hub. Modifications are required to the policy and reasoned justification to ensure that appropriate weight is given to protecting the relevant routes, proportionate to their status, when considering development proposals, and to ensure consistency with other parts of the Plan including policies relating to the Watford Gateway Strategic Development Area [**MM157**, **MM160** and **MM161**]. Modifications are also required to the reasoned justification, Figure 11.3, and development considerations for allocation EM02 Wiggshall Industrial Estate to ensure that it is effective in facilitating access to the safeguarded disused Croxley rail line [**MM163** to **MM165** and **MM237**]. Changes are required to the policies map to ensure that the routes are accurately and appropriately defined. This will ensure the Plan is justified and effective.
133. Policy ST11.3 requires major developments to observe a number of defined principles and to support specific infrastructure schemes listed in Appendix C (where locationally relevant). For effectiveness, a modification is required to ensure consistency with other parts of the Plan and to make clear that relevant routes and areas are defined on the policies map [**MM162** and **MM166**].

Cycle and car parking

134. Policy ST11.4 requires all development to provide secure on-site cycle parking facilities in line with the standards set out in Appendix D of the Plan. Modifications are required to the policy, and the cycle standards for larger dwellings, to ensure that they are justified and effective [**MM167**, **MM168** and **MM252**].
135. Policy ST11.5 sets out requirements for car parking provision including maximum standards for different types of development in the Core Development Area and other parts of the Borough (Appendix E); the provision of spaces for disabled persons, car club use, and powered two wheelers; and the installation of active and passive charging infrastructure for electric vehicles. A modification is required to the car parking standards for industrial and warehouse developments in Appendix E to ensure that they are justified and effective [**MM253** and **MM254**].
136. The Council's viability assessment did not include an additional cost for meeting the requirement in policy ST11.5 to provide 20% of parking spaces with active charging infrastructure and for all other spaces to have passive provision. However, an additional cost of £3,600 per dwelling would not make a significant difference to the findings of the viability assessment³¹. Furthermore, incorporating such infrastructure into development at the outset will be cost effective and is necessary to encourage the shift to more sustainable forms of transport.

Strategic road network

137. The Council's transport evidence shows that, subject to the Plan's policies and mitigation measures, the development proposed will not have significant impacts (in terms of capacity, congestion and safety) on the strategic road network, including the M1 motorway. The County Council and National Highways are satisfied in that regard.

Conclusion

138. Subject to the main modifications that I have described, the Plan will be effective in encouraging the use of sustainable modes of transport, ensuring safe and suitable access to development for all

³¹ Council oral evidence to the hearing session on 9 February 2022.

users, and mitigating the impacts of development on the transport network.

Issue 11 – Will policies IN10.1 to IN10.3 be effective in helping to ensure the timely provision of new or improved infrastructure needed to support development proposed in the Plan?

139. Policy IN10.1 seeks to achieve an integrated approach to the delivery of development and infrastructure. A modification is required to give appropriate weight to the Watford Infrastructure Delivery Plan and achieve consistency with other parts of the Plan [**MM152**]. This will ensure the policy is justified and effective.
140. Policy IN10.2 requires developments to ensure there is, or will be, sufficient infrastructure capacity to meet the additional needs generated. Modifications are required to refer to the use of planning conditions and clarify the requirements for non-householder developments including relating to the provision of high speed internet facilities [**MM153** and **MM154**]. This will ensure the policy is justified and effective.
141. Policy IN10.3 seeks to balance the priorities for infrastructure delivery with those for affordable housing, other non-infrastructure related planning obligations and sustainability standards. A modification is required to ensure consistency with national policy relating to planning obligations and to clarify the requirement relating to off-site highway works thereby ensuring effectiveness [**MM155**]

Conclusion

142. Subject to the main modifications described above, policies IN10.1 to IN10.3 will be effective in helping to ensure the timely provision of new or improved infrastructure needed to support development proposed in the Plan in ways that are justified and consistent with national policy.

Issue 12 – Will policies QD6.1 to QD6.5 be effective, when applied with other relevant policies in the Plan, in helping to create high quality, beautiful and sustainable buildings and places?

143. Policy QD6.1 sets out different approaches to the design of development in the Core Development Area, Established Areas, and Protected Areas. These reflect the different characters of those areas, and the type and amount of development proposed in them. To ensure effectiveness, a modification is required to clarify that the three areas are defined on the policies map [**MM105**].
144. Policy QD6.2 requires all development to demonstrate how it responds to a number of design principles relating to character and identity, built form, active and passive frontages, movement and connectivity, and views. Modifications are required to refer to the Council's Skyline Supplementary Planning Document and to include an additional principle relating to sustainability [**MM106** to **MM108**]. This will ensure consistency with national policy and effectiveness.
145. Policy QD6.4 sets out detailed design requirements for new buildings. Modifications are required to clarify those relating to primary access for ground floor units and internal cores, and to include an additional requirement for buildings to promote the use of stairs and provide secure cycle parking in easily accessible locations [**MM109** to **MM111**]. These changes are necessary to ensure effectiveness given the number of new homes that will be provided in apartment blocks.
146. Policy QD6.5 sets out additional design requirements for buildings that exceed the base building heights defined in Figure 6.3. Those base heights range from four storeys outside the Core Development Area to ten storeys in parts of the Watford Gateway Strategic Development Area. The approach is justified by the Watford Tall Buildings Study³² and is, in most respects, sound. However, to ensure effectiveness and consistency with national policy, modifications are required relating to design quality and the types of significant public benefits that such development is expected to deliver, and to include reference to the Skyline Supplementary Planning Document [**MM112** to **MM117**].

³² HER19 [2021]

Conclusion

147. Subject to the main modifications I have referred to above, policies QD6.1 to QD6.5 will be effective, when applied with other relevant policies in the Plan, in helping to create high quality, beautiful and sustainable buildings and places.

Issue 13 – Does the Plan set out a positive strategy for the conservation and enjoyment of the historic environment, and are policies HE7.1 to HE7.4 consistent with national policy?

148. I have already recommended modifications to the development requirements and considerations set out in chapter 13 of the Plan for various allocations, and to policies CDA2.1 to CDA2.3, to ensure that the development proposed in the Plan takes appropriate account of the historic environment. Policies HE7.1 to HE7.4 set out various requirements for development in relation to particular types of heritage assets. A number of modifications are required to ensure consistency with national policy, effectiveness, and that the policies are adequately justified.

149. Policy HE7.1 seeks to ensure that development embraces 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. Modifications are required to the reasoned justification [**MM118** and **MM119**].

150. Policy HE7.2 sets out detailed requirements for development that would affect designated heritage assets or their settings, including conservation areas, listed buildings, scheduled monuments, and registered parks and gardens. A modification is required to the first paragraph to ensure consistency with national policy relating to the weight to be given to conservation and the need for clear and convincing justification for any harm to, or loss of, significance [**MM121**].

151. A modification is required to policy HE7.3 and the reasoned justification to clarify that the policy applies to all non-designated heritage assets including those identified during the preparation of a neighbourhood plan, conservation area appraisal, or the assessment of a planning application, not only those that are on "Watford's local

list". The modification also needs to refer to monuments, sites, places and landscapes with heritage value [**MM120** and **MM122**]. This will ensure the policy is effective in relation to all types of non designated heritage asset.

152. Policy HE7.4 requires all development to protect remains of archaeological importance, and sets out a number of requirements aimed at achieving this. A modification is required to the reasoned justification [**MM123**].

Conclusion

153. Subject to the modifications I have described above and elsewhere in this report, the Plan sets out a positive strategy for the conservation and enjoyment of the historic environment, and policies HE7.1 to HE7.4 are consistent with national policy.

Issue 14 – Will policies NE9.1 to NE9.8 be effective in protecting and enhancing the Borough's natural environment and ensuring access to a network of high quality open spaces and opportunities for sport and physical activity?

154. Strategic policy NE9.1 requires development to have a positive impact on Watford's natural environment and sets out factors to be considered to demonstrate that this will be achieved. Various changes are required to the detailed wording to ensure effectiveness and consistency with national policy [**MM139**].
155. Policy NE9.2 requires development proposals to demonstrate how they will appropriately conserve, restore, expand or enhance the green infrastructure network. A modification is required to clarify that green infrastructure is defined on the policies map, and to amend the requirements relating to the protection and replacement of trees, woodlands and hedgerows [**MM140** and **MM141**]. This will ensure effectiveness and consistency with national policy.
156. Modifications are required to the detailed wording of policies NE9.3, NE9.4 and NE9.5 to ensure that they are effective and consistent with national policy relating to protecting the water environment and reducing flood risk [**MM142** to **MM147**].

157. Policy NE9.6 states that open space and ancillary facilities will be protected, unless an up to date assessment demonstrates they are surplus. A modification is required to clarify that the open space and ancillary facilities to be protected are defined on the policies map, and to refer to adverse impacts on the community and environment being taken into account in the needs assessment [**MM148**]. To ensure the policy is justified and can be effectively implemented, changes are required to the open space and green infrastructure designations on the policies map relating to land at Blackwell Drive; Kytes Drive; Alban Wood school; and Callowland allotments.

158. I have considered policy NE9.7, relating to the provision of public open space in residential development, under main issue 8.

159. A modification is required to policy NE9.8 to ensure consistency with national policy and to clarify the approach to achieving an overall net gain in biodiversity including through additional requirements relating to long term monitoring and maintenance plans, and ecological surveys and assessment reports [**MM151**]. The approach to biodiversity net gain provides an interim policy, consistent with national policy, until the relevant parts of the Environment Act 2021 come into effect.

Conclusion

160. The modifications I have referred to above will ensure that policies NE9.1 to NE9.8 are effective in protecting and enhancing the Borough's natural environment and ensuring access to a network of high quality open spaces and opportunities for sport and physical activity.

Issue 15 – Are policies HC12.1 to HC12.3 justified and consistent with national policy, and will they be effective in helping to achieve healthy, inclusive and safe places and access to community facilities and services?

161. Policy HC12.1 encourages development to contribute towards an inclusive and healthier community through delivering a number of objectives relating to physical activity, healthy eating, pollution, poverty, and community facilities. For effectiveness, a modification is required to the third paragraph to clarify the requirement to promote

active design having regard to relevant guidance including from Sport England [**MM169**].

162. Policy H12.2 requires health impact assessments to be submitted in support of planning applications for developments of 100 or more homes; major transport improvements; and other locally or nationally significant infrastructure projects. For effectiveness, a modification is required to the reasoned justification so that it reflects up to date guidance about health impact assessments, including from Hertfordshire County Council [**MM170**].
163. Policy HC12.3 supports the provision of new, extended or improved cultural and community uses in accessible locations and seeks to prevent the loss of existing community and cultural venues unless it can be demonstrated that they are no longer needed or they can be re-provided of a higher quality in an equally accessible location. A modification is required to refer to the marketing requirements in Appendix F and to delete reference to proposals for new facilities being refused in isolated locations [**MM171**]. This will ensure the policy is effective and justified.
164. Modifications are required to the development requirements in Table 13.4 relating to playing field provision on allocation ED01 Former Meriden School [**MM243** and **MM244**]. A change is also proposed to the policies map to reduce the site area of allocation ED01. The modification and change to the policies will ensure the policy is effective and justified.

Conclusion

165. Subject to the modifications I have described, policies HC12.1 to HC12.3 are justified and consistent with national policy, and they will be effective in helping to achieve healthy, inclusive and safe places and access to community facilities and services.

Other soundness matters

166. In addition to the main issues that I have considered above, there are a number of other soundness matters that I need to address through main modifications.

Types and amounts of development proposed in Plan policies and on allocated sites

167. Policy SA13.1 states that the sites listed in Tables 13.1 to 13.4 as shown on the policies map are allocated for residential, mixed use development, employment uses, education use and any other uses specified, and that planning permission will be granted if the stated requirements are met. Tables 13.1 to 13.4 set out for each allocation: site size; timescale; indicative yield (numbers of dwellings and/or non-residential floorspace); and development requirements and considerations. To be effective, policy SA13.1 needs to be modified to clarify how the information in Tables 13.1 to 13.4 is to be taken into account in development proposals [**MM175** and **MM177**].
168. To ensure effectiveness, modifications are required to Tables 13.1 to 13.4 and the thematic chapters to clarify the uses proposed in certain policies and on allocated sites with reference to the Use Classes Order [**MM195** to **MM198**, **MM238** and **MM239**]. A modification is also required to the reasoned justification for policy SA13.1 to clarify the process for determining, and the purpose of specifying, the indicative yields for each allocation [**MM174**].

Documents referred to in Plan policies

169. Legislation and national guidance³³ set out information requirements for planning applications. National policy states that local planning authorities should publish a list of their local information requirements, that these should be kept to a minimum and be reviewed at least every two years. The requirements for "sustainability statements", "air quality assessments" and "BREEAM pre-assessments" in policies CC8.1, CC8.2, CC8.3, CC8.4 and IN9.5 are not consistent with national policy or justified and should therefore be deleted [**MM126**, **MM130**, **MM133** and **MM146**].
170. Various policies in the Plan refer to supplementary planning documents and other local guidance. Modifications are required to ensure that these are given appropriate weight in decision making [**MM39**, **MM42**, **MM49**, **MM107**, **MM155** and **MM177**].

Sites and areas referred to in Plan policies

³³ PPG ID:14.

171. To ensure effectiveness and consistency with national policy, modifications are required to various policies to clarify that they relate to specific sites or areas in the Borough as defined on the policies map [**MM35, MM46, MM55, MM87, MM97, MM104, MM105, MM173** and **MM176**].
172. Changes are required to the titles of various maps in the Plan and the reasoned justification to ensure that their purpose and relationship with policies and the policies map is clear [**MM17, MM18, MM20, MM36, MM37, MM47, MM48, MM56, MM82, MM97, MM102, MM104, MM118, MM138** and **MM162**]. Figure 8.1 "energy opportunity areas" and associated reasoned justification need to be deleted to avoid ambiguity with national policy³⁴ and because it does not provide reasoned justification for the Plan [**MM124** and **MM125**].

Other issues

173. The requirement in policy VT5.3 for hot food takeaways in district and local centres to be located more than 400 metres walking distance from the entrance of an existing or permitted primary school is not justified. Nor is it effective as it could encourage such uses to locate outside designated town centres. It should therefore be deleted [**MM103**].
174. Policy CC8.3 needs to be modified to ensure that it is justified and consistent with national policy relating to energy efficiency and transition to a low carbon future [**MM131**].
175. Policies CC8.4 and CC8.5 need to be modified to ensure that they are effective and consistent with national policy relating to air quality, pollution and contamination, including through reference to the agent of change principle [**MM134** to **MM137**].

Overall Conclusion and Recommendation

176. The Plan has a number of deficiencies in respect of soundness for the reasons set out above. This means that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act.

³⁴ NPPF 155(b), 158(b) and footnote 54.

177. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant, and therefore capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the appendix the Watford Local Plan 2018 to 2036 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

William Fieldhouse

Inspector

This report is accompanied by an appendix containing the
main modifications

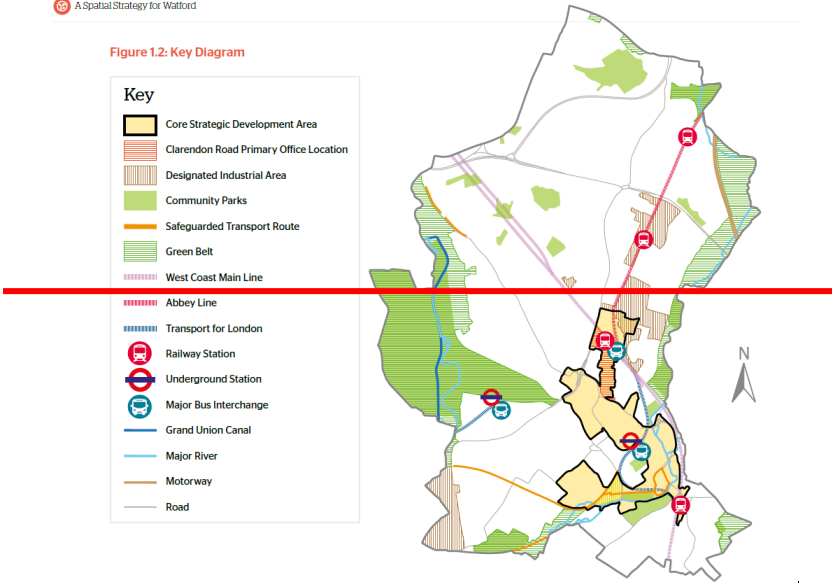
Appendix – Main Modifications


The main modifications in this Appendix are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Whilst the main modifications are referenced M1, M2, etc in this appendix they correspond to the main modifications with the same numbers referred to in the report as MM1, MM2, etc.

MM Ref	Local Plan Ref	Modification (deleted text shown as red strike through and additional text shown green <u>underlined</u>). Unchanged text is in black font
How to use this document (introduction)		
M1	Page 6, after Table 'The Local Plan and the Spatial Strategy'	<u>The diagrams covering the borough at the beginning of the majority of chapters are included to provide context to the strategic objectives of the Local Plan and opportunities to consider when development comes forward. This also applies to the schematic diagrams for each of the three Strategic Development Areas. The strategic maps are not intended to demonstrate policy requirements and are indicative only. Where specific areas and sites within the borough are covered by particular policies, these are defined on the Policies Map.</u>
CHAPTER 1: A SPATIAL STRATEGY FOR WATFORD		
M2	Front cover	2018 <u>2021-2036</u> <u>2038</u>
M3	Page 8 paragraph 1.2 Second sentence	It covers the period from 2018 to 2036 <u>2021 to 2038</u> 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.
M4	Page 11, paragraph 1.21	Watford will see a lot of change in the 18-17 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.
M5	Page 11 paragraph 1.22 first sentence	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 <u>2038</u> .
M6	Page 11 paragraph 1.23 Second sentence	The following highlights the key Economic, Social and Environmental characteristics of Watford now, and where the Council wants it to be in 2036 <u>2038</u> .
M7	Page 12, green text box, title	Watford's economy in 2036 <u>2038</u>

M8	Page 13, green text box, title	<p>Watford's society in 2036 2038- the sustainable objectives</p> <p>New development will have met the needs of a population projected to increase to <u>97,156</u> 97,080 people in 2036-2038 (ONS, 2011 Census and 2018 based population projections).</p>
M9	Page 14, green text box, title	Watford's environment in 2036 2038
M10	Page 14 paragraph 1.26 first sentence	The Local Plan is a roadmap of where we want to be, and when looking ahead to 2036-2038 ...
M11	Page 15, red text box title and paragraph 11	2036 2038
M12	Page 17, Key diagram, revised to reflect modifications	<p>A Spatial Strategy for Watford</p> <p>Figure 1.2: Key Diagram</p>  <p>The diagram includes a key with the following items:</p> <ul style="list-style-type: none"> Core Strategic Development Area (Yellow shaded area) Clarendon Road Primary Office Location (Red rectangle) Designated Industrial Area (Brown hatched area) Community Parks (Green shaded area) Safeguarded Transport Route (Orange line) Green Belt (Light green shaded area) West Coast Main Line (Purple dashed line) Abbey Line (Red dashed line) Transport for London (Blue dashed line) Railway Station (Red circle with 'R') Underground Station (Blue circle with 'U') Major Bus Interchange (Blue circle with 'B') Grand Union Canal (Blue line) Major River (Blue line) Motorway (Brown line) Road (Grey line)

		<p>A Spatial Strategy for Watford</p> <p>Figure 1.2: Key Diagram</p> 
<p>M13</p>	<p>Page 21, Strategic Policy SS1.1 paragraph 1</p>	<p>The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs between 2018 and 2036, along with other supporting infrastructure. From 2021 to 2038, the Local Plan makes provision for 13,328 net additional homes and 110,514 sqm of net employment floorspace consisting of 25,206 sqm of industrial uses as classified by the Use Classes B2, B8, E(g)(ii) and E(g)(iii) and 85,488sqm of office uses as classified by the Use Class E(g)(i) between 2021 and 2038, along with supporting infrastructure and facilities. 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.</p>
<p>M14</p>	<p>Page 21, Strategic Policy SS1.1 paragraph 2</p>	<p>2036 2038</p>
<p>M15</p>	<p>Page 21, Strategic Policy SS1.1, paragraph 8</p>	<p>All development will take place on brownfield, or previously developed land and only in exceptional circumstances will development on greenfield land be supported. Inappropriate development, as defined in national planning policy, in the Metropolitan Green Belt will not be supported approved except in very special circumstances unless it can be demonstrated that exceptional circumstances apply.</p>

M16	Page 21, Strategic Policy SS1.1, after final paragraph	<u>The Core Development Area is defined on the Policies Map.</u>
CHAPTER 2: CORE DEVELOPMENT AREA		
M17	Page 23, Paragraph 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. <u>The information set out in Figure 2.1 reflects these areas as defined on the Policies Map.</u>
M18	Page 24, Paragraph 2.6, New sentence after final sentence	<u>Figure 2.2 is a schematic diagram to provide context for the area and is not to be interpreted as policy.</u>
M19	Page 24, after paragraph 2.8, new text	<u>Eastern Mobility Hub</u> <u>The area to the east of the Abbey Line will support the delivery of the Eastern Mobility Hub. As part of a long-term objective to support active transport, this will include a new multi-storey car park and access for coaches and taxis, relieving the pressure on the entrance to Watford Junction rail and bus stations (the Sustainable Transport Hub) located on the west side of the West Coast Main Line. The bridge over the railway lines will facilitate movement for pedestrians and cyclists between the two transport hubs.</u>

<p>M20</p>	<p>Page 24, Figure 2.2, Diagram, revised title and added features including Conservation Areas, Eastern Mobility Hub area of search, sidings to the concrete batching plant, infilled active frontages</p>	<p>Figure 2.2 Watford Gateway Strategic Development Area, Illustrative Concept Diagram</p>
<p>M21</p>	<p>Page 25, after paragraph 2.14, new paragraph, delete last sentence of preceding paragraph. Revise paragraph 2.15</p>	<p>However, the compatibility of new uses will need to be carefully considered, particularly where residential uses are proposed. <u>The transformation of the area from an under-utilised employment area to a mixed-use area inclusive of new homes, employment space and community facilities will take place throughout the plan period. It will encompass a new Eastern Mobility Hub east of the railway lines connecting to the Sustainable Transport Hub located west of the railway lines at Watford Junction Station. This will 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, proposals for the redevelopment of employment floorspace with either replacement or alternative forms of employment uses will be supported. Mixed-use development that may include residential uses that contribute towards the long-term vision of the area will be supported and in such circumstances the loss of employment floorspace may be acceptable. The compatibility of new and existing uses will need to be carefully considered, particularly where when residential uses are proposed in the area as the ‘agent of change’ principle will need to be addressed.</u></p> <p><u>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 relocation Relocation of the facility will be 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. 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>
M22	Page 25, paragraph 2.16,	<p>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. <u>A new multi-storey car park will be provided as part of the Eastern Mobility Hub east of the Abbey Line. Any proposals that come forward which include the loss of the existing multi-storey car park and surface parking will need to demonstrate how the replacement facility will be delivered.</u></p>
M23	Page 25, paragraph 2.17, after fifth sentence	<p><u>When the area comes forward with more comprehensive mixed-use development in the second part of the plan period and longer-term, a</u> 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.</p>
M24	Page 26, after paragraph 2.22	<p><u>Delivery and managing development</u></p> <p><u>The Watford Gateway Strategic Development Area consists of two constituent parts; land around Watford Junction Station and the area of Clarendon Road.</u></p>

		<ul style="list-style-type: none"> • <u>East of Watford Junction Station and west of the Abbey Line, site MU05 is a high density development with planning consent to be delivered over several phases to 2031. Site MU06 is located adjacent to the south and will come forward in phases across the plan period. The existing car park is expected to be reprovided as part of the Eastern Mobility Hub. This will help to unlock the central part of site MU06 and support the delivery of a mixed-use quarter in the later stages of the plan period. Road access to the facility will be from Clive Way and a pedestrian/cycle crossing over the West Coast Mainline will provide access to Watford Junction Station, which itself will be improved to increase capacity. The crossing may be delivered in either a single phase across both the West Coast Mainline and Abbey Line or in two phases with a crossing over the West Coast Mainline in the first part of the plan period alongside site MU06, followed with an extension to the crossing that would enable access to land east of the Abbey Line in the later stages of the plan period. If the latter, the crossing will need to be designed so that it may be adapted to support an extension at a later time.</u> <p><u>While sites MU07 and MU24 are likely to be redeveloped for industrial uses in the first part of the plan period, delivery of the aforementioned facilities will support redevelopment for mixed-use development on land located east of the Abbey Line in the latter stages of the plan period. With the crossing over the West Coast Mainline in place along with the Eastern Mobility Hub, a pedestrian/cycle crossing over the Abbey Line will be delivered to improve access from the east side of Watford Junction Station and reduce the pressure associated with access via the west entrance located opposite Clarendon Road. This will be supported by enhancements to the station, including the forecourt, in the early part of the plan period and ongoing improvements to Clarendon Road.</u></p> <ul style="list-style-type: none"> • <u>Clarendon Road is well established as a commercial office district and is subject to an increasing number of proposals for higher density development. Much of the area is unallocated and proposals are anticipated to come forward as windfall as redevelopment opportunities arise. As the area continues to intensify, it is envisaged that further investment interest will be secured in the area reflecting the objectives for this part of the Strategic Development Area.</u>
M25	Page 27, Strategic Policy CDA2.1, Part c)	c) <u>A site for a new primary school site within Site MU05 ‘Land and Buildings at 94-98 St Albans Road’, and a site for a new 3 form entry primary school within Site MU06 ‘Land at Watford Junction’, to meet the demands generated by the development;</u>
M26	Page 27, Strategic Policy CDA2.1, new bullet after Part e)	<u>New development should contribute towards, and not compromise the delivery of the Eastern Mobility Hub to be located east of the Abbey Line;</u>

M27	Page 27, Strategic Policy CDA2.1, Part g)	<u>Prior to the implementation of a planning permission which includes residential uses on land east of the railway line West Coast Main Line, a pedestrian and cycle bridge for commuters and residents across from the east side of the Abbey Line to Watford Junction Station must be agreed before planning permission is granted. Development proposals will need to be designed to ensure they do not compromise delivery of the bridge;</u>
M28	Page 27, Strategic Policy CDA2.1, revised text for Part h)	<u>A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded;</u> <u>As part of a comprehensive mixed-use redevelopment of the area in the second part of the plan period, a route for a pedestrian and cycle bridge that will enable access to Watford Junction station via Penn Road must be shown to be feasible and achievable when redevelopment proposals are submitted;</u>
M29	Page 27, Strategic Policy CDA2.1, Part j)	<u>On land east of the West Coast Main Line and within the Strategic Development Area, redevelopment of existing employment floorspace for replacement or other employment uses will be supported in the first part of the plan period. Where it is demonstrated that proposals for residential-led mixed-use development will contribute towards the delivery of the wider objectives of the Watford Gateway Strategic Development Area, and the proposed use will not undermine existing uses through the 'Agent of Change' Principle, the loss of employment floorspace may be acceptable;</u> <u>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."</u> <u>If a proposal is to include the loss of the child care facility, a replacement facility should be reprovided as part of the commercial floorspace. As part of the commercial floorspace a replacement childcare facility should be provided."</u>
M30	Page 27, Strategic Policy CDA2.1, new bullet after Part j)	<u>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>
M31	Page 27, Policy CDA2.1, part k)	<u>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. A new multi-storey car park as part of the Eastern Mobility Hub will be provided on land to the east of the Abbey Line. Proposals that include the loss of the existing multi-storey car park will be required to set out how the replacement facility will be delivered, including delivery phases, as part of the planning application;</u>

M32	Page 27, Strategic Policy CDA2.1, Part l)	New development will not compromise vehicle access from Colonial Way and <u>Clive Way via Colonial Way</u> into the <u>site area</u> and access to the <u>Eastern Mobility Hub station</u> ;
M33	Page 27, Strategic Policy CDA2.1, Part m)	The concrete batching plant and rail aggregates depot, <u>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> ;
M34	Page 27, Strategic Policy CDA2.1, two new bullets after part m)	<u>n) Future development in the Strategic Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area and where prepared, for individual sites.</u> <u>o) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessments for all sites to be submitted prior to the determination of any application.</u>
M35	Page 27, Strategic Policy CDA2.1, after final paragraph	<u>The Watford Gateway Strategic Development Area is defined on the Policies Map.</u>
M36	Page 28, Paragraph 2.23, new sentence after final sentence	<u>Figure 2.3 is a schematic diagram to provide context for the area and is not to be interpreted as policy.</u>
M37	Page 28, Figure 2.3, Diagram title	<u>Figure 2.3 Town Centre Strategic Development Area, Illustrative Context Plan</u>
M38	Page 29, paragraph 2.32, second sentence	In this context, proposals will be expected to contribute towards the vision for Watford to 2036 <u>2038</u> ,
M39	Page 30, paragraph 2.35,	The Civic Core Conservation Area encompasses several listed and locally listed buildings, including the Town Hall and Watford library. A number of cultural facilities are also <u>located within the conservation area</u> nearly 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. Development P proposals

		will need to <u>have regard to the Heritage Impact Screening Assessment and other</u> consider heritage-related Supplementary Planning Documents <u>and undertake a full Heritage Impact Assessment of the proposals</u> . 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.
M40	Page 32, paragraph 2.52, third sentence	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 eight storeys to the rear, although this may not always be achievable on sites where the site is close to heritage assets</u> .
M41	Page 32, new paragraph after 2.52	<u>Delivery and managing development</u> The Town Centre has an established character and <u>dispersed redevelopment opportunities identified in the Local Plan which reflect the evolving nature of the Strategic Development Area. It is envisaged that windfall redevelopment opportunities will come forward on unallocated sites during the plan period and it is important that these are coordinated and contribute positively towards the area. To support the delivery of new development that will enhance the Town Centre, planning guidance such as a Supplementary Planning Document will be prepared. This should be applied in conjunction with other planning tools, such as the Council's 3-D visualisation model, to inform the preparation of development proposals, best understand the impact new development may have on the townscape and heritage assets and assist with decision-making.</u>
M42	Page 33, Policy CDA2.2, second sentence of first paragraph	To achieve this, <u>proposals will need to have regard to Supplementary Planning Documents and strategies supporting redevelopment and enhancements to the Town Centre. These are intended to guide the coordinated delivery of development that will contribute towards achieving the objectives for the area and provide greater detail about specific proposals in the Local Plan that may be relevant.</u> Applicants will be required to demonstrate how proposals will make provision for, and contribute positively towards, the following criteria:
M43	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, Part f)	f) Opportunities should be taken to reduce the vehicle dominance of the ring road. <u>Proposals that provide active frontages onto the ring road and contribute towards will be supported, transforming the environment into one that is inclusive by supporting a street that is a positive experience to use for pedestrians and cyclists alongside other transport modes will be a priority. This will help to support the use of the new Sustainable Transport Hub at the southern end of the High Street, as well as vehicle users, will be a priority;</u>

M44	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, part i)	i) Proposals must 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.
M45	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, three new bullets after Part h)	<p>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; Heritage assets are located in key parts of the Strategic Development Area such as the High Street and the areas around St Mary's Church and the Town Hall. They are a key component of the character of this area and proposals for new development should respond to these assets, enhancing their character and setting;</p> <p><u>i) Future development in the Strategic Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area and where prepared for individual sites;</u></p> <p><u>j) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessments for all sites which are to be submitted prior to the determination of any application;</u></p> <p><u>k) 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>
M46	Page 33, Strategic Policy CDA2.2, after final paragraph	<u>The Town Centre Strategic Development Area is defined on the Policies Map.</u>
M47	Page 34, Paragraph 2.23, New sentence after final sentence	<u>Figure 2.4 is a schematic diagram to provide context for the area and is not to be interpreted as policy.</u>
M48	Page 34, Figure 2.3 Diagram title	<u>Figure 2.4 Colne Valley Strategic Development Area, Illustrative Context Plan</u>

M49	Page 35, paragraph 2.59,	<p>Major development proposals should <u>have regard to Supplementary Planning Documents, masterplans and strategies related to the Strategic Development Area. Applicants will be expected to demonstrate 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. Applicants will also be expected to demonstrate that proposals would contribute to the co-ordinated delivery of development and that it would not compromise future development opportunities within the Strategic Development Area.'</u></p>
M50	Page 36, after paragraph 2.67, two new paragraphs	<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 the Riverwell and the Watford General Hospital/stadium areas 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.</u></p> <p><u>The existing hospital located in the north part of the site is adjacent to the existing residential area of Vicarage. Redevelopment schemes will need to take into account how new development may affect these 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>
M51	Page 36, after 2.68, additional paragraph	<p><u>Delivery and managing development</u></p> <p><u>The constituent parts of the Colne Valley Strategic Development Area including the Lower High Street, Riverwell and the hospital/stadium areas, will together contribute towards the wider regeneration of the Colne Valley. To support the coordinated delivery of development and achieving the objectives for the area, the following mechanisms are either in place or will be prepared in the future:</u></p> <ul style="list-style-type: none"> <u>Riverwell will continue to deliver new homes and community facilities guided by an existing masterplan for the area developed by the Council in partnership with the private sector.</u>

		<ul style="list-style-type: none"> • <u>The Lower High Street area extending from Watford High Street Overground Station to Bushey Overland Station consists of a mix of allocated sites and land that remains unallocated. A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Adoption is anticipated in 2024.</u> • <u>The proposed new hospital is a distinct area within the Strategic Development Area that has outline planning permission. Once delivered, the existing hospital site will be able to support the delivery of new homes in the later part of the plan period. The Council will prepare appropriate guidance for the redevelopment of the surplus land.</u>
M52	Page 37, paragraph 2.72, first sentence	Informed by the Taller Buildings Study, the base future building height in the area is <u>up to five or six</u> storeys.
M53	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, and Lower High Street and the area of Watford General Hospital area, producing a sustainable and mixed-use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses.</p> <p><u>A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Once adopted, development proposals will need to have regard to the masterplan. Applicants will be expected to demonstrate that their proposals contribute towards the coordinated delivery of development, infrastructure and improvements to the public realm. Proposals should be designed so not inhibit the delivery of other sites or compromise future development opportunities that could make a positive contribution towards the objectives for the area.</u></p>
M54	Page 38, Strategic Policy CDA2.3, new bullets after parts a) and j) amend part f),	<p>b) <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></p> <p>c) <u>A 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></p> <p>f) <u>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, New primary school sites to meet the demands generated by new development.</u></p>

		<p>j) <u>Future development in the Core Development Area will take into account the findings and recommendations of the Council’s Heritage Impact Assessment Screening Report for this area, and where prepared, for individual sites.</u></p> <p>k) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for all sites to be submitted prior to the determination of any application.</u></p>
M55	Page 38, Strategic Policy CDA2.3, after final paragraph	<u>The Colne Valley Strategic Development Area is defined on the Policies Map.</u>
CHAPTER 3: HOMES FOR A GROWING COMMUNITY		
M56	Page 40, paragraph 3.1	<u>The Spatial Strategy to 2036 seeks to deliver at least 14,988 new homes. The Spatial Strategy seeks to deliver at least 13,328 net additional new homes between 2021 and 2038. This is equivalent to the delivery of at least 784 new homes each year and forms the baseline figure to calculate the five year housing supply. 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 anticipate. The figures that make up this the housing supply in the Local Plan target are set out in Figure 3.1. Figure 3.2 provides an overview of site allocations for residential use and their distribution across the borough. For more detailed information about these sites, refer to Table 13.1 and for site boundaries refer to the Policies Map.</u>
M57	Page 40, additional paragraph after paragraph 3.2	<u>The number of homes to be delivered on site allocations during the plan period is 8,604 units. This figure is the sum total of the indicative yields for all of the allocations as listed in Chapter 13 which are derived from the size of each site and standard density assumptions depending on its location. As of 1 April 2021, a total of 1,218 units on site allocations have been granted planning consent. These units are not included in the maximum of 2,507 units that could come forward on sites with extant planning permission as represented in Figure 3.1</u>

<p>M58</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>Figure 3.1 Housing figures in the Local Plan</p> <p>8,748 + 4,145 + 2,095 = 14,988</p> <p>Homes on allocated sites + Commitments (completions and extant planning permissions) + Windfall (inclusive of a 5% buffer of the total housing requirement) = Total number of homes</p> <p>Figure 3.1: Summary of housing supply identified in the Local Plan</p> <p>8,604 + 2,507 + 2,217 = 13,328</p> <p>Homes on allocated sites + Commitments (maximum number of homes delivered through extant planning permissions) + Windfall = Total number of homes</p>
<p>M59</p> <p>Page 41, paragraph 3.3</p>	<p>As part of the housing to be provided to 2036-2038, a total of 2,217 homes are included in the housing supply as windfall. 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</p>

		development will contribute, on average, <u>116 158</u> new homes per year <u>over the plan period with the windfall contribution as part of the housing trajectory from 2024/25.</u>
M60	Page 41, paragraph 3.5	<u>2036 2038</u>
M61	Page 41, additional paragraph after paragraph 3.5	<u>The commitments figure of 2,507, as quoted in Figure 3.1, assumes that all sites with planning permission on 1 April 2021, which are not site allocations in the Local Plan, will be developed. This means that any permissions which are not implemented will lead to a reduction in this source of supply. Since the adoption of the Core Strategy in 2013, the Council has seen an average annual lapse rate of 15%. If this rate was to be replicated across all permissions as of 1 April 2021, this supply of 2,507 dwellings would be reduced by 376 dwellings to 2,131 dwellings.</u>
M62	Page 41, Strategic Policy HO3.1	<u>To meet housing need, at least 13,328 net additional homes, equivalent to at least 784 new homes per year, Provision will be delivered made for 14,988 new homes, inclusive of a 5% buffer of 714 homes, in Watford Borough between 2021 and 2038. for the period 2018 to 2036</u> Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development.
M63	Page 41, Strategic Policy HO3.1, after last paragraph add new sentence	<u>Site allocations for housing and mixed-use, where residential use would be supported, are defined on the Policies Map.</u>
M64	Page 43, Policy HO3.2, 1 st paragraph, 1 st sentence	Proposals for new residential development <u>of five dwellings or more</u> 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).
M65	Page 43, new paragraph after paragraph 3.13	Affordable housing can refer to rented or sales properties and is defined by the National Planning Policy Framework (Annex 2). 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 measured by 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. <u>The number of affordable housing units provided does not have to be equivalent to 35% of the total number of housing units proposed. The housing mix, in terms of size of units of the market and affordable elements of the scheme, can be</u>

		<p><u>varied so long as the number of habitable rooms provided as affordable accommodation is equivalent to 35% of the total number of habitable rooms in the proposed development.</u></p> <p><u>Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. Applicants should present affordable housing figures as a percentage of total residential provision by habitable rooms and units to enable comparison as part of the housing schedule.</u></p> <p><u>The distribution of habitable rooms can help deliver the type of affordable homes needed in the borough more effectively and contribute towards providing 20% family sized homes across the scheme as set out in Policy HO3.2 'Housing Mix, and Optimising Use of Land'. Applicants are encouraged to engage with the Local Authority at an early stage to determine the housing mix of the affordable housing element of the scheme.</u></p>
M66	Page 43, new paragraph after paragraph 3.14	<u>The National Planning Policy Framework requires a proportion of the total number of residential units to be provided for affordable home ownership. Therefore, the delivery of other types of affordable housing, including social rent, are to be applied once this threshold has been achieved.</u>
M67	Page 44, Policy HO3.3, first paragraph	Residential developments, including residential institutions of 10 ten homes or more will be supported where they provide at least 35% affordable housing (by habitable room).
M68	Page 44, Policy HO3.7, third paragraph	If the a plot has been offered to people registered on the Council's Self Build Register and the open market and marketed for a minimum of 12 months from the commencement of development on the site and has not been sold, then the plot will be returned to the developer. 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.
M69	Page 44, Policy HO3.3, last paragraph	In exceptional circumstances, Where a viability assessment, undertaken in accordance with national planning policy and guidance, demonstrates particular circumstances it is demonstrated that mean the it would not be viable to meet the affordable housing requirements set out in this policy cannot be met, 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 that a higher the number of affordable units can be achieved 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.
M70	Page 44, Paragraph 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

	and 3.20, new sentence and amended structure	<p>provided, the affordable housing offer may be entirely Discounted Market Rent, if agreed with the Local Planning Authority. <u>To meet housing need, the proportion of affordable housing to be provided as Discounted Market Rent should be the same as required in Policy HO3.3 'Affordable Housing' (by habitable rooms). The minimum discount on the market rent units should be at least 20%, as required by Planning Practice Guidance. A discount greater than 20% will only be applied if demonstrated to be deliverable through an update to the Local Housing Needs Assessment.</u></p> <p><u>In particular circumstances, a viability assessment may be acceptable to demonstrate that the Discounted Market Rent requirement is not achievable. Viability assessments submitted as part of a planning application will be made publically available and robustly scrutinised by the Local Planning Authority.</u></p> <p>The discount on the market rent should be provided in line with the findings of the Local Housing Needs Assessment. Discounted Market Rent units should be fully integrated into the development, with no differences between these units and the market units, tenure blind.</p> <p>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.</p>
M71	Page 45, paragraph 3.22, second sentence	<p>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.</p>
M72	Page 46, Policy HO3.4, first paragraph	<p>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. <u>The discount on the market rent should be at least 20% having regard to the most up-to-date Local Housing Market Needs Assessment or other relevant evidence.</u></p>
M73	Page 47, Policy HO3.5	<p>Policy HO3.5: <u>Specialist Care and Supported Living Specialist Housing and Care Homes</u></p> <p>Existing specialist and supported housing will be protected where it is up to the standards set out in Hertfordshire County Council guidance.</p>

		<p>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:</p> <p><u>Proposals for new specialist care and supported living accommodation, as defined in the Glossary, will be supported.</u></p> <p><u>Proposals that result in the loss of existing residential accommodation that provides specialist care and supported living will be resisted unless:</u></p> <ul style="list-style-type: none"> 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; <u>or</u> c) Reprovision <u>Redevelopment</u> would <u>provide</u> result in improved quality of specialist housing <u>and facilities.</u> <p>Proposals for new specialist housing should be located within 400m of a district or local centre and public transport, <u>Proposals should be</u> designed to include pick-up and drop-off facilities close to the principal <u>principle</u> entrance that are able to accommodate specialist transport vehicles. To aid mobility, development should provide space for the storage of mobility scooters.</p> <p>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'.</p> <p><u>Should a proposal for new specialist care and supported living accommodation fall within Use Class C3, the proposals will be required to provide affordable housing consistent with Policy HO3.3 for that proportion of the scheme. This requirement will not be applied to proposals for new specialist care and supported living accommodation classified as being within Use Class C2.</u></p>
M74	Page 48, paragraph 3.32	<p>However, self-build and custom housebuilding will be supported on windfall sites where proposals are for 50 new houses or more <u>on allocations and windfall sites, and proposals that include 50 or more non-flatted homes (excluding affordable housing) will be required to provide 10% of plots for such development.</u></p>
M75	Page 48, paragraph 3.33,	<p>Marketing of the site should be demonstrated to have been undertaken proactively to gauge potential interest in a self-build plot by <u>on the open market, including those registered on the Council's Self-build Register.</u></p>

	second sentence	
M76	Page 49, Policy HO3.7	<p>Residential proposals for 50 non-flatted homes houses or more (excluding houses to be provided as affordable homes) will be supported where they provide one self-build plot for every ten 10 houses, in agreement with the Local Planning Authority. This will be secured through legal agreement.</p> <p>The average size of a self-build plot should be comparable to the average size of the market sized plots provided on site.</p> <p>If the a plot has been offered to people registered on the Council's Self-build Register and the open market and marketed for a minimum of 12 months from the commencement of development on the site and has not been sold, then the plot will be returned to the developer 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.</p>
M77	Page 52, paragraph 3.46, second sentence	In Watford this translates to about 2% of people who could be living with Alzheimer's by 2036 2038.
M78	Page 53, Policy HO3.10, third paragraph	For developments of 10 or more homes, at least 10% 4% of the dwellings will be built to be wheelchair adaptable and comply with M4(3) of the Building Regulations.
M79	Page 53, Policy HO3.10, fourth paragraph	<p>For developments of 50 homes or more, 2% of dwellings are to should be designed to support someone living with dementia <u>by having regard to the 'Dementia Friendly design principles' set out in Figure 3.3.</u></p> <p><u>Homes designed to be M4(3) compliant can also be designed to be 'dementia friendly'. Where such homes are provided, they will contribute towards both the M4(3) and 'dementia friendly' home requirement.</u></p>
M80	Page 54, paragraphs 3.51 and 3.52	<p>Communal <u>Shared private</u> amenity space</p> <p><u>While private amenity space in the form balconies provides space for residents of the property, these will be small and generally not suitable for gatherings of people or recreational use. Shared private amenity space on-site can enhance the quality of a scheme and support residents by providing areas to socialise and use for recreation purposes.</u></p>

		<p>Where communal amenity space is provided this should be of a minimum size of 50sqm for two units, plus 15sqm per additional two units. Apartment schemes should provide high quality shared private amenity space on-site that is accessible to all residents unless it would not be possible or appropriate to do so. The use of roof areas, including podiums and courtyards for additional private or shared amenity or garden space is supported and should be 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.</p> <p>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’.</p> <p>Where shared private communal amenity space is provided, it should be designed to be accessible to all residents and provide places to sit, play and the exercise. Where provision is catering for families in the development, informal play space, and as appropriate, equipped play space should be integrated into the shared space. 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, shared private amenity communal open space should be designed into the scheme so as not to be overshadowed or suffer low levels of daylight.</p>															
M81	Page 54 Policy HO3.11	<p>Policy HO3.11: Private and Communal Outdoor shared private amenity space</p> <p><u>Private amenity space</u></p> <p>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.</p> <p>Provision of private amenity space is to meet the following standards: All new homes should be provided with private outdoor amenity space that meets the following minimum standards:</p> <table border="1" data-bbox="573 1166 1469 1388"> <thead> <tr> <th>Size of dwelling</th> <th>Apartment</th> <th>House/Duplex/Maisonette</th> </tr> </thead> <tbody> <tr> <td>1-bed</td> <td>5sqm</td> <td>12sqm</td> </tr> <tr> <td>2-bed</td> <td>7sqm</td> <td>24sqm</td> </tr> <tr> <td>3-bed</td> <td>8sqm</td> <td>25-40sqm</td> </tr> <tr> <td>4-bed</td> <td>9sqm</td> <td>25-40sqm</td> </tr> </tbody> </table>	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
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															

		<p>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.</p> <p><u>Shared private amenity space</u></p> <p>The provision of communal <u>shared private</u> outdoor amenity space, including roof and terrace space, will be supported. <u>Residential development comprising 10 or more flats should provide shared private outdoor amenity space that is high quality and accessible to all residents unless it would not be possible or appropriate to do so.</u> Communal outdoor amenity space will need to be designed to be usable by all residents.</p>
CHAPTER 4: A STRONG ECONOMY		
M82	Page, 56, paragraph 4.2, new sentence after final sentence	<u>Figure 4.1 reflects designated employment areas as defined on the Policies Map. For information about site allocations for employment uses, or have an element of employment use, refer to Tables 13.2 and 13.3 in Chapter 13.</u>
M83	Page 56, paragraph 4.4, third sentence	<u>For Watford, the study suggested there was a need for 37,600sqm of office floorspace and 98,400sqm of industrial floorspace. Reflecting the strengths and opportunities across SW Herts and Watford, To contribute towards this requirement, Watford has planned for 111,175 <u>85,488</u>sqm of office floorspace and 40,759 <u>25,206</u>sqm of industrial floorspace.</u>
M84	Page 56, after paragraph 4.4	<u>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.</u>
M85	Page 57, Strategic Policy EM4.1, second paragraph	<u>To meet the employment needs in Watford and contribute towards the strategic employment requirements of South West Hertfordshire, the Local Plan makes provision for 25,206sqm net additional industrial floorspace (Use Classes B2, B8, E(g)(ii) and E(g)(iii)) and 85,488sqm net additional office floorspace (Use Class E(g)(i)). 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</u>

		the five Designated Industrial Areas. Over the plan period, the Council will seek to plan for the creation of 11,500 new jobs.																				
M86	Page 57, Strategic Policy EM4.1, third paragraph	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.																				
M87	Page 57, Strategic Policy EM4.1, new sentence after last paragraph	<u>Site allocations for employment and mixed-use development, where employment uses would be supported, are defined on the Policies Map.</u>																				
M88	Page 58, paragraph 4.8, last sentence	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 <u>2038</u> .																				
M89	Page 58, Table 4.1, heading and floorspace figures	<p>Revised Table 4.1 (below paragraph 4.13, p58)</p> <table border="1"> <thead> <tr> <th>Industrial potential supply 2018-2036</th> <th>Floorspace (sqm)</th> </tr> </thead> <tbody> <tr> <td>Site allocations</td> <td><u>17,035</u></td> </tr> <tr> <td>Sites with planning permission</td> <td><u>23,724</u></td> </tr> <tr> <td>Total</td> <td><u>40,759</u></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Summary of industrial floorspace provision 2021-2038</th> <th>Floorspace provision (sqm)</th> </tr> </thead> <tbody> <tr> <td><u>South West Hertfordshire requirement</u></td> <td><u>481,500</u></td> </tr> <tr> <td><u>Watford requirement</u></td> <td><u>98,400</u></td> </tr> <tr> <td><u>Provision through site allocations</u></td> <td><u>12,799</u></td> </tr> <tr> <td><u>Provision on sites with planning permission</u></td> <td><u>12,407</u></td> </tr> <tr> <td><u>Total industrial floorspace provision in the Local Plan</u></td> <td><u>25,206</u></td> </tr> </tbody> </table>	Industrial potential supply 2018-2036	Floorspace (sqm)	Site allocations	<u>17,035</u>	Sites with planning permission	<u>23,724</u>	Total	<u>40,759</u>	Summary of industrial floorspace provision 2021-2038	Floorspace provision (sqm)	<u>South West Hertfordshire requirement</u>	<u>481,500</u>	<u>Watford requirement</u>	<u>98,400</u>	<u>Provision through site allocations</u>	<u>12,799</u>	<u>Provision on sites with planning permission</u>	<u>12,407</u>	<u>Total industrial floorspace provision in the Local Plan</u>	<u>25,206</u>
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M90	Page 58, Table 4.2, heading and floorspace figures	<p>Revised Table 4.2 (below paragraph 4.15, p59)</p> <table border="1" data-bbox="589 279 2045 448"> <thead> <tr> <th>Office potential supply 2018-2036</th> <th>Floorspace (sqm)</th> </tr> </thead> <tbody> <tr> <td>Site allocations</td> <td>38,672</td> </tr> <tr> <td>Sites with planning permission</td> <td>72,503</td> </tr> <tr> <td>Total</td> <td>111,175</td> </tr> </tbody> </table> <table border="1" data-bbox="589 470 2045 719"> <thead> <tr> <th>Summary of office floorspace provision 2021-2038</th> <th>Floorspace provision (sqm)</th> </tr> </thead> <tbody> <tr> <td><u>South West Hertfordshire requirement</u></td> <td><u>188,000</u></td> </tr> <tr> <td><u>Watford requirement</u></td> <td><u>37,600</u></td> </tr> <tr> <td><u>Provision through site allocations</u></td> <td><u>19,428</u></td> </tr> <tr> <td><u>Provision on sites with planning permission</u></td> <td><u>66,060</u></td> </tr> <tr> <td><u>Total office floorspace provision in the Local Plan</u></td> <td><u>85,488</u></td> </tr> </tbody> </table>	Office potential supply 2018-2036	Floorspace (sqm)	Site allocations	38,672	Sites with planning permission	72,503	Total	111,175	Summary of office floorspace provision 2021-2038	Floorspace provision (sqm)	<u>South West Hertfordshire requirement</u>	<u>188,000</u>	<u>Watford requirement</u>	<u>37,600</u>	<u>Provision through site allocations</u>	<u>19,428</u>	<u>Provision on sites with planning permission</u>	<u>66,060</u>	<u>Total office floorspace provision in the Local Plan</u>	<u>85,488</u>
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M91	Page 59, Policy EM4.2 2 nd paragraph	<p>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 <u>Proposals that would incur a net loss of industrial floorspace will be resisted unless the new use would avoid compromising the industrial activities in the area, and:</u></p> <p>a) An up-to-date evidence base demonstrates that the site is no longer required for industrial use; or</p> <p>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.</p>																				
M92	Page 60, paragraph 4.19	<p>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 <u>and the Town Centre, followed by</u> 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.</p>																				

<p>M93</p>	<p>Page 60, Figure 4.3</p>	<pre> graph TD A["Clarendon Road Primary Office Location Performs a strategic function in South West Hertfordshire as a regional office hub, It is expected that the office floorspace requirements up to 2038 can be met within this location through intensification."] B["Watford Town Centre Office development appropriate as part of a mix of main town centre uses."] C["Wider Core Development Area Small clusters of office."] D["Elsewhere in the Borough Small offices dispersed throughout the Borough."] A --> C B --> C C --> D </pre>
<p>M94</p>	<p>Page 60, Policy EM4.3, second paragraph</p>	<p>Proposals for new office development, <u>defined within the office Use Class E(g)(i)</u>, 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 <u>they safeguard the commercial role and character of the Clarendon Road Primary Office Location, and:</u></p> <ul style="list-style-type: none"> 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. <p>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 <u>that reinforces the commercial character of the area.</u></p>

M95	Page 60, Policy EM4.3, third paragraph	Mixed-use development, including residential <u>and other uses that are consistent with the type of development and the objectives for the area</u> , will be supported where there is no net loss of office floorspace and a predominantly <u>active</u> commercial frontage is maintained on to Clarendon Road.
M96	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 250sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to <u>Proposals are also to</u> 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.
CHAPTER 5: A VIBRANT TOWN		
M97	Page 64, Paragraph 5.2, new sentence after final sentence	<u>Figure 5.1 indicatively shows where the Town Centre, District Centres and Local Centres are located in the borough. For more detailed information such as the spatial coverage of these designations, refer to the Policies Map where these are defined.</u>
M98	Chapter 5: A vibrant town, page 65. Delete text	blue box that sets out the Sequential Test.
M99	Page 66, Paragraph 5.9, first sentence	There are a number of out-of-centre retail <u>and leisure</u> parks in Watford.
M100	Page 66, Policy VT5.1, first paragraph	Planning permission will be granted for the development of <u>retail, leisure, entertainment, arts, culture, office and other main town centre uses (as defined in the NPPF)</u> 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.
M101	Page 66, Policy VT5.1, third paragraph	To ensure the long-term vitality and viability of the <u>Watford T</u> own centre the Council will apply <u>sequential tests for main town centre uses</u> , and require impact assessments for retail and leisure developments over 2,500sqm, in accordance with <u>national planning policy</u> a 'Town Centre first' approach to proposals for retail, leisure, cultural facilities and other town centre uses.

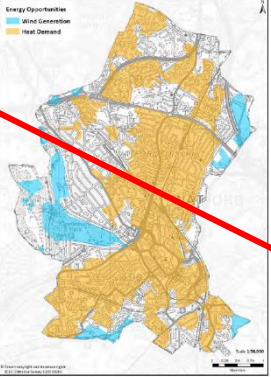
M102	Page 71, Policy VT5.3, at the end of the policy	<u>The Town Centre, District Centre and Local Centres are defined on the Policies Map.</u>
M103	Page 71, Policy VT5.3: Local Centres, bullet f)	Are located more than 400m walking distance from the entrance of an existing or permitted primary school.
CHAPTER 6: AN ATTRACTIVE TOWN		
M104	Page 74, Paragraph 6.4, new sentence after final sentence	Protected areas include all parks and open spaces (detailed map at Figure 9.1) and all conservation areas (detailed map at Figure 7.2). <u>These maps are to provide context about Policy QD6.1, however, they are not intended to set out policy requirements. Areas identified are defined on the Policies Map and this should be referred to as part of the decision-making process.</u>
M105	Page 75, Strategic Policy QD6.1, after last paragraph	<u>The Core Development Area, Established Areas and Protected Areas are defined on the Policies Map.</u>
M106	Page 76, paragraph 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 <u>the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document. supporting planning documents.</u>
M107	Page 77, Policy QD6.2, final paragraph, last sentence	New development will need to make a positive contribution towards important views in the borough, <u>having regard to the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document or equivalent future guidance.</u> 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.

M108	Page 77, Policy QD6.2: Design Principles, new paragraph	<u>Sustainable design</u> 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.
M109	Page 81 QD6.4 Building Design, bullet e)	e) All ground floor units <u>facing the street or public realm should</u> to be designed so that the primary access for each individual unit is directly onto that the <u>street or public realm</u> ; deviation from this (by exception) will need to demonstrate <u>that individual ground floor access is not feasible due to the constraints of the site.</u>
M110	Page 81 QD6.4 Building Design, bullet h)	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.
M111	Page 81, Policy QD6.4: Building Design, new bullets after Part h)	i) <u>Buildings should be designed to promote the use of stairs through locating the stairwell in a prominent and easily accessible location within the entrance core of the building, providing a well-lit and spacious internal space which allows social interaction as well as being comfortable for residents to walk up and down and to pass one another;</u> j) <u>Secure cycle parking should be provided in easily accessible and convenient locations;</u>
M112	Page 83, paragraph 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 <u>outstanding</u> design quality, high quality living environments and public benefits for the town and community.
M113	Page 83, paragraph 6.29, second sentence	To ensure taller buildings are of exceptional <u>outstanding</u> 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.
M114	Page 84, paragraph 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. <u>Proposals should be able to demonstrate that</u> that t <u>These benefits should</u> 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) <u>Enhanced</u> p <u>provision of affordable housing and a good mix of dwelling sizes which reflects the identified housing needs;</u> b) <u>Enhanced</u> p <u>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;</u>

		<p>c) Building to high environmental standards, with comfortable internal living environments that provide good air ventilation, daylight and minimise overheating;</p> <p>d) Maximising opportunities to generate energy, using low carbon and renewable sources and taking advantage of the scale of development;</p> <p>e) Make a positive contribution towards place-making, including measures to reflect <u>and reinforce positive elements of local character</u>, and <u>deliver a signify a-recognisable and distinctive local landmark</u>; and</p> <p>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.</p>
M115	Page 85, Policy QD6.5, part a)	Exceptional <u>Outstanding</u> 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;
M116	Page 85, Policy QD6.5, part b)	Significant public benefits that the development will provide, <u>as set out in paragraph 6.30</u> , clearly setting out why these would not be achievable as part of a development restricted to the base building height;
M117	Page 85, Policy QD6.5, part f)	A desire to achieve a specific skyline shape or cluster <u>having regard to Skyline: Watford’s Approach to Tall Buildings Supplementary Planning Document or any subsequent replacement document</u> ;
CHAPTER 7: THE HISTORIC ENVIRONMENT		
M118	Page 87, paragraph 7.2, new sentence after first sentence	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. <u>{Figure 7.2}- provides an overview of where heritage assets are located in the borough. This map is for context purposes and for more detailed information about specific areas and sites covered by policies refer to the Policies Map.</u> Some key elements of the town’s heritage include:
M119	Paragraph 7.5, additional evidence base added to list	<ul style="list-style-type: none"> • <u>Extensive Urban Survey Project Assessment Report (Hunns for HCC) 2000;</u> • <u>List of Freestanding Assets.</u>

M120	Paragraph 7.16, added supporting text	<p>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 <u>National Planning Policy Framework NPPF</u> identifies these as non-designated assets.</p> <p><u>Non-designated assets include a range of buildings, monuments, sites, places, areas or landscapes which have heritage value and should be considered in determining planning applications. These can either be identified as part of the planning process, through neighbourhood plans, conservation area appraisals, or be on Watford's Local List or other documents identified in paragraph 7.5.</u></p> <p><u>Many of these are identified in the List of Buildings of Local Interest, which includes freestanding structures; and many places, areas and landscapes in the town are included in conservation areas and therefore, are considered as designated assets.</u></p> <p><u>Non-designated assets which are not yet identified and which come to light during the preparation of proposals for a site will be taken into account following guidance set out by Historic England so that proportionate weight can be given in the decision-making process. Other assets which are identified through processes such as neighbourhood plans or local history research will be reviewed and recognised as non-designated assets.</u></p> <p>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. <u>As part of a planning proposals, applicants should provide an explanation regarding the social and historic context of the heritage asset and how the proposal has responded to this. This should follow guidance set out in the National Planning Policy Framework and guidance provided by Historic England.</u></p> <p>Proposals for development must have regard to Watford's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent.</p>
M121	Page 91, Policy HE7.2 Designated Heritage Assets, first paragraph	<p>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 benefit from the scheme should convincingly outweigh the harm caused.</p> <p><u>When considering the impact of a proposed development on the significance of a designated heritage asset, great weight</u></p>

		<u>will be given to the conservation of the asset. Any harm to, or loss of, significance will require clear and convincing justification in accordance with national policy.</u>
M122	Policy HE7.3, final paragraph additional policy requirements provided	<p>To preserve and enhance the character, appearance and setting of non-designated heritage assets Locally Listed Buildings all planning applications that affect non-designated assets Locally Listed Buildings will be determined in accordance with the following:</p> <p>a) Where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building;</p> <p>b) All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building;</p> <p>c) <u>Monuments with heritage value will be protected and proposals should consider how they will respond to the retention and enhancement of the structure and its setting in situ or as appropriate.</u></p> <p>d) <u>Identified sites with places and landscapes with heritage value will be protected and proposals will be required to demonstrate how they are positively contributing towards the heritage value to enhance local distinctiveness. Assets which come to light during the course of an application will need to be properly assessed and recommendations reflected in the details of the proposal.</u></p>
M123	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 in a location agreed with Local Planning Authority which is publicly available.</u>
CHAPTER 8: A CLIMATE EMERGENCY		

M124	Page 94, delete Figure 8.1	<p>Figure 8.1: Energy opportunities map</p> 
M125	Page 94, paragraph 8.3	<p>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).</p> <p><u>Major developments, particularly those located within the Core Development Area, that could benefit from the scale and density of development anticipated to take place during the plan period, should maximise opportunities to do so. This may include low-carbon and renewable energy schemes that could be integrated into a development and consideration of how the design and management of a scheme could make effective use of materials and reduce waste.</u></p>
M126	Page 95, paragraph 8.6, fourth sentence	Therefore, major non-residential developments should aim <u>are to</u> meet the BREEAM 'excellent' standard, or equivalent.
M127	Page 95, paragraph 8.7, first sentence	To be effective and reduce costs of retrofitting buildings, applicants should <u>are to</u> 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.
M128	Page 96, Policy CC8.2, Second paragraph, first sentence	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 <u>aim to</u> achieve BREEAM excellent standard.

		<p>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.</p>
M129	Page 94, paragraph 8.4	<p>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.</p>
M130	Page 95, Policy CC8.1, first paragraph	<p>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:</p>
M131	Page 98, Policy CC8.3, Energy Efficiency	<p>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:</p> <ol style="list-style-type: none"> Be designed so they can be adapted to be <u>carbon neutral</u> Net Zero Carbon; Avoid overheating and use passive ventilation when possible; Achieve the minimum applicable percentage, as set out below, <u>a 19%</u> improvement for carbon emissions over the target emission rate (TER) as <u>set out</u> outlined in National Building Regulations Part L (2013), or any updated government standards, whichever results in a higher target. <p>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.</p>
M132	Page 98, Policy CC8.3, Water Efficiency, second paragraph	<p>In new, non-residential developments, <u>that are unable to achieve BREEAM 'excellent' standard</u>, water conservation measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM 'very good' for the appropriate building typology.</p>
M133	Page 98, Policy CC8.3,	<p>Sustainability Statements</p>

	Sustainability Statements, delete section	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.
M134	Page 100, Policy CC8.4	<p>Development will be supported where it <u>minimises emissions that would</u> 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.</p> <p>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 <u>resulting</u> from significant emissions or pollutants <u>will need to consider air quality</u>. 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. <u>Assessments Proposals</u> will be required to consider the cumulative impacts in conjunction with other developments in the vicinity and include mitigation measures where necessary.</p> <p>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:</p> <ol style="list-style-type: none"> Public exposure to the pollution source has been minimised; Sensitive development has been located an appropriate distance away from the source of exposure; and The development would not lead to the creation of a new street canyon or a building configuration that inhibits effective pollution dispersion.
M135	Page 101, Policy CC8.5, first paragraph, second sentence	In accordance with the <u>'Agent of Change' Principle</u> , new development <u>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.
M136	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.

M137	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 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>
CHAPTER 9: CONSERVING AND ENHANCING THE ENVIRONMENT		
M138	Page 103, new paragraph after paragraph 9.2	<u>The content of Figure 9.1 reflects the green infrastructure and open space network as defined on the Policies Map. The opportunity areas and strategic/local links demonstrate how important elements of the green infrastructure network are connected and help to show where improvements could be made. This information is set out to provide context and aid policy implementation and applicants are encouraged to consider how their proposals can contribute towards enhancing the green infrastructure network.</u>
M139	Page 104, Strategic Policy NE9.1, Part c) onwards	<p>Ensuring all new 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>Following the ‘mitigation hierarchy’ of avoidance, mitigation or compensation as appropriate;</p> <p>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, <u>as required under the Water Framework Directive;</u></p> <p>e) Minimising <u>Reducing</u> the risk of flooding, including surface water flood risk;</p> <p>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;</p> <p>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;</p> <p>h) Improving the quality of Watford’s existing open spaces through development contributions;</p> <p>i) Where necessary, Ensuring that protected species and their habitats are a material consideration when determining planning applications;</p>

		<p>j) Protecting trees and encouraging native planting on new development; and</p> <p>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></p>
M140	Page 106, Policy NE9.2, second paragraph	<p>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. Existing trees, woodlands and hedgerows should be retained wherever possible. <u>If loss is demonstrated as being unavoidable, appropriate replacement or compensation will be required with native species being prioritised.</u></p>
M141	Page 106, Policy NE9.2, after final paragraph	<p><u>Green infrastructure as defined on the Policies Map will be protected.</u></p>
M142	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 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></p> <p>Development proposals in close proximity to, or that include a watercourse must:</p> <ol style="list-style-type: none"> Maintain an undeveloped and unobstructed buffer strip of eight metres from the top of the bank of all watercourses of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). <u>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,</u> Proposals should be accompanied by a management plan; Conserve and enhance the biodiversity value of the watercourse and its corridor <u>by including Water Framework Directive 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;</u> Enhance the role of the 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 access, where appropriate, to the green infrastructure network;

		<p>d) Integrate the watercourse into the scheme as a vital part of the public realm; and</p> <p>e) 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 Water Framework Directive 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 Water Framework Directive 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> <p><u>Flood Zones 2 and 3 are defined on the Policies Map.</u></p>
M143	Page 109, paragraph 9.16	<p>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 <u>'minimise 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.</p>
M144	Page 110, Policy NE9.4, Fluvial Flooding, second paragraph onwards	<p>Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. <u>Only water compatible and essential infrastructure 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.</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"> 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. <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 Strategic Flood Risk Assessment) and that where possible, development will reduce flood risk overall.</u> Proposals <u>for development in the floodplain must should</u></p>

		<p>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> <p><u>Developers should seek to provide an undeveloped buffer zone of eight 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> 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 eight 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 eight 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>
M145	Page 110, Policy NE9.4, Groundwater, fifth paragraph	<p>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), <u>deep-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.</u> Certain discharges into the ground may require an Environmental Permit.</p>
M146	Page 112, Policy NE9.5, second paragraph, delete last sentence	<p>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.</p>
M147	Page 112, Policy NE9.5, fourth paragraph	<p>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.</p>

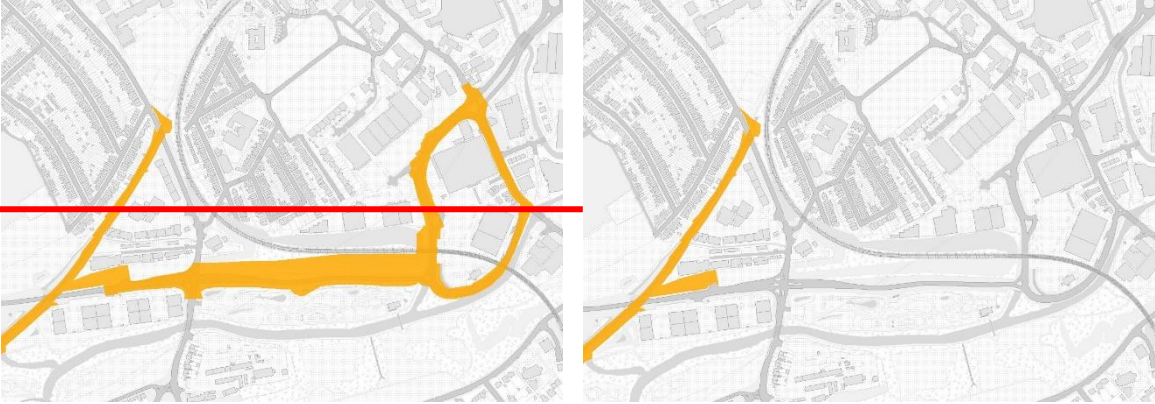
M148	Page 113, Policy NE9.6, first, second and third paragraphs, replace final paragraph	<p>Open space and ancillary facilities used for leisure and recreation will be protected, unless an up to date assessment <u>of needs</u> demonstrates the space is surplus to need. For an open space or an ancillary facility to be considered surplus to requirements, the following must be demonstrated:</p> <ol style="list-style-type: none"> An assessment <u>of needs</u> 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 The open space is not needed for alternative open space uses; or 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. <p>Development proposals for alternative open space uses will be supported where an up-to-date assessment <u>of needs</u> clearly shows the benefits outweigh the loss <u>any adverse impacts on the community and the environment</u>.</p> <p>The absence of identification of an open space on the Policies Map does not imply that development is appropriate. Open space and ancillary facilities used for leisure and recreation, as defined on the Polices Map, will be protected.</p>
M149	Page 113, paragraph 9.28	<p>As new development comes forward, there may <u>will</u> be opportunities to provide <u>create</u> new <u>publicly accessible communal</u> 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, <u>The different types of publically accessible open space have been defined in the Watford Green Spaces Strategy and include the following:</u></p> <ul style="list-style-type: none"> • 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. <p>The different types of open space have been defined in the Green Spaces Strategy. <u>The Green Space 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.</u></p>

M150	Page 114, Policy NE9.7, first paragraph	New <u>major</u> residential 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 <u>obligations</u> .
M151	Page 115, Policy NE9.8	<p>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.</p> <p>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 <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.</p> <p>Development should apply the mitigation hierarchy to avoid <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 should be submitted <u>to demonstrate that any off-site measures 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. 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.</u></p>
CHAPTER 10: INFRASTRUCTURE		
M152	Page 118, Policy 10.1	<p>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:</p> <ol style="list-style-type: none"> Contributes appropriately and proportionately towards required infrastructure, <u>having regard to the latest identified in</u> in <u>Watford's Infrastructure Delivery Plan</u>, at a rate and scale sufficient to support the growth identified in this Local Plan; Where applicable, connects to area-wide infrastructure and enables future connections;

		<p>c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the Watford's Infrastructure Delivery Plan, Site Allocations <u>site allocations</u> and / or other policies in the Local Plan;</p> <p>d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; this will be delivered on site;</p> <p>e) Is appropriately designed so that it complements and does not unduly restrict development on adjacent or connected sites.</p> <p>Developers will be expected to engage <u>participate in early pre-application engagement</u> with the Council and infrastructure service providers to discuss their requirements.</p> <p>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.</p>
M153	Page 120, Paragraph 10.17, first sentence	Future-proofed, high quality digital infrastructure, <u>such as fibre optic cables for high speed internet</u> is considered vital to support well-functioning <u>residential and</u> employment areas.
M154	Page 120, Policy IN10.2	<p>Planning permission, except for householders, will be granted where it is demonstrated <u>All non-householder development will be expected to demonstrate</u> that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from <u>the 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.</u> Infrastructure provision <u>should be made in accordance with relevant requirements set out in this Local Plan; have regard to the latest Watford</u> 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.</p> <p>Developers must demonstrate they have explored existing infrastructure capacity <u>with appropriate providers</u>, 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.</p> <p>Proposals for <u>residential and</u> employment uses should demonstrate that provision is made for high quality digital facilities <u>high speed internet infrastructure</u> as part of the application.</p>
M155	Page 122, Policy IN10.3	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.

		<p>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:</p> <p>a) Securing appropriate on-site enabling and development works;</p> <p>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;</p> <p>c) Securing Section 106 Agreements <u>planning obligations</u> to provide affordable housing and make provision to mitigate the impacts of the development, <u>in accordance with national policy and where necessary, or appropriate</u> having regard to any relevant <u>Supplementary Planning Documents</u> or <u>other local</u> guidance;</p> <p>d) Securing off-site highway works, <u>including provision for cycling and walking</u>, where necessary;</p> <p>e) Working with relevant service providers to identify and secure infrastructure funding or financing mechanisms.</p>
CHAPTER 11: A SUSTAINABLE TRAVEL TOWN		
M156	Page 125, paragraph 11.7, third sentence	2036 <u>2038</u>
M157	Page 124, Paragraph 11.15, last sentence	Improvements to the road network through an extension of Imperial Way , to provide a connection with the new proposed mobility hub and access from Colonial Way via Clive Way with upgrades to the necessary road junction and road extension to provide a connection with the proposed <u>Watford Junction Sustainable Transport Hub</u> . The <u>potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot via Imperial Way</u> , should also be facilitated.
M158	Page 126, Policy ST11.1, Part g)	g) Supporting a Sustainable Transport Hub <u>mobility hub</u> within the town centre that serves as a focal point for multiple modes <u>and links to the High Street Station</u> .
M159	Page 126, Policy ST11.1, new bullet after Part g)	<u>h) Enhancing pedestrian and cycle facilities at key junctions with the ring road</u>
M160	Page 127, Paragraph 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 <u>as part of the comprehensive redevelopment of the area</u> . One of <u>these bridges</u> 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 should be 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, <u>provide a connection to the Eastern Mobility Hub and not compromise any future re-routing of vehicle access to the concrete batching plant and rail aggregates depot.</u>
M161	Page 128, Policy ST11.2	<p>Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a <u>Sustainable</u> Transport Hub.</p> <p>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, <u>developers will need to have regard to the following Safeguarded Transport Routes</u> the following routes will be protected from development whose to ensure designs would <u>not</u> compromise their ability to prioritise public transport and active travel routes:</p> <ul style="list-style-type: none"> a) The disused former Croxley Rail Line, including access points <u>and routes on the existing road network</u>, as set out in the Watford MRT Safeguarding Technical Report <u>Croxley Line – Safeguarding for Mass Rapid Transit Technical Report</u>; b) The current Ebury Way cycle path and access to it; and c) The Abbey Line. <p><u>Additionally, proposals should have regard to:</u></p> <ul style="list-style-type: none"> d) <u>Existing</u> Current and planned cycle routes identified in the Local Cycling and Walking Infrastructure Plan; and e) <u>Any future p</u>Planned mass rapid transit routes identified by Hertfordshire County Council. <p>All routes are <u>The Safeguarded Transport Routes are identified on the Policies Map and</u> represented in Figure 11.3.</p> <p>The role of Watford Junction as a multi-modal <u>Sustainable Transport Hub</u> hub should be preserved, meaning that development must not hinder the provision of the following on-site and cross-boundary infrastructure;</p> <ul style="list-style-type: none"> 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 <u>from the existing and new road networks</u>; g) Bus and rail access that also provides for <u>the use of</u> cycles, electric vehicles, drop-off movements, taxis, coaches and <u>any</u> future mass rapid transit access; h) Extension of Imperial Way to <u>Pedestrian and cycling access from Colonial Way (or Imperial Way as part of a comprehensive redevelopment of the area) that will</u> provide a connection to the Eastern Mobility Hub and access to

		<p>the station and the <u>not compromise potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot. via Imperial Way;</u></p> <p>i) Upgrading of the bus station and bus priority improvements to roads in the vicinity of the station.</p>
M162	Page 129, paragraph 11.16, amend 2 nd sentence	These areas are shown in Figure 11.3 and are representative of the Transport Improvement Areas as defined on the <u>Policies Map.</u>
M163	Page 130, paragraph 11.21, after last sentence, add new sentence	<u>Land should also be safeguarded to provide access to the disused former Croxley Rail Line safeguarded transport corridor (and a potential station area).</u>
M164	Page 129, Figure 11.3 Revisions to the Safeguarded Transport Route around Thomas Sawyer Way, Dalton Way and Lower High	
M165	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 safeguarded disused former Croxley Rail Line.</u>
M166	Page 132, Policy ST11.3, after 2 nd paragraph	<u>Transport Improvements Areas and Safeguarded Transport Routes are defined on the Policies Map.</u>

M167	Page 133, paragraph 11.33	Cycle parking standards are set out in Appendix D and parking should be laid out in accordance to <u>with regard to</u> the Watford Cycle Parking Supplementary Planning Document.
M168	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.
CHAPTER 12: A HEALTHY COMMUNITY		
M169	Page 146, Policy HC12.1, third paragraph, fifth sentence	Major developments are expected to promote active design by adhering to the 10 Principles of Active Design set out by Sport England. Non-householder developments should promote active design having regard to relevant guidance, including that from Sport England.
M170	Page 147, Paragraphs 12.4, 12.5, 12.6	<p>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.</p> <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"> • Rapid Assessment for simpler proposals; • In-depth Health Impact Assessment for more complicated or larger proposals. <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>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"> <u>• Understand the local community health needs and demonstrate how it can support these;</u> <u>• Demonstrate how it has considered health inequalities;</u> <u>• Meet the requirements of the Environmental Impact Assessment (EIA) Regulations for human health;</u> <u>• Meets the policy requirements of the Watford Local Plan that major development proposals undertake a Health Impact Assessment;</u> <u>• Demonstrate the opportunities of a proposal and how a development has been positively planned.</u> <p><u>Hertfordshire County Council has adopted a Health Impact Assessment Position Statement which sets out when a Health Impact Assessment should be undertaken and frameworks to use for each stage of the Health Impact Assessment process. 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:</u></p> <ul style="list-style-type: none"> <u>• Rapid Assessment for simpler proposals;</u> <u>• In-depth (comprehensive) assessment for more complicated or larger proposals</u> <p>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, 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>
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M171	Page 148, Policy HC12.3	<p>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.</p> <p>The loss of existing community and cultural venues will only be permitted where it can be demonstrated that:</p> <ol style="list-style-type: none"> The facility is no longer needed and there is no need for an alternative community or cultural use on that site; or 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. <u>In accordance with Appendix F, 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 community uses.</u> <p>Development within the curtilage of existing community facilities should demonstrate that the continued operation of these facilities is not compromised.</p>
CHAPTER 13: SITE ALLOCATIONS AND NEW DEVELOPMENT		
M172	Page 150, paragraph 13.2, second sentence	The administrative area of Watford has a capacity for providing 14,988 <u>13,328</u> units over the plan period, with current estimates indicating a 793 <u>784</u> units per annum requirement.
M173	Page 150, Paragraph 13.3, first sentence	These sites are identified defined on the Policies Map and set out in Figure 13.1. The policy is applicable to those sites identified in Tables 13.1, 13.2, 13.3 and 13.4 <u>Tables 13.1 (housing), 13.2 (Gypsies and Travellers), 13.3 (mixed-use), 13.4 (employment) and 13.5 (education)</u> which include the following information:
M174	Page 151, Paragraph 13.4	The process for calculating the indicative yields of the site has been set out in the HELAA <u>Housing and Economic Land Availability Assessment</u> , as has the wider process for site selection. <u>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, character and any heritage sensitivities which may affect the site, 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.</u>
M175	Page 151, new paragraphs	<u>For each site allocation, the types of uses that are considered appropriate have been set out. Proposals for uses classified as sui generis will be supported where these are consistent with the uses set out in Tables 13.1 – 13.5, support the wider</u>

	after paragraph 13.4	<p><u>objectives for the area, particularly on sites that are located within a Strategic Development Area, and will make a positive contribution towards achieving these. Where proposals include an ancillary use that is not within a use-class set out in a site allocation, applicants should demonstrate how this is consistent with the allocation and the positive contribution it will make to the area. Where there is a potential negative impact, applicants should demonstrate how this will be appropriately mitigated.</u></p> <p><u>In addition to meeting the requirements set out in a site allocation, proposals will need to be prepared in accordance with policies in the Local Plan. For sites located within a Strategic Development Area, they will need to comply with policies set out in Chapter 2 'Core Development Area'.</u></p>
M176	Page 151, paragraph 13.5, new sentence after the first sentence	<p>The development requirements and considerations detailed in Tables 13.1, 13.2, 13.3, and 13.4 and <u>13.5</u> are not exhaustive. <u>Accompanying the development considerations for each site allocation is an outline map of the site. This information reflects that special extent of the allocation as defined on the Policies Map.</u></p>
M177	Page 151, Strategic Policy SA13.1, first paragraph	<p>The sites listed in Tables 13.1, 13.2, 13.3 and 13.4 <u>13.1 'Allocated sites for housing development', 13.2 'Allocated site for Gypsies and Travellers', 13.3 'Allocated site for mixed-use development', 13.4 'Allocated sites for employment development' and 13.5 'Sites allocated for education development'</u> are defined as shown on the Policies Map, are allocated for residential (Use Class C3), mixed-use development (Sui Generous), employment uses (Use Classes B and E), education use (Use Class F1(a)) and any other uses specified.</p> <p><u>Appropriate types of development or land uses are identified for each site allocation. Where mixed-use development is proposed, this may refer to specific identified uses and also consist of one or more of the uses set out in Table 13.3. Other ancillary uses and sui generis will be acceptable where they are compatible and positively contribute towards the objectives of the area, particularly where a site is located within a designated Strategic Development Area.</u></p> <p>Planning Permission will be granted for proposals that:</p> <ol style="list-style-type: none"> Accord with the policies in the Local Plan; <u>Have regard to Accord</u> with any Supplementary Planning Document, master plan or development brief that affects the site; <u>Deliver the uses identified and a</u>Address the key development considerations for each site; and Provide appropriate mitigation measures for issues identified where the development considerations set out the need for an assessment.

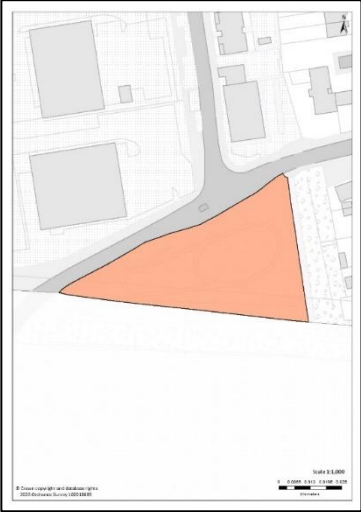
M178	Site allocations for residential use where these are the only proposed uses.	<i>Residential allocations have been clarified to state these are classified as C3 use. These proposed amendments will be included in the Schedule of Minor Modifications.</i>
M179	Page 152, Table 13.1: Housing sites HS01 Land and garages at Lych Gate, add new requirement after second bullet	<u>b) 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>
M180	Page 154, Table 13.1: Housing sites HS06 Land at Russell Lane, amend third bullet	Incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy; and <u>c) 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;</u>
M181	Page 157, Table 13.1: Housing Sites HS12 Land and garages between 139 and 149 Queens Road	Timescale 4-5 <u>6-15</u> years
M182	Page 158, Table 13.1, Site HS14, first bullet	Avoid any significant adverse impacts on the locally listed building, Exchange House, located opposite the site; <u>a) Future development proposals for HS14 will take account of the findings and recommendations of the Council's Heritage Impact Assessment ;</u>


		<u>b) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u>
M183	Page 159, Table 13.1, Site HS15, new bullet after last bullet	<u>d) Future development proposals for HS15 will take account of the findings and recommendations of the Council's Heritage Impact Assessment;</u>
M184	Page 161, Table 13.1, Site HS18, replace second and sixth bullets	<p>Avoid any significant adverse impacts on the locally and nationally listed buildings located in the immediate 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;</p> <p><u>b) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>c) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M184A	Page 161, Table 13.1, Site HS19, penultimate bullet	<p>Replace penultimate bullet with:</p> <p><u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M185	Page 161, Table 13.1, HS20 Land at Derby Road, after second bullet add new bullets	<p><u>d) Future development at HS20 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p><u>e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>

M186	Page 162, Table 13.1, HS21 Land at Waterfields Retail Park, replace fifth bullet	<p>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;</p> <p><u>f) Future development at HS21 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p><u>g) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>h) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M187	Page 162, Table 13.1, HS22 Land and buildings at 252-272 Lower High Street, replace second bullet	<p>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;</p> <p><u>b) Future development at HS22 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p><u>c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M188	Page 163, HS23 Land and buildings at 247 Lower High Street, replace third bullet	<p>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;</p> <p><u>b) Future development at HS23 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p>

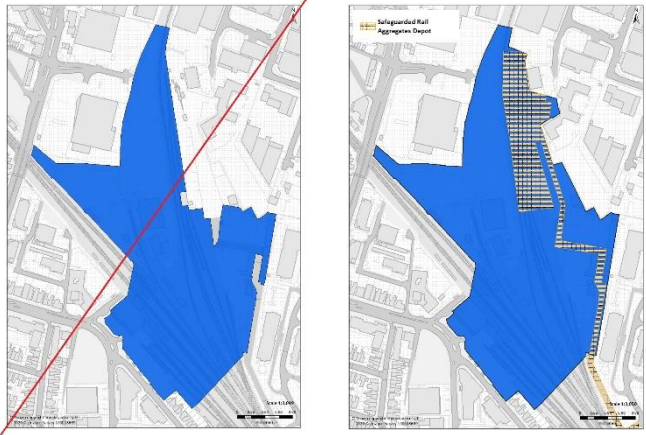
		<p><u>c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M189	Page 163, Table 13.1: Housing sites HS24 Land and garages between 41 and 61 Brightwell Road	Indicative yield = 4 <u>5</u> units
M190	Page 165, Table 13.1, HS28 Wiggshall Depot, replace third bullet	<p>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;</p> <p>c) <u>Future development at HS28 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p>d) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate design;</u></p> <p>e) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for the site to be submitted prior to the determination of any application;</u></p> <p>f) <u>New development proposals for the site should retain the locally listed buildings on the site. If this cannot be achieved the loss of these assets must be strongly justified and the replacement scheme must be of extremely high quality.</u></p>

M191	Page 167, Table 13.1 Housing sites HS31 Land at Bushey Station	Timescale: 4-5 <u>6-15</u> years												
M192	Page 167, Table 13.1 Housing sites HS31 Land at Bushey Station, replace fourth bullet	<p>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;</p> <p><u>d) Future development at HS31 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p><u>e) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>f) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for the site to be submitted prior to the determination of any application;</u></p>												
M193	Page 168, Table 13.1: Site HS33, delete	<table border="1" data-bbox="607 850 1532 1153"> <thead> <tr> <th colspan="4" data-bbox="607 850 1532 882">Site: HS33 Land and garages at Kingsfield Court</th> </tr> </thead> <tbody> <tr> <td data-bbox="607 882 840 914">Size (ha): 0.06</td> <td data-bbox="840 882 1115 914">Location: Outside of CDA</td> <td data-bbox="1115 882 1339 914">Timescale: 6-15 years</td> <td data-bbox="1339 882 1532 914">Indicative yield = 4 units</td> </tr> <tr> <td colspan="4" data-bbox="607 914 1532 1153"> <p>Development requirements and considerations</p> <p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> • 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. </td> </tr> </tbody> </table>	Site: HS33 Land and garages at Kingsfield Court				Size (ha): 0.06	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 4 units	<p>Development requirements and considerations</p> <p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> • 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. 			
Site: HS33 Land and garages at Kingsfield Court														
Size (ha): 0.06	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 4 units											
<p>Development requirements and considerations</p> <p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> • 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. 														
M194	Page 169, New Table 13.2- Addition of Gypsy and Traveller Site Tolpits Lane	<u>Table 13.2: Gypsy and Traveller Site</u>												

Site: GT01 Land at Tolpits Lane, south of Epsom Road		
Size (ha): 0.31	Location: Outside of CDA	Timescale: 1-5 years
Indicative Yield = 2 Gypsy and Traveller Pitches		
	<p><u>Development requirements and considerations</u></p> <p><u>The site is considered suitable for the provision of Gypsy and Traveller pitches.</u></p> <p><u>Development proposals should:</u></p> <p><u>Have regard to criteria a-f of Policy H03.8: Gypsies and Travellers.</u></p> <p><u>Ensure that the plots are protected for Gypsy and Traveller use exclusively unless it can be demonstrated that they are no longer required in accordance with Policy H03.8.</u></p> <p><u>Retain and enhance the walking and cycle route immediately adjacent to the eastern boundary of the site.</u></p> <p><u>Provide quality landscaping along the frontage with Tolpits Lane and the path along the eastern boundary of the site</u></p> <p><u>Be accompanied by a Preliminary Ecological Assessment</u></p> <p><u>Incorporate compensatory measures for the loss of Green Belt into the scheme.</u></p>	
M195	Page 169, Table 13.2, Site MU01, amend first sentence	This site is considered suitable for mixed-use development including <u>one or more of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community uses.</u> Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.
M196	Page 169, Table 13.2, Site MU02, amend first sentence	This site is considered suitable for mixed-use development including <u>one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential, and E(e) medical facilities and F2(b) meeting places for community use.</u> Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.
M197	Page 170, Table 13.2, Site	This site is considered suitable for mixed-use development including <u>one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community uses.</u> Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.


	MU03, amend first sentence	
M198	Page 170, Table 13.2, Site MU04, amend first sentence	This site is considered suitable for mixed-use development including <u>one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community uses</u> . Redevelopment of the site should be in line with Policy HC12.3 ‘Built Cultural and Community Facilities’.
M199	Page 171, Table 13.2: Mixed-use sites MU05 Land and buildings at 94-98 St Albans Road <u>Safeguarded Rail Aggregates Depot layer added</u>	
M200	Page 171, Table 13.2: Mixed-use sites MU05 Land and buildings at 94-98 St Albans Road, revised requirements	<p>Indicative yield = 1,214 units <u>C3 residential</u>, 295sqm of <u>E(g)(i) office floorspace</u>, 4,960 <u>2,050sqm of E(a), E(c) commercial floorspace and 2,910sqm of F1(a) educational floorspace.</u></p> <p>This site is considered suitable for mixed-use development including for residential uses <u>C3 residential, E(g)(i) office floorspace and a F1(a) primary school. is also required on site.</u></p> <p><u>In addition, one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: C2 residential institutions, E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace, F1(a) education facilities and F2(b) meeting places for community.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> a) Support the wider objectives of the Watford Gateway Strategic Development Area; b) Ensure that retail re-provision on site will not exceed the existing retail floorspace;

		<p>c) <u>Provide a new primary school;</u></p> <p>d) <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></p> <p>e) <u>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 and to ensure that the development proposals consider the cumulative impacts of development, including heritage;</u></p> <p>f) <u>Future development at MU05 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p>g) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p>h) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u> 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;</p> <p>i) 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;</p> <p>j) 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</p> <p>k) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.</p>
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<p>M201</p>	<p>Page 172, Table 13.2: Mixed-use sites MU06 Land at Watford Junction, site allocation map</p> <p><u>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 as Safeguarded Rail Aggregates Depot layer.</u></p>	
<p>M202</p>	<p>Page 172, Table 13.2: Mixed-use sites MU06 Land at Watford Junction,</p>	<p>Indicative yield = 1,232 units <u>C3 residential</u>, 20,998 sqm of <u>E(g)(i) office floorspace</u>.</p> <p>This site is considered suitable for mixed-use development including residential-C3 residential, employment and commercial uses <u>E(g)(i) office floorspace</u>, a replacement <u>E(f) childcare facility</u> and a <u>F1(a) primary school</u>. is required on site.</p> <p>Development proposals should:</p>

	revised requirements	<ul style="list-style-type: none"> a) Support the wider objectives of the Watford Gateway Strategic Development Area, including the necessary improvements to the station and its <u>operation functionality</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; c) A-Provide a new 3 form entry primary school; d) A-Provide a replacement child care facility; e) Seek to work collaboratively with the landowners of sites MU05 and MU07 which are located adjacent to the site, <u>MU24 located north east of the site and the operator of the concrete batching plant and rail aggregates depot located almost entirely within the site to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage</u>; f) <u>Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided</u>; g) <u>Development will not compromise Clive Way as a safe, high quality active travel route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub</u>; h) <u>In collaboration with the landowners of sites MU05, MU07 and MU24 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides access to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub</u>; i) 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>Support the delivery of a second crossing point from Penn Road across the railway lines in the latter part of the plan period when comprehensive mixed-use redevelopment is proposed</u>; j) <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network</u>; k) Demonstrate that safe access has been provided to the site; l) <u>Have regard to the safeguarded concrete batching plant and rail aggregates depot 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</u>
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		<p><u>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></p> <p>m) <u>Ensure the layout of the scheme has been planned, laid out and designed to minimise any 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 This may include locating non-residential floorspace in the lower storeys;</u></p> <p>n) <u>Future development at MU06 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p>o) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p> <p>Avoid significant harm to the setting of the Nascot Conservation Area, located directly to the west of the site;</p> <p>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;</p> <p>p) 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;</p> <p>q) Take account of the potential risk of contamination on site;</p> <p>r) 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> <p>s) <u>For all noise sensitive 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 and rail aggregates depot located largely within 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.</u></p>
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<p>M203</p>	<p>Page 173, Table 13.2: Mixed-use sites – Site MU07</p> <p><u>Safeguarded Rail Aggregates Depot layer added</u></p>	
<p>M204</p>	<p>Page 173, Table 13.2: Mixed-use sites MU07 Land at Astral House, revised requirements</p>	<p>Timescale: 1-5 years (<u>industrial development</u>) 6-15 years (<u>long-term transitional mixed-use development</u>) Indicative yield = <u>6,600sqm of B2, B8 industrial floorspace</u> 131 residential units</p> <p>This site is considered suitable for mixed-use development, including residential and employment uses. <u>This site is considered suitable for mixed-use development including one or more of the uses, or a mix thereof, defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development and E(g)(iii) industrial processes.</u></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: E(e) health facilities, E(f) crèche/nursery, E(g)(ii) research and development, E(g)(iii) industrial processes, C2 residential institutions, C3 residential, and C4 houses in multiple occupation.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> a) Support the wider objectives of the Watford Gateway Strategic Development Area; b) Result in no net loss of employment floorspace on site <u>unless the office use is replaced with industrial uses;</u>

		<p>c) <u>Seek to work collaboratively with the landowners of sites MU06, and MU24 EM05 and the operator of the concrete batching plant and rail aggregates depot, which are located adjacent to the east of to the site, to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage;</u></p> <p>d) <u>Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided;</u></p> <p>e) <u>Demonstrate that safe pedestrian and cyclist access to the site has been provided; Development will not compromise Clive Way as a safe, high quality active travel route to the Watford Junction Sustainable Transport Hub;</u></p> <p>f) <u>In collaboration with the landowners of sites MU05, MU06 and MU24 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;</u></p> <p>g) <u>Future development at MU07 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p>h) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p> <p>i) <u>Support the delivery of a second crossing point from Penn Road across the railway lines in the latter part of the plan period when comprehensive mixed-use redevelopment is proposed;</u></p> <p>j) <u>Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land required for bridge;</u></p> <p>k) <u>Take account of the potential risk of contamination on site;</u></p> <p>l) <u>Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required if <u>new residential dwellings come forward; due to the scale of the new dwellings to be provided; and</u></u></p> <p>m) <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</u></p>
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		<p><u>on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</u></p> <p>n) <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></p> <p>o) <u>For all noise sensitive 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 sensitive noise receptors.</u></p>
M205	Page 174, Table 13.2, Site MU08, amend first sentence	<p>Indicative yield = 21 units <u>C3 residential</u>, 480sqm of <u>E(g)(i) office floorspace</u></p> <p>This site is considered suitable for mixed-use development of <u>C3 residential and/or E(g)(i) office floorspace</u>, including residential and office uses.</p>
M206	Page 174, Table 13.2, Site MU08, amend last bullet. Two new bullets added	<p>Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site. Future development at MU08 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</p> <p>d) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design.</u></p> <p>e) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.</u></p>
M207	Page 175, Table 13.2, Site MU09, amend first sentence	<p>Indicative yield = 120 units <u>C3 residential</u>, 2,770sqm of <u>E(g)(i) office floorspace</u></p> <p>This site is considered suitable for mixed-use development of <u>C3 residential and/or E(g)(i) offices</u>, including residential and office uses.</p>

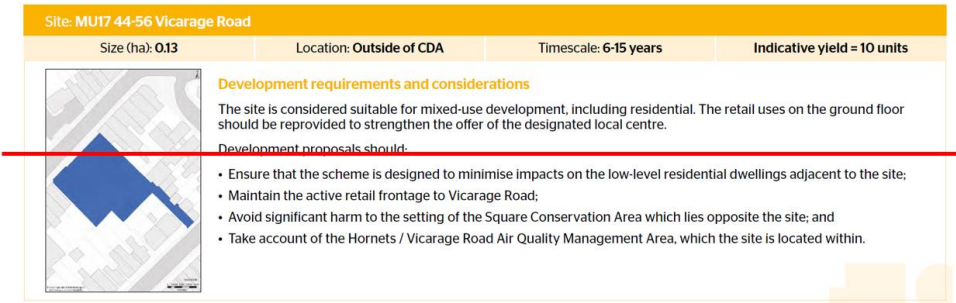
M208	Amend second bullet Two new bullets after c)	<p>b) Position the tallest elements of the scheme along the Clarendon Road frontage; <u>Building heights along the Westland Road elevation should have regard to the building heights of existing properties on Westland Road opposite the site;</u></p> <p>d) <u>Future development at MU09 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p>e) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.</u></p>
M209	Page 176, Table 13.2, Site MU10, amend first sentence	<p>Indicative yield = 90 units <u>C3 residential</u></p> <p>This site is considered suitable for mixed-use development including C3 residential, including residential and commercial uses. <u>One or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use would be supported to provide active ground floor frontages.</u></p>
M210	Page 176, Table 13.2, Site MU10, amend third bullet, last two bullets, two new bullet after last bullet	<p>c) Provide a quality, <u>active ground floor</u> frontage and landscaping along the <u>The Parade and Albert Street South;</u></p> <p>e) Avoid significant harm to the setting of the Civic Core Conservation Area</p> <p>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</p> <p>e) <u>Future development at MU10 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p>f) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p>g) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M211	Page 177, Table 13.2, Site	<p>Indicative yield = 72 units <u>C3 residential</u></p>

	MU11, amend first sentence, amend last two bullet, two new bullet after last bullet	The site is considered suitable for mixed-use development <u>including C3 residential, including residential uses and active commercial uses on the ground floor. One or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use would be supported to provide active ground floor frontages.</u>
M212	Page 177, Table 13.2, Site MU11, amend second bullet, two new bullets new bullets after second bullet, new bullet after third bullet	<p>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.</p> <p>b) <u>Future development at MU11 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p>c) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p>d) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p> <p>e) <u>Provide a quality, active ground floor frontage and landscaping along The Parade;</u></p>
M213	Page 178, Table 13.2, Site MU12, amend first sentence	<p>Indicative yield = 14 units <u>C3 residential</u></p> <p>This site is suitable for mixed-use development <u>including C3 residential, including residential and commercial uses and one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use to provide active ground floor frontages.</u></p>
M214	Page 178, Table 13.2, Site MU12, amend third bullet	<p>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;</p> <p>c) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p>


		d) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u>
M215	Page 179, Table 13.2, Site MU13, amend first sentence	Indicative yield = 220 units <u>C3 residential</u> This site is suitable for mixed-use development <u>including C3 residential, including residential and commercial uses and one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use to provide active ground floor frontages.</u>
M216	Page 179, Table 13.2, Site MU13, amend fifth and sixth bullets	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; e) <u>Future development at MU13 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u> f) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u> g) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u>
M217	Page 180, Table 13.2, Site MU14, amend first sentence	Indicative yield = 40 units <u>C3 residential</u> This site is suitable for residential led, mixed-use development <u>including C3 residential and one or more of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use</u> E and F class uses are possible on the ground floor to maintain an active frontage.
M218	Page 180, Table 13.2, Site MU14, amend second bullet	Avoid significant adverse impacts on the locally and nationally listed buildings in the vicinity of the site. A Heritage Impact Assessment may be required b) <u>Future development at MU14 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u>

		<p>c) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p>d) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application. However, due to the significance of the heritage assets which form the Holy Rood complex (Grade I church and Grade II ancillary buildings) the building height, scale and massing of any new proposals on the Exchange Road frontage should have regard to the heights, scale and massing of the Holy Rood Complex;</u></p>
M219	Page 180, Table 13.2, Site MU15, amend first sentence	<p>Indicative yield = 19 units <u>C3 residential</u></p> <p>This site is suitable for mixed-use development including <u>residential C3 residential and F2(b) meeting places for community uses.</u></p>
M220	Page 180, Table 13.2, Site MU15, amend third bullet	<p>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.</p> <p>d) <u>Future development at MU15 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p>e) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p>f) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M221	Page 181, Table 13.2: Mixed-use sites MU16 Land at Tesco, amend first and second	<p>Indicative yield = 1,338 units <u>C3 residential</u></p> <p>The site is considered suitable for mixed-use development, including <u>residential C3 residential, E and F class uses and a F1(a) primary school.</u></p>

	<p>paragraphs and c)</p>	<p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: C2 residential institutions, E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> 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) <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u> 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; <p>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;</p> <ul style="list-style-type: none"> h) <u>Future development at MU16 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u> i) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u> j) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u>
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		<p>k) <u>New proposals should seek to incorporate the locally listed coal duty marker into the new scheme; proposals which seek to relocate the monument will need to justify why this is appropriate and that the new location provides an enhanced setting and interpretation of the monument;</u></p> <p>l) Adequately address the level changes on site;</p> <p>m) Have regard to the high pressure pipeline that traverses the site;</p> <p>n) 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;</p> <p>o) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;</p> <p>p) 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;</p> <p>q) Take account of the potential risk of contamination on site;</p> <p>r) 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</p> <p>s) Retain significant trees on site wherever possible, including those with a Tree Protection Order.</p>				
<p>M222</p>	<p>Page 182, Table 13.2, Site MU17, delete</p>	 <p>Site: MU17 44-56 Vicarage Road</p> <table border="1"> <tr> <td>Size (ha): 0.13</td> <td>Location: Outside of CDA</td> <td>Timescale: 6-15 years</td> <td>Indicative yield = 10 units</td> </tr> </table> <p>Development requirements and considerations</p> <p>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.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> • 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. 	Size (ha): 0.13	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 10 units
Size (ha): 0.13	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 10 units			
<p>M223</p>	<p>Page 183, Table 13.2, Site MU18, amend first sentence</p>	<p>Indicative yield = 466 units <u>C3 residential</u></p> <p>The site is considered suitable for residential-led, mixed-use development, <u>including C3 residential. In addition one or more of, or a mix thereof, the uses defined within the following Use Classes would be supported to provide active ground</u></p>				


		<p>floor frontages: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use</p> <p><u>Reprovision of E class uses is possible on the ground floor.</u></p>
M224	<p>Page 183, Table 13.2: Mixed-use sites</p> <p>MU18, Land at Colne Valley Retail Park, replace fifth bullet and added requirement after fifth bullet</p>	<p>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;</p> <p><u>e) Future development at MU18 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p><u>f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p> <p><u>h) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></p>
M225	<p>Page 183, Table 13.2: Mixed-use sites</p> <p>MU18, Land at Colne Valley Retail Park, replace fifth bullet, added requirement after eighth bullet</p>	<p><u>Have regard to the overhead electricity transmission lines that traverse the site;</u></p>
M226	<p>Page 184, Table 13.2, Site</p>	<p>Indicative yield = 43 units <u>C3 residential</u></p>

	MU19, amend first sentence	<p>The site is considered suitable for residential-led, mixed-use development, <u>including C3 residential and transport improvements.</u></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: C2 residential institutions, C3 residential, E(f) crèche or nursery.</u></p>
M227	Page 184, Table 13.2, Site MU20, amend first sentence	<p>Indicative yield = 27 units <u>C3 residential</u></p> <p>The site is considered suitable for residential-led, mixed-use development, <u>including C3 residential.</u></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes: E(c)(i) financial services, E(c)(ii) professional services and E(c)(iii) other appropriate services in a commercial, business or service locality use would be supported with E class uses suitable on the ground floor.</u></p>
M228	<p>Page 185, Table 13.2: Mixed-use sites – Site MU21</p> <p><u>Allocated Sites For Delivery Layer site MU21 amended to include Watford General Hospital</u></p>	
M229	Page 185, Site allocation MU21, site area	<p>Size (ha): 12.0 <u>18.1</u> Location: CDA Timescale: 1-15 years Indicative yield = 1,383 units</p>

M230	Page 185, Site allocation MU21, revised development requirements and considerations with hospital added to the allocation	<p>Indicative yield = 1,383 units <u>C3 residential</u></p> <p>This site is considered suitable for mixed-use development including for residential, C3 residential, commercial uses and a F1(a) primary school, a new hospital and associated car park.</p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: C1 Hotels, C2 residential institutions, E(e) medical or health facilities, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> a) Support the wider objectives of the Colne Valley Strategic Development Area; b) <u>Complete a review of transport impact and safety as part of a full Transport Assessment;</u> c) <u>A clearly legible, continuous pedestrian route, suitable for all users including those with mobility issues, should be provided from Vicarage Road to Thomas Sawyer Way along the west side of the existing hospital;</u> d) <u>Cycle infrastructure to be provided along Thomas Sawyer Way and Willow Lane;</u> e) <u>Pedestrian and cycle connections to the disused former Croxley Rail Line adjacent to the southern boundary of the site should be provided;</u> f) Enhance the public realm through the provision of a new public square; g) <u>Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan;</u> h) <u>Future development at MU21 will take into account the findings and recommendations of the Council's Heritage Impact Assessment, recognising the former workhouse within the site boundary is a nationally listed building;</u> i) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u> j) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application. Any taller elements of a proposed scheme should be located on the sections of the site farthest away from the heritage assets and buildings heights should step down towards the heritage assets to reflect the heights of the assets;</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; l) Take account of the potential risk of contamination on site; <u>and</u>
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		<p>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, <u>including the sewerage pipe traversing the site near the existing hospital.</u></p>
M231	Page 186, Table 13.2, Site MU22, new first sentence	<p>Indicative yield = 141 units <u>C3 residential</u></p> <p>The site is considered suitable for residential-led, mixed-use development, <u>including C3 residential.</u></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c) commercial floorspace and F2(b) meeting places for community use would be supported. Reprovision of the retail uses is possible on the ground floor.</u></p>
M232	Page 186, Table 13.2, Site MU22, replace fifth bullet	<p>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.</p> <p><u>e) Future development at MU22 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p><u>f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M233	Page 187, Table 13.2, Site MU23, add first sentence	<p>Indicative yield = 422 units <u>C3 residential</u></p> <p><u>The site is considered suitable for mixed-use development including C3 residential.</u></p> <p><u>In addition, one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: E(a) retail sale of good other than hot food, E(b) food and drink for consumption (mostly) on the premises, E(d) indoor sport, recreation or fitness F1(a) education and F2(b) meeting places for community use.</u></p>

M234	Page 187, Table 3.2: Mixed-Use Site Allocations, MU23, Land at Asda, Dome Roundabout, added requirement 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>
M235	Page 188, Table 13.3, Employment Site Allocations, EM01 Cassiobury House 11-19 Station Road Amend first sentence	Indicative yield = 2,530 <u>5,153</u> sqm of office <u>and commercial</u> floorspace <u>6,165sqm of hotel floorspace</u> <u>This site is considered suitable for office-led development including one or more, or a mix thereof, the uses defined within the following Use Classes: E(g)(i) offices and C1 hotels.</u>
M236	Page 188, Table 13.3, Employment Site Allocations, EM01 Cassiobury House 11-19 Station Road Amend third bullet.	c) 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. ; <u>-Future development at EM01 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u> and d) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.</u>

	After fourth bullet, new bullet	
M237	Page 188, Table 13.3, Site EM02, amend first sentence	<i>[See the proposed amended allocation in the row below]</i>
Site: EM02 Land to the south of Wiggshall Industrial Estate		
Size (ha): 0.58		Location: CDA
		Timescale: 1-5 years 6-15
		Indicative Yield = 11,600 5,800sqm of B2, B8, E(g)(ii), E(g)(iii) industrial office floorspace
	<p>This site is considered suitable for office <u>industrial uses development</u> and may include one or more of the uses defined within the following Use Classes: <u>B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> 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; Ensure that a safe access to the site has been provided; and <u>Be designed to enable access from the disused former Croxley Rail Line to Thomas Sawyer Way; and</u> Take account of the potential risk of contamination on site. 	
M238	Page 189, Table 13.3, Site EM03, amend first sentence	This site is considered suitable for industrial uses <u>and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.</u>
M239	Page 189, Table 13.3, Site EM04,	This site is considered suitable for industrial uses <u>and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.</u>

	amend first sentence	
M240	<p>Page 190, Table 13.3: Employment sites – Site EM05 <u>MU24</u></p> <p><u>Allocated Sites For Delivery Layer amended - existing site Land at Colonial Way/Clive Way, EM05, changed to a mixed-use site, reference MU24</u></p>	
M241	<p>Page 190, Table 13.3: Employment sites Site allocation EM05 <u>MU24</u> Land at Colonial Way/Clive Way, renumbered and relocated to Table 13.2</p>	<p>Timescale: <u>1-5 years (short-term industrial redevelopment)</u> <u>6-15 years (long-term transitional mixed-use development)</u></p> <p>Indicative yield = <u>8,215</u> 9,200 sqm of industrial floorspace</p> <p>This site is considered suitable for industrial uses <u>mixed-use development including one or more, or a mix thereof, the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development and E(g)(iii) industrial processes.</u></p> <p><u>In addition, one or more of the uses defined within the following Use Classes would be supported: E(e) health facilities, E(f) crèche/nursery, C2 residential institutions, C3 residential and C4 houses in multiple occupation.</u></p> <p>Development proposals should:</p> <p>a) Support the wider objectives of the Watford Gateway Strategic Development Area;</p>

		<ul style="list-style-type: none"> b) <u>Seek to work collaboratively with the landowners of sites MU06 and MU07 and the operator of the concrete batching plant and aggregates facility which is located adjacent to the west of the site to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage;</u> 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 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> d) <u>Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided;</u> e) <u>New development will not compromise Clive Way as a safe, high quality active travel route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;</u> f) <u>In collaboration with the landowners of sites MU05, MU06 and MU07 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;</u> g) <u>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;</u> h) <u>Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required; Future development at MU24 will take into account the results and recommendations of the Council's Heritage Impact Assessment;</u> i) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u> j) <u>Take account of the potential risk of contamination on site;</u> k) <u>Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required if new dwellings come forward; and</u>
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		<p>l) <u>For all noise sensitive 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 located west of 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 operation due to the introduction of noise receptors.</u></p>
M242	<p>Site allocations for residential use where these are the only proposed uses.</p>	<p><i>Residential allocations have been clarified to state these are classified as C3 use. These proposed amendments will be included in the Schedule of Minor Modifications.</i></p>
M243	<p>Page 191, Table 13.4: Education facilities – Site ED01</p> <p><u>Allocated Sites For Delivery Layer site ED01 boundary amended</u></p>	
M244	<p>Page 191, Table 13.4: Education facilities, Site: ED01 Former Meriden School Site, first bullet.</p>	<p>Development proposals should:</p> <ul style="list-style-type: none"> • Provide appropriate mitigation for the lapsed <u>detached playing field for Park Gate Junior School</u> in line with the Playing Pitch Strategy (2020);

Appendix A: Draft Monitoring Framework		
M245	Page 193, Chapter 1 row	Number of jobs / 13,000 jobs provided 2018 – 2036 / Planning applications
M246	Page 193, Chapter 3 row 1	14,274 dwellings 2018 – 2036 with 793 per year. Maintain 5 year housing supply. <u>13,328 net additional dwellings between 2021 and 2038, equivalent to 784 homes per year.</u>

Appendix B: Housing Trajectory

M247

Page 198, Appendix B: Housing Trajectory (table), revised to reflect 2021-2038 housing need figure of 13,328 new homes to be completed

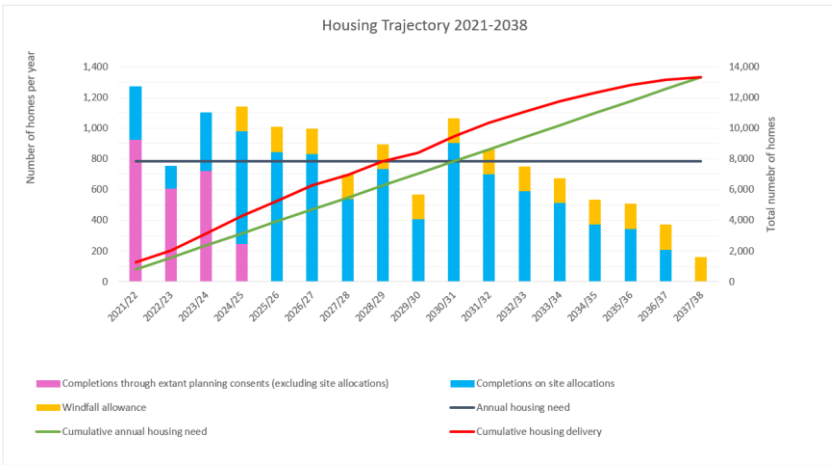
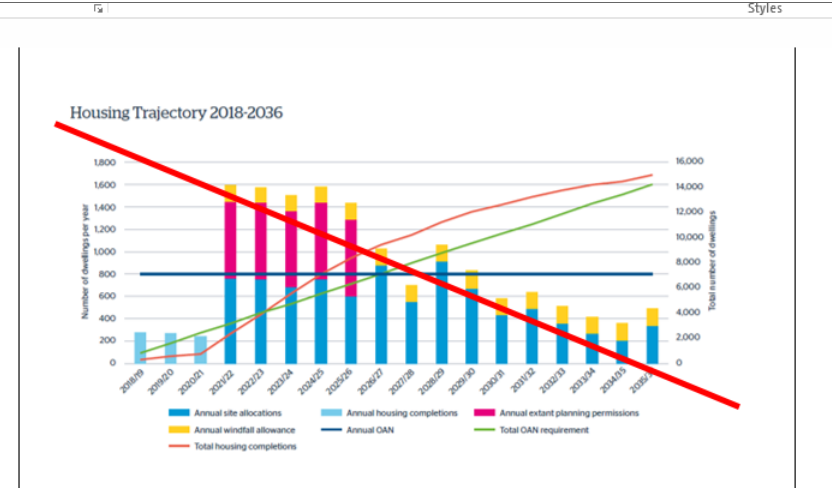
Appendix B: Housing Trajectory

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	795	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	140	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
Total	4,145	8,345	2,095	14,988	14,988

		<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 site allocations</th> <th>Windfall allowance</th> <th>Annual housing completions</th> <th>Cumulative housing completions</th> </tr> </thead> <tbody> <tr><td>2021/22</td><td>925</td><td>344</td><td>0</td><td>1,269</td><td>1,269</td></tr> <tr><td>2022/23</td><td>609</td><td>144</td><td>0</td><td>753</td><td>2,022</td></tr> <tr><td>2023/24</td><td>725</td><td>374</td><td>0</td><td>1,099</td><td>3,121</td></tr> <tr><td>2024/25</td><td>248</td><td>732</td><td>158</td><td>1,138</td><td>4,259</td></tr> <tr><td>2025/26</td><td>0</td><td>848</td><td>158</td><td>1,006</td><td>5,265</td></tr> <tr><td>2026/27</td><td>0</td><td>835</td><td>158</td><td>993</td><td>6,258</td></tr> <tr><td>2027/28</td><td>0</td><td>540</td><td>158</td><td>698</td><td>6,956</td></tr> <tr><td>2028/29</td><td>0</td><td>735</td><td>158</td><td>893</td><td>7,849</td></tr> <tr><td>2029/30</td><td>0</td><td>407</td><td>158</td><td>565</td><td>8,414</td></tr> <tr><td>2030/31</td><td>0</td><td>905</td><td>158</td><td>1,063</td><td>9,477</td></tr> <tr><td>2031/32</td><td>0</td><td>703</td><td>158</td><td>861</td><td>10,338</td></tr> <tr><td>2032/33</td><td>0</td><td>590</td><td>158</td><td>748</td><td>11,086</td></tr> <tr><td>2033/34</td><td>0</td><td>515</td><td>159</td><td>674</td><td>11,760</td></tr> <tr><td>2034/35</td><td>0</td><td>374</td><td>159</td><td>533</td><td>12,293</td></tr> <tr><td>2035/36</td><td>0</td><td>347</td><td>159</td><td>506</td><td>12,799</td></tr> <tr><td>2036/37</td><td>0</td><td>211</td><td>159</td><td>370</td><td>13,169</td></tr> <tr><td>2037/38</td><td>0</td><td>0</td><td>159</td><td>159</td><td>13,328</td></tr> <tr> <td>Total</td> <td>2,507</td> <td>8,604</td> <td>2,217</td> <td>13,328</td> <td>13,328</td> </tr> </tbody> </table>	Year	Commitments (completions and extant permissions)	Housing Completions from site allocations	Windfall allowance	Annual housing completions	Cumulative housing completions	2021/22	925	344	0	1,269	1,269	2022/23	609	144	0	753	2,022	2023/24	725	374	0	1,099	3,121	2024/25	248	732	158	1,138	4,259	2025/26	0	848	158	1,006	5,265	2026/27	0	835	158	993	6,258	2027/28	0	540	158	698	6,956	2028/29	0	735	158	893	7,849	2029/30	0	407	158	565	8,414	2030/31	0	905	158	1,063	9,477	2031/32	0	703	158	861	10,338	2032/33	0	590	158	748	11,086	2033/34	0	515	159	674	11,760	2034/35	0	374	159	533	12,293	2035/36	0	347	159	506	12,799	2036/37	0	211	159	370	13,169	2037/38	0	0	159	159	13,328	Total	2,507	8,604	2,217	13,328	13,328
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M248	Page 199, Appendix B, Housing Trajectory, graph title- 'Housing Trajectory 2018-2036'	Housing Trajectory 2018-2036 <u>2021-2038</u>																																																																																																																		

M249

Page 199, Appendix B: Housing Trajectory (chart), revised to reflect 2021-2038 housing need figure of 13,328 new homes to be completed



Appendix C: TRANSPORT INFRASTRUCTURE REQUIREMENTS

M250	Page 202, Watford Gateway Strategic Development Area, second row, second column	<u>The Eastern Mobility Hub, located east of the railway lines at Watford Junction station with a new multi-storey car park, a new station bridge and two platforms and infrastructure provision for vulnerable road users via an extended link from Clive Way and through to Orphanage Road. Improvements to the new Eastern Mobility Hub through upgrade works along the existing route of along Imperial Way, Clive Way and Reeds Crescent/Orphanage Road.</u>
M251	Page 202, Watford Gateway Strategic Development Area, fourth row	New pedestrian bridge and cycle bridge over the Abbey Line to connect Penn Road and Colonial Way Imperial Park, land to the east of the Abbey Line. Improvements to the station access for vulnerable users, and improvements to the station car park access.

Appendix D: Cycle Parking Standards

M252	Residential cycle parking standards, lines 1-6	Use Class	High Sustainability Area		Other Areas	
			Minimums			
		Residential	Long-Term (employee / resident)	Short-Term (visitor)	Long-term (employee / resident)	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	N/A		

		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
		<u>C3 Dwelling House 2+ bed</u>	<u>2.00 spaces per unit</u>		<u>1.75 spaces per unit</u>	
		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
Appendix E: Car Parking Standards						
M253	Non-residential, line 1, B2 General Industrial	B2 General Industrial (spaces per 1500sqm)				
M254	Non-residential, line 1, B8 Storage and Distribution	B8 Storage and Distribution (spaces per 1500sqm)				
Appendix G: Glossary						
M255	Specialist Care and Supported Living Accommodation	<p><u>This includes the following forms of housing:</u></p> <ul style="list-style-type: none"> • Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include <u>amenities such as communal gardens, but does not include support or care services.</u> 				

		<ul style="list-style-type: none"> • Retirement living or sheltered housing: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a kitchen, living room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This includes 24-hour on-site assistance (alarm) and a warden or house manager. • Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently but have access to support services and staff, and meals are also available. <p>There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as care villages or communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.</p> <ul style="list-style-type: none"> • Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care needed for independent daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.
M256	Town Centre Uses	<p>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).</p> <p>Main town centre uses: 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).</p>
Appendix H: Planning policies to be superseded by the Watford Local Plan		
M257	Page 214, title	Appendix H: Planning policies to be superseded by the Watford Local Plan 2018—2036 2021 - 2038



**WATFORD
BOROUGH
COUNCIL**

Equality Impact Analysis

Title of policy, function or service	Final Draft Watford Local Plan
Lead officer	Jack Green
Person completing the EIA	Vicky Hughes
Type of policy, function or service:	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
Version & Date	V2 28 October 2020 Updated 31 May 2021 (page 4)

1. Background

Every Local Planning Authority (LPA) is required to have a Local Plan under the [Planning and Compulsory Purchase Act 2004](#).¹

Watford's current development plan consists of the Watford District Plan (2003) and the Core Strategy (2013). As development plans need to be reviewed every five years and government housing targets have since increased, the current Plan is considered out of date. Therefore, the council has prepared a new draft Local Plan.

The new draft Local Plan sets out a vision for how Watford will grow over the next sixteen years. It will be used to guide future planning decisions. The Plan contains site allocations, as well as Development Management and strategic policies.

2. Focus of the Equality Impact Analysis

This EIA, therefore, considers the potential equality related impacts, both positive and negative of the Local Plan on the people in the groups or with the characteristics protected in the Equalities Act 2010.

These are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership.

3. Engagement and consultation

The Plan is subject to certain stages of consultation, as per the Town and Country **Planning (Local Planning) Regulations 2012**.

An Issues and Options consultation (Regulation 18) was held between September and October 2018, which aimed to gather views and suggestions from the community about how new development should take place in the future. Following this, a Preferred Options consultation (Regulation 18) was held between September and November 2019. A full first draft of the Local Plan was consulted on. This feedback, alongside other evidence studies, has informed the preparation of the Local Plan. The

¹ <https://www.legislation.gov.uk/ukpga/2004/5/part/3/crossheading/development-plan>

final draft of the Local Plan will be further consulted on in January 2021 with representations required on the soundness of the Plan. Further participation will be possible during the examination process.

A variety of consultation methods have been used to engage Watford's diverse community. This has included social media posts, Youtube videos including an animation and voxpops, leaflets, exhibitions events, newspaper articles, press releases, interviews on local radio, posters around town and putting the documents for viewing in the town hall and nearby libraries.

This document will support the Final Draft Watford Local Plan which will be available for consultation from January to March 2021. With the pandemic, exhibitions will not be possible, however, all documents will be available upon request and the consultation will be publicised in a similar manner to previous consultations.

Update 31 May 2021: The Regulation 19 consultation has been completed. There were no significant issues raised regarding the Equalities Impact Assessment or issues set out in the Final Draft Local Plan that have not been outlined in this assessment.

4. What we know about the Watford population

Population

The current population of Watford is 96,600 (ONS mid-2019 estimate). This was slightly less than estimated in 2018 (96,800 rounded). The slowing of population growth across the UK (marked by a fall in Watford) is attributed to the lowest number of births for 14 years alongside an increase in emigration and a fall in international immigration.

Watford's population is currently projected to increase to 105,000 by 2025 and 110,300 by 2035, a rise from 2016 of 14.2%. This growth will be a challenge for Watford, given our tight borough boundaries and is recognised within the Council Plan, shaping a number of our commitments and areas for action in the Delivery Plan.

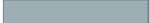

The graphs below show a comparison between the sex and age profile of England's population with that of Watford. (ONS 2018).

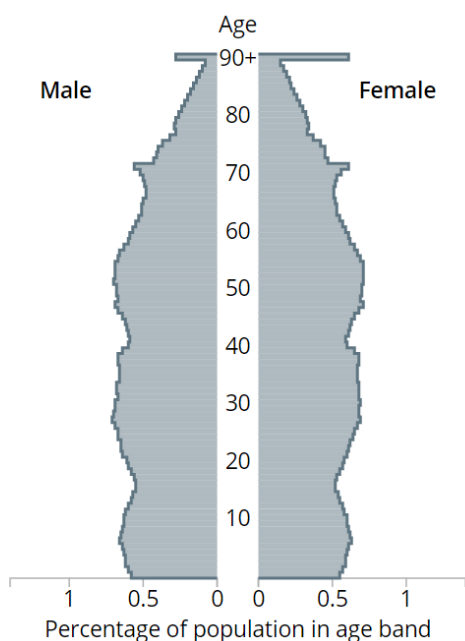
ENGLAND

WATFORD

55,977,178 people in 2018

All ages

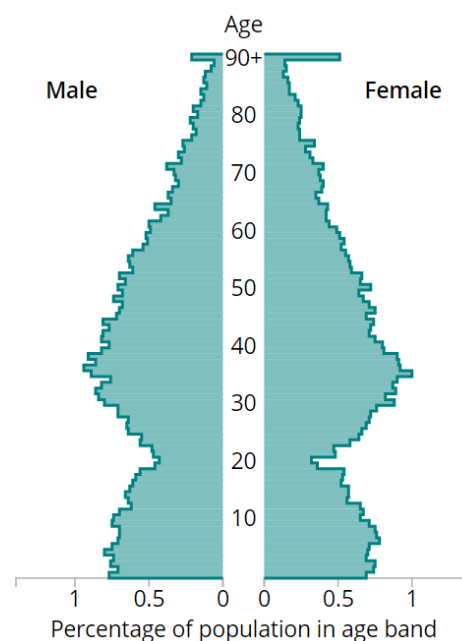
27,667,942 males 49.4% 
28,309,236 females 50.6% 



96,767 people in 2018

All ages

48,011 males 49.6% 
48,756 females 50.4% 



Overall, this comparison shows that Watford is a relatively young town. This is particularly the case in the 0 to 19 age range where 26.5% of the population are between those ages, compared with 23.6% nationally. Similarly the 30 to 49 cohort accounts for a significantly higher proportion of the Watford population at 32.1%, compared to 26.1% nationally. This means that we are a town which is popular with families and, whilst we are a town for all, we recognise that our plans need to reflect our large number of young people and families.

Population density

The population density for Watford is circa 4,600 people per square kilometre. This makes it the most densely populated district area in Hertfordshire and in the country (432 per square kilometre). This is a reflection that we are an urban district, with many characteristics of a metropolitan borough. In comparison with many metropolitan boroughs, particularly those in and around the outskirts of London, our density is relatively low.

Ward level populations (mid-year 2018 estimates)

The ONS publishes experimental data on ward level populations. The last release date was for mid-year 2018. This showed Central ward had the highest population (9,447) and Tudor the lowest (6,825). Further analysis shows that Nascot ward had a significantly higher number of elderly residents than other wards in Watford, whilst Central a significantly higher number of under 20s. The age profile of Nascot ward was recently highlighted by the COVID-19 crisis, when it experienced the highest death rate of any ward in Watford.

Ward	Mid-year 2018
Callowland	7,928

Ward	Mid-year 2018
Oxhey	6,847

Central	9,447
Holywell	8,610
Leggatts	7,757
Meriden	7,972
Nascot	8,815

Park	8,698
Stanborough	7,403
Tudor	6,825
Vicarage	8,854
Woodside	7,611

ONS experimental data (Ward Level Mid-Year Population Estimates (experimental), Mid-2018)

Households

Number of households

The ONS data, based on the census, says that there were 36,681 households in Watford at the time of the Census; as of 31 May 2020 the figure was 40,275 (council tax base).

The average household size in Watford is currently 2.45. This is currently average for the region. Nationally, there is downward trend in household size projected over the next 20 years. The Watford average household size is envisaged to drop to 2.33 person household in 2039, which this is larger than that projected for the English average (2.21 in 2039) and the Hertfordshire average (2.29 in 2039). These projections have implications for Watford in terms of development and growth.

Household size

The 2014 projections estimate that, between 2014 and 2039:

- Watford's average household size will decrease from 2.45 to 2.33
- Hertfordshire's average household size will decrease from 2.42 to 2.29
- England's average household size will decrease from 2.35 to 2.21

Household Composition

From the 2016 projections, one person households see the biggest increase in household growth in Watford, representing 44% of the total household growth.

However, households with dependent children see the next biggest rise, with 35% of household growth; couples with other adults make up 9%; other (multi-person adult) households make up 7% and couple households (without children or other adults) make up the remaining 6% of all estimated growth.

Ethnicity

Watford has a very diverse population, more so than the rest of Hertfordshire; it is one of the strengths of our town and what makes us such a vibrant and diverse town.

For Watford, the Census 2011 shows the following main breakdown in terms of ethnicity: White British (61.9%), White other (7.7%), Pakistani (6.7%), British Indian (5.5%), British other Asian (4.4%) and African (3.5%), White Irish (2.3%) and Caribbean (1.7%).

The full breakdown from Census 2011 is at Appendix A.

In 2016, the ONS published population estimates by ethnicity. This did not report ethnicities to the level of granularity that the Census reported ethnicity. The estimates for 2016 were: White British (59% - 57,000 residents), Asian / Asian British (19% - 19,000 residents), All Other White (12% -

12,000 residents), Black / African / Caribbean / Black British (4% - 4,000 residents), Mixed / Multiple Ethnic Group (4% - 4,000 residents) and Other Ethnic Group (1% - 1,000 residents).

National insurance registration: Census information is now nearly 10 years old and it is likely that the ethnic profile of the borough has changed during this time. For example, it would not have captured the more recent EU arrivals to the borough (EU2 countries – Romania and Bulgaria, who were given residency rights in 2014). We know from other data such as National Insurance Registration that Watford has experienced a relatively high increase in nationals from the EU2 countries applying for National Insurance registrations as Watford residents. This follows a period of a high number from EU8 countries (including Poland, Latvia, Lithuania) who were given freedom of movement to the UK from 2004. Throughout the period the arrival of new residents from south Asia (e.g. Pakistan / India) has remained relatively constant.

The National Insurance Registrations for January – March 2020 shows there were 2,194 registrations in Watford, of which 640 were from Romania and Bulgaria, 527 from South Asia and 395 from Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden. 148 came from sub Saharan Africa and 30 from North Africa. The most recent breakdown (March 2020) is at Appendix B.

Language spoken at home: Other data sources, including school language survey on the languages spoken by Watford school children at home, endorse the National Insurance findings that Watford remains a town with a diverse community with English still the predominant language (at around 60%) followed by (in order of self-selection by Watford families): Urdu, Polish, Tamil, Romanian, Gujarati, Punjabi, Gujarati and Hindi. The most selected African language spoken is Arabic (113 families – although not spoken exclusively in Africa) and Akan/Twi-Fante (78 families).

The full breakdown for 2018 is at Appendix C.

Births and origin of parents: In 2018, nearly 60% (59.6%) of children born to Watford based parents, had one or both parents born outside of the UK, with 42% having both parents born outside of the UK. 52% of new mothers in Watford were born outside of the UK (1397 births in total, with 667 to mothers born in the UK and 730 born outside of the UK. Of these 257 mothers were born in the 'new' EU countries – those that had joined since 2004) and 252 in the Middle East and Asia. 88 mothers were born in Africa.

EU Settlement Scheme (EUSS) quarterly statistics (28 August 2018 to 31 March 2020) –

experimental data: In May 2020, the Government issued data on the number of applications made to the EUSS from 28 August 2018 to 31 March 2020, and applications concluded during the same time period. This shows that up to March 2020, 11,630 people in Watford had applied for EUSS. Of these the following were the highest number of nationalities who had applied: Romanian (3,530), Polish (1,810), Portuguese (1,020) and Bulgarian (580).

The full analysis is at Appendix D.

Age

The largest populations by age band in Watford are:

- 35-39 years (8,537)
- 30-34 years (7,921)

- 40 -44 years (7,458)
- 5 -9 years (7,027)

Compared with other districts in Hertfordshire, Watford has fewer 65+ years residents. The age profile of the borough is more comparable with cities who have younger age profiles and where younger people are attracted by lifestyle opportunities, affordable housing and good transport links.

Median age: the median age in Watford is 37 years. This compares to 40 for England (mid-year 2019 population estimates)

Disability / Health

Around 85% of the population of Watford state that they have ‘good health’ and just under 14% record a disability. We do not have details as to what these disabilities are but they will include a wide range of physical and mental health disabilities or impairment (Census 2011). The 2019 NHS Health Profile’s summary conclusion is that the health of people in Watford is ‘varied’ compared with the England average. About 12% (2,300) of children live in low income families – this is an improvement on 2016 (14% / 2,700). Life expectancy for men at 65 is similar to the England average but for women it is significantly worse (2016-18). The profile also shows that Watford is below average for a number of important health indicators, which may have had some impact on the town’s rate of deaths from COVID-19. These include: residents eating the recommended 5 a day portions of fruit and vegetables, over-18s who are obese and physically active adults. All reported cancer screenings were below average for Watford and emergency admissions for falls from the age of 65 plus were worse than for the England average.

Religion / belief

The religious breakdown in the Census 2011 of the main religions in Watford was: Christian (54.1%), Muslim (9.8%), Hindu (4.8%), with no religion stated at 21.4%.

In 2016, the ONS published population estimates by religion. This took an estimated population of 94,000 for Watford and the main religions identified through the estimates were: Christian (53%), Muslim (10%), Hindu (9%) with no religion at 26%.

Sexual orientation / Transgender

Watford has no specific data on the transgender community within the borough or for the sexual orientation of its community. It is anticipated that these questions will be asked in the Census 2021.

Education and skills

A skilled workforce supports the economic development and employment aspirations for Watford. There has been a mostly increasing trend in educational attainment in Watford over the last few years. Watford’s working age population has the fourth highest percentage (44.4%) in Hertfordshire of those with qualifications at NVQ 4 and above (Three Rivers is the highest with 63.5%, St Albans the second highest at 58.5% and East Herts third highest with 45.7%); this is close to the Hertfordshire average of 42% average but higher than the Great Britain average of 40.3%.

83.7% of Watford residents have achieved 5 A*-C or equivalent. This is the better than the England average of 75.6 (Jan – Dec 2019)

Homelessness

Whilst this is not a protected characteristic under the Equality Act 2010, the council recognises that the particular circumstances of people without their own home might be a factor in their taking an active role in our community. We currently have 17 statutory homeless (September 2020) and 97 households in temporary accommodation (March 2020).

Deprivation

The English Indices of Deprivation (IoD) 2019 were published by the Government in September 2019, and updates the previous 2015 Indices, published in September 2015. The Indices of Deprivation measure relative levels of deprivation in 32,844 small areas or neighbourhoods, called Lower-layer Super Output Areas, in England

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains of deprivation which are combined and weighted to calculate the Index of Multiple Deprivation 2019

In the IMD 2019, Watford is ranked 195 out of 317 authorities, putting it in the 7th decile nationally. This means that, overall, Watford is less deprived than half the authorities in England.

Watford is the third most deprived authority in Hertfordshire. (Stevenage and Broxbourne are the most deprived.) However, three Hertfordshire authorities are among the 10% least deprived authorities in England (Three Rivers, East Herts and St Albans).

Overall, Watford is not an area with significant deprivation issues and the majority of the LSOAs within the town are in the bottom 50% of LSOAs nationally for deprivation; the borough's position has improved relative to that of 2015.











The combined deprivation index, which weights income and employment more heavily than the other domains, obscures the more deprived areas in Watford, which are affected by crime, living environment deprivation, health and disability, and education, skills and training deprivation in particular. This is, at least in part, because income and employment deprivation are less of an issue for Watford than for other areas.

The ten most deprived LSOAs in Watford, as ranked in the IMD 2019 are as follows (the ranking for the last IMD data in 2015 is shown in brackets in the first column). Deprivation has also been identified as an indicator for poorer COVID-19 outcomes so understanding our areas of deprivation, particularly if we apply greater granularity around health and income deprivation. The LSOA, which contains some of Whippendell Road, Chester Road and Durban Road West is within the second most deprived health and disability quartile does not feature in the top 10 most deprived LSOAs.

Watford rank	Ward	LSOA code	Hertfordshire		England	
			Rank	Decile in Herts (1st = most deprived)	Rank	Decile (1st = most deprived)
1 (1)	Central (Water Lane, Gladstone Road, Grosvenor Road, part of Radlett Road, Brockleberry Close, Raphael Drive, top part of Queens Road)	E01023860 (009B)	5 (5)	1st (1st)	5055 (5005)	2nd (2nd)
2 (3)	Holywell (Caractacus Green, part of Charlock Way, Moor View, Jellicoe Road, Stripling Way, Rose Gardens)	E01023865 (011C)	21 (22)	1st (1st)	7239 (7800)	3rd (3rd)
3 (2)	Meriden (Garsmouth Way, Aldbury Close, Harvest End, part of York Way)	E01023876 (003D)	26(19)	1st (1st)	7924 (7590)	3rd (3rd)
4 (4)	Holywell (Ascot Road, Greenhill Crescent, Caxton Way, Croxley View)	E01023866 (011D)	27 (30)	1st (1st)	8294 (9203)	3rd (3rd)
5 (7)	Woodside (Haines Way, Queenswood Crescent, Sheriff Way, Nottingham Close)	E01023906 (001C)	61 (41)	1st (1st)	10719 (10062)	4th (4th)
6 (10)	Oxhey (Deacons Hill, Blackwell Drive, Riverside Road, Eastbury Road, Thorpe Crescent)	E01023883 (012B)	62 (49)	1st (1st)	10758 (10710)	4th (4th)
7 (13)	Callowland (Maude Crescent, St George's Road, Breakspere Close, Nicholas Close)	E01023857 (006C)	67 (56)	1st (1st)	10894 (10812)	4th (4th)
8 (9)	Meriden (Gaddesden Crescent, Bovingdon Crescent, Garston Lane)	E01023877 (003E)	73 (75)	2nd (2nd)	11225 (11837)	4th (4th)
9 (12)	Leggatts (The Harebreaks, Chestnut Walk, Foxhill, Brushrise, Elm Grove)	E01023870 (004C)	78 (52)	2nd (1st)	11515 (10734)	4th (4th)
10 (5)	Stanborough (Clarke Way, Rushton Avenue, Orbital Crescent, Harris Road)	E01023891 (002B)	92 (31)	1st (1st)	11970 (9377)	4th (3rd)

MOSAIC profile

Our MOSAIC profiling of the borough enhances our understanding of our population and provides valuable context for our decision-making as well as underpinning our communications and engagement. It confirms we are a young and diverse borough.

	Mosaic Code	Name	Description	Number of Household	2017 Watford %	2016 Watford %	Difference	Trend	Rank (last year)
1	J40	Career Builders	Singles and couples in their 20s and 30s progressing in their field of work from commutable properties	4,045	12.5%	11.9%	0.6%		1
2	I36	Cultural Comfort	Thriving families with good incomes in multi-cultural urban communities	3,321	10.3%	8.7%	1.6%		2
3	D14	Cafes and Catchments	Affluent families with growing children living in upmarket housing in city environs	2,499	7.7%	8.0%	-0.3%		3
4	D17	Thriving Independence	Well-qualified older singles with incomes from successful professional careers living in good quality housing	2,422	7.5%	5.4%	2.1%		7
5	M56	Solid Economy	Stable families with children renting better quality homes from social landlords	2,172	6.7%	6.4%	0.3%		6
6	J44	Flexible Workforce	Young renters ready to move to follow worthwhile incomes from service sector jobs	1,954	6.0%	7.0%	-1.0%		4
7	H35	Primary Ambitions	Forward-thinking younger families who sought affordable homes in good suburbs which they may now be out-growing	1,550	4.8%	6.8%	-2.0%		5
8	B08	Premium Fortunes	Influential families with substantial income established in large, distinctive homes in wealthy enclaves	1,237	3.8%	3.2%	0.6%		10
9	I37	Community Elders	Established older households owning city homes in diverse neighbourhoods	1,128	3.5%	4.1%	-0.6%		8
10	I39	Ageing Access	Older residents owning small inner suburban properties with good access to amenities	1,099	3.4%	3.4%	0.0%		9

Mosaic Profile 2020

5. How will the council ensure equality is promoted through the Local Plan

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Local Plan:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

A. Positive impacts

The Local Plan is a document that seeks to improve the quality of new development and the influence it has on its surrounds. By virtue, the document seeks to have a positive impact on the community. There are a number of specific policies that respond to specific groups, including the protected characteristics. The policies make provision for new housing that meets the needs of the elderly and those with disabilities, including wheelchair accessible and dementia friendly accommodation.

Improvements to infrastructure may also aid some of the protected characteristics. The Plan supports the provision of new health facilities to meet the needs of the community, such as the elderly, those with disabilities or pregnant people. Transport infrastructure improvements may also

support those who cannot drive, which includes young people, the elderly, and those with disabilities and/or impairments.

The Plan also seeks to make sure the provision of community, cultural, social, and leisure facilities meets the needs of the community. This may have a positive impact on the protected characteristics for it provides space for groups to meet e.g. religious, gender based or ethnic groups.

The Watford Borough Council website features 'browsealoud', which allows for translations into a large number of languages, speech and larger text. This enables the council to offer information and engagement in a way that addresses potential barriers, which could potentially discriminate, albeit unintentionally.

Through establishing a broad and comprehensive approach to consultation and engagement, the council is actively seeking to embrace all of its communities, reducing barriers and, by listening to all the feedback it receives, shape the town in a way that builds on the strength and cohesion of its diverse communities

B. Negative impacts

The analysis of the Watford population identifies the diversity of the borough. This acknowledges that this diversity could mean that there are some parts of our communities who may find it harder to engage with the council on the Local Plan and consequent planning applications, which would mean the outcomes / decisions might not reflect all groups living and working in the town or the people we serve.

However, the council acknowledges that in order to meet our equalities duty, particularly around fostering good relations and eliminating discrimination we need to ensure that residents respond proportionately. Planning can be a complex issue and can be difficult for people to navigate and fully understand in terms of its impacts on individuals, communities and the borough overall. The document is also somewhat long to ensure all content is covered and some planning terms have been used. This could be because of language barriers, physical or learning disabilities or age. There are a number of practical steps that can be taken to address these issues, these could be through signposting translation, working with groups or individuals that represent parts of our community or explaining policies and documentation face to face. A professional proof reader has edited the Plan to ensure that it is comprehensible and a glossary has been included as an appendix to the Plan to explain key terms. Visuals have also been used to make the Plan more engaging and accessible.

6. Overall conclusion

The Plan is a document which seeks to improve the quality of new development. By ensuring that new development is inclusive and accessible, the Plan should have an overall positive impact. The Plan also makes provision for specific groups through housing mix, design considerations and through the allocation and protection of land for certain uses.

Ways to make the document more accessible to the public, as well as encouraging broad participation in consultation, should be continued.

Summary of potential positive impacts and ways in which they can be ensured

Protected characteristics	Positive Impact	Ways to ensure the positive impact
Age	<p>The Local Plan identifies issues related to services and provision for different age groups. This includes provision of a mix of homes to meet the needs of people at different lifecycle stages housing for an ageing population (i.e. sheltered accommodation) and facilities required by different age groups such as schools for young people.</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to increase the prospect of delivery in a timely manner and in the right location.
Disability	<p>Identification of issues related to services and provision for those with physical and/or mental disabilities. This includes increased provision of accessible housing, specialist housing and supported living accommodation and the requirement to provide disabled parking bays in new development. Design considerations also address how new development can be made more accessible with those with disabilities, such as dementia friendly development.</p> <p>The council website also uses 'Browsealoud', which is able to which allows for speech reading and larger text.</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Gender reassignment	<p>The Plan does not directly make specific provision for the protected characteristic of gender reassignment. Although, the Plan emphasises the importance of inclusivity and safety of scheme design</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.

Protected characteristics	Positive Impact	Ways to ensure the positive impact
	and supports the provision of new social, health and community facilities, which may be used by those who have undergone or are undergoing gender reassignment.	
Pregnancy and maternity	Identification of issues related to services and provision for pregnant women and new parents. This includes support for new health facilities, to be located away from areas of poor air quality. The Plan emphasises the importance of inclusive and safe design and makes provision for community facilities. Improvements to the environment also feature strongly in planning policies and the wider objectives of the Local Plan.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be important to identify needs for new health and prenatal/neonatal facilities and to increase the prospect of delivery in a timely manner and in the right location.
Race	<p>The Local Plan makes provision for the needs of the gypsy and traveller community, by protecting land used by gypsies and traveller and allocating additional land to meet the future identified need. The Plan emphasises the importance of inclusive and safe design, and makes provision for cultural facilities which may be used by racial groups.</p> <p>The council website also uses 'Browsealoud', which is able to which allows for translations into several different languages.</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.

Protected characteristics	Positive Impact	Ways to ensure the positive impact
Religion	The Local Plan emphasises the importance of inclusive and safe design and makes provision for community and cultural facilities, which includes places of worship and other religious facilities.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Sex (gender)	The Local Plan emphasises the importance of inclusive and safe design and makes provision for community facilities, which may be used by gender groups.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Sexual orientation	The Local Plan emphasises the importance of inclusive and safe design and makes provision for community facilities, which may be used by those with the protected characteristic of sexual orientation.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Marriage and civil partnership	The Local Plan emphasises the importance of inclusive and safe design and makes provision for community facilities, which may be used by those with the protected characteristic of marriage and civil partnership.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.

Summary of potential negative impacts and ways in which they can be removed or mitigated

Protected characteristics	Negative Impact	Ways to mitigate the negative impact
All	There may be issues with the accessibility of the document itself. The Local Plan is relatively long (100+ pages) and contains some planning terms to be used by applicants when designing large schemes. However, this could become a barrier to successfully accessing the document by a member of the community with no prior involvement in planning before.	Document has been shortened from its original draft and has been edited by a professional proof reader for clarity. The inclusion of a variety of graphics in the document should also make it more visual and accessible. Contact details can be put on the document so the reader can speak to the planning department for clarity should it be required.
Age	Risk that certain age groups may not be well represented in forming the document through poor participation from the under 30s in past consultations.	Continue to use a variety of approaches to consult, such as social media balanced with more traditional methods such as public notices in local newspapers/magazines and posters in prominent locations. The document should be relevant and relatable to all ages.

This EIA has been approved by:

KR..... **Date 2/11/2020**

Appendix 1

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership.

Policy	1	2	3	4	5	6	7	8	9	Comment
SS1.1 Spatial Strategy										The policy sets out how Watford will grow up until 2036. The policy places an emphasis on design to promote social inclusion, as well as providing communities with good access to facilities and services, and so a positive effect is expected for all of the protected characteristics.
CDA2.1: Watford Gateway Strategic Development Area			0	0	0	0	0	0	0	The policy establishes a broad framework for the development of the Watford Gateway Strategic Development Area. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
CDA2.2: Town Centre Strategic Development Area	0	0	0	0	0	0	0	0	0	The policy establishes a broad framework for the development of the Town Centre Strategic Development Area. While the policy may support the regeneration of the area for the benefit of all the community, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CDA2.3: Colne Valley Strategic Development Area		0	0	0	0	0	0	0	0	The policy establishes a broad framework for the development of the Colne Valley Strategic Development Area. While the policy may support the regeneration of the area for the benefit of all the community, the policy requires the provision of a new school. Those who require access to education facilities may particularly

										benefit from the policy and so a positive impact has been identified in relation to the protected characteristic of age.
HO3.1 Housing Provision			0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for housing provision. The policy makes specific reference to specialist adaptations to the housing stock and so a positive impact has been identified in relation to the protected characteristic of age and disability.
HO3.2 Housing Mix, Density and Optimising Use of Land	0	0	0	0	0	0	0	0	0	The policy refers to requirements for optimal site densities and a better housing mix, including family housing provision. Whilst the policy is expected to have a positive impact, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.3 Affordable Housing	0	0	0	0	0	0	0	0	0	The policy sets out the requirements for affordable housing provision. Whilst the policy is expected to have a positive impact, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.4 Build to Rent	0	0	0	0	0	0	0	0	0	The policy sets out the requirements for build to rent unit provision. Whilst the policy is expected to have a positive impact, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.5 Specialist Housing and Care Homes			0	0	0	0	0	0	0	This policy supports specialist housing and supported living accommodation for the elderly and those with disabilities. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
HO3.6 Student and Co-Living Housing		0	0	0	0	0	0	0	0	This policy supports student housing and co-living space. As the majority of students (unless mature) are aged between 18 and 21, this policy helps to provide lower cost living for students. Therefore a positive impact has been identified in relation to the protected characteristic of age.
HO3.7 Self-Build and Custom Housebuilding	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.8 Gypsies and Travellers	0	0	0	0		0	0	0	0	The policy protects land used by gypsy and travellers and makes provision for future land based on identified need. Therefore a positive impact has been identified in relation to the protected characteristic of race.
HO3.9 Residential Conversions	0	0	0	0	0	0	0	0	0	The policy sets out the requirements for HMOs. Whilst the policy is expected to have a positive impact by providing housing for people who can afford lower rents, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.

HO3.10 Building Standards for New Homes			0	0	0	0	0	0	0	The policy sets out building standards for new homes. Requirements for dementia friendly and wheelchair adaptable homes has been included so a positive impact has been identified in relation to the protected characteristics of age and disability.
HO3.11 Private and Communal Outdoor Amenity Space			0	0	0	0	0	0	0	The policy requires provision of communal open space on new schemes. The policy requires them to be accessible by all users and so a positive impact has been identified in relation to the protected characteristics of age and disability.
EM4.1 Providing New Employment	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for employment in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.2 Designated Industrial Areas	0	0	0	0	0	0	0	0	0	The policy supports the protection and intensification of designated industrial areas. Whilst the policy is expected to have a positive impact on the community by providing more jobs, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.3 Office Development	0	0	0	0	0	0	0	0	0	The policy supports the protection and intensification of office floor space. Whilst the policy is expected to have a positive impact on the community by providing more jobs, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.4 Economic Development Outside Designated Employment Locations	0	0	0	0	0	0	0	0	0	The policy supports economic development across the borough, including provision of new employment land. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.5 Different Ways of Working	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.6 Training, Skills and Professional Development		0	0	0	0	0	0	0	0	The policy requires new development to provide apprenticeships and training opportunities in the construction phase. A positive impact has been identified for the protected characteristic of age, as apprenticeships are often undertaken by those at school leaving age.
VT5.1 Supporting Vibrant Retail Centres	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for retail in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
VT5.2 Watford Town Centre		0	0	0	0	0	0	0	0	The policy sets out requirements for future town centre uses. The policy restricts takeaways within 400m of a primary school, which may positively impact the health of primary school children.

										Therefore a positive impact has been identified in relation to the protected characteristic of age.
VT5.3 Local Centres	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
QD6.1 Spatial and Place Shaping	0	0	0	0	0	0	0	0	0	This is a strategic policy for design. The Plan emphasises the importance of inclusive and safe design and makes provision for community and cultural facilities, which includes places of worship and other religious facilities.
QD6.2 Design Principles	0	0	0	0	0	0	0	0	0	This policy sets out key design principles. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
QD6.3 Public Realm										This policy sets out the design principles for public realm. A key principle in the policy is natural surveillance to increase perceptions of safety for those with protected characteristics that could be more vulnerable to crime, or even more targeted hate crime. Therefore, a positive impact has been recorded against all of the protected characteristics.
QD6.4 Building Design	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for retail in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
QD6.5 Building Heights	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HE7.1 Enhancement and Protection of the Historic Environment										This is a strategic policy which sets out the future vision for the historic environment in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HE7.2 Designated Heritage Assets	0	0	0	0	0	0	0	0	0	This policy seeks to protect Watford's designated heritage assets, which may have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HE7.3 Non-Designated Heritage Assets	0	0	0	0	0	0	0	0	0	This policy seeks to protect Watford's non-designated heritage assets, which may have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.

HE7.4 Archaeology	0	0	0	0	0	0	0	0	0	0	This policy seeks to protect Watford's archaeological assets, which may have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.1 Mitigating Climate Change and Reducing Carbon Emissions	0	0	0	0	0	0	0	0	0	0	This is a strategic policy. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.2 Sustainable Construction Standards for Non-Residential Development	0	0	0	0	0	0	0	0	0	0	The policy sets out sustainable construction standards for non-residential development. Whilst the policy is expected to have a positive environmental and economic impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.3 Sustainable Construction and Resource Management	0	0	0	0	0	0	0	0	0	0	The policy sets out sustainable construction requirements and resource management. Whilst the policy is expected to have a positive environmental and economic impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.4 Managing Air Quality											The policy relates to improving air quality. It takes into account those vulnerable to the impacts of poor air quality and makes provision for sensitive development to be located away from areas of poor quality. This may positively impact the elderly, young children, those with disabilities (including respiratory illnesses) and pregnant women, as these groups are increasingly sensitive to poor air quality. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
CC8.5 Managing the Impacts of Development	0	0	0	0	0	0	0	0	0	0	This policy seeks to protect the community from any potential negative impacts of development, such as noise and light pollution. The policy is expected to have a positive impact on the community, but does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.1 The Natural Environment	0	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for the natural environment in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.2 Green Infrastructure Network	0	0	0	0	0	0	0	0	0	0	This policy seeks to protect and enhance Watford's green infrastructure network, which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral

										impact has therefore been recorded against the protected characteristics.
NE9.3 Blue Infrastructure Network	0	0	0	0	0	0	0	0	0	This policy seeks to protect and enhance Watford's blue infrastructure network, which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.4 Flood Risk and Mitigation	0	0	0	0	0	0	0	0	0	The policy seeks to minimise flood risk. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.5 Surface Water Management	0	0	0	0	0	0	0	0	0	The policy seeks to minimise surface water flood risk. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.6 Protecting Open Space	0	0	0	0	0	0	0	0	0	This policy seeks to protect and enhance Watford's open spaces which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.7 Providing New Open Space	0	0	0	0	0	0	0	0	0	This policy relates to the provision of open space in new development which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.8 Biodiversity	0	0	0	0	0	0	0	0	0	This policy relates to the improvement of the biodiversity value of new development, which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
IN10.1 Integrated Infrastructure Delivery			0		0	0	0	0	0	The strategic policy relates to provision of new infrastructure to support development, including health and education facilities. Whilst the policy may have a positive impact on all of the community, those who require more frequent access to health, education and leisure facilities may particularly benefit from the policy. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
IN10.2 Providing Infrastructure			0		0	0	0	0	0	The strategic policy relates to provision of new infrastructure to support development, including health and education facilities. Whilst the policy may have a positive impact on all of the community, those who require more frequent access to health, education and leisure facilities may particularly benefit from the

to Support New Development										policy. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
IN10.3 Development Contributions			0		0	0	0	0	0	The policy relates to obtaining development contributions to support the necessary infrastructure provision. Whilst the policy may have a positive impact on all of the community, those who require more frequent access to health, education and leisure facilities may particularly benefit from the policy. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
ST11.1 Sustainable Travel Town			0	0	0	0	0	0	0	The policy sets out the strategic vision to move towards a sustainable travel town. Potential improvements to public transport including the development of mass rapid transit addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
ST11.2 Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub			0	0	0	0	0	0	0	The policy seeks to protect public transport routes and Watford Junction as a transport hub. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
ST11.3 Providing Sustainable Transport Infrastructure for Major Development			0	0	0	0	0	0	0	The policy seeks to ensure new development has access to sustainable transport. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
ST11.4 A Walking and Cycling Infrastructure Improvement Town	0	0	0	0	0	0	0	0	0	The policy specifies requirements to improve infrastructure for active travel. Whilst the policy will generally have a positive environmental impact by encouraging sustainable travel, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
ST11.5 Electric Vehicles, Car Parking and Car Clubs	0		0	0	0	0	0	0	0	The policy sets out requirements for car parking in new developments. The policy makes specific provision for designated parking bays for those with disabilities. Therefore a positive impact has been identified in relation to the protected characteristic of disability.
ST11.6 Managing the Transport			0	0	0	0	0	0	0	The policy seeks to ensure new development has access to sustainable transport, including developer contributions to mass rapid transit. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able

Impacts of Development										to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
HC12.1 Healthy Communities										The policy sets out the strategic vision to create healthy communities. The policy makes specific reference to the importance of access to health facilities, as well as other community facilities. A positive impact has therefore been recorded against the protected characteristics.
HC12.2 Health Impact Assessments	0	0	0	0	0	0	0	0	0	This policy requires new development to provide health impact assessments. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HC12.3 Built Cultural and Community Facilities										The policy relates to community facilities. It is an inclusive policy that supports social, community and cultural venues where they meet the social, leisure, cultural and religious needs of the community. Therefore, a positive impact has been recorded against all of the protected characteristics.
AS13.1 Allocated Housing Sites for Delivery		0	0	0	0	0	0	0	0	This policy allocates sites for redevelopment for housing. The policy requires provision of a school on some of the strategic sites to support the needs of young people. Therefore a positive impact has been identified in relation to the protected characteristic of age.

Adoption Statement for the Watford Borough Council Local Plan 2021-2038

The Town and Country Planning (Local Planning) (England) Regulations 2012: Regulation 26.

In accordance with Regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, notice is hereby given that Watford Borough Council adopted the Watford Local Plan 2021-2038 on 17 October 2022.

The Watford Local Plan 2021-2038 sets out a range of planning policies which will set a strategic direction for growth in the borough as well as detailed requirements and restrictions on development where necessary. The Plan also includes housing, mixed use, employment and education allocations with associated site specific criteria. The policies in the Plan fully supersede the policies in the Watford Core Strategy 2006-2031 and the saved policies in the Watford District Plan 2000. A new policies map has also been published to reflect the designations and policies in the Plan.

The Plan was subject to independent examination by Mr Will Fieldhouse BA (Hons) MA MRTPI, an Inspector appointed by the Secretary of State for the Department for Levelling up, Housing and Communities. In his report following this examination, issued 20 September 2022, he found the Plan to be sound subject to a number of main modifications being made. The adopted Local Plan incorporates these modifications alongside some additional minor modifications to address factual updates and corrections.

Any person who is aggrieved by the adoption of the Watford Local Plan may make an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004 on the grounds that:

- the document is not within the appropriate power; or
- a procedural requirement has not been complied with.

Any application must be made no later than the end of the period of six weeks beginning the day after the date on which the Local Plan was adopted, i.e. before 29 November 2022.

Any enquiries should be made to strategy@watford.gov.uk or 01923 278263.

Document Availability

This Adoption Statement, the Local Plan, changes to the policies map, the Inspectors Report and associated schedule of main modifications and additional modifications, and the Sustainability Appraisal Adoption Statement are all available to view online at www.watfordlocalplan.co.uk.

Alternatively they will be available to view in hard copy at the following locations during opening hours:

Venue	Address	Open Days	Opening Hours
Watford Borough Council Offices	Watford Town Hall, WD17 3EX	Monday, Friday Wednesday	9:00am-3:00pm 11:00am-5:00pm
North Watford Public Library	St Albans Rd, Watford, WD24 7RW	Monday-Wednesday Friday Saturday	9:30am-6:00pm 1:00pm-6:00pm 9:30am-4:00pm
Watford Public Library	Hempstead Road, Watford, WD17 3EU	Monday, Wednesday Tuesday, Thursday Friday (self-service only in morning) Saturday Sunday	9:30am-6:00pm 9:30am-7:00pm 9:30am-6:00pm 9:30am-4:00pm 1:00pm-5:00pm

A copy of this Adoption Statement will be sent to all parties who have asked to be notified of the adoption of the Local Plan and to the Secretary of State for Levelling Up, Housing and Communities.

Part A

Report to: Council

Date of meeting: Monday, 17 October 2022

Report author: Group Head of Democracy and Governance

Title: Council Scheme of Delegation, Budget and Policy Procedure Rules and Contract Procedure Rules

1.0 Summary

1.1 Following the Senior Officer Restructure it has been necessary to update the Council's Scheme of Delegation to reflect new posts and responsibilities. The updated Scheme is attached at Appendix 1

1.2 It has also been necessary to update the Budget and Policy Procedure Rules and Contract Procedure Rules to again reflect the change of posts. The updated Rules are attached as Appendices 2 and 3

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 scheme of delegation is not updated	The posts with delegated authority are out of date and decision making is impeded.	Updated scheme approved.	treat	2
The Budget and Policy Procedure Rules are not updated	Virements are unable to be made	Updated rules are approved	treat	2
The Contract Procedure Rules are not updated	The posts with relevant authority are out of date	Updated rules are approved	treat	2

3.0 **Recommendations**

- 3.1 To approve the Council Scheme of Delegation at appendix 1.
- 3.2 To approve the Budget and Policy Procedure Rules at appendix 2.
- 3.3 To approve the Contract Procedure Rules at appendix 3.

Further information:

Carol Chen
carol.chen@watford.gov.uk
Tel: 01923 278350

4.0 **Detailed proposal**

- 4.1 Following the Senior Officer Restructure in August it has been necessary to amend the Council's Scheme of Delegation, Budget and Policy Procedure Rules and Contract Procedure Rules to reflect the new posts and responsibilities including the use of an electronic seal where appropriate.
- 4.2 The changes are set out in appendices 1, 2 and 3.
- 4.3 Council is asked to approve the updated Scheme and the updated Rules.
- 4.4 The Executive Scheme of Delegation has also been amended and this is in the gift of the Elected Mayor.

5.0 **Implications**

5.1 **Financial**

- 5.1.1 The Shared Director of Finance comments that the changes reflect the revised senior structure and responsibilities and therefore there are financial implications directly arising from this report.

5.2 **Legal Issues (Monitoring Officer)**

- 5.2.1 The Group Head of Democracy and Governance comments that the changes reflect the revised senior structure and responsibilities.

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

5.3.1 Having regard to the council's obligations under s149 of the Equalities Act it is considered that there are not equalities implications in this report, nor are there any Human Rights or Data Protection implications.

5.4 **Staffing**

5.4.1 The post holders referred to in the updated Scheme and Rules have been consulted.

5.5 **Accommodation**

5.5.1 Not applicable

5.6 **Community Safety/Crime and Disorder**

5.6.1 There are no implications in this report.

5.7 **Sustainability**

5.7.1 There are no implications in this report.

Appendices

- Appendix 1 Council Scheme of Delegation.
- Appendix 2 Budget and Policy Procedure Rules.
- Appendix 3 Contract Procedure Rules

Background papers

No papers were used in the preparation of this report.

2.0 Responsibility for Council Functions

Function	Body/Individual with Delegation	Terms of Delegation
A Relating to Town & Country Planning and Development Control	Council	<p>To approve, for the purpose of its submission to the Secretary of State for independent examination under Section 20 of the Planning & Compulsory Purchase Act 2004, a development plan document.</p> <p>To adopt Local Development Documents after consultation and independent public examination and subject to any direction imposed by the Secretary of State.</p>
<p>1 In connection with the discharge of functions under Sections 28-31 of the Planning & Compulsory Purchase Act 2004 to:</p> <p>a) Agree to the making of an Agreement to prepare one or more joint development plan documents</p> <p>b) Agree the making of an Agreement to establish a joint committee to be for the purposes of Part 2 of the 2004 Act to be the Local Planning Authority</p>	Council	<p>To determine all matters referred to in 1(a) to (c)</p>

Function	Body/Individual with Delegation	Terms of Delegation
c) Agree the making of a request to the Secretary of State for the revocation as the Local Planning Authority for any area or in respect of any matter		
2 Power to determine applications for planning permission	Development Management Committee	To exercise all powers referred to in paragraphs A2-A36
3 Power to determine applications to develop land without compliance with conditions previously attached	Executive Director of Place, Associate Director of Planning Infrastructure and Economy, Development Management Manager and Strategic Applications Manager	To exercise all powers referred to in paragraphs A2-A14 and A26- A34 except (in the case of paragraphs A2-A4): 1 where more than 4 objections have been received unless the application is to be refused or 2 where the development is for non-residential purposes (whether an increase of an existing use or a new development) of more than 1,000 square metres or 3. where the development is for 10 or more residential units 4. Where the Development Management Manager or Strategic Application Manager is the case officer
4 Power to determine applications for planning permission for development already carried out		
5 Power to decline to determine application for planning permission		
6 All matters relating to the processing of applications and their determination and the making of any appropriate administrative charge	In addition to the	To exercise all powers referred to in paragraphs A2-4,A7-8

Function	Body/Individual with Delegation	Terms of Delegation
<p>related to the exercise of these powers (as provided for by s303 of the Town and Country Planning Act 1990 and s 93 of the Local Government Act 2003) including:</p> <p>a) the giving of directions requiring additional information from an applicant in accordance with s63(3) of the Town & Country Planning Act 1990.</p> <p>b) determination as to whether an application requires to be referred to the County Planning Authority as a “county matter” under s.1 and Schedule 1 of the Town and Country Planning Act 1990.</p> <p>c) determination as to whether the County Planning Authority requires to be consulted on an application under s.1 and Schedule 1 of the Town and Country Planning Act 1990.</p>	<p>above Principal Planning Officers</p>	<p>A10,A12,A26-29,A35 and A37 except (in the case of A2 -4):</p> <ol style="list-style-type: none"> 1. where more than 4 objections have been received or 2. where the development is for non residential purposes (whether an increase of an existing use or a new development) of more than 1,000 square metres or 3. where the development is for 10 or more residential units or 4. where the Principal Planning Officer is the case officer

Function	Body/Individual with Delegation	Terms of Delegation
d) determination of the appropriate fee for planning and other applications.		
e) determination as to whether and how planning or other applications are required to be advertised.		
f) all powers and duties under the Town and country Planning (Environmental Impact Assessment) Regulations 2011		
g) determination as to whether and what material open to public inspection should be permitted to be copied, and the making of reasonable charges for copies supplied.		
h) determination as to whether the Council's case at an appeal should be dealt with by way of public inquiry, hearing or written representations.		
i) responding to		

Function	Body/Individual with Delegation	Terms of Delegation
<p>consultations on planning and other applications from neighbouring planning authorities under the Town and Country Planning (Development Management Procedure) (England) Order 2015</p>		
<p>j) responding to consultations concerning development with government authorisation under s90 of the Town and Country Planning Act 1990</p>		
<p>k) responding to consultations from the Forestry Commission under the Forestry Act 1967 and related legislation.</p>		
<p>l) responding to consultations under the Mission and Pastoral Measure 2011 no 3.</p>		
<p>m) the making of a Direction under Article 4 of the Town and Country Planning General</p>		

Function	Body/Individual with Delegation	Terms of Delegation
Permitted Development Order 2015 (as amended)		
7 Power to determine applications for planning permission made by a Local Authority, either alone or jointly with others		
8 Power to make determinations, give or refuse prior approvals and agree other matters relating to the exercise of permitted development rights set out in schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995		
9 Power to enter into agreements and accept unilateral undertakings regulating development or use of land under s106 of the Town and Country Planning Act 1990		
10 Power to determine applications for a certificate of existing		

Function	Body/Individual with Delegation	Terms of Delegation
or proposed lawful use or development		
11 Power to serve a completion notice		
12 Power to determine applications for the display of advertisements		
13 Power to authorise entry onto land under the Planning Acts		
14 Power to require the discontinuance of a use of land or the alteration or removal of buildings or works		
15 Power to serve a planning contravention notice, breach of condition notice, stop notice or temporary stop notice	Executive Director of Place, Associate Director of Planning, Infrastructure and Development Management Manager and Strategic Applications Manager	To exercise all powers referred to in paragraphs A15-A25
16 Power to issue an enforcement notice	In addition to the above the Planning Enforcement Manager	To exercise all powers referred to in paragraphs A15-25,A32 and A37 except where the Planning Enforcement Manager has been the case officer
17 Power to make an		

Function	Body/Individual with Delegation	Terms of Delegation
application for a planning enforcement order		
18 Power to apply for an injunction restraining a breach of planning control		
19 Power to serve a notice to require the proper maintenance of land		
20 Power to authorise the execution of works required by an enforcement notice, a listed building enforcement notice or an enforcement notice in relation to the demolition of an unlisted building in a conservation area, or for the enforcement of a discontinuance order		
21 Power to issue a listed building enforcement notice		
22 Power to issue an enforcement notice in relation to the demolition of an unlisted building in a conservation area		
23 Power to enforce		

Function	Body/Individual with Delegation	Terms of Delegation
control over advertisements in accordance with ss224-225E of the Town and Country Planning Act 1990 and related legislation		
24 Power to remedy defacement of premises in accordance with ss225F-225J of the Town and Country Planning Act 1990 and related legislation		
25 Power to determine that no enforcement action be taken either because either (a) there is no breach of planning control (b) it would not be expedient to pursue any action or (c) the breach of planning control previously identified has been remedied		
26 Power to determine applications for hazardous substances consent and related matters		
27 Power to determine applications for		

Function	Body/Individual with Delegation	Terms of Delegation
conservation area consent and related matters		
28 Power to determine applications for listed building consent and related matters		
29 Duties relating to applications for listed building consent and conservation area consent		
30 Power to serve a building preservation notice and related matters		
31 Power to acquire a listed building in need of repair and to serve a repair notice		
32 Power to apply for an injunction in relation to a listed building or a building in a conservation area		
33 Power to execute urgent works under s54 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and related matters		
34 Power to approve or refuse the issue of certificates of appropriate alternative development		
35 Power to determine	Executive Director	To exercise all powers referred to in

Function	Body/Individual with Delegation	Terms of Delegation
applications for (a) the discharge of planning and listed building conditions and (b) non material amendments to permissions and consents	of Place, Associate Director of Planning , Infrastructure and Economy, Development Management Manager and Strategic Applications Manager.	paragraph A35
36 Powers relating to the preservation of trees	Executive Director of Place, Associate Director of Planning, Infrastructure and Economy	To agree to make, and confirm Tree Preservation Orders
37 Powers relating to the administration of the Community Infrastructure Levy under the Community Infrastructure Regulations 2010 (as amended) or any subsequent legislation repealing or replacing those regulations	Executive Director of Place, Associate Director of Planning, Infrastructure and Economy, Development Management Manager, Strategic Applications Manager and Infrastructure and Technical Support Manager	To exercise all powers relating to the collection and enforcement of the Community Infrastructure Levy.
B Relating to Licensing & Registration Functions		
	Licensing Committee	To exercise all the Council's functions as specified paragraphs B1 – 38 with the exception of (a)

Function	Body/Individual with Delegation	Terms of Delegation
	Executive	setting of hackney carriage fares under section 65 of the Local Government (Miscellaneous Provisions) Act 1976 which is delegated to the Executive
	Director of Partnerships, Associate Director Housing and Wellbeing, Community Protection Manager, Licensing Manager, Environmental Health Manager (Business), Senior Licensing Officer, Licensing Officer, Assistant Licensing Officer, Licensing Enforcement Officer	<p data-bbox="922 611 1445 745">Setting hackney carriage fares under section 65 of the Local Government (Miscellaneous Provisions) Act 1976</p> <p data-bbox="922 824 1433 1328">To exercise all the Council's functions listed in B1- 38 delegated to the Licensing Committee and the Licensing (Licensing Act 2003) Committee in accordance with the policies set by those committees and where the function relates to functions under the Licensing Act 2003 Act and Gambling Act 2005 in accordance with the policy set by the Committee or the Executive as necessary with the exception of</p> <ol data-bbox="922 1373 1433 2000" style="list-style-type: none"> <li data-bbox="922 1373 1433 1462">1) approving policy in relation to those functions <li data-bbox="922 1507 1433 1619">2) the approval of the Annual Report in relation to those functions <li data-bbox="922 1664 1433 2000">3) in relation to items B6-B8 where valid objections have been received other than in relation to applications for minor variations to premises licences and club premises certificates under the Legislative Reform (Minor Variations to Premises Licences

Function	Body/Individual with Delegation	Terms of Delegation
		and Club premises certificates) Order 2009
		4) conducting reviews of premises' licences under Section 52 of Licensing Act 2003
		5) conducting reviews of club premises' certificates under Section 88 of Licensing Act 2003
		6) setting fees under section 212 of the Gambling Act 2005
		7) conducting reviews under section 197 of the Gambling Act 2005
		8) making orders under section 284 of the Gambling Act 2005 (removal of automatic authorisation for gaming machines in alcohol-licensed premises)
		9) determining applications under section 283 of the Gambling Act 2005 for permits in licensed premises for five or more gambling machines
		10) determining whether to transfer enforcement functions under the Smoke-free (Premises and Enforcement) Regulations 2006 to another Enforcement Authority

Function**Body/Individual
with Delegation****Terms of Delegation**

Associate Director
of Housing and
Wellbeing,
Director of
Partnerships
in consultation
with the Chair of
Licensing
Committee or in
his or her absence
a member of that
Committee

Determining applications for minor
variations to premises licences
and club premises certificates
under the Legislative Reform
(Minor Variations to Premises
Licences and Club premises
certificates) Order 2009

Making any minor amendments to
the Interim Street Trading policy

Associate Director
of Housing and
Wellbeing,
Community
Protection
Manager, Licensing
Manager,

Function	Body/Individual with Delegation	Terms of Delegation
	Environmental Health Managers, Licensing Enforcement Officer, Senior Licensing Officers, Community Protection Officer, Community Safety Manager	To act as the Responsible Authority for the Council under the Licensing Act 2003

1. Power to issue licenses authorising the use of land as a caravan site ("Site Licenses")
Caravan Sites and Control of Development Act 1960

2 Power to licence the use of moveable dwellings and camping sites
The Public Health Act 1936

3 All powers in connection with the

Function	Body/Individual with Delegation	Terms of Delegation
licensing of hackney carriages and private hire vehicles under The Town & Police Clauses Act 1847 Public Health Act 1875 Transport Act 1945 Local Government (Miscellaneous Provisions) Act 1976 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings		
4 All powers in connection with the licensing of drivers of hackney carriages and private hire vehicles under Local Government (Miscellaneous Provisions) Act 1976, including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
5 All powers in connection with the licensing of operators of hackney carriages and private hire vehicles under Local Government		

Function	Body/Individual with Delegation	Terms of Delegation
(Miscellaneous Provisions) Act 1976 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
6 All powers in connection with the Licensing Act 2003 including granting, refusing, suspending, revoking licences and club premises' certificates, issuing formal cautions and initiating legal proceedings		
7 All powers in connection with the Gambling Act 2005 including granting, refusing and revoking temporary use notices, premises licences, provisional statements, and permits, making representation to the Licensing (Licensing Act 2003) Committee and initiating reviews in accordance with the Council's Statement of Principles, determining registration of small		

Function	Body/Individual with Delegation	Terms of Delegation
society lotteries, issuing formal cautions and initiating and defending legal proceedings		
8 All powers in connection with the determination of sexual entertainment venue licences and sex establishment licences under schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982.	Licensing Sub-Committee Director of Partnerships , Associate Director of Housing and Wellbeing.	Where relevant objections have be lodged In all other cases, including undertaking all related enforcement.
9. All powers in connection with the licensing of performances of hypnotism under Hypnotism Act 1952 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
10All powers in connection with the licensing of premises for acupuncture,		

Function	Body/Individual with Delegation	Terms of Delegation
<p>tattooing, ear piercing and electrolysis under Local Government (Miscellaneous Provisions) Act 1982 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>11 All powers in connection with the licensing of pleasure boats and pleasure vehicles under Public Health Amendment Acts 1907 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>12 All powers in connection with the licensing of market and street trading under Local Government (Miscellaneous Provisions) Act 1982 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal</p>		

Function	Body/Individual with Delegation	Terms of Delegation
proceedings.		
13 All powers in connection with the registration of licensing premises for the preparation of food under Food Safety Act 1990 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
14 All powers in connection with the licensing of scrap yards under Scrap Metal Dealers Act 1964 and Scrap Metal Dealers Act 2013 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
15 All powers in connection with the licensing of premises for the breeding of dogs under The Animal Welfare (Licensing of Animals Act) 2018, Animal Health Act 1981 including granting, refusing, revoking, suspending, issuing		

Function	Body/Individual with Delegation	Terms of Delegation
formal cautions and initiating legal proceedings.		
<p>16 All powers in connection with the licensing of pet shops and other establishments where animals are bred or kept for the purposes of carrying on a business under Animal Health Act 1981, The Animal Welfare (Licensing of Animals Act) 2018, Riding Establishments Acts 1964 and 1970 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>17 All powers in connection with the licensing of zoos under The Zoo Licensing Act 1981 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>18 All powers in connection with the</p>		

Function	Body/Individual with Delegation	Terms of Delegation
<p>licensing of dangerous wild animals under The Dangerous Wild Animals Act 1976 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>19All powers in connection with the licensing of knackers yards under The Slaughter Houses Act 1974 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>20All powers in connection with the licensing of persons to collect charitable and other causes under Police, Factories etc. (Miscellaneous Provisions) Act 1916 House to House Collections Act 1939 granting, refusing, revoking, suspending, issuing formal cautions and initiating legal</p>		

Function	Body/Individual with Delegation	Terms of Delegation
proceedings.		
21 All powers in connection with the granting of consent for the operation of a loud speaker under Noise & Statutory Nuisance Act 1993 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
22 All powers in connection with the approval of meat product premises under Meat Products (Hygiene) Regulations 1994 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
23 All powers in connection with the approval of premises for the production of minced meat or meat preparations under Minced Meat & Meat Preparations (Hygiene) Regulations 1995 including granting,		

Function	Body/Individual with Delegation	Terms of Delegation
refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
24All powers in connection with approving dairy establishments under Dairy Products (Hygiene) Regulations 1995 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
25All powers in connection with the approval of egg product establishments under Egg Products Regulations 1993 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
26All powers in connection with the licensing of butchers shops carrying out commercial operations in relation to unwrapped raw		

Function	Body/Individual with Delegation	Terms of Delegation
<p>meat and selling or supplying both raw meat and ready to eat foods under Food Safety (General Food Hygiene) Regulations 1995 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>27 All powers in connection with the approval of fish products premises under Food Safety (Fishery Products & Live Shellfish) (Hygiene) Regulations 1998 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>28 All powers in connection with the approval of dispatch or purification centres under Food Safety (Fishery Products & Live Shellfish) (Hygiene) Regulations 1998 including granting, refusing, revoking,</p>		

Function	Body/Individual with Delegation	Terms of Delegation
suspending, issuing formal cautions and initiating legal proceedings.		
29 All powers in connection with the registration of auction and wholesale markets under Food Safety (Fishery Products & Live Shellfish) (Hygiene) Regulations 1998 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
30 All powers in connection with the duty to keep food register of food business premises under Food Premises (Registration) Regulations 1991 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.		
31 All powers in connection with the registration of food business premises		

Function	Body/Individual with Delegation	Terms of Delegation
<p>under Food Premises (Registration) Regulations 1991 including granting, refusing, revoking, suspending, issuing formal cautions and initiating legal proceedings.</p>		
<p>32 All powers to authorise named officers to undertake all necessary steps to secure compliance with all Environmental Health legislation and EU derived domestic legislation & direct EU legislation in accordance with the European Union (Withdrawal) Act 2018 within the remit of this Committee</p>		
<p>33 To take all necessary steps to ensure compliance with all Acts, Statutory Instruments and EU derived domestic legislation & direct EU legislation in accordance with the European Union (Withdrawal) Act 2018 in relation to food safety, food hygiene, food premises, animal welfare, and maintaining general public health, including issuing, refusing, revoking or</p>		

Function	Body/Individual with Delegation	Terms of Delegation
suspending licences, prohibiting premises or equipment, inspection of premises, animals, plant and vehicles, issuing formal cautions and initiating legal proceedings		
34 To exercise all powers under Section 115E Highways Act 1980 in relation to issuing permits to place structures on the highway including initiating legal proceedings		
35 To enforce the provisions of chapter 1 and regulations made under the Health Act 2006		
36 To authorise officers under section 10 and Schedule 2 of the Health Act 2006		
37 To exercise all functions in relation to fixed penalty notices under Schedule 1 of the Health Act 2006 and the Smoker Free (Vehicle Operators & Penalty Notices) Regulations 2007		
38 To transfer		

Function	Body/Individual with Delegation	Terms of Delegation
<p>enforcement functions under the Smoke –free (Premises and Enforcement) Regulations 2006 to another enforcement authority</p>		
<p>39 Power to register common land or town or village green, except where the power is exercisable solely for the purpose of giving effect to:</p>	<p>Council Functions Committee</p>	<p>To exercise the Council’s functions as specified in B39 and 40</p>
<p>a) an exchange of lands effected by an Order under S19(3) of, or paragraph 6(4) of Schedule 3 to the Acquisition of Land Act 1981; or) b) an Order under S147 of the Inclosure Act 1945) Regulation 6 of the Commons Registration (New Land) Regulations 1969)</p>	<p>Executive Director of Place, Associate Director of Planning Infrastructure and Economy</p>	<p>To exercise the Council’s functions specified in B39 and 40 in accordance with policy set by the Council Functions Committee</p>
<p>40 Power to register variation of rights of common Commons Registration (General) Regulations 1966</p>		

Function	Body/Individual with Delegation	Terms of Delegation
41 All functions referred to in numbers 1-7 of Part I of the Local Authorities (Functions & Responsibilities) (England) Regulations 2000 and numbers 1-34 of Paragraph 2 of Schedule 1 of Regulations 2001 within the remit of the Council by either delegation from Hertfordshire County Council or otherwise	Development Management Committee Executive Director of Place, Associate Director of Planning Infrastructure and Economy	To exercise all of the Council's functions To exercise all of the Council's functions in accordance with the approved policy of the Committee or the Hertfordshire County Council as appropriate

C Functions relating to Health & Safety at Work

1 To exercise all functions under any of the relevant statutory provisions within the meaning of Part 1 (Health Safety and Welfare in connection with work and control of Dangerous Substances) of the Health & Safety at Work etc. Act 1974 to the extent that those functions are discharged otherwise than in the Authority's capacity	Licensing Committee Director of Partnerships , Associate Director of Housing and Wellbeing	To exercise all the Council's functions in relation to this matter To exercise all the Council's functions in relation to this matter
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Function	Body/Individual with Delegation	Terms of Delegation
as an employer		
D Functions Relating to Elections		
1 Duty to appoint Electoral Registration Officer	Council	
2 Duty to appoint Returning Officer for Local Government Elections	Council	
3. Power to assign officers in relation to the requisitions of the Registration Officer	Electoral Registration Officer	To exercise all functions of the Council referred to in D3 and D8
4 Duty to provide assistance at European Parliamentary elections	Returning Officer	To exercise all functions of the Council referred to in D4-7 and 9-11
5 Duty to divide constituency into polling districts	Returning Officer	
6 Duty to divide electoral divisions into polling districts at Local Government elections	Returning Officer	
7 Power in respect of holding of elections	Returning Officer	
8 Power to pay expenses properly incurred by Electoral	Electoral Registration Officer	

Function	Body/Individual with Delegation	Terms of Delegation
Registration Officers		
9 Power to fill vacancies in the event of insufficient nominations	Returning Officer	
10 Duty to declare vacancy in office in certain cases	Returning Officer	
11 Duty to give public notice for casual vacancy	Returning Officer	
12 Power to submit proposals to the Secretary of State for an Order under S10 (Pilot Schemes for Local Elections in England and Wales) of the Representation of the People Act 2000	Council Functions Committee	
13 Duty to consult on change of scheme for elections	Council	
14. Duties relating to publicity regarding change to the scheme of elections	Council	
15 Duties relating to notice to Electoral Commission regarding changes to scheme of election	Council	
16 Functions relating to change of name of electoral area	Council	

Function	Body/Individual with Delegation	Terms of Delegation
E Functions Relating to Name and Status of Areas and Individuals		
1 Change the name of a District	Council	
2 Power to confer title of Honorary Alderman or to admit to be an Honorary Freeman	Council	
3 Power to petition for a Charter to confer a Borough status	Council	
EA Functions relating to changing governance arrangements under Local Government Act 2000		
1. Duty to draw up proposals	Council	
2. Duty to consult prior to drawing up proposals	Council	
3. Duty to comply with direction given by Secretary of State	Council	
4. Duty to hold referendum to change governance arrangements	Council	
5. Duty to Publish notice if proposals not	Council	

Function	Body/Individual with Delegation	Terms of Delegation
approved in a referendum		
6. Duty to obtain consent of elected mayor to change governance arrangements	Council	
EB Functions relating to community governance		
1. Duties relating to community governance reviews	Council	
2. Functions relating to community governance petitions	Council	
3. Functions relating to terms of reference of a review	Council	
4. Power to undertake a community governance review	Council	
5. Functions relating to the making of recommendations for a community governance review	Council	
6. Duties when undertaking a community governance review	Council	
7. Duty to publicise the outcome of a	Council	

Function	Body/Individual with Delegation	Terms of Delegation
community governance review		
8. Duty to send 2 copies of order to Secretary of State and Electoral Commission	Council	
9. Power to make agreements about incidental matters	Council	
F Power to Make, Amend, Revoke re-Enact or Enforce Bylaws	Council	
G Power to Promote or Oppose Local or Personal Bills	Council	
H Functions Relating to Local Government Pensions	Council	
1 Exercise all administrative functions relating to the provision of a pension	Functions Committee	To make all policy decisions, including exercising of discretion regarding the operation of the Local Government Pension Scheme as it relates to the Council.
	Executive Head of HR and OD	To exercise all Council administrative functions in relation to pensions on behalf of the Council
	Director of Finance in consultation with the Chief Executive	To make additional payments into the Pension Fund and to act on any recommendations of the Pension Fund Actuaries
I Miscellaneous		

Function	Body/Individual with Delegation	Terms of Delegation
Functions		
1 Duty to set the Council Tax for the Watford Area	Council Functions Committee	To set the total Council Tax, including precepts, for the Watford Area, on the basis of precepts notified and tax approved by Council for Watford Borough Council purposes
2 To agree the use of earmarked reserves and contingencies	Council Functions Committee	To agree schemes for the use of earmarked reserves or contingency provisions made in any budget, including the allocation of delegated authority to Chief Officers where not otherwise provided for in the Scheme of Delegation
3 Power to appoint staff, and to determine the terms and conditions on which they hold office, including Procedures for grievance and discipline, with the exception of determining and reviewing the terms and conditions of Chief Officers	Functions Committee	To approve the Council's Policies on discipline, grievance and general terms and conditions
To appoint Chief Officers and determine procedures for grievance and discipline of Chief Officers	Council	To appoint the Chief Executive and Chief Officers in conjunction with the Executive To appoint a panel of Members to make Chief Officer appointments To appoint a panel of Members to hear appeals against dismissal for

Function	Body/Individual with Delegation	Terms of Delegation
		<p>Chief Officers</p> <p>To appoint in accordance with officer employment rules a panel of Members to consider disciplinary action against the Chief Executive, Statutory Officers and Chief Officers</p>
	Executive	<p>Recommending overall policy to Council Functions Committee on areas relating to pay and conditions, discipline and grievance and dismissal</p>
		<p>To determine the structure of the Organisation (including approving restructuring) and the overall number of posts for exercising all Council functions</p>
	<p>Chief Executive, Executive Directors, Directors, Executive/Group Heads and Associate Directors in consultation with Executive Head of HR and OD</p>	<p>To implement all changes to the structure of the Council within their area of responsibility, including recruitment, redeployment, assimilation and ring fencing, termination of employment including redundancy and early retirement, and implementing changes to terms and conditions, subject to complying with the Council Policy and the structural requirements of the Executive</p>
	All Chief Officers	<p>To be responsible for the day to day management of all human resources made available for the exercise of functions within their area of responsibility including appointments, terminations, re-</p>

Function	Body/Individual with Delegation and Associate Directors	Terms of Delegation grades, discipline and dismissals, subject to complying with the overall policies of the Council and the structural requirements of the Executive
4 Power to determine and review the terms and conditions of all Chief Officers	Chief Officer Pay Panel	To determine and regularly review the terms and conditions of the Council's Chief Officers
5 Power to make Standing Orders	Council Functions Committee	To exercise all the functions under 5-12 that are not by statute the sole responsibility of the Council
6 Power to make Standing Orders as to Contracts		
7 Power to make payments or provide other benefits in case of maladministration		
8 Duty to designate officer as the Head of the Authority's Paid Service and to provide staff		
9 Duty to designate officer as the Monitoring Officer and to provide staff		
10Duty to provide staff etc to person nominated by Monitoring Officer pursuant to Sections 82A(4) and (5) of the		

Function	Body/Individual with Delegation	Terms of Delegation
Local Government Act 2000		
11 Duty to designate officer as the Chief Finance Officer and to provide staff		
12 Power to appoint officers for particular purposes		
13 Appointment of Proper Officers	Chief Executive	Will receive a written request and formally record all appointments and place on individual's Personnel file
14 Function to create a scheme to provide for co-opted Members to attend Overview & Scrutiny Committees and vote at such Committees pursuant to paragraphs 12 and 14 of Schedule 1 to the Local Government Act 2000	Council	To devise a Scheme and publish it
15 To implement the provisions of Part 8 of the Anti-Social Behaviour Act 2003	Executive Director of Place, Associate Director of Planning Infrastructure and Economy	To receive, investigate and determine complaints made to the Council under part 8. Including appointing authorised officers to enter land for any purposes authorised by part 8.
	Development Management Committee	To defend any appeals To determine any complaints referred to it by the Executive

Function	Body/Individual with Delegation	Terms of Delegation
		Director of Place and Associate Director of Planning Infrastructure and Economy
16 To approve (but not direct) internal audit's strategy (including its terms of reference), plan and performance	Audit Committee (members of the Executive are excluded from sitting as members of Audit Committee)	To exercise all the functions under 16-25
17 To review the annual internal audit report and other summary internal audit reports and the main issues arising and seek assurance that action has been taken where necessary		
18 To consider the reports of external audit and inspection agencies and make any recommendations for action to either the Executive or other appropriate Committee and follow up on its recommendations as appropriate		
19 To consider the effectiveness of the Authority's risk management arrangements, the		

Function	Body/Individual with Delegation	Terms of Delegation
<p>control environment and associated anti-fraud and anti-corruption arrangements and to seek assurances that action is being taken on risk related issues identified by auditors and inspectors</p>		
<p>20 To approve the Council’s Risk Management, Anti-Fraud & Corruption and Whistle Blowing Policies and all policies associated with risk and financial probity</p>		
<p>21 To approve and be satisfied that the authority’s assurance statements, including the statement of internal control properly reflect the risk environment and any actions required to improve it</p>		
<p>22 To ensure that there are effective relationships between internal audit, external audit, inspection agencies and other relevant bodies, and that the value of the audit</p>		

Function	Body/Individual with Delegation	Terms of Delegation
process is actively promoted		
23 To approve the Council's annual financial statement		
24 To receive and consider the external auditor's opinion and any reports to Members and monitor management action in response to the issues raised by external audit		
25 To make an annual report on its work to the Council		

Any function specified in this Scheme to be exercised by a Committee or by an officer, can in the event of either a decision needing to be taken as a matter of urgency and/or the designated officer being unavailable be exercised by the Chief Executive, a Chief Officer or Associate Director.

BUDGET AND POLICY PROCEDURE RULES

1.0 Framework for Executive Decisions

The Council will be responsible for the adoption of its budget and policy framework as set out in Article 4. Once a budget and policy framework is in place it will be the responsibility of the Executive to implement it.

2.0 Process for Developing the Framework

2.1 The process by which the budget and policy framework shall be developed is:

- a) After consulting stakeholders in a manner appropriate to the matter under consideration, the Executive will draw up initial proposals in relation to any plan, strategy which form part of the Council's Policy Framework. Once drawn up, the Group Head of Democracy and Governance will serve copies of them on the Chair of the Overview and Scrutiny Committee, together with dates when the Executive will consider them further, which shall be at least 6 weeks after service of the Notice on the Chair.
- b) The Overview and Scrutiny Committee will be convened within 7 working days to consider whether and how to respond to the Executive's initial proposals and whether any consultation by it or any other Overview and Scrutiny Panel/Task Group is appropriate. If so, it will determine how to conduct a consultation exercise and will reflect any representations made to an Overview and Scrutiny Panel/Task Group set up for the purpose in its response to the Executive within the timescale set for decision by the Executive.
- c) The Executive will finalise its proposals for the Council to consider, having taken into account the comments from the Overview and Scrutiny Committee. The report to Council will show the Executive's response to those comments.
- d) The Council will consider the proposals of the Executive, and may adopt them, amend them, refer them back to the Executive for further consideration or substitute its own proposals in their place. The Council shall have before it the Executive's proposals and any report from the Overview and Scrutiny Committee.

- e) The Council's decision will be published in accordance with Article 4 and a copy shall be given to the Mayor. The notice of decision shall be dated and shall state either that the decision shall be effective immediately if the Council accepts the Executive's proposal without amendment, or if the Executive's proposal is not accepted without amendment, that the Council's decision will become effective on the expiry of 7 working days after the publication of the notice of decision unless the Mayor formally objects in that period.
 - f) If the Mayor objects to the decision of the Council, he/she shall give written notice to the Group Head of Democracy and Governance to that effect no later than 5.00 p.m. on the 6th working day prior to the date the decision is to be effective. The written notification must state the reasons for the objection. Where such notification is received, the Group Head of Democracy and Governance shall convene a further meeting of the Council to reconsider its decision and the decision shall not be effective pending that meeting.
 - g) The Council meeting must take place in not less than 5 and not more than 10 working days of the receipt of the Mayor's written objection. At that meeting the decision of the Council shall be reconsidered in the light of the objection, which shall be available in writing for the Council.
 - h) The Council shall, at that meeting, make its final decision on the matter on the basis of a two-thirds majority. If the Council does not agree its original decision or any amendment thereto by a two-thirds majority the motion originally proposed by the Mayor at the original meeting will be deemed to be carried. The decision shall be made public in accordance with Article 4 and shall be implemented immediately.
 - i) In approving the budget and policy framework, the Council will also specify the extent of virement within the budget and degree of in-year changes to the policy Framework which may be undertaken by the Executive in accordance with Paragraphs 5 and 6 of these rules (virement and in-year adjustments). Any other changes to the Budget and Policy Framework are reserved to the Council.
- 2.2 a) Where before the 8th February in any financial year the Executive submits to Council for its consideration in relation to the following financial year:

- i) estimates of the amounts to be aggregated in making a calculation in accordance with Section 32 to 37 or 43 to 49 of the Local Government Finance Act 1992.
- ii) estimates of other amounts to be used for the purposes of such a calculation
- iii) estimates of such a calculation
- ii) amounts required to be stated in a precept under Chapter IV of the Local Government Finance Act 1992

and following consideration of those estimates or amounts Council has any objections to them it must also comply with the provisions of 2.1(e) to (h) above.

- b) 2.2(a) shall not apply in relation to calculations or substitute calculations the Council is required to make in accordance with Sections 52I, 52J, 52T or 52U of the Local Government Finance Act 1992.

3.0 **Decisions Outside the Budget and Policy Framework**

- a) Subject to the provisions of Paragraph 5 (virement) the Executive, committees of the Executive, individual members of the Executive and any Officers, Neighbourhood Forums or joint arrangements discharging Executive functions may only take decisions which are in line with the budget and policy framework. If any of these bodies or persons wish to make a decision which is contrary to the policy framework, or contrary to or not wholly in accordance with the budget approved by full Council, then that decision may only be taken by the Council subject to 4 below.
- b) If the Executive, committees of the Executive, individual members of the Executive and any Officers, Neighbourhood Forums, or joint arrangements discharging Executive functions want to make such a decision, they shall take advice from the Monitoring Officer and/or the Chief Financial Officer as to whether the decision they want to make would be contrary to the policy framework or contrary to or not wholly in accordance with the budget. If the advice of either of these Officers is that the decision would not be in line with the existing budget and/or policy framework, then the decision must be referred by that body or person to the Council for decision, unless the decision is a matter of urgency, in which case the provisions in Paragraph 4 (urgent decisions outside the budget and policy framework) shall apply.

4.0 **Urgent Decisions Outside the Budget and Policy Framework**

- a) The Executive, a committee of the Executive, an individual member of the Executive or Officers, Neighbourhood Forum or joint arrangements discharging Executive functions may take a decision which is contrary to the Council's policy framework or contrary or not wholly in accordance with the budget approved by full Council if the decision is a matter of urgency. However, the decision may only be taken:
- i) if it is not practicable to convene a quorate meeting of the full Council
 - ii) if the Chair of the Overview and Scrutiny Committee agrees that the decision is a matter of urgency.

The reasons why it is not practicable to convene a quorate meeting of full Council and the Chair of the Overview and Scrutiny Committee's consent to the decision being taken as a matter of urgency must be noted on the record of the decision. In the absence of the Chair of the Overview and Scrutiny Committee, the consent of the Chairman of the Council, and in the absence of both, the Vice Chairman, will be sufficient.

- b) Following the decision, the decision taker will provide a full report to the next available Council meeting explaining the decision, the reasons for it and why the decision was treated as a matter of urgency.

5.0 **Virement**

Budgetary Management

Budget management ensures that once the budget has been approved by the Council, resources allocated are used for their intended purposes and are properly accounted for. Budgetary control is a continuous process, enabling the Council to review and adjust its budget targets during the financial year. It also provides the mechanism that calls to account managers responsible for defined elements of the budget.

By continuously identifying and explaining variances against budgetary targets, the Council can identify changes in trends and resource requirements at the earliest opportunity. The Council itself operates within

an annual cash limit, approved when setting the overall budget. To ensure that the Council in total does not overspend, each service is required to manage its own expenditure within the cash-limited budget allocated to it.

For the purposes of budgetary control by managers, a budget will normally be the planned income and expenditure for a service area or cost centre. However, budgetary control will also take place at a more detailed level in order to construct the higher level position

Scheme of Virement

Within budgetary management control a scheme of virement exists to enable the Mayor, Executive/ Cabinet, Chief Officers and their staff to manage budgets with a degree of flexibility within the overall policy framework determined by the Council. With regard to the procedures detailed below, (the Chief Executive can also substitute for the Chief Finance Officer in case of absence/ emergency) .

- a) The Council has two budgets; the General Fund Revenue Budget and the Capital budget. Council approves these budgets annually and may vary them during the year.
- b) Once approved by Council, these budgets may only be varied by Full Council, in accordance with the use of earmarked reserves or through the Scheme of Virement set out below in (d) and contained within the Councils Constitution
- c) A decision to use the Council's general fund working balance, can only be made by Full Council.
- d) The Scheme of Virement
 - (i) These rules apply to virements within the General Fund and the Capital Budget. It is not possible to vire between these budgets.
 - (ii) All virements over £10,000 are subject to the approval of the Chief Finance Officer to ensure compliance with proper practices. This includes the need for consultation between officers and a written report to any member body or individual member of the Executive considering a virement under (vii) or (viii)

(iii) No virement shall be used to fund new services or projects that will create additional budget commitment in future years without the approval of the Executive (Cabinet) for amounts up to £100,000 and by Full Council for amounts in excess of £100,000.

(iv) The Chief Executive, in consultation with the Chief Financial Officer is authorised to withdraw or limit the delegated authority of officers to vire.

(v) An Executive Director/Director/Executive/ Group Head/Associate Director may approve virements **within cost centres** under his or her control on up to three occasions per annum per cost centre

- up to and including £10,000 following notification to the Chief Financial Officer.
- Over £10,000 up to and including £50,000 with approval from the Chief Executive and Chief Financial Officer.
- Over £50,000 and up to and including £100,000 with approval from the Chief Executive, Chief Financial Officer, Portfolio Holder or Mayor

(vii) An Executive Director/ Director/Executive/Group Head/Associate Director may approve virements **between cost centres** under his or her control on up to three occasions per annum following the same approval processes as detailed at (v) above.

(viii) Where there is a requirement to vire across 'divisional' boundaries, then the approval of both Executive Directors/Directors/Group/Executive Heads will be required. Otherwise the processes to be followed remain the same.

(ix) Virements between and within cost centres over £100,000 can only be approved by Full Council

(x) Virements should be made with the following caveats:

- Virements should not be made for ongoing items of growth unless there is a permanent corresponding reduction to the base estimate from where the source of the virement originated.

- The Associate Director/Executive/Group Head will have regard to ensuring that potential overspends within cost centres within their control are met from under spends in other areas in the first instance and before any virement request is requested.
- Where a staffing vacancy general provision, or procurement saving or any further unallocated savings have been assumed within the overall budget then any forecast underspend needs, in the first instance, to be earmarked to ensure such savings are achieved.
- Any over provision for pay awards cannot be used as a source of a virement as it will need to be returned back to the strategic finance cost centre. Similarly Support Costs recharged from another Associate Director/Group/Executive Head cannot be used as a source of virement.
- The Associate Director/Group/Executive Head will have regard for any actions proposed by the Chief Financial Officer in times of financial constraint in order to maintain the overall net budget
- Multiple amounts for the same budget head virement will not be allowed beyond a maximum of three occasions per year. A general exemption (to this 'three times' limit) is allowed in the case of virements between staffing and agency budgets where flexible management may well require more frequent use of virement. Even in this case all financial thresholds will continue to apply.
- Virements which would curtail or stop service delivery (by taking away available finance to vire to other areas) should be discussed with the Chief Executive/ Chief Finance Officer /Portfolio Holder or Mayor as appropriate.

(xi) In the case of an emergency the above limits may be exceeded with the approval of the Chief Financial Officer, Chief Executive , Portfolio Holder or Mayor, and a report made retrospectively to Full Council.

(xii) If following consultation with the Chief Financial Officer and relevant portfolio holder a projected overspend cannot be accommodated within budget, by virement or by transfer from

earmarked reserves then Full Council can consider a supplementary estimate following the submission of a report. The submission of such a report will have regard to

- The time in the budget cycle when the overspend has been identified until the end of the financial year
- The case put forward as to why the overspend cannot be contained
- The overall financial position of the Council
- In respect of capital expenditure authorisation should be obtained from the Executive (Cabinet) for individual schemes where the estimated expenditure exceeds the capital provision by more than the 10% or £25,000 whichever is the lower.

In summary the scheme of virement can be presented as follows :

Virement How Much	Who	Which Budgets	Frequency	Required Consultation/Approval
Below £10,000	Associate Directors/Group /Executive Heads	Within and Between Cost centres Within their control	Three times per annum per cost centre	Notification only to Chief Financial Officer
Between £10,000 and £50,000	Associate Directors/Group /Executive Heads	Within and between cost centres within their control	Three times per annum per cost centre	Approval of Chief Financial Officer and the Chief Executive
Between £50,000 and £100,000	Executive Directors/Directors/Associate Directors/Group /Executive Heads / Chief Financial Officer /Chief Executive	Within and between cost centres within their control	Three times per annum per cost centre	Approval of Chief Financial Officer, Chief Executive, Portfolio Holder or Mayor
Over £100,000	Executive Directors/Directors /Group /Executive Heads/ Associate Directors /Chief Executive/Chief Financial Officer	Between cost centres within their control	Unlimited	Consultation with Portfolio Holder or Mayor and then formal report to and approval by Full Council
Virements that funds new services or projects within budget commitments in future years below £100,000	Executive Directors/Directors/Group /Executive Heads /Associate Directors/Chief Executive /Chief Financial Officer	Any	Unlimited	Executive (Cabinet)
Virements that funds new services or projects within budget commitments in future years over £100,000	Executive Directors/Group/Executive Heads /Associate Directors/Chief Executive /Chief Finance Officer	Any	Unlimited	Formal report to and approval by Full Council

Carry Forward of Underspends

All revenue budgets are approved by Full Council with the expectation that expenditure is incurred upon approved service levels within a financial year. Budgets are not approved on the basis that surplus provision can be carried forward to augment future years funding. There may be occasion where an unavoidable delay has occurred in procuring anticipated services/ supplies.

In these rare instances Executive Directors/Group/Executive Heads/Associate Directors should submit a proposal indicating why a carry forward should be permitted. All such submissions will be considered by the Chief Finance Officer / Chief Executive and reported to Corporate Management Board. Where approval has been obtained then these cases will be reported as part of the Annual Statement of Accounts report to Audit Committee and Cabinet.

For capital expenditure, it will be harder to fund all projects within a specific timescale (although the increasing use of project management techniques should reduce its occurrence). In these instances carry forward approvals will be endorsed through periodic monitoring reports

to Budget Panel/ Cabinet and through the Annual Statement of Accounts to Audit Committee and Cabinet.

Use of Earmarked Reserves

Earmarked reserves and contingencies outside the General Fund or Capital budget shall be used only in accordance with the purpose for which the reserve was set up and shall not be vired to other uses. Specific earmarked reserves have been established to smooth out variations in expenditure year on year and to fund approved initiatives. The use of reserves is delegated to individual Executive Directors/Group/Executive Heads/Associate Directors but requires the approval of the relevant Portfolio Holder and the Chief Finance Officer and will be reported as part of the monthly Finance Digest to all members of the Council and considered by the Budget Panel and Cabinet at their appropriate meetings. Earmarked reserves generally :

- Should not be used to fund on-going revenue expenditure
- Expenditure should be shown within the Income and Expenditure Account and funded by a transfer from reserves not simply charged to the reserves
- Transfer to and from reserves should be reported to the Budget Panel and Cabinet at the earliest possible opportunity and at end of year via the annual Statement of Accounts to Audit Committee and cabinet.

6.0 In-Year Changes to Policy Framework

The responsibility for agreeing the budget and policy framework lies with the Council and decisions by the Executive, a committee of the Executive, an individual member of the Executive or Officers, Neighbourhood Forums or joint arrangements discharging Executive functions must be in line with it. No changes to any policy and strategy which make up the policy framework may be made by those bodies or individuals, except those changes:

- a) which will result in the closure or discontinuance of a service or part of a service to meet a budgetary constraint

- b) necessary to ensure compliance with the law, ministerial direction or government guidance
- c) in relation to the policy framework in respect of a policy which would normally be agreed annually by the Council following consultation, but where the existing policy document is silent on the matter under consideration.

7.0 Call-In of Decisions Outside the Budget or Policy Framework

- a) Where the Overview and Scrutiny Committee is of the opinion that an Executive decision is, or if made, would be contrary to the policy framework or contrary or not wholly in accordance with the Council's budget, then it shall seek advice from the Monitoring Officer and/or Chief Financial Officer.
- b) In respect of functions which are the responsibility of the Executive, the Monitoring Officer's report and/or the Chief Financial Officer's report shall be to the Executive, with a copy to every Member of the Council regardless of whether the decision is delegated or not, the Executive must meet to decide what action to take in respect of the Monitoring Officer's/Chief Financial Officer's report and to prepare a report to Council in the event that the Monitoring Officer or the Chief Financial Officer concludes that the decision was a departure, and to the Overview and Scrutiny Committee if the Monitoring Officer or Chief Financial Officer conclude that the decision was not a departure.
- c) If the decision has yet to be made, or has been made but not yet implemented, and the advice from the Monitoring Officer and/or Chief Financial Officer is that the decision is or would be contrary to the policy framework or contrary to or not wholly in accordance with the budget, the Overview and Scrutiny Committee may refer the matter to Council. In such cases no further action will be taken in respect of the decision or its implementation until the Council has met and considered the matter. The Council shall meet within 7 working days of the request by the Overview and Scrutiny Committee. At the meeting it will receive a report of the decision or proposals and the advice of the Monitoring Officer and/or the Chief Financial Officer. The Council may either:
 - i) endorse a decision or proposal of the Executive decision taker as falling within the existing budget and policy framework. In this case no further action is required save that the decision of the

- Council be minuted and circulated to all Councillors in the normal way
- ii) amend the Council's financial procedure rules or policy concerned to encompass the original proposal of the individual or body responsible for that Executive function and agree to the decision with immediate effect. In this case no further action is required save that the decision of the Council be minuted and circulated to all Councillors in the normal way; or
 - iii) where the Council accepts that the decision or proposal is contrary to the policy framework or contrary to or not wholly in accordance with the budget and does not amend the existing framework to accommodate it, it may require the Executive to reconsider the matter in accordance with the advice of either the Monitoring Officer/Chief Financial Officer, or it can impose its own decision by simple majority
 - iv) if it imposes its own decision by simple majority, paragraph 2.1 (e)-(f) of these rules will then apply



Contract Procedure Rules

Contract Procedure Rules (version 10.2 October 2022)

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Introduction

These Contract Procedure Rules, issued in accordance with S.35 Local Government Act 1972, are intended to promote good practice and public accountability.

Officers responsible for purchasing or disposal must comply with these Contract Procedure Rules (the Rules). Compliance is the best defence against any allegation that a procurement has been made incorrectly or fraudulently. These are minimum requirements and more detailed procedures may be appropriate for particular contracts. Where there is a requirement for communication to be in writing, this shall include e-mail as well as hard copy. In summary you must:

- Comply with the Rules for all procurements and disposals except where explicitly exempted.
- Comply with the principles of Transparency, Proportionality, Equal Treatment and Non-Discrimination.
- Act with the highest standards of probity and integrity
- Take all necessary legal, financial and professional advice.
- Declare any personal financial interest or other conflict of interest.
- Conduct a Best Value review and appraise the procurement need.
- Comply with the Council's corporate aims, objectives and policies.
- Check if there is an existing Corporate Contract or Framework Agreement to use
- Ensure tender documents give a full, clear and accurate description of the work.
- Clearly specify the exclusion, evaluation, selection and award criteria and their weighting.
- Keep commercial information confidential.
- Notify unsuccessful bidders of why the decision was taken, the name of the successful bidder and the relative advantages of its bid, or of any decision not to award the contract.
- Complete a formal Contract or issue an Official Purchase Order before the supply, service or works begins.
- Add the Contract details to the Council's Contract Register
- Assess the Contract Management skills available and identify any training needs and support required.
- Identify a contract manager with responsibility for ensuring the contract delivers as intended.
- Maintain proper Contract Management records.
- Undertake a post-contract review to monitor performance, how well it met the procurement need and the Value for Money.

The Rules are part of the Council's Constitution. They apply directly to every employee of the Council involved in any part of a procurement process. They apply equally to any partnership the Council may enter into and to contracts in respect of which the Council may nominate sub-contractors or suppliers.

The Rules must be followed by the Council, the Executive/Committees (including Portfolio Holders/Lead Members) and by Agents, Consultants, including architects and engineers, and Public Private Partners, acting for or on behalf of the Council. These Rules apply to contracts involving the receipt of income as well as expenditure and to Concessions.

In accordance with the Constitution, the Director of Finance may amend these Rules after consultation with the Group Head of Democracy & Governance and the Audit and Risk Managers.

If you are in doubt about whether these Rules apply to a contract or proposed contract, about their meaning or how to apply them, consult:-

- (a) Your Manager.
- (b) The Corporate Procurement Manager.
- (c) The Group Head of Democracy & Governance.
- (d) Director of Finance
- (e) Internal Audit Service.

Procurement refers to the whole process relating to the purchase, acquisition or commissioning of Works, Supplies and Services. One definition is: Procurement is the business management function that ensures identification, sourcing, access and management of the external resources that an organisation needs or may need to fulfil its strategic objectives.

Contracts

Contracts are legally binding agreements and in English law they do not need to be in writing. In simple terms a contract is formed when an offer, to do or to supply something for another party, is accepted by the party to whom the offer was made. Contracts may be formed in writing, by word of mouth, or by performance. Care must be taken when communicating, verbally or in writing, with bidders. You must only enter into contracts on behalf of the Council where there is current budget provision.

Relevant Contracts

All Relevant Contracts must comply with these Rules, these include arrangements made by or on behalf of the Council for the:

- Supply of goods, materials or Services and the carrying out of Works
- Disposal of goods, materials, plant, vehicles or equipment
- Hire, Rental or Lease of goods, plant, vehicles or equipment
- Granting of Concession Contracts
- Delivery of Consultancy, Advisory and other Services, including but not limited to those related to the recruitment of staff, land and property transactions, legal, financial, construction and other consultancy services.

Relevant Contracts do not include:

- Contracts of Employment which make an individual a direct employee of the Authority. For the avoidance of doubt the Rules do apply to contracts with agencies or companies for the employment of staff.
- Acquisition and disposal of Land. For the avoidance of doubt the Rules do apply to advice and other services taken in relation to the disposal of land.

Officer Responsibilities

Officers responsible for purchasing or disposal must:

- Comply with these Rules, the Financial Procedural Rules, the Code of Conduct for employees, other Council policies and all UK legal requirements.
- Ensure that any Agents, Consultants and Partners acting for or on behalf of the Council comply with these Rules.
- Check if a suitable Corporate Contract exists before seeking to procure another contract; where a suitable Corporate Contract exists, this must be used unless there is a sound business case not to do so. In the event that another contract is procured, the reasons must be documented and approved by the relevant Director, Executive/Group Head.
- Consult the participating Councils in the shared service partnership on any opportunity to aggregate demand for more efficient procurement where a new procurement requirement is identified
- Consider Collaborative Procurement opportunities with other Authorities, particularly other Councils in Hertfordshire.
- Assess if a Contract may have the consequence that any employee of the Council or of a current service provider might be affected by any transfer of the work or undertaking. Officers must ensure that the implications of the Transfer of Undertaking (Protection of Employment) Regulations (TUPE) are assessed. The advice of the Group Head of Democracy & Governance must be sought in any case involving the TUPE Regulations before proceeding with the procurement.
- Assess if the Construction (Design and Management) Regulations 2015 (CDM), which places legal duties on those involved in construction work, apply.
- Consult with and receive the approval of Associate Director of ICT and Shared Services for all ICT Hardware and Software procurements, including licences, printers, telephony and ICT accessories.
- Consult with and receive the approval of Executive Head of HR and OD for all procurements involving the recruitment, appointment or employment of agency, self-employed or contract staff.
- Consult with and receive the approval of the Group Head of Democracy and Governance for any proposal to commission legal support. External support will be sourced by the Group Head of Democracy and Governance if there is insufficient internal capacity or capability available. The Group Head of Democracy and Governance, or nominated officer, is the single point for accessing legal support or placing contracts for such work.
- Consider social and local economic value in the procurement.

Officer Requirements

- Assess the most appropriate procurement route to achieve Best Value. Including in-house provision, using an existing contract, external procurement, Partnering, collaborative procurement with other local authorities, public body or purchasing consortium or use of an appropriate existing Framework Agreement let by others which the Council is able to procure from.
- Prepare a pre-tender estimate of the value of the supplies, services or works.
- Set out a clearly defined Specification for the supply, services or works with reference where necessary to appropriate standards etc.

- Clearly set out the Terms and Conditions, or Conditions of Contract that are to apply to the proposed contract. These include any Special Conditions of Contract where a standard form of contract is used. Examples of standard forms of contract are the Council's standard goods and services terms, the JCT or NEC Suite of contracts. Consider how SME's and / or the 3rd Sector could engage with the procurement.
- Define clear Evaluation (selection and award) Criteria and their weightings for each stage of the procurement process.
- Develop a clear 'pre procurement engagement plan' for the requirement in order to elicit at least 3 responses if expenditure is likely to be over £25,000.
- Ensure there is appropriate approval or delegated authority for the expenditure and the procurement accords with the approved policy framework and scheme of delegation set out in the Constitution.
- Carry out appropriate credit checks and observe any requirements for a surety.
- Observe any Standstill or "Alcatel" period as appropriate for procurements above the UK Procurement Regulation Thresholds.
- Publish an Award Notice if appropriate on the Contracts Finder website
- The Corporate Procurement Manager is informed of all contracts that are awarded and that copies of all procurement and contract information are made available.

Executive Director / Executive/Group Head/Associate Director Responsibilities

They must ensure that:

- their staff comply with their Officer responsibilities
- The Contract Register is up to date and that copies of all contract documents are kept safe and accessible. Electronic copies are acceptable for contracts. It is advisable that an additional hard copy of all major contracts is retained by the Contract Manager. All major contracts are stored on the Council's Legal Document management system and in paper form in the strong room at Watford Borough Council.
- any Exemptions are recorded.
- contract records are retained in accordance with the Council's Document Retention policy.
- That the Corporate Procurement Manager has been informed of all contracts that are awarded and that copies of all procurement and contract information are made available.

Exemptions

An exemption to these Rules may only be requested where the value of the contract would not exceed UK Procurement Regulation threshold and remains in compliance with the Public Contracts Regulations 2015.

- Acquisition or disposal of Land:

These Rules do not apply to the acquisition or disposal of Land except where a lease or licence is granted as a part of a principal contract for other Works, Supplies or Services.

- Unforeseeable emergency:

Where exemption from these Rules is unavoidable due to an unforeseeable or emergency event involving immediate risk to persons or property or likely to give rise to major or serious disruption to the Council's services, the Chief Executive and Executive Director/Director/Executive/Group Head/Associate Director may jointly approve an exemption. They must inform the relevant Portfolio Holder and where the value of the exemption exceeds £100,000 make a report to the next Cabinet meeting on the action taken. Urgency caused by undue delay is not a valid reason for an exemption.

- **Exceptional Circumstances:**

An exceptional circumstances exemption may be jointly approved by the Chief Executive, Executive Director/Director/Executive/Group Head/Associate Director in limited and exceptional circumstances. This applies at the Chief Executive's discretion and only below the UK Procurement Regulation thresholds examples of which may include but not be limited to:

- Events which may involve significant risk to a key contract, for example where a key supplier goes into Administration or Receivership
- Situations which may cause significant disruption to a Council service
- Extensions of or additions to existing contracts where demonstrable benefits and clear savings can be shown and the original contract was not one that was procured under the UK Procurement Regulations
- Single tender action or use of a substitute contractor from the original tender responses to complete a contract or part of a contract. An Exemption is not required where a procurement has been made from a framework agreement permitting a Direct Award where the awarding officer can demonstrate value and valid reasons for not conducting a competition through that framework.
- Short term provisions to enable more effective and efficient procurement to be undertaken
- Other circumstances where clear synergies with existing services can be evidenced or where supported by substantial market research

They must inform the relevant Portfolio Holder and where the value of the exemption exceeds £100,000 make a report to the next Cabinet meeting on the action taken.

- **Limited market:**

A partial exemption may apply where a supply or service is only obtainable from a single or a very limited number of contractors. In such a case, evidence of the limited market must be provided, such as by public advertisement or detailed market research.

They must inform the relevant Portfolio Holder and where the value of the exemption exceeds £100,000 make a report to the next Cabinet meeting on the action taken.

- **Prior approval:**

Other than as specified above no exemption from these Rules shall be made unless prior approval has been granted at a Cabinet. Cabinet cannot authorise an exemption where the value of the contract would exceed the UK procurement threshold or would result in non-compliance with the PCR2015.

Record of Exemptions – Executive Director/Director/Executive/Group Head/Associate Director must ensure that full details of approved waivers and exemptions are recorded in a central register held by the Corporate Procurement Manager on behalf of the Chief Executive.

E-Procurement

Electronic procurement systems simplify the tender process, reduce the bureaucratic burden for suppliers, make it easier to tender, improve smaller organisations' ability to bid and allow shorter tender periods.

All procurements above a value of £25,000 must be procured via the Council's e-procurement portal, unless where an external framework agreement has been used that has its own e-procurement process or following a specific agreement with the Corporate Procurement Manager.

The e-procurement portal is designed to simplify the procurement process, to make the process more secure and auditable and to improve accessibility to procurement opportunities for potential suppliers.

Opportunities should be openly and widely publicised. The portal enables links to the UK Government's "Contracts Finder" and "Find My Tender" website. If required, the portal can still publish to the Official Journal of the European Union (OJEU) / Tenders Electronic Daily (TED).

Advice on using the portal should be taken from the Corporate Procurement Manager.

Records

Contract records must be retained in accordance with the Council's Document Retention Policy and where relevant should include:

- Details of any exemptions granted
- Pre-procurement market testing / research
- The procurement route used
- Tender Adverts / Notices
- The Standard Questionnaire responses (SQ's) and expressions of interest received
- The evaluation criteria used and the evaluation record based on those criteria
- Credit checks and records of economic and financial standing
- Invitations to Tender and tender documentation
- Tenders received and tender records and registers
- Pre and post tender clarifications and, where relevant, records of dialogue and /or negotiation.
- The award criteria and the evaluation record based on those criteria
- Records of communications with the successful contractor
- Details of feedback given to successful and unsuccessful bidders
- Standstill / Alcatel letters
- Contract documents
- Regulation 84 reports
- Contract Management records
- End of Contract Reviews

Approved or Standing Lists of Suppliers

The Council does not maintain Standing or Approved Lists of Contractors or Suppliers. Approved Lists cannot be used where PCR2015 Regulations apply.

Where recurrent transactions of a similar type are likely a suitable framework agreement, or term contract, should be used. The framework agreement must include terms for calling off supplies, services or works from the framework supplier(s). A Framework Agreement may be with a single supplier or have two or more suppliers on the list. Additional suppliers cannot be subsequently added to a framework agreement. A Dynamic Purchasing System may be used in compliance with Regulation 34 of the PCR2015.

A formal and approved register of pre-qualified Contractors and Consultants maintained by or on behalf of the public sector (e.g. Construction line) may be used for the selection of a shortlist where appropriate. Any contractors or consultants from such a register must be assessed against the selection criteria published for the procurement.

It is not acceptable to use a random selection facility as available on some of these registers as this is not a substitute for the proper evaluation and selection of contractors and consultants, against a set of pre-determined evaluation criteria, despite the pre-qualification stage achieved by inclusion on the register.

Framework Agreements and Collaborative Procurements

A Framework Agreement is a contractual arrangement with one or more providers that set out terms and conditions under which specific or call-off purchases or contracts can be made at any time throughout the term of the framework agreement. The term of a Framework Agreement should not exceed four years. A call off contract may be for longer than four years and can exceed the term of and survive beyond the end date of the framework agreement.

Call-off contracts formed under a Framework Agreement must be awarded in accordance with the procedure prescribed in the Framework Agreement. Where there is more than one provider under the framework it is usually necessary to hold a mini competition. The Council's Rules apply to a mini competition in the same manner as all other procurements. Direct Awards can be made on Framework Agreements if permitted by the terms of that framework agreement, but the Council encourages competition through any framework used. Direct Awards must be supported by a statement as to why competition has not been sought through the framework, how it demonstrates value for money to the Council, and agreed by the Executive Director, Director, Executive/Group Head/Associate Director.

Framework Agreements to which the Council has access may be let by another body e.g. the Government Crown Commercial Service (CCS), another Local Authority (LA) or a consortium of LA's e.g. Eastern Shires Purchasing Organisation (ESPO) or suitable Public Buying Organisation (PBO).

Officers proposing to use a Framework Agreement must check that:

- The Framework Agreement has been let in full accordance with these Rules and where appropriate Procurement Regulations.
- The Council has the right to use the Framework Agreement.
- The procedures for call-offs or mini-competitions under the agreement accord with these Rules.

Officers proposing to use a Collaborative arrangement with other parties e.g. other Local Authorities to jointly procure works, supplies or services, must check that:

- The collaborative procurement contract has been let in full accordance with these Rules and where appropriate the Public Contract Regulations (PCR2015).
- The Council is a member of the collaboration or consortium and has the right to use the contract.
- The procedures for using the contract accord with these Rules.

Collaborative and Partnership arrangements are subject to the same procurement legislation and must follow the Council’s Rules. If in doubt, Officers must seek the advice of the Corporate Procurement Manager.

Competition Requirements

The requirements relate to the Estimated Total Value of the procurement:

The Value of a Contract is the total value over the whole potential duration of the contract including any possible extension to the term of the contract. Where the duration is uncertain a minimum of four years shall be assumed. The value of a framework agreement is the value of all the potential call offs that may be made by all contracting bodies permitted to use the framework. The value of a concession is the total potential gross income or other assessment of value to the contracting parties. If in doubt, Officers must seek the advice of the Director of Finance.

Minimum requirements:

Thresholds excl. VAT	Minimum requirements
Less than £10,000	A minimum of one written quotation is provided. The Council would expect that Officers will seek more than one quote, where appropriate, to demonstrate value for money to the Council through a combination of cost and quality.
Greater than £10,000 up to £24,999	Three written quotations are sought from suitable organisations. The requirement does not need to be advertised.
Greater than £25,000 – UK Procurement Threshold	Public advertisement of the requirement and invite Tenders from at least three and usually no more than six bidders. If an appropriate framework agreement is used, there is no need to advertise. However a mini competition should be held in the majority of cases. Any Direct Awards must be supported by a statement as to why competition has not been sought through the framework and how it demonstrates value for money to the Council.
Above UK Procurement Threshold	Advertise and follow PCR2015 procedures and invite Tenders from at least five and usually no more than seven bidders. Alternatively, competition is sought through an appropriate framework agreement.

All tender opportunities should be advertised to comply with the principle of transparency.

Where it can be demonstrated that there are fewer suitably qualified bidders than the minimum set out in the table, to meet the competition requirement, all suitably qualified Candidates must be invited. The Executive Director/ Director/Executive/Group Head/Associate Director and the Corporate Procurement Manager must be consulted in such cases.

If more than one contractor is to be appointed, for example to a framework agreement or if a contract is split into Lots, the number of bidders invited to tender may be increased to more than six.

Contracts must not be disaggregated nor methods of calculating the Estimated Total Value used in order to undermine the intention and application of these Rules or the Regulations.

The nature of the requirement and the procurement strategy will determine the procurement procedure to be used. Officers shall consult the Corporate Procurement Manager and / or the Group Head of Democracy & Governance if the Competitive Dialogue or Negotiated procedures are to be used.

Assets for Disposal

Assets (excluding land) for disposal must be sent to public auction except where better Value for Money is likely to be obtained by inviting Quotations or Tenders. The method of disposal of surplus or obsolete stock, plant, vehicles and equipment or assets, other than land, must be formally agreed with the Director of Finance.

Providing Services to External Purchasers

The Director of Finance and the Corporate Procurement Manager must be consulted where proposed contracts include supplies to or work for or on behalf of other organisations.

Appointment of Consultants

The procurement of Consultants, including solicitors, architects, engineers, surveyors and other professionals, must comply with these Rules. Any Consultant appointed who acts for or on behalf of the Council must also comply with these Rules. A written contract, or appointment in the form of a formal letter for values above £25k or Purchase Order for values below £25,000 clearly stating the outputs, must be used. A standard Professional Consultancy form of contract, should be used where appropriate.

Records of consultancy contracts must be maintained in the same manner as all other contracts and shown on the Contract Register.

Consultants must be required to provide evidence of, and maintain, Professional Indemnity insurance to the satisfaction of the Council's Insurance Officer.

Procurement Strategy, Pre-Procurement Engagement or Soft Market Testing and Research

A Procurement Strategy is to be written for each procurement in excess of £100k. The purpose of the Procurement Strategy is to illustrate how the procurement will achieve the objectives of the requirement. The strategy will;

- ensure there is rigorous appraisal of procurement options;
- detail the Pre-tender estimate;

- identify risk and mitigations ensuring that these are defined in the Procurement and sit with the party best placed to manage those risks;
- define the most appropriate route to market;
- outline the market engagement and soft market testing;
- define how the Council will achieve value for money through the procurement;
- define the appropriate contractual terms and conditions including detailing special clauses

Pre-procurement engagement is a range of activities to engage with the market before starting a procurement process and may include a technical dialogue to inform a specification. Engaging with the market before starting the formal procurement process is best practice and helps to maximise value for money from the resulting procurement.

Officers should consider pre-procurement consultations with potential suppliers prior to the start of any part of the formal procurement process including a Tender Advert or Notice. Care must be taken not to prejudice the equal treatment of potential suppliers or to distort potential competition. Advice on pre-procurement strategies should be sought from the Corporate Procurement Manager.

Insurance

Insurance requirements must be clearly specified in the contract. The Council's Insurance Officer will advise on the minimum limits of indemnity required for each contract. Prior to entering into a contract Officers must require the contractor to produce current insurance certificates in respect of Employers' Liability and Public Liability risks and for Professional Indemnity where appropriate for such limits and for such periods as are specified by the Council's Insurance Officer. The Contractor must be required to produce up to date Insurance Certificates at each subsequent renewal date during the term of the contract.

Specifications, Standards and Evaluation Criteria

Specifications must set out the minimum required standards of technical and professional ability and reliability. Specifications must refer to relevant UK, EU or international standards which apply to the subject matter of the contract. The Group Head of Democracy & Governance must be consulted if it is proposed to use other than UK or EU standards. The Council is committed to ensuring that sustainable and social value options are fully considered when setting contract specifications, making award decisions and delivering requirements.

Tenders should be assessed on the basis of the Most Economically Advantageous Tender (MEAT), where Quality and Price considerations both apply. In minor or exceptional cases bids may be invited on a lowest price (where payment is to be made by the Council) or highest price (if payment is to be received by the Council). The Officer must define and publish appropriate Price and Quality Evaluation Criteria and their respective weightings.

Quality Evaluation (selection or award) criteria may include experience, technical merit, programme and delivery proposals, environmental matters, sustainability criteria, social value, added value, whole life costs, innovative, aesthetic and functional characteristics, health and safety, after-sales service and response, technical assistance, CV's of key staff, accreditations, approach to collaborative working or partnering with a Local Authority and any other relevant matters. The weighting of the evaluation criteria will be a representation of the importance of that criteria in the

procurement as set out in the Procurement Strategy. Therefore, these should be representative of the key decisive purchasing factors as set out in the Procurement Strategy.

Evaluation Criteria must not include non-commercial considerations or geographic limits which might discriminate against suppliers. It is acceptable to require submissions to be in English and priced in Pounds.

Accreditations should be considered where appropriate and relevant but must not be a substitute for other checks and due diligence. These should not be required or assessed in a manner that may inadvertently disadvantage potential providers, for example, SMEs, public service mutuals or third sector organisations.

Financial Assessment and Vendor Capabilities

Financial assessment of potential providers should be undertaken in a manner that is proportionate, flexible and not overly-risk averse while ensuring taxpayer value and safety is protected and relevant Procurement Law complied with. All potential providers, whatever their size or constitution, should be treated fairly and with equal diligence during the financial appraisal process. For example: no SMEs, public service mutuals or third sector organisations should be inadvertently disadvantaged by the financial assessment process.

Due diligence must be carried out to ensure that the vendor has the necessary skills, resources and abilities to undertake the work. The due diligence must be proportionate to the nature and scale of the work proposed. This includes checking the credentials of sub-contractors where appropriate.

Social Value

Social value is the consideration of how procurement might offer social, economic or environmental benefits to the community. The Public Services (Social Value) Act 2012 applies to certain types of services contracts and framework agreements but it is good practice to consider these principles for all procurements. The requirement is to consider the economic, environmental and social benefits of the approach to the procurement before the process starts and to consider whether there is a need to consult on these issues.

The Act applies to the pre-procurement stage of contracts for services as that is where social value can be considered to greatest effect. This should inform the shape of the procurement approach and the design of the services required. It should enable a re-think of the outcomes and the types of services to be procured.

The potential interest of Small and Medium Size Enterprises (SME's) and the 3rd Sector should be considered when assessing the shape of the procurement approach and the design of the Supplies or Services required. This may also include ways to cascade good practice down the supply chain.

Contracts should ensure that the principles of these Rules including the need for market testing and the provision of Value for Money is cascaded down the supply chain. The Council expects good practice to be in place to ensure a fair selection of sub-contractors, appropriate terms and conditions and prompt payment of monies due. Further guidance is available through the "Social Value Toolkit for District Councils" published by the LGA.

Past Performance

The Council is entitled to establish minimum standards for reliability based on past performance which must be met by potential bidders for public contracts. To provide assurance about performance and protection for the taxpayer and recipients of the services, procurements should include minimum standards for reliability based on past performance.

It is good practice to request specified information, which may include certificates of performance, about past performance in the last 3 years to establish that:

- the principal contracts of those who would provide the goods and / or services have been satisfactorily performed in accordance with their terms; or
- Where there is evidence that this has not occurred, that the reasons for failure will not recur if that bidder were to be awarded the relevant contract.
- A due diligence process can be carried out to assess the contractors understanding of contracting with the public sector and their approach to contracting / partnering with the Council where appropriate.

If the evaluation panel remains unsatisfied that the principal contracts of those who would provide the goods and / or services have been satisfactorily performed, it should exclude that bidder on the grounds that it has failed to meet the minimum standards of reliability set.

Public Sector Equality Duty (PSED)

Officers must ensure compliance with the Council's legal obligations under the Equality Act 2010 and its associated Public Sector Equality Duty with due regard to the three aims of the duty:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not share it.

Officers must ensure that public goods and services are accessible to, and meet the diverse needs of all users to ensure that no one group is disadvantaged in accessing public goods and services. Procurements must meet the Fundamental principles of equal treatment, non-discrimination, transparency and proportionality (PPN09/12 and 01/13).

Invitations to Tender (ITT's) / Requests for Quotations (RFQ's)

The Standard Questionnaires (SQ's) can be used where appropriate. Where used, the aims are to select a list of suitably competent and qualified bidders and to reduce the number of bidders to an appropriate and manageable number using pre-published evaluation criteria.

The criteria may include pass / fail mandatory and discretionary criteria. Where the capability of an individual(s) is essential to the delivery of the contract, for example, the provision of consultancy, CV's should be requested and assessed. SQ's should not impose arbitrary minimum requirements which may have the unintended effect of barring new or small businesses from bidding.

Officers should undertake a financial check as part of the evaluation process but, in the spirit of encouraging supplier growth, should not rule out a supplier unless there is clear evidence that the supplier's financial position places public money or services at unacceptable risk. The Director of Finance must be consulted in all cases of doubt.

The Notice or Advert and the Invitation to Tender shall state that late submission, of an Expressions of Interest or of a Tender will not be accepted. Submissions must be received by the due time and date. Any appeals for consideration of a late submission, due for example to a default by the Council, may only be considered by The Group Head of Democracy & Governance and / or the Corporate Procurement Manager.

Where late submissions are received, including by e-mail, other than via the procurement portal they shall be opened only by The Group Head of Democracy & Governance, or representative, or the Corporate Procurement Manager. No details of the late submission shall be disclosed.

An Invitation to Tender (ITT) should set out full details of the Council's requirements. An ITT may allow the submission of Variant bids to allow for supplier innovation.

An Invitation to Dialogue should set out an overview of the Authority and its needs; a starting position from which the dialogue can commence and how the dialogue will be structured together with any rules that apply to the dialogue phase.

All Invitations to Tender shall include the following:

- (a) A Specification that describes the Council's requirements in sufficient detail to enable the submission of competitive offers.
- (b) The Terms and Conditions of Contract that shall apply.
- (c) A Certificate of Non- Collusion for tenderers to declare that they have not colluded with any other party nor disclosed details of their submission to any other party (except where such a disclosure is in confidence and necessary for the purposes of preparing their submission).
- (d) A Form of Tender in the prescribed format for bidders to sign and confirm their bid price.
- (e) An Equality and Diversity questionnaire.
- (f) Notification that bidders must disclose any actual or potential conflict of interest.
- (g) Notification that bidders are responsible for all their costs of preparing a submission and that no costs will be reimbursed by the Council.
- (h) Details of the Evaluation Criteria with their relevant weightings and the methodology for scoring those criteria.
- (i) That submissions must be made via the Council's e-procurement portal unless otherwise agreed.
- (j) Where submissions are made other than via the procurement portal, notification that no Tender will be considered unless it is in a sealed envelope or container which bears the word 'Tender' followed by the subject to which it relates, with no other name or mark indicating the sender.

- (k) The method by which any arithmetical errors discovered in the submitted Tenders are to be dealt with.
- (l) A statement that the council is not bound to accept the lowest or any Quotation or Tender.
- (m) Advice that the council is subject to the obligations of the Freedom of Information Act 2000, the Environmental Information Regulations 2004 and the Government's Transparency Code 2014 and that the final decision on publication or disclosure of any information shall remain with the Council.
- (n) Advice that Credit checks and records of economic and financial standing may be sought.

All bidders invited to tender or quote must be issued with the same information at the same time and subject to the same conditions. This also applies to any supplementary information or clarification given during the tender period.

Nominated Sub-contractors and Suppliers

These Rules apply to nominated sub-contractors and suppliers. Officers should avoid the use of nominated sub-contractors and suppliers as far as practicable. If a nominated sub-contractor or supplier is to be considered, Officers must take advice from the Group Head of Democracy & Governance.

The invitations to tender (ITT) for contracts involving Nomination must include a clause to require the parties to enter into contract on terms relevant to the indemnities and obligations of each party as required by the Group Head of Democracy & Governance.

Short listing

Where bidders are evaluated for short listing or for the award of a contract Officers must assess the financial and technical standards appropriate to the contract. Assessments must be made in accordance with the published Evaluation Criteria. This includes having regard to the Proportionality Rule in relation to the size and resources of a company relative to the value of the contract.

Submission, Receipt and Opening of Tenders or Quotations

Tender periods must be sufficient for bidders to prepare and submit proper bids consistent with the complexity of the contract requirements.

All Tenders must be returned via the procurement portal or, where that doesn't apply, to the Corporate Procurement Manager. The procurement portal provides an audit trail and a reference of opening and on time receipt.

In the event that a tender is submitted not using the portal, tenders for contracts for £100,000 or more must be opened at one time by, or in the presence of, the Corporate Procurement Manager or nominated officer.

The Officer nominated to receive the tenders shall be responsible for the safekeeping of Tenders until the appointed time of opening. Each Tender must be suitably recorded to verify the date and precise time it was received, adequately safeguarded against amendment of its contents. The procurement portal is compliant with this requirement.

The Officer nominated to receive the tenders must ensure that all Tenders are opened at the same time as soon as practicable after the period for their submission has ended. They must ensure that the bids received are recorded on the Tender Record Form.

Clarifications and Negotiations

Providing clarification during a tender period is permitted. It must not be in the form of any negotiation and must be made in writing to all bidders. Where any verbal discussion is entered into any clarification given must be confirmed in writing and copied to all bidders. Bidders will be informed that answers to questions will be made available to all bidders.

Post tender clarifications to the bidder from the Council are permitted. These are to be sent with the request and response recorded via the portal.

Post tender negotiations, between submission of bids and contract award, are not permitted. An exception is where a Negotiated or Competitive Dialogue procedure has been used. In such cases the rules relating to the negotiations must be clearly set out in the tender documents and those negotiation rules must provide for:

- (i) The requirements of relevant UK legislation, these Rules and good practice guidance.
- (ii) The documentation sent out to prospective bidders stating that negotiation may take place and the basis upon which such negotiation would be held

The circumstances under which such negotiations may be considered are where:

- (i) High levels of innovation are required as part of the tender solution
- (ii) The new contract will involve radical changes from existing practices
- (iii) There are a number of alternative proposals or solutions that the Council is considering
- (iv) The specification has a number of alternative packages or elements
- (v) Variant bids are shown as acceptable in the Notice and negotiations relate to variant bids.

Other post-tender negotiation must only be conducted in accordance with advice given by The Group Head of Democracy & Governance who, with the Corporate Procurement Manager, must be consulted wherever it is proposed to enter into post-tender negotiation.

If post-tender negotiations are necessary then such negotiations shall only be undertaken with the preferred bidder who is identified as having submitted the Most Economically Advantageous Tender and after all unsuccessful bidders have been informed. During negotiations tendered rates and prices shall only be adjusted in respect of a corresponding adjustment in the scope or quantity included in the Tender documents.

Negotiations must be conducted by a team of at least two Officers, one of whom must be from a service independent of that leading the negotiations. The independent representative can be a representative from another council if the tender is a collaborative procurement.

Officers appointed to carry out any post-tender negotiations must ensure that they keep full and accurate records and minutes of all negotiation meetings and discussions and that any actions and outcomes are confirmed and agreed in writing by both parties.

If post-tender negotiation results in a fundamental change to the specification or to the terms of a contract the contract must not be awarded. A fundamental change from the work tendered must be re-tendered. The advice of The Group Head of Democracy & Governance and the Corporate Procurement Manager must be sought before concluding any post-tender negotiations.

Evaluation, Selection, Award and Feedback

The confidentiality of Quotations, Tenders and the identity of bidders must be observed at all times. Information about one bidder or their response must not be given to another bidder except as provided in these Rules.

Evaluation and Moderation panels must comprise a minimum of two Officers. The procedures to be used by the panels, including the Interview panel if an interview stage is included in the process, must be set out in advance of the receipt of submissions.

If an Interview stage and / or a Best and Final Offer (BAFO) stage is included in the process the procedures for them must be clearly set out for bidders in the bid documents. The published arrangements cannot be revised post tender submission.

Contracts must be evaluated and awarded by the panels in accordance with the published Evaluation (selection and award) Criteria. Neither criteria nor weightings can be revised post tender submission.

Officers shall compare submitted Tender prices with any pre-tender estimates and examine and explain any discrepancies.

The arithmetic in compliant Tenders must be checked. If simple arithmetical errors are found they should be corrected and the bidder notified. The bidder must be given the opportunity to stand by or withdraw the corrected bid.

The Officer responsible for the evaluation panel and moderation must prepare a Recommendation report setting out the reasons for the selection, having regard to the evaluation criteria, and the reasons for rejecting the unsuccessful tenders. Where a Procurement Strategy has been written, the recommendation report needs to confirm that the requirements of the strategy (and business case) have been met through the procurement.

The Officer is required to notify all bidders at the same time of the intention to award the contract to the successful bidder.

Where the Public Contract Regulations apply, the Standstill or “Alcatel” period of at least ten days must be observed. The Regulations require a formal letter containing prescribed information to give unsuccessful bidders time to challenge the decision before an award. If the decision is challenged the award of contract must not be made and the advice of The Group Head of Democracy & Governance and the Corporate Procurement Manager must be sought.

Feedback must be offered to all bidders. Where the total value is in excess of £25,000, this needs to be provided to potential bidders including those not short listed at a SQ stage. The advice of The

Group Head of Democracy & Governance and / or the Corporate Procurement Manager should be sought although the feedback must include:

- The Evaluation Criteria and how they were scored for their submission
- The characteristics and relative advantages of those short listed at a SQ stage. Details that could identify those short listed must not be disclosed.
- The name of the successful bidder(s)
- The reasons for the award decision and the characteristics and relative advantages of the successful bidder(s).
- When the standstill period is due to end.

Avoiding Challenges

Challenges are increasing for public sector procurements with the most likely challenges being from unsuccessful bidders challenging the evaluation process. This risk of challenge should be reduced by:

- publishing the process and timings for issuing the ITT and supporting documentation, dealing with clarifications, receiving bids and placing contracts, and adhering to the process.
- Providing all the relevant Procurement Documents when a Contract notice is published that is above UK Threshold. This includes a full and final specification, the terms and conditions and the evaluation model.
- making sure that evaluation criteria, sub-criteria and weightings are clearly linked to the work required and published in the ITT.
- using a clear and objective marking scheme that removes any ambiguity from the marking process.
- maintaining an audit trail during the process, to help explain why a bid was unsuccessful and to defend any challenges raised. Evaluators are required to detail why they have scored the bid accordingly.

The key principles are that criteria must be reasonable, proportionate, transparent and relevant to the goods, works or services being procured. Objective criteria should be clear, verifiable and targeted with measurable outputs. Subjective criteria should clearly define the basis on which any value judgements would be based. All criteria must be fair and not involve any discrimination, including a level playing field for non-local bidders, to ensure compliance with the Public Contract Regulations.

Contracts

All Contracts must be in writing and held in accordance with these Rules and, irrespective of value, must clearly specify:

- what is to be done or provided (i.e. the works, materials, services, supplies, matters or things to be done or provided)
- the provisions for payment (i.e. the price to be paid and when and details of any indexation)
- the time, or times, within which the contract is to be performed
- the provisions for the council to terminate the contract.

The Council's Official Purchase Order form, the Council's Standard Terms and Conditions or a Standard Form of Contract issued by a relevant professional body must be used as appropriate. The form of contract must be approved by the Group Head of Democracy & Governance.

In addition, every Contract must also state clearly as a minimum:

- That the contractor may not assign or sub-contract without prior written consent
- Insurance requirements
- Health and Safety requirements
- Data Protection requirements
- Equality and Diversity requirements
- Freedom of Information Act and Environmental Information Regulations requirements
- TUPE requirements
- That those acting for or on behalf of the Council must comply with the council's Contract Procedure Rules
- A right of access to all relevant documentation and records of the contractor for monitoring and audit purposes.
- VAT and other tax requirements.
- The Requirements for a Bond and / or Parent Company Guarantee.
- Prevention of Corruption requirements.
- Any Indexation or Price variation details or if no variation of Rates or Prices applies.

The formal advice of the Group Head of Democracy & Governance must be sought for contracts where:

- The Total Value exceeds the UK procurement legislation thresholds
 - The Risk is outside acceptable parameters
 - They involve leasing arrangements
 - It is proposed to use a supplier's own Terms and Conditions of Contract
- They are complex in any other way.

Indexation and price variation Clauses

The advice of the Director of Finance must be sought on any indexation clauses and the indices to be used, e.g. CPI. Where an indexation clause is used consideration should be given to an efficiency factor, e.g. less 1% p.a., to encourage Best Value and continuous improvement during the term of the contract.

Price variation clauses should allow for any potential variation in the scope or scale of goods, works or services to be provided during the term of the contract. This may be in consequence of other factors e.g. a variation in the number of service users where another service has been outsourced.

Forming of Contracts

Formal contracts must be formed for contracts with a value greater than £25,000. Below this threshold an Official Purchase Order may be placed but it must include full details of the supply, service or works to be delivered and the Terms and Conditions that apply to the Order.

Contracts must be in a form approved by the Group Head of Democracy & Governance. An industry standard may be used subject to the additional clauses being added to meet the requirements of these Rules and to protect the Council's interests.

Every contract must specify the work, goods, supplies and services to be provided, the price and charging basis including any indexation, and the time in which the contract is to be performed.

Extension of contracts

A Contract may be cumulatively extended by up to 50% of the initial contract value. Contracts should include suitable clear, precise and unequivocal clauses to enable contracts to be extended or amended. The revised total value of a contract initially let below the UK Procurement Regulation Threshold must not exceed that Threshold value. The Executive Director/Director/ Executive/Group Head/Associate Director for contract extensions up to £25,000, and jointly with the either the Chief Executive or relevant Executive Director/Director/Executive/Group Head for greater values, may approve a contract extension. They must inform the relevant Portfolio Holder and where the value of the extension exceeds £100,000 make a report to the next Cabinet meeting on the action taken.

Contract Formalities

Contracts not under Seal, including Purchase Orders, shall be completed as follows, subject to the relevant Scheme of Delegation:

Up to £50,000 - Signature by any one of the following: Executive Director/Director/Executive/Group Head/Associate Director or authorised representative; Group Head of Democracy & Governance; Chief Executive; Director of Finance/Head of Finance.

Above £50,000 (Excluding Sealing) Signature by any two of the following: Executive Director;/Director/Executive/Group Head/Associate Director, Group Head of Democracy & Governance; Managing Director; Director of Finance; Head of Finance .

Where risk and high value are relevant contracts should be under Seal subject to the advice of the Group Head of Democracy & Governance.

All contracts should be concluded formally in writing before the Supply, Service or Work begins, except in exceptional circumstances, and then only with the written consent of the Group Head of Democracy & Governance or Chief Executive. An award letter or an intention to award letter is insufficient.

The Officer responsible for securing signature of the contract must ensure that the person(s) signing for the other contracting party has / have authority to bind it and that the appropriate decision has been made by the council to enter into the contract

All contracts for the purchase of motor vehicles or mechanical plant irrespective of value must be in writing and must be signed at least two of the following Chief Executive; Executive Director/Director/Executive/Group Head/Associate Director ; the Director of Finance; the Head of Finance; the Group Head of Democracy & Governance.

Sealing

A contract must be sealed where:

- The council may wish to enforce the contract more than six years after its end
- The contract is valued at more than £150,000

Where contracts are completed by each side adding their formal seal (including use of an electronic seal), such contracts shall be signed by the Group Head of Democracy & Governance or their authorised nominee.

Every non electronic Council sealing will be consecutively numbered, recorded and signed. The Council's seal must not be affixed without the proof that the appropriate authority to enter the contract has been obtained under the scheme of delegation with that authority either included within the minutes of a formal meeting of councillor's or recorded as a delegated decision within the Modern.gov system.

Contract Surety

The Officer must consult the Director or Head of Finance about the need for a Parent Company Guarantee (PCG), preferably from the Ultimate Parent Company, where a bidder is a subsidiary of a parent company and:

- The Total Value exceeds £150,000, or
- The award is based on the evaluation of the parent company, or
- There is some concern about the stability of the bidder.

The Officer must consult the Director or Head of Finance about the need for a Bond where:

- The Total Value exceeds £1,000,000, or
- It is proposed to make stage or other payments in advance of receiving the whole of the subject matter of the contract and there is concern about the stability of the bidder.

Where a Bond is required it shall normally be for a sum equal to 10% of the total contract sum. The decision of the Director or Head of Finance on the need for a PCG and / or the need for and the size of a Bond is final.

Remedies for non-performance

Contracts must include provisions for remedies in the event of non-performance including liquidated damages, other financial deductions and termination of the contract.

Every Contract which exceeds £50,000 in value and is for the execution of Works, shall provide for liquidated damages to be paid by the Contractor in respect of any delay in performing such work. This shall not apply where the Director or Head of Finance determines that such remedy is not appropriate or necessary for a particular contract.

Prevention of Corruption

Everyone involved in a procurement process as employees or for or on behalf of the Council must comply with the Employee Code of Conduct on the prevention of corruption. They must not invite or accept any gift, inducement or reward in respect of the evaluation, award or performance of any contract.

Any offer of a gift, inducement or reward must be declared whether or not it was accepted. High standards of conduct and probity are required. Corrupt behaviour is a criminal offence and may lead to dismissal.

Cartels are a potential concern and are a breach of competition law. They can influence the price paid for goods and services by the Council. Any suspicions about such activities must be reported to the Group Head of Democracy & Governance and the Director of Finance.

The following clause must be put in every written Council contract:

“The Council may terminate this contract and recover all its loss if the Contractor, its employees or anyone acting on the Contractor’s behalf do any of the following things:

- (a) offer, give or agree to give to anyone any inducement or reward in respect of this or any other Council contract (even if the Contractor does not know what has been done), or
- (b) commit an offence under the Bribery Act 2010 or shall have given any fee or reward the receipt of which is an offence under Section 117(2) of the Local Government Act 1972, or
- (c) commit any fraud in connection with this or any other Council contract whether alone or in conjunction with Council members, contractors or employees.

Any clause limiting the Contractor’s liability shall not apply to this clause.”

Declaration of Interests

If it comes to the knowledge of a Councillor, an Employee of the authority or anyone acting as an Agent for or on behalf of the Authority that a contract in which he or she has a personal interest has been awarded or is proposed to be entered into by the council, he or she shall immediately give written notice to the Group Head of Democracy & Governance.

The Group Head of Democracy & Governance shall maintain a record of all declarations of interests notified by Councillors and Officers.

The Group Head of Democracy & Governance will ensure that every councillor receives a copy of the Council’s Code of Conduct for Councillors.

Contract Management

All contracts must have a named contract manager, nominated by the relevant Associate Director/Group/Executive Head, for the entire duration of the contract.

They must keep under review the skills and experience required and available for the good management of the contract.

Risk Assessment and Contingency Planning

Where the risk and financial value of the Contract is deemed appropriate, including all those above the UK Procurement Thresholds, contract managers must:

- prepare a Business Case
- undertake appropriate Risk Assessments
- maintain a Risk Register during the contract period
- ensure that mitigation and contingency measures are in place
- manage the contract in accordance with best practice
- have regard to end of contract reviews of other similar contracts

Contract Monitoring, Evaluation and Review

All contracts with a value above the UK Procurement Thresholds, or which are High Risk, should have a formal monthly or quarterly review with the contractor.

Throughout a contract period the Contract Manager must monitor:

- Contractor's performance
- Compliance with the Specification
- Compliance with the Programme
- Contract costs and Value for Money requirements
- Health and Safety compliance
- Risk Management.
- The Project Plan
- Client's resourcing of the contract

At the end of a contract period the Contract Manager must ensure:

- That all required Works, Supplies and Services have been completed
- The Final Account has been completed
- An End of Contract Review on the standard template has been completed

Late Payment Regulations and Prompt payment of sub-contractors

The Late Payment of Commercial Debts Regulations 2013 requires public authorities to pay within 30 calendar days following receipt of a valid and undisputed invoice. Simple interest is calculated equal to the sum of the Bank of England reference rate plus at least eight percentage points. The creditor is also entitled to a fixed charge of £40, £70 or £100 depending on the size of the debt (under £1,000, under £10,000, and higher), plus additional reasonable costs incurred.

As a public authority the Council, if a debt is not paid within the deadline, is obliged to automatically pay the outstanding amount that includes, daily interest for every day the payment is late based on 8 percentage points above the Bank of England's reference rate plus the fixed amount, depending on the size of the unpaid debt. The onus is on the Officer to pay a supplier on time and the supplier is not obliged to remind you that payment is outstanding.

Officers must include a clause in their contracts that requires contractors to pay their sub-contractors and suppliers within 30 days of receipt of a valid and undisputed invoice. This is to comply with the PCR2015 and to cascade good practice in public procurement supply chains. There must also be a requirement for a sub-contractor to include in any sub-contract which it in turn awards requirements to the same effect.

VAT

To avoid potential VAT loss and to enable the recovery of VAT officers must ensure that VAT invoices are sent and addressed directly to the Council. Officers must avoid situations where a 3rd party receives the taxable supply that the Council subsequently pays where the supporting evidence from a 3rd party shows their payee details. A failure to recover VAT is an unnecessary and additional budget pressure and is a cost to the project / spending department.

SMEs

The Procurement regulations have provisions to make procurements more accessible for smaller businesses and third sector providers. These include:

- Restrictions on using SQs for below threshold procurements
- An encouragement to use Lots for larger contracts
- An obligation to publish opportunities on the Government's Contract Finder website for certain procurements. These include where an opportunity is advertised, so not when exercising a call-off from a framework for example, and where the contract value is over £25,000.

The Regulations require an Award notice to be published on Contracts Finder when:

- A UK Procurement Regulation Award notice is published
- an above UK Procurement Regulation threshold call-off under a framework is awarded
- a public contract over £25,000 is awarded

The Concession Contracts Regulations 2016

A Concession is a written contract for works or services where the consideration consists in the right to exploit the works or services or in that right together with payment and there is transfer of an operating risk to the concessionaire and a risk of exposure to the vagaries of the market.

The Regulations apply to Works and Services above the UK Procurement concessions threshold. The value of a concession is the estimated total turnover, net of VAT, generated by the concessionaire over the duration of the contract. The amount paid by the Council is not relevant. The method for estimating the value should be set out in the concession documents when the concession is advertised.

The Regulations limit the potential duration of concessions. Where the contract will exceed 5 years it cannot exceed the time a concessionaire could reasonably be expected to take to recoup the investment made plus a reasonable return on invested capital.

There is no formal prescribed procurement process but must comply with basic standards and principles and includes selection and award criteria, an UK Procurement Concession Notice, a standstill period and an UK Procurement Award notice

Procurement Procedures

The Public Contracts Regulations 2015 procurement procedures apply where the value of a contract exceeds the relevant threshold. These thresholds are reviewed from time to time by UK Government. Up to date figures and advice on which threshold applies can be confirmed by the Corporate Procurement Manager.

The Regulations define the classification of “Supply”, “Service” and “Works” contracts. Where a contract covers more than one classification it is usually classified according to its predominant purpose.

The Regulations define how the value of a contract is assessed for the purposes of these Thresholds. The various procurement procedures include some defined timescales which are mandatory. These include minimum times for the receipt of requests to tender and for receipt of tenders.

The Contract Notice must be submitted in the prescribed form and be published in Contracts Finder and Find My Tender. The Corporate Procurement Manager can advise on the application of the Regulations.

Five procurement procedures are available for UK procurements regulated by the Public Contracts Regulations 2015:

Choice of Procedures:

Contracting authorities may apply open or restricted procedures or innovation partnerships as regulated.

Contracting authorities may only apply a competitive procedure with negotiation or a competitive dialogue with regard to works, supplies or services fulfilling one or more of the following criteria:

- the needs cannot be met without adaptation of readily available solutions;
- they include design or innovative solutions;
- the requirement is complex in nature, in its legal and financial makeup or because of its risks;
- the technical specifications cannot be established with sufficient precision;
- in response to an open or a restricted procedure where only irregular or unacceptable tenders are submitted.

Open procedure

All interested parties can submit a tender in response to the Open Notice. Tenders can be clarified following receipt but changes to the tender and any negotiations are not permitted. The open procedure is not suitable where there is any complexity or if a high number of bids might be received.

Restricted procedure

Interested parties can submit an expression of interest in response to the Contracts Find a Tender Notice. A short listing exercise is carried out using a Standard Questionnaire (SQ). Only those meeting the published evaluation criteria can be invited to tender. A minimum of five suppliers must be invited to tender unless fewer suitable candidates have met the criteria and there is sufficient number to ensure genuine competition. Tenders can be clarified following receipt with finalisation of contract terms but changes to the tender and any negotiations are not permitted.

Competitive Procedure with Negotiation (CPN)

Any party may express an interest in tendering and the authority will select potential bidders with whom to negotiate. Minimum requirements are set out at the beginning and cannot be changed during the process. The minimum requirements and the award criteria shall not be subject to negotiation

Only those meeting the required capabilities can be invited to tender. A minimum of three suppliers must be invited to tender unless fewer suitable candidates have met the criteria and there is sufficient number to ensure genuine competition.

Negotiation may take place:

- On all aspects other than the Minimum Requirements, such as quality, quantities, commercial clauses, social, environmental and innovative aspects.
- In stages with successive elimination by applying the award criteria.
- On all tender stages except the final stage, negotiation is not permitted on the final tender.

Competitive Dialogue (CD)

Many of the requirements for Competitive Dialogue are broadly similar to Competition with Negotiation, as noted above.

Final tenders may be clarified, specified and optimised. Negotiations may confirm financial commitments or other terms in the tender that do not materially modify essential aspects of the final tender or risk distorting competition or causing discrimination.

The recitals to the regulations note that CPN and CD should not be used for off-the-shelf services or products which can be provided by many different operators in the market.

It is good practice to have pre-market engagement with current and potential suppliers to identify the technical means of delivering the requirement and / or the legal / financial make-up of the project.

Innovation Partnerships

This procedure is aimed at encouraging the development of innovative products, services or works which are not already available on the market. The procurement process largely follows that for CPN.

Following award the structure of the process covers two parts, the development of the innovative product, service or works and then the purchase of the resulting supplies, services or works.

It should be structured in successive phases with intermediate targets and payments and provide an option to end the contract after each phase. The arrangements applicable to IPR should be set out in the procurement documents.

Version Control Information:

Document Status	Constitution	Mandatory
Document Owner	Group Head of Democracy & Governance	Carol Chen
Document Manager	Corporate Procurement Manager	Derek Hatcher
Review	Annual review due:	July 2022
Version Control	Details	Date
v 1.0 – 4.0	Drafts for consultation	
v 5.0	Approved at Full Council	24 July 2013
v 6.0	Amendment page 4 re HR	Sept 2013
v 7.2	Amendments: CDM, Record of Exemptions, End of Contract actions, VAT, Version Control information added	December 2013
V 8.0	Updates from PCR2015	June 2016
V 9.0	Minor updates and typos	February 2019
V9.1	Updating titles of officers	April 2019
V10.1	Update as UK leaves Brexit. Review of Thresholds and Guidance	October 2021
V10.2	Update as senior restructure	October 2022