

## WATFORD BOROUGH COUNCIL

### Local Plan Part 2: Site Allocations and Development Management Policies – proposed minor modifications

This schedule identifies and sets out the proposed changes and clarifications to the Council’s Local Plan Part 2: Site Allocations and Development Management Policies. These changes do not prejudice any potential changes that the Inspector may propose and for the avoidance of doubt these proposed changes shall be referred to as ‘minor modifications’.

This schedule of additional modifications is proposed in order to correct errors, provide greater clarity where required or to reword specific paragraphs and policies of the plan in response to comments by the consultees. It is considered that these proposed changes are minor in nature and therefore “do not materially affect the policies that would be set out in the document”. However, the council notes that there is not specific guidance to inform what constitutes ‘minor’ or ‘major’ modifications and if the Inspector considers that any change is material, the Council will consult on these changes in conjunction with any proposed modifications the Inspector may identify. The proposed modifications are listed in document order of the Local Plan Part 2: Site Allocations and Development Management Policies. The following identifies the terms in the schedule:

**MM. No:** unique reference number for each proposed Minor Modification

**Policy/ Paragraph Number:** the specific policy or paragraph within the SADM to which the proposed Additional Modification applies.

**Description of Modification:**

Where text is proposed for deletion it is shown by strikethrough as: ~~deleted text~~.

Where text is proposed for addition, it is underlined as: additional text.

**Reason for Change:** This gives a brief summary as to the reason/ rational behind the change

AM.No	Policy/ Paragraph Number	Page	Description of Modification	Reason for Change
<b>CONTENTS AND GLOSSARY</b>				
MM1	Contents		Add: <u>Appendix L : Replaced Watford District Plan 2000 Policies</u>	To ensure the Contents Page is accurate.
MM2	Glossary		Add new entry between those for Policies Map and Primary Shopping Frontages: <u>Preliminary Risk Assessment (PRA): PRAs must identify all previous uses, potential contaminants associated with those uses and a conceptual site model of the site indicating sources, pathways and receptors.</u>	The Environment Agency (EA) requested that PRA be the term for site investigations and suggested a definition was required
<b>INTRODUCTION</b>				
MM3	1.1	1	Part 1 of Watford's Local Plan – the Core Strategy - was adopted on 30 <sup>th</sup> January 2013, <u>replacing some of the policies in the Watford District Plan 2000</u> . The Core Strategy sets out the vision, objectives and spatial strategy for Watford Borough to 2031 and forms the strategic planning context.	The introduction as written was for the publication consultation of the plan, and therefore it has been changed to reflect what an introduction would be for an adopted plan. All changes are clarifications.
MM4	1.2 and 1.3	1	<del>The Core Strategy and remaining policies of Watford District Plan (WDP) 2000 currently make up the development plan for Watford, along with Hertfordshire County Council Minerals and Waste Local Plans.</del>  Part 2 of the Local Plan <u>will replace and update</u> the remaining Watford District Plan 2000 policies and site allocations, to support the delivery of the Core Strategy vision and objectives by:  1) Identifying sites and areas for specific purposes; and  2) Providing environmental criteria, against which development proposals and planning applications can be judged.  <u>The Local Plan (Parts 1 and 2), together with the Hertfordshire Minerals and Wastes Local Plans, make up the development plan for Watford.</u>	The introduction as written was for the publication consultation of the plan, and therefore it has been changed to reflect what an introduction would be for an adopted plan. All changes are clarifications.

MM5	para 1.4	1	<p>We first asked for views on what Local Plan Part 2 should cover, back in November 2012, and followed this up by publishing draft policies and a list of potential sites for consultation during November and December 2013. There were subsequent consultations on revised policies and sites in December 2014-Feb 2015; additional policies and changes from December 2015-Feb 2016 and on the adoption of the optional nationally described space standards in June – July 2015, as well as ongoing discussions under the Duty to Cooperate. Information received in response to these consultations has been used, alongside relevant evidence, to prepare <u>this the plan which is the version we intend to submit to the Secretary of State for examination.</u></p> <p><u>Publication consultation, focussing on compliance with legal and soundness tests, took place between August and October 2016 and the plan was submitted for examination in March 2017.</u></p>	The introduction as written was for the publication consultation of the plan, and therefore it has been changed to reflect what an introduction would be for an adopted plan. All changes are clarifications.
MM6	1.5	1	<p><del>The Publication stage is a formal stage in plan preparation when you can comment on the Plan we propose to submit for examination. At examination the inspector will consider whether the plan has been prepared in accordance with the duty to cooperate, legal and procedural requirements, and whether the plan is “sound” according to the 4 tests set out in paragraph 182 of the National Planning Policy Framework (NPPF), namely that the plan is:</del></p> <ul style="list-style-type: none"> <li><del>• Positively prepared – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including any requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</del></li> <li><del>• Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on</del></li> </ul>	The introduction as written was for the publication consultation of the plan, and therefore it has been changed to reflect what an introduction would be for an adopted plan. All changes are clarifications.

			<p>proportionate evidence;</p> <ul style="list-style-type: none"> <li>• <del>Effective the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and</del></li> <li>• <del>Consistent with National Policy the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF</del></li> </ul> <p>It is therefore helpful if comments are focussed on these matters.</p> <p><del>Alongside this we are also consulting on the Environmental Report prepared to assess the sustainability of the proposed policies. This report contains the sustainability and strategic environmental assessment required by the European Strategic Environmental Assessment (SEA) Directive.</del></p>	
MM7	1.7 and 1.8	2	<p><del>You will see that in many cases</del> <u>There are instances where the</u> policy numbering in each chapter does not start at 1. This is because the numbering follows on from that in the Core Strategy, to make it clear that the policies will all form part of the same Local Plan. Once <del>agreed</del> <u>adopted</u> the policies will all operate together and, <del>following adoption, the policies will be shown on an adopted policies map</del> <u>the proposed policies map</u> <u>which</u> illustrates the geographical coverage of relevant policies.</p>	<p>The introduction as written was for the publication consultation of the plan, and therefore it has been changed to reflect what an introduction would be for an adopted plan. All changes are clarifications.</p>
MM8	1.9	2	<p>There are a number of formal stages in the preparation of the Local Plan, which <del>we have</del> <u>were</u> supplemented with additional consultation to ensure all interested parties have had a chance to help shape the plan.</p>	<p>The introduction as written was for the publication consultation of the plan, and therefore it has been changed to reflect what an introduction would be for an adopted plan. All changes are clarifications.</p>
MM9	1.10	2	<p><u>Plan preparation is an iterative process with the aim of arriving at a plan that there is as much agreement on as possible before it is submitted for examination.</u> Policies are <del>were</del> <u>also</u> subject to sustainability appraisal / strategic environmental assessment</p>	<p>The introduction as written was for the publication consultation of the plan, and therefore it has been changed</p>

			<p>which considers the environmental impact of the preferred policy approach and all reasonable alternatives <u>as described in the Environmental Report</u>, and <u>An equalities impact assessment was also undertaken</u> which considers the effect on defined “protected characteristics”. <del>Plan preparation is therefore an iterative process, with the aim of arriving at a plan that there is as much agreement on as possible by the time we reach this formal publication stage (Stage 2 in Table 1 below).</del></p>	<p>to reflect what an introduction would be for an adopted plan. All changes are clarifications.</p>
MM10	1.11	2	<p><del>By Stage 2 the plan should be ready to submit for examination, and the scope of consultation is therefore limited to compliance with defined legal and soundness tests.</del></p>	<p>The introduction as written was for the publication consultation of the plan, and therefore it has been changed to reflect what an introduction would be for an adopted plan. All changes are clarifications.</p>
MM11	Table 1	3	<p><u>Current stage Aug-Oct 2016</u></p>	<p>Clarification</p>
MM12	Table 1	4	<p><u>Feb 2017-Mar 2017</u></p>	<p>Clarification</p>
MM13	Table 1	4	<p><u>Examination: April – Nov 2017</u></p>	<p>Clarification</p>
MM14			<p><b>How to comment:</b></p> <p><del>Consultation on the Local Plan Part 2 and the Environmental Report will run from noon Thursday 18th August 2016 until noon on Mon 3rd October 2016. Please submit any comments during this timeframe.</del></p> <p><del>The quickest and easiest way to submit comments is via our online system at this link: <a href="https://watford.jdi-consult.net/localplan">https://watford.jdi-consult.net/localplan</a>. Comments may be submitted by selecting the relevant document then clicking on the pen symbol next to the policy on which you wish to comment. Before you submit comments for the first time you will need to register on the system. This is a simple process requiring a valid email address. Submitting comments this way is easy to do, and avoids any chance of</del></p>	<p>This information is no longer necessary</p>

			<p>confusion as to which policy you are commenting on.</p> <p>If you are unable or prefer not to submit comments online, please email them to <a href="mailto:strategy@watford.gov.uk">strategy@watford.gov.uk</a> ensuring each comment clearly indicates the policy referred to, and the relevant legal or soundness test. Such comments should be sent in a format that allows comments to be easily cut and pasted into the consultation system.</p> <p>Our postal address and contact details are:</p> <p><b>Watford Borough Council</b>  <b>Planning Policy</b>  <b>FREEPOST ANG0394</b></p>	
<b>SPECIAL POLICY AREAS AND MIXED USE ALLOCATIONS</b>				
MM14	Paragraph 2.3	10	Core Strategy and Development Plan Document <u>Local Plan</u>	Correction requested by HCC
MM15	SPMX1	10	Development proposals should accord with the related Core Strategy <u>and guidance on environmental considerations contained in this plan.</u>	Historic England requested this change for clarity
MM16	SPMX1	10	Any proposals should also take account of safeguarded facilities and areas of search contained in the Hertfordshire Waste <u>Local Plan</u> <del>Core Strategy and Development Plan Document</del> or the Hertfordshire Minerals Local Plan	Correction requested by HCC
MM17	SPMX1	10	<b>SPA2</b> Watford Junction (includes a safeguarded rail aggregates depot <u>and associated facilities</u> at Orphanage Road)	London Concrete requested that this change is incorporated in the policy for consistency
MM18	SPMX2	11	Replace 0 in estimated housing component with: <u>A proportion as part of a mixed use development and subject to provisions set out in Appendix I.</u>	The developer of this site was concerned that the '0' figure in the table precluded housing on the Gasholder site. This is not the intention of the council, which identifies this as a mixed use site. The site

				constraints affect housing capacity on site which will need to be determined in conjunction with the Environment Agency as any scheme is prepared.
<b>SUSTAINABLE DEVELOPMENT</b>				
MM19	Paragraph 3.1	13	Until the commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015 (the date of which is still unknown) we will continue to require energy performance above that currently set in the building regulations in <u>the special policy areas</u> . The council is supportive of developments which go beyond the building regulations for residential development. Standards relating to non-residential development are unaffected by these national changes.	Clarification to ensure that the supporting text is consistent with the policy.
MM20	Policy SD5	14	<p><b>Policy SD 5</b>  <b>Sustainable Design Requirements</b></p> <p>All residential development will need to comply with the energy performance standards set in the building regulations, as a minimum. Non-residential development should achieve BREEAM Very Good, as a minimum.</p> <p><del>All major development should meet current BREEAM Communities standards.</del></p> <p>Major development within the Special Policy Areas should achieve an energy performance standard equivalent to the former sustainable code for homes level 4 in the case of residential development or BREEAM Excellent in the case of non-residential development.</p>	Following discussion with DCLG, this policy currently is worded to be in line with national policy. However it is clear that residential development should not have performance targets attached, and because the communities standards may include residential development it was required to remove this requirement for the policy.
MM21	Para 3.17	17	Insert " <u>water supply and</u> " before "wastewater infrastructure" in first sentence.	Clarification in response to comments from Thames Water
MM22	Policy SD8	18	<p>Add text after "flood risk zones 2 and 3" at end of 3<sup>rd</sup> para:  <u>A sequential approach to site design will be required.</u></p> <p><u>Development should be directed away from flood risk zone 3b (land where water flows or is stored in times of flood). The only type of development which may be</u></p>	Clarification requested by Environment Agency

			<u>acceptable would be water compatible development or essential infrastructure, subject to the Exception test.</u>	
MM23	Policy SD8	19	Amend the last para before the heading “Drainage and Surface Water”: Floor levels in flood zones 2 and 3a should be designed <u>in accordance with the guidance “ Flood Risk Assessments: Climate Change Allowances” updated 12 April 2016. This can be found on Gov.uk. to be above the 1 in 100 years predicted maximum flood levels, plus a minimum freeboard of 300,,. Taking account of climate change. The allowances to be made for climate change should follow the latest Environment agency guidance ( currently Climate Change Allowance for Planners 2016).</u>	Clarification requested by Environment Agency
MM24	Policy SD8	19	Insert “ <u>as part of development proposals</u> ” after “infrastructure provider” in 4 <sup>th</sup> bullet under “Drainage and surface water”	Clarification requested by Environment Agency
MM25	Table following Policy SD8	20	NPPF: Paras 100 -104 on flood risk, Para 99 on climate change adaptation. <del>A Practice Guide Companion to PPS25.</del>	Correction to remove reference to obsolete PPS.
MM26	Policy SD9	22	Insert “ <u>or will be provided in time to serve the development</u> ” after ““water supply is available...”	Clarification in response to comments from Thames Water
MM27	Para 3.30	24	The Waste <u>Local Plan Core Strategy and Development Management Policies Document</u> , produced by Hertfordshire County Council defines the Waste Hierarchy for Hertfordshire to minimise the amount of waste disposed of in landfill as prevention-preparing for Re-Use – Recycling – Other Recovery – Disposal. <u>Information from WRAP about the benefits of a circular economy in reducing waste is detailed in the diagram overleaf.</u>	HCC requested that this clarification is made
MM28	Figure re the circular economy after para 3.30	25	<ul style="list-style-type: none"> <li>• Drive <del>r</del> greater resource productivity</li> </ul>	To correct a typo
MM29	Para 3.61	35	Proposals including significant external lighting will require a Lighting Impact Assessment prepared by a lighting specialist and <u>should adhere to the guidance</u>	Addition requested by HCC



			provided by the Institute of Lighting Engineers. Conditions may be used to mitigate any significant impact, for example by limiting the times of use and restricting illumination levels. The replacement or improvement of existing lighting to minimise impact shall also be considered.	
MM30	Policy SD15	36	avoid adverse impact on <del>heritage assets</del> <u>the historic environment</u> .	Historic England asked for all references to “heritage assets” to be changed to the “historic environment”
<b>TOWN AND LOCAL CENTRES/RETAIL</b>				
MM31	Policy TLC3	41	The Council will normally seek to achieve at least 60% of the shop units <del>on a street</del> within the primary area in retail use (i.e. Use Class A1).	Clarification
MM32	Policy TLC4	41	Within Intu Watford (the former Harlequin and Charter Place) Shopping Centre (including units with direct access to <u>the</u> High Street and Queens Road – <u>excluding those units designated as secondary frontage</u> – as defined on the policies map) planning permission will not be granted for uses outside Use Classes A1, A2 or A3.	NLP requested this additional wording to clarify that those units identified as secondary retail frontage are not included within the Intu designation.
MM33	Policy TLC5	41	Within the Secondary Retail Frontages (as identified on the policies map) the Council will permit uses falling within classes A2 and A3 and other uses appropriate for a Town Centre ( <u>as set out in Annex 2 of the NPPF</u> ).	NLP requested that these change to text to make clear that the full range of town centre uses as set out in the NPPF would be acceptable in the secondary frontages.
MM34	Policy TLC9	46	ii) Cultural Area - The Parade and Colosseum/Palace Theatre  This area has an important role to play in creating a diverse family friendly town centre. The area makes an important contribution to the cultural offer of the town and it is important to reinforce this. <u>The area includes a significant part of the Civic Core Conservation and a number of listed (Palace Theatre and Colosseum) and locally listed buildings.</u> Much of this area is designated as secondary retail frontage and policy TLC 5 applies in terms of land use at ground floor which allows the growth of service and restaurant /café use in this area. The use of upper floors in this area	Additional wording requested by Historic England

			<p>for office or residential will be encouraged as the occupation of upper floors will make an important contribution to the vitality and vibrancy of the town centre. The Colosseum is functionally part of the cultural offer of the town but is physically separated from the cultural area by the ring road so it is shown as being within the Civic Area. The Palace Theatre is also functionally a key part of the town's cultural offer, but is located within the area where retail is the main activity and is included in this area rather than the cultural area.</p> <p>“vi) Heritage Area St Mary’s and High Street/King Street conservation areas</p> <p>Policies for these conservation areas are set out in the Conservation Areas Management Plan.</p> <p>The primary concern in these areas is the impact of any proposed development on the designated heritage assets. The Council will expect proposals for development in these areas to actively seek to enhance the identified character and appearance of the conservation areas <u>and the setting of the listed buildings and heritage assets within and adjoining them.</u></p>	
<b>HOUSING</b>				
MM35	Policy HS11	67	Amend section title: Older Persons’ <u>and Specialist</u> Housing	To match the policy title and recognise that specialist accommodation is not only for older people – clarification requested by HCC
MM36	Policy HS11	67	in order to provide <del>further older persons’</del> <u>the appropriate type of accommodation</u>	Amended to recognise that specialist accommodation is not only for older people.
MM37	Policy HS12	70	Insert row for MXD3: <u>A proportion as part of a mixed use development and subject to provisions set out in Appendix I.</u>	The developer of this site was concerned that the ‘0’ figure in the table precluded housing

				on the Gasholder site. This is not the intention of the council, which identifies this as a mixed use site. The site constraints affect housing capacity on site which will need to be determined in conjunction with the Environment Agency as any scheme is prepared.
MM38	Para 5.24	72	Add to the end of para 5.24:  <u>Core Strategy Policy HS4 provides that sites will be identified to accommodate 20 additional pitches by 2021 – site GT1 below provides for this. The suitability of windfall sites to contribute to provision beyond this will be assessed against the criteria in Policy HS4.</u>	Wording agreed with National Federation of Gypsy Liaison Groups
<b>EMPLOYMENT</b>				
MM39	Policy EMP3	75	E3 Fishers <u>Wiggenhall Industrial Areas</u>	Change of name requested by Watford BC Property Team
MM40	Paras 6.18 – 6.23 and Policy EMP6	79	In recent years the UK film and TV industry has created successful British films and television shows, maximising its value in employment terms and underpinning its position in a highly competitive international environment by stimulating further private investment in world-class infrastructure. The importance of the UK creative industries to the economy is reflected in government ambitions to make Britain one of the world's leading audio-visual economies, sustaining high quality jobs and driving international exports. Warner Bros. Studios Leavesden is an integral part of the UK <del>film industry</del> <u>creative sector</u> , representing one of the largest studio spaces in the UK <u>and</u> attracting inward investment of national significance to the UK film <u>and</u> <u>TV</u> industry.  The Studios, and the wider UK film <u>and</u> <u>TV</u> industry, play an important role in promoting the UK overseas, <del>particularly as a result of investments such as the Harry Potter Studio Tour</del> and are therefore important to the continuing growth of the UK's	Wording clarification requested by Warner Bros

		<p>tourism economy and international profile of the UK. The spill over effects of the <u>film creative industries</u> are significant, particularly as a result of investments such as <u>the Harry Potter Studio Tour which increases tourism spend and contributes substantially to the local and national economies.</u></p> <p>The film <u>and TV</u> industry is also important in terms of job creation, with employment in <u>the film</u> <del>this</del> sector outpacing almost all other sectors in the economy. The Studios provide direct and indirect employment across the Borough, <u>and the Studio Tour focuses</u> <del>focusing</del> on employing local people wherever possible and investing in skills and training.</p> <p>The economic contribution of Warner Bros. is of significance to the UK <u>film creative industries</u> and to the continuing growth of the local economy. The Island Site is a key component in the future development of the Studios <u>and the wider sector</u>, further supporting its contribution to the UK film industry.</p> <p><b>Why is this policy needed?</b></p> <p>The Island site straddles the administrative boundary between Watford Borough and Three Rivers District. The Three Rivers Site Allocations document was adopted in November 2014 and includes a policy for the part of the Island Site, which falls within Three Rivers District. <u>The site has been allocated by Three Rivers to support the Studios.</u> It makes sense for a similar policy to apply to the remainder of the site, within Watford's boundary, to ensure a consistent approach. This site is required for the future expansion <u>and redevelopment of the nationally significant Leavesden Studios which, together with those other businesses that support the creative industries sector.</u> <u>Jointly</u> with its popular Harry Potter attraction (<u>Warner Bros. Studio Tour London - The Making of Harry Potter™</u>), <u>the site is considered to be</u> <del>is</del> of national economic benefit as well as <u>bringing employment benefits to the area, and the Island Site will play an important role in furthering these benefits.</u></p> <p><b>What is it intended to do?</b></p>	
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			<p>This policy provides for the future expansion of Leavesden Studios, <u>acknowledges the contribution that the creative industries make to the Hertfordshire film and TV cluster</u> and ensures a consistent approach for the site with Three Rivers. The site will be removed from the Green Belt on adoption of this Plan. <u>This will be undertaken in order not to compromise the ability of Leavesden Studios and the Hertfordshire film and TV cluster to contribute to the national and regional economy, both as a local employment site and as a centre of economic growth for the District.</u></p> <p><b>Policy EMP6</b> <b>Leavesden Studios Operations – The Island Site</b></p> <p>Development of the Island Site should be <del>connected to the operation of Leavesden Studios</del> <u>for purposes ancillary to the use of the main Studio site for film and TV productions.</u></p> <p>The design of any development should take into account the site’s proximity to, and protect the visual amenity of, the Green Belt. Appropriate landscaping should be provided.</p>	
<b>TRANSPORT</b>				
MM41	Policy T6	82	<p>All development should provide an appropriate level of parking in line with the parking guidance set out in Appendix G based upon the proposed size, use and the accessibility of the site. Accessibility Zones for the borough (as shown in the appendix) have been defined with regard to accessibility to railway stations and bus routes, with a minimum frequency of services that provide an alternative means of travel to the private car. Flexibility on the recommended <u>guidance</u> standards will be considered positively for ‘car lite’ developments in close proximity to major transport infrastructure where secure cycle storage is provided.</p>	<p>Comments were received which requested that it be made clear that the parking requirement are ‘guidance’.</p>
<b>URBAN DESIGN AND THE HISTORIC ENVIRONMENT</b>				
MM42	Policy UD4	92	<p><b>Policy UD 4</b></p> <p><u>The Council will conserve the significance (including character and setting) of the borough’s heritage assets</u></p>	<p>Changes for clarity and consistency with NPPF – agreed with Historic England</p>

		<p><b>The Historic Environment</b></p> <p><b>Listed Buildings (Nationally Listed Buildings)</b></p> <p>The Council will preserve the character and setting of the borough's listed buildings and will support applications where:</p> <ul style="list-style-type: none"> <li>• <del>development the extension/alteration of a listed building</del> would not adversely affect <del>the</del> its character as a building of special architectural or historic interest, both internally and externally, or adversely affect its wider setting;</li> <li>• any change of use would preserve its character as a building of special architectural or historic interest and ensure its continued use/viability.</li> </ul> <p><del>Applications involving the demolition of a listed building will only be granted in wholly exceptional circumstances.</del></p> <p><b>Setting of a Listed Building</b></p> <p>Where development proposals lead to harm to, or loss of significance of, a listed building <del>(including due to an impact on its setting), applications for such development will only be granted in wholly exceptional circumstances where this harm or loss can</del> would be weighed against the public benefits of the proposal.</p> <p><b>Conservation Areas</b></p> <p>Within conservation areas development will be supported where it:</p> <ul style="list-style-type: none"> <li>• is of a design and scale that preserves or enhances the character and appearance of the area;</li> <li>• uses building materials, finishes, including those for features such as walls, railings, gates and hard surfacing, that <del>are appropriate to the local context</del> preserve or enhance the character of the conservation area;</li> <li>• retains historically significant boundaries, important open spaces and other elements of the area's established pattern of development, character and historic value, including gardens, roadside banks and verges;</li> </ul>	
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			<ul style="list-style-type: none"> <li>retains and restores, where relevant, traditional features such as shop fronts, walls, railings, paved surfaces and street furniture, and improves the condition of structures worthy of retention;</li> <li>does not harm important views into, out of, or within the Conservation Area;</li> <li>protects trees, hedgerows and other significant landscape features and incorporates landscaping appropriate to the character and appearance of the Conservation Area;</li> <li>Results, where relevant, in the removal of unsympathetic features and the restoration or reinstatement of missing features.</li> </ul> <p><b>Demolition in Conservation Areas</b></p> <p>Within conservation areas, permission for development involving demolition or substantial demolition will not be granted unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>the structure to be demolished makes no significant contribution to the special character or appearance of the area;</li> <li><del>it can be demonstrated that the structure is wholly beyond repair or incapable of beneficial use;</del></li> <li>it can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would enhance the conservation area.</li> </ul> <p>Permission will not be granted for development outside of <del>but</del> near to a conservation area which adversely affects the setting, character, appearance of or views in to and out of that conservation area.</p>	
MM43	Paragraph 9.10	96	<p>9.10 This policy will require that all new housing development complies with the guidance in the Watford Residential Design Guide and in particular that it complies with the nationally described space standard which is presented in a revision to the Residential Design Guide. <u>In certain circumstances the Nationally Described Space</u></p>	Changes are agreed with St William.

			<p>Standard may be applied with some flexibility. These circumstances are where :</p> <ul style="list-style-type: none"> <li>• <u>The internal space guidelines are exceeded for nearly all the proposed units in a scheme; and/or</u></li> <li>• <u>The building being converted is a constrained heritage asset and the design accords with objectives of Policy UD1: Delivering High Quality Design</u></li> </ul>	
<b>GREEN INFRASTRUCTURE</b>				
MM44	Paras 10.1	98	Green Infrastructure refers to a network of multifunctional green space, both new and existing, rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities. It provides landscape, wildlife, recreation, sport, <u>local food production, ecosystems services</u> and cultural experiences and can play a key role in adapting to and mitigating <u>the effects of climate change.</u>	HCC requested that these insertions are made
MM45	Paras 10.3	98	The policy is needed to ensure the adequate protection of the trees, woodlands and hedgerows within the borough. Watford is essentially an urban area but does contain significant and high quality areas of green infrastructure which contain trees, woodland and hedgerows. In addition, the borough contains many trees in gardens and on streets, all of which play an important role for <u>amenity and</u> human and animal welfare by providing breathing space within the urban area and valuable habitats <u>which includes ecological networks and green corridors.</u>	Clarification requested by HCC
MM46	Paras 10.6	99	<u>The loss of trees due to development does result in impacts on biodiversity and the loss of amenity value in the short term.</u> Where redevelopment of a site involves the loss of trees the developer will be expected to replace those trees with new ones and where there are significant losses replacement will be at a level of two new trees for every one lost.	Clarification requested by HCC
MM47	Paras 10.11	101	The policy is intended to ensure that all development adjacent to the canal respects its character, setting, ecological and heritage value as well as having regard to improving and enhancing views along and from the canal. Development including environmental improvements to the canal's appearance will need to include enhancement of its historic <u>and biodiversity</u> value and should include <u>measures to improve biodiversity value along the canal corridor.</u> Adverse impacts on biodiversity	Clarification requested by HCC



			will be resisted unless suitable mitigation or compensation is demonstrated.	
MM48	Policy GI7		<p>Development affecting <del>within/adjacent or close to</del> a nearby river or watercourse will be expected to conserve and enhance the biodiversity, landscape and <u>amenity recreational</u> value of the river or watercourse and its corridor through good design, and to have regard to historic interest. Improvements to the water environment and water ecology should be made <u>to contribute to the achievement of the Water Framework Directive</u>, including restoration and enhancement of marginal, bankside and floodplain habitat where appropriate as well as in stream, aquatic habitats <u>or other mitigation measures in consultation with the Environment Agency</u>. The siting of lighting will need to be carefully considered in order to ensure that there are no adverse impacts on biodiversity. <del>Where on-site improvements are impossible</del> <u>In exceptional circumstances where onsite improvements are clearly not possible, this must be fully demonstrated and agreed to the satisfaction of the council. In this circumstance,</u> financial or land contributions towards the restoration of rivers or watercourses and improvements to their health and resilience will be required.</p> <p>Applicants should demonstrate that they have taken account of the Thames River Basin Management Plan, the Colne Catchment Management Plan and any other relevant river management and restoration plans.</p> <p>Opportunities for deculverting should be taken wherever possible and new culverts will not be permitted.</p> <p>Development close to <del>T</del>the <u>River Colne</u>, The Gade or The Waterfields Way Ditch (defined by DEFRA as main rivers) should be set back by at least 8m from the top of the bank, <u>which is defined as the point at which the bank meets the level of the surrounding land</u>. Development should be set back at least 5m from the top of the bank of any other watercourse or pond to ensure acceptable flood flow routes are maintained, to allow access and to provide a corridor for <del>wildlife</del> and biodiversity. In terms of setting, large buildings should not be closer to the river than their height.</p> <p>The removal of redundant structures (as identified by the Thames Basin <u>Management Plan</u>) within water channels is <del>encouraged</del> <u>required except</u> where they</p>	Wording changes requested by the Environment Agency and HCC and for clarification

			<p>are not of <u>particular</u> historic interest. Replacement structures are discouraged and if required must ensure they allow adequate fish passage.</p> <p>Wherever appropriate, public access to the river or watercourse should be maintained or provided. This access should be designed to allow access for all users in a way which respects ecological value.</p>	
MM49	Table	105	<p>Add to the Other Local Policies line:</p> <p><u>Watford and Herts Wide Green Infrastructure Plan:</u></p>	HCC asked that this document is included in the section.
MM50	Table	105	<u>These this policy policies supports/delivers</u>	The same table is relevant to both GI6 and GI7.
MM51	Paras 10.36	109	The Council will also seek contributions towards the enhancement of either existing natural green spaces and/or to increase the biodiversity of other existing green space typologies such as parks and gardens, <u>allotments, community orchards</u> , sports pitch sites and other local amenity green space.	HCC has that the definition of green infrastructure be expanded to include these features
MM52	Paras 10.37	110	Add heading: <u>Why is this policy needed?</u>	For consistency - HCC identified that these headings were missing
MM53	Para 10.38	110	Add heading: <u>What is it intended to do?</u>	For consistency - HCC identified that these headings were missing
MM54	Paras 10.37	110	<p>10.37 National Policy places importance on minimising the impacts of development on biodiversity and seeks a net gain where possible (NPPF paras 109, 117 and 118). <u>The Wildlife and Countryside Act 1981 and subsequent amendments consolidate national legislation to implement the Convention of Europe Wildlife and Natural Habitats Directives. In addition, the Natural Environment and Rural Communities Act 2006 (England and Wales), identifies the duty on Local Authorities to have regarding to biodiversity.</u></p> <p>The Core Strategy policy GI3 sets out the key areas within Watford which have the highest biodiversity value and seeks to protect and enhance these areas. <u>In line with the aims of the Local Nature Partnership (LNP)</u>, the Council also places significant</p>	Clarification requested by HCC

			importance on the Hertfordshire Green Infrastructure Plan and Biodiversity <u>Action Plan Principles</u> and the data in the Hertfordshire Environment Records Centre as a primary evidence source.	
MM55	Paras 10.39	110	10.39 This policy <u>expects that where appropriate , development proposals will demonstrate the relative ecological value of a site before and after development. Proposals should follow the mitigation hierarchy and provide clear evidence of impacts and enhancements where appropriate, consistent with the aims of the NPPF 2012, sets out the methods which the Council will use to assess the ecological value of a particular site before and after development.</u> The policy requires the use of a nationally accepted method which follows BS42020 “Biodiversity – Code of Practice for Planning and Development” and guidance provided by CIEEM. <u>This will require sufficient detail and clarity to enable net losses and gains to be identified and monitored consistent with the Code. Where unavoidable, biodiversity offsetting should be considered as a means to ensure there is no net loss of biodiversity resulting from the development. To comply with code requirements an objective method for assessment should be used. This can be the DEFRA, Natural England, The Environment Bank and Warwickshire County Council – the Biodiversity Impact Assessment Calculator or other similar tool e.g. (CIEEM)</u>	HCC Ecology and HMWT asked for rewording.
MM56	Policy GI10	111	New development will be permitted provided that it meets the requirements of Policy GI3 of the Core Strategy and avoids negative impacts on <del>the natural environment including impacts on protected species, designated local wildlife sites, Sites of Special Scientific Interest (SSSI) and green infrastructure/ecological networks outside but near the borough boundary.</del> The mitigation hierarchy will be followed and effective mitigation should be used to reduce the likelihood of harm arising. Compensation will only be considered as a last resort <u>if avoidance and mitigation measures are not possible. Where compensatory measures are needed to address impacts on land which is not designated a SSSI but is considered to be of significant biodiversity value (this includes designated local wildlife sites, known protected species and local ecological networks).</u> The use of established best practice will be expected to evaluate the <del>threats-impacts</del> and opportunities provided by all development proposals. <u>Ecological information should be presented in accordance</u>	HCC Ecology, HMWT and Natural England all requested minor wording changes. The wording changes sought to satisfy all consultees and the final wording was agreed with NE.

			<del>with Any tools used to present the assessment should follow BS42020 “Biodiversity – Code of Practice for Planning and Development” or other measures of best practice, including Biodiversity offsetting where necessary.</del>	
MM57	Para 10.40	111	<del>Protected and priority species represent a material consideration in planning decisions. Where there is a reasonable likelihood of these species being negatively impacted by development, an appropriate survey will be required which demonstrates that adverse impacts will be avoided, mitigated or as a last resort compensated. Any offsetting or gain identified by an assessment of a development, and the mitigation, if required, should be clearly demonstrated. Through the use of the calculator referred to in the policy it will be clear whether there is a net loss or gain to biodiversity value after a development proposal has been implemented; scores which show a positive value at the end of process will show a net gain to the habitat and those which show a negative value will show a net loss to the habitat.</del>	Reference to the calculator had been removed from the policy before Publication in response to concern from HCC but a reference to it remained in the supporting text in error. Change is for clarity and consistency.
<b>TALLER BUILDINGS</b>				
MM58	Policy TB1	116	The majority of Watford is characterised by low level residential and other forms of development where taller buildings would generally be considered inappropriate. All development needs to be designed in order to respect, reinforce and enhance the local character, <u>including historic character</u> , of the area in which it is located and to contribute to Watford’s <u>distinctive</u> sense of place and identity as referred to in Policy UD1 of the Core Strategy.	Change requested by Historic England
MM59	Policy TB2	118	<del>4.</del> Public realm, open space and amenity	Correction – number had been omitted.
MM60	Policy TB2	118	8. The design should detail a transport strategy for the proposed development to include how cycle <u>parking</u> , car parking, <u>cycle permeability</u> and pedestrian permeability have been integrated into the <u>proposals overall design</u> ....	Clarification requested by HCC
MM61	Appendix G		Dimensions:  All parking spaces must have minimum dimensions of 2.4m wide by 4.8m long with a minimum <u>distance of area</u> 6m deep in front of the space to allow for manoeuvring in	Clarification required and HCC requested that the dimensions of garages and parallel parking spaces be clarified.

			and out of the space. For parallel spaces minimum dimensions should be 6.0m by 2.4m with a minimum distance of 4.5m for manoeuvring in and out. All external and integral garages must have minimum internal dimensions of 3m wide by 6m 5.5m long (per vehicle) with a minimum of area 7m deep in front of the garage to allow for manoeuvring in and out of the garage. Any spaces or garages that do not meet these minimum dimensions will not be considered as parking accommodation for the purposes of Policy T6.	
<b>APPENDIX I</b>				
MM62	Appendix I		The following site allocations schedules provide further information on each site. It identifies <del>provides</del> a list of some of the key constraints and development considerations, which should be used to inform how the site should be progressed. Applications for each site will need to fully account for these considerations when preparing any application or development brief. The considerations were developed at allocation stage and are not exhaustive but serve <u>only</u> as a guide. It is likely that further development considerations will be identified at application stage. Please note that the maps and illustrations in this appendix are for illustrative purposes only. Please refer to the Policies Map which accompanies the Local Plan Part 2: Site Allocations and Development Management Policies.	The council were concerned that the development considerations were been taken as the full list of what needs to be considered for application. Naturally, this is not possible at site allocation stage, but rather at application stage where full site visits are undertaken by an application to identify the required information.
MM63	SPA1		<del>Heritage assets</del> The historic environment (conservation areas, listed buildings including Little Cassiobury and locally listed buildings) in the town centre needs to be carefully considered as part of any proposals.	HE requested that Historic Environment term be used and that reference to Little Cassiobury is made here.
MM64	SPA2		Design and development <del>along the boundaries</del> will need to be sympathetic to the <u>significance and setting of the adjacent following heritage assets:</u> Nascot Conservation Area, Grade II listed Benskins House (The Flag Public House), Reeds Crescent <u>and other heritage assets within the area including the Old Station House.</u>	Clarification requested by Historic England
MM65	SPA 2		Development proposals will need to be in line with the emerging Watford Junction <del>Masterplan</del> <u>Development Brief</u> and the SPA objectives requirements of Policy SPA2 in	Clarification changes requested by London Concrete

			<p>the Core Strategy.</p> <p><u>The Orphanage Road rail and The waste– aggregates depot and associated facilities (concrete batching plant) within the SPA is safeguarded as identified in Policy SPA2 and Hertfordshire County Council's Minerals Plan. This will need to be retained, or a comparable facility provided within the local area. on site, which will also be subject to safeguarding, or a new comparable facility provided in the local area. Any new development in the vicinity of the safeguarded area should not prejudice the existing or future use of the safeguarded site and operations.</u></p>	
MM66	SPA3		<p>Consideration will need to be given to <u>the preservation and enhancement of the setting of the Square Conservation Area</u> and an archaeological investigation may be required for sites within the SPA</p>	HE requested that this change is included
MM67	SPA3		<p>The Lairage Land Local Nature Reserve will be protected from development <u>and a phase 1 habitat survey may be required.</u></p>	HCC provided further information regarding ecology and it was felt the inclusion of this wording to cater for any ecological constraints on or around this site would be helpful.
MM68	SPA 3		<p>Development will focus on the new health campus proposals and the provision of high quality housing (<u>next to the Vicarage Road Station</u>) in this SPA to be consistent with the SPA objectives in the Core Strategy</p>	TFL requested that reference is made to the new station in this area.
MM69	SPA4		<p>Flood risk assessments will be required for specific development areas i.e. the gas holder site and the surrounding area, as detailed in the SFRA Level 2 Study <u>this may include sustainable drainage approaches and green infrastructure to mitigate against flood risk.</u></p>	This clarification is to satisfy the authorities responsible for flood risk
MM70	SPA4		<p>Design and development will needs to <u>be sympathetic to the significance and setting of the cluster of Grade II listed buildings on Lower High Street</u> while <u>an appropriate scheme of repair and reuse for Grade II* listed Frogmore House will be given</u></p>	HE requested that this addition is made

			<del>significant weight include measures to secure the future of Frogmore House [Nationally Listed] and protect the setting of locally listed Frogmore Cottages</del>	
MM71	SPA5		Robust pedestrian and cycle linkages are expected to form part of new developments, including linkages with North Watford and <u>Watford Junction Train Stations</u>	HCC requested that this addition is made. " Train" deleted as unnecessary .
MM72	SPA 6		Robust pedestrian and cycle linkages are expected to form part of new development in this location, including the retention of the established cycle route through Croxley View <u>which needs to connect to the new Cassiobridge Station</u>	HCC requested that this addition is made
MM73	MXD1		Initial preliminary <del>risk assessment site investigation</del> required to identify any contaminated land <u>and archaeological assessment</u>	HCC and the EA requested these two changes to be included.
MM74	MXD3		<del>Design and development will needs to be sympathetic to the significance and setting of the cluster of Grade II listed buildings on Lower High Street while an appropriate scheme of repair and reuse for Grade II* listed Frogmore House will be given significant weight include measures to secure the future of Frogmore House [Nationally Listed] and protect the setting of locally listed Frogmore Cottages</del>	HE requested that this change be included
MM75	MXD4		<u>A Preliminary Risk Assessment will be required</u>	EA identified that a Preliminary Risk Assessment will be required.
MM76	R2		Clear pedestrian <u>and cycle</u> connections between the High Street and the site should be provided	HCC requested that this information be included

MM77	R2		<u>Design and development will need to be sympathetic to the significance and setting of adjacent heritage assets. 11-33 The Parade are locally listed buildings and will need to be considered as part of new proposals, as well as the adjacent while proposals should preserve and enhance the setting of the adjacent Civic Core Conservation Area</u>	HE requested that this wording change be included to adequately reflect heritage assets
MM78	R3		Robust pedestrian <u>and cycle</u> links with the town centre are expected to form part of new development in this location	HCC requested that reference be made to cycle links in this site
MM79	R3		<del>There are listed buildings along the High Street Elevation at</del> <u>Design and development will need to be sympathetic to the significance and setting of the adjacent heritage assets including 14-16 The Parade and 58 High Street the latter of which need is expected to be retained in any redevelopment proposals</u>	HE requested that this wording change is included
MM80	R4		<del>Design and Development will need to be sympathetic to the significance and The setting of Grade 1 listed building of St. Marys Church and Grade II* listed nationally listed buildings (Church (grade I), the almshouses and the Elizabeth Fuller Free School (grade II)) while proposals should enhance and preserve the and a designated conservation area} and surroundings need to be protected as part of any redevelopment</del>	HE requested that this wording change be included
MM81	R5		<u>Design and development will need to be sympathetic to the significance and setting of adjacent heritage assets including the Grade II listed building The protection of 63 -65 High Street which is expected to be retained is a nationally listed building [Grade II] is required particularly the frontage elevation.</u>	HE requested that this wording change be included
MM82	H1		Sufficient car <u>and cycle</u> parking for the train station and <u>the site</u> will need to be re-provided.	HCC requested that cycle links be included for this site



MM83	H1		Design and development will need to be sympathetic to the significance and setting of the adjacent should not impact on the nearby nationally <u>Grade II</u> listed buildings at Bushey Arches <u>railway viaduct</u> and the Oxhey Conservation Are	HE requested that this be included
MM84	H2		Greater pedestrian and cycle connectivity with the High Street and the nearby <u>stations</u> is required as well as public realm improvements	HCC requested that cycle links be included in this line
MM85	H2		Preliminary archaeological assessment and preliminary risk assessment required for this site	EA requested that a Preliminary risk assessment be included in this site
MM86	H2		A replacement skate park, of at least equivalent size and quality, should be provided in an accessible location ahead of this site being developed. The Sports Facilities Strategy includes a site for an improved replacement at Oxhey Park North. The skate park will need to be re-provided as part of this scheme to a location that is accessible and close to existing transport nodes	Wording agreed with Sport England to address their concern – to make it clear that development would not take place without a replacement skate park being provided.
MM87	H3		Design and development will need to be sympathetic to the significance and setting of the adjacent should not impact on the adjacent Watford Printers Building, the Red Lion Public House (locally listed buildings) and the Square Conservation Area. The materials and the setting should complement these adjacent historical assets	HE requested that this addition be included to adequately account for the historic environment
MM88	H3		Initial preliminary risk assessment <del>site investigation</del> and archaeological assessment required to identify any contaminated land	HCC and the EA requested these two changes to be included.
MM89	H4		Initial preliminary risk assessment <del>site investigation</del> required to identify any	HCC and the EA requested these two changes to be

			contaminated land <u>and archaeological assessment</u>	included.
MM90	H5		Careful design is required to provide suitable road access <del>secure cycle storage</del> and pedestrian <u>and cycle connectivity</u> to the surrounding area	HCC requested that cycle links are included in this plan
MM91	H6		Phase 1 Habitat survey to identify any ecological interest <u>to include bat roost potential in buildings.</u>	HCC identified further information regarding ecology and it was felt the inclusion of this wording to cater for any ecological constraints on or around this site.
MM92	H7		Design <u>and development will need to be sympathetic to the significance and setting of the adjacent</u> <del>should seek to complement</del> locally listed buildings [195-199 Rickmansworth Road] <del>adjacent to the site</del>	HE requested this further information
MM93	H9		<u>Design and Development will need to be sympathetic to the significance and setting</u> <del>The setting and protection of the Grade II station building [nationally listed] is required, with</del> <u>where</u> a potential complementary non-residential use <u>may be possible.</u>	HE requested this further information
MM94	H9		Phase 1 Habitat Survey <del>for any of the older buildings on station land to identify any</del> <u>ecological interest such as bats or reptiles</u> <del>bat roost potential/ ecological interest.</del>	HCC identified further information regarding ecology and it was felt the inclusion of this wording to cater for any ecological constraints on or around this site.
MM95	E2		<u>An ecological survey may be required to identify any bat roost potential in some of the older buildings on site</u>	HCC identified further information regarding ecology and it was felt that the

				inclusion of this wording would cater for ecological constraints on site.
MM96	E4		<u>Design and development will need to be sympathetic to the significance and setting of the adjacent locally listed buildings in the proximity of the Paramount Industrial Estate and the Former Odhams Press Hall (locally listed buildings) will need to be designed to protect the integrity of these heritage assets.</u>	HE requested this further information
MM97	E5		Taller buildings will be considered in particular locations in this designation, however how these relate to the surrounding low rise residential areas will require a sensitive design approach [Skyline Taller Buildings SPD] and <u>public realm improvements</u>	HCC requested that public realm improvements be mentioned
MM98	E5		<u>Design and development in this location will need to be sympathetic to the significance and setting of the Grade II Benskins House (The Flag Public House) and it should be demonstrated a design that any proposals has no adverse effect on preserve and enhance conservation areas and the cluster of locally listed and nationally buildings on Clarendon Road as well as the Flag Pub which is a Nationally Listed Building</u>	HE requested some additions, and some of this has been included. However, the development considerations are not exhaustive and are a short guide for applicants bringing forward a site.
<b>Appendices K and L</b>				
MM99			Replace these with the new combined monitoring framework( attached at the end of this table)*	To provide a single monitoring framework for the Local Plan.
<b>Appendix M</b>				
MM100			Appendix L M: Replaced Watford District <u>Plan</u> 2000 Policies	To correct title – missing word, and to renumber due to the change above.
<b>PROPOSED POLICIES MAP</b>				
MM101			Remove green infrastructure hatching from 2 areas of land in Hertsmere included in error (Paddock Road Allotments and Stephenson Way)	This is in order to remove a discrepancy whereby land was hatched outside the borough boundary
MM102			Remove the local and neighbourhood centre hatching from Market Street [numbers	Map correction required

			33-97 and numbers 28-74] and Queens Broadway [all of the Broadway]	
MM103			Correct A3 Hub and Primary Retail Frontage designation	Map correction required to reflect the policy
MM104			Show the safeguarded area on the map of the aggregates depot.	London Concrete requested that the extent of the aggregates depot be shown on the map.

**\* Local Plan Part 2: Monitoring Framework**

<b>Local Plan Part 2: Chapter/Policy</b>	<b>Local Plan Part 2: Proposed Indicator</b>	<b>Existing complementary Core Strategy Indicator</b>	<b>Monitoring Mechanism</b>	<b>Target, if applicable</b>
<b>Chapter 2. Special Policy Areas and Mixed Use Allocations</b>				
<b>Policy SPMX 1: Special Policy Areas</b>		<b>Net additional dwellings by</b> <ul style="list-style-type: none"> <li>• local authority area</li> <li>• SPA1 Town centre</li> <li>• SPA2 Watford Junction</li> <li>• SPA3 Health Campus</li> <li>• SPA6 Western Gateway</li> </ul> <b>Total amount of additional</b>	Reported annually through the AMR	SPA1 Town centre – development will be monitored as a proportion of net additional dwellings by LA  SPA2 Watford Junction – progress on 1500 homes reviewed annually  SPA3 Health Campus– progress on 500 homes reviewed annually



Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
				<p>delivered within the following areas:</p> <p>SPA1 Town Centre - 3,300 to 4,200 jobs within the wider town centre area (as shown in Figure 6)</p> <p>SPA2 Watford Junction – 1,350 to 2,350 jobs</p> <p>SPA3 Health Campus – 1,000 to 1,900 jobs</p> <p>SPA6 Western Gateway – 700 to 2,000 jobs in Watford Business Park and 150 retail jobs at Ascot Road</p> <p>(Allocated employment areas outside of the SPAs - 500 jobs are expected to be delivered through the reoccupation or redevelopment of vacant space)</p>
<b>Policy SPMX 2: Mixed Use</b>	<b>Housing allocations within mixed use allocations will</b>		Reported annually through the AMR	Development will be monitored

<b>Local Plan Part 2: Chapter/Policy</b>	<b>Local Plan Part 2: Proposed Indicator</b>	<b>Existing complementary Core Strategy Indicator</b>	<b>Monitoring Mechanism</b>	<b>Target, if applicable</b>
<b>Allocations Policy</b>	<b>be monitored for capacity and phasing.</b>			
<b>Chapter 3. Sustainable Development</b>				
<b>Policy SD 5: Sustainable Design Requirements</b>		<b>Building for Life Assessments - on sites of 10 or more housing units</b>	Reported annually through the AMR	Trend of scores of increasing quality desired
<b>Policy SD 6: Renewable Energy Technology</b>  <b>Policy SD 7: Decentralised Energy</b>		<b>Renewable Energy Generation - by installed capacity and type</b>	Reported annually through the AMR	Increasing trend
<b>Policy SD 8: Managing Flood Risk and the Water Environment</b>		<b>Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds</b>	Reported annually through the AMR	No planning permissions granted contrary to Environment Agency advice - any objections received from the Environment Agency to be subsequently withdrawn following fulfilment of recommendations
<b>Policy SD 9: Water consumption</b>		<b>Average water consumption</b>	Reported annually through the AMR	Reducing trend
<b>Policy SD 10: Waste</b>	<b>Percentage of waste reused, recycled or composted</b>		Reported annually through the AMR	50% by 2020 or as amended by Waste Strategy
<b>Policy SD 13: Air Quality</b>		<b>Air Quality and Air Management Areas</b>	Reported annually through the AMR	Improvement in quality

<b>Local Plan Part 2: Chapter/Policy</b>	<b>Local Plan Part 2: Proposed Indicator</b>	<b>Existing complementary Core Strategy Indicator</b>	<b>Monitoring Mechanism</b>	<b>Target, if applicable</b>
		<b>Per capita CO2 emissions in LA</b>	Reported annually through the AMR	Reducing trend
<b>Policy SD 14: Noise</b>	<b>Noise Complaints received per 1,000 population</b>		Reported annually through the AMR	Decreasing trend
<b>Chapter 4. Town and Local Centres / Retail</b>				
<b>Policy TLC 3: Restriction of Non-Retail Uses in Primary Retail Frontage</b>	<b>% of retail/non-retail use in primary retail frontage</b>		Individual planning applications Annual shopping survey reported through the AMR	A minimum 60% to be A1 (of ground floor shop units)
<b>Policy TLC 4: Restriction of Non-Retail Uses in the Intu Watford (former Harlequin Centre and Charter Place)</b>	<b>% of retail/non-retail use in INTU Watford (former Harlequin Centre and Charter Place)</b>		Individual planning applications Annual shopping survey reported through the AMR	A minimum 90%, to be A1 (excluding the food court)
<b>Policy TLC 5: Restriction of Non-Retail Uses within Secondary Retail Frontage</b>	<b>% of retail/non-retail use in secondary retail frontage</b>		Individual planning applications Annual shopping survey reported through the AMR	No increase in A4/A5
<b>Policy TLC 6: A3 Restaurant Hub Areas</b>	<b>% of A1 retail and A3 restaurants &amp; cafes/ non-retail in A3 hub areas</b>		Individual planning applications Annual shopping survey	Increase in the percentage of A3; no increase in the percentage of A4 and A5



Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
<p><b>Policy TLC 7: Restriction of Betting and Money Shops/ Clusters</b></p>	<p><b>Change in the number of betting and money shops</b></p>	<p><b>Amount of completed retail, office and leisure development</b></p> <ul style="list-style-type: none"> <li>• within town centre</li> <li>• within local authority area</li> </ul> <p><b>Amount of completed retail development in neighbourhood centres</b></p>	<p>reported through the AMR</p> <p>Individual planning applications</p> <p>Annual shopping survey reported through the AMR</p> <p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p>	<p>Development will be monitored</p> <p>Development will be monitored in the town centre as a proportion of development of retail and other town centre uses within the LA, with 20,000 sq m gross retail floorspace expected to be delivered between 2006-2031; 10,000 sq m net retail floorspace expected to be delivered at Charter Place in the town centre by 2020 and net convenience retail sales area not exceeding 2,500 sq m at Ascot Road.</p> <p>Development will be monitored as a proportion</p>

<b>Local Plan Part 2: Chapter/Policy</b>	<b>Local Plan Part 2: Proposed Indicator</b>	<b>Existing complementary Core Strategy Indicator</b>	<b>Monitoring Mechanism</b>	<b>Target, if applicable</b>
				of retail development within the LA
<b>Policy TLC 10: Public Realm Enhancement</b>		<b>Progress update on Planning obligations - monies received and infrastructure provided</b>	The CIL report is published annually and a summary of receipts and expenditure is reported annually through the AMR	Section 106 funded schemes and CIL funded schemes will be monitored against the Infrastructure Delivery Plan, which will be regularly updated every two to three years and the requirements of the Core Strategy
<b>Policy TLC 11: Restriction of Non A1 Use Classes in District and Local Centres</b>	<b>% of retail/non-retail use (at ground floor level) in District and Local Centres</b>		Individual planning applications  Annual shopping survey reported through the AMR	A minimum 50% of total units in each district and local centre, to be A1
<b>Policy TLC 12: Community Facilities</b>		<b>Access to local facilities in neighbourhood centres as per Table 5 of Watford's Local Plan Part 1, Core Strategy</b>	Reported annually through the AMR	Development will be monitored. The Council will use the distances set out in Table 5 as a measure of how sustainable a centre is and will use this measure to assess new proposals for services identified on the table
<b>Policy TLC 13: Community Facilities Site Allocations</b>  <b>Policy TLC 14: Town Centre Retail Site</b>	<b>Development progress will be monitored on allocated sites on a site specific basis</b>		Reported annually through the AMR	Development will be monitored

<b>Local Plan Part 2: Chapter/Policy</b>	<b>Local Plan Part 2: Proposed Indicator</b>	<b>Existing complementary Core Strategy Indicator</b>	<b>Monitoring Mechanism</b>	<b>Target, if applicable</b>
<b>Allocations</b>				
<b>Chapter 5. Housing</b>				
<b>Policy HS 5: Conversion of Houses in Multiple Occupation (HMOs) into Flats</b>	<b>Net additional dwellings as a result of conversions (number of HMOs before conversion and number of dwellings after conversion)</b>		Individual planning applications  Reported annually through the AMR	Development will be monitored
<b>Policy HS 6: Applications for Houses in Multiple Occupation (HMOs), self-contained flats (as block HMOs) or Hostels</b>	<b>Number &amp; % of additional HMOs as a proportion of net additional dwellings</b>		Individual planning applications  Reported annually through the AMR	Development will be monitored
<b>Policy HS 7: Conversions and Subdivision of Family Housing</b>	<b>Net additional dwellings as a result of conversions (number of dwellings before conversion and number of dwellings after conversion)</b>		Individual planning applications  Reported annually through the AMR	Development will be monitored
<b>Policy HS 9: Retention of Affordable Housing</b>		<b>Gross/net affordable housing completions</b>  <b>Gross affordable housing completions as percentage of gross housing completions on qualifying sites</b>	Reported annually through the AMR  Reported annually through the AMR	No net loss of affordable housing units  35% affordable housing will be sought on major applications of 10 residential units and above (or sites of more than 0.5 ha)

Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
		<p><b>Gross affordable housing commitments</b></p> <p><b>Affordable housing mix</b></p>	<p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p>	<p>35% affordable housing will be sought on major applications of 10 residential units and above (or sites of more than 0.5 ha)</p> <p>Target for social rent 20%, affordable rent 65%, intermediate affordable 15%. The council will produce further guidance on the provision of affordable housing in the borough.</p>
<b>Policy HS 10: Garden Development</b>		<b>New and converted dwellings – on previously developed land</b>	Reported annually through the AMR	80% residential development on PDL
<b>Policy HS11: Older Persons’ and Specialist Housing</b>	<b>Additional care homes/bedrooms will be monitored</b>		Reported annually through the AMR	Development will be monitored
<b>Policy HS12: Housing Delivery</b>	<b>Housing allocations will be monitored for capacity and phasing.</b>	<b>Housing trajectory data</b> – plan period and housing targets; net additional dwellings for past, current and future years of	Reported annually through the AMR	A minimum of 6,500 homes 2006-2031, average 260 p.a. Maintaining minimum

Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
		<p>plan period to illustrate the expected rate of housing delivery for both market and affordable housing; the five year housing supply; managed delivery target</p> <p><b>Net additional dwellings by size, market or affordable tenure and type</b></p> <p><b>Housing density</b></p>	<p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p>	<p>105% 5 year housing supply</p> <p>Will be as per the Residential Design Guide &amp; Character of the Area Study</p> <p>Will be as per the Residential Design Guide &amp; Character of the Area Study</p>
<b>Policy GT 1: Gypsy and Traveller Provision</b>		<b>Net additional pitches (Gypsy and Traveller)</b>	Reported annually through the AMR	20 additional Gypsy and Traveller pitches by 2021. No specific target for transit and show people sites - development will be monitored
<b>Chapter 6. Economic Development and Employment</b>				



Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
		<p><b>Total amount of employment floorspace on previously developed land (PDL) – by type</b></p> <p><b>GCSE and Equiv. results</b></p> <p><b>Qualifications of working age pop.</b></p>	<p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p>	<p>90% of employment floorspace completed on PDL</p> <p>Increasing trend</p> <p>Increasing trend</p>
<b>Policy EMP 5: Clarendon Road, Station Road and Bridle Path Office Area</b>	<b>Office floorspace completed (including gains, losses) in the Clarendon Road and Bridle Path office area (proposed Employment Area E5)</b>		<p>Individual planning applications</p> <p>Reported annually through the AMR</p>	Net gain in office floorspace
<b>Chapter 7. Transport</b>				
<p><b>Policy T 6: Car parking provision</b></p> <p><b>Policy T 9: Access and Servicing</b></p>		<p><b>Accessibility – percentage of new residential development within 400 metres public transport time of services/key activities</b></p> <p><b>Amount of completed residential development</b></p>	<p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p>	<p>Development is monitored</p> <p>Development is monitored</p>

Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
		<p><b>within UCOs A,B and D complying with car-parking standards set out in the LDF</b></p> <p><b>Percentage change in total vehicle kilometreage on HCC roads in Watford</b></p> <p><b>Travel mode shares</b></p> <p><b>General update on development progress on major schemes such as the Metropolitan Line Extension (formerly Croxley Rail Link) and Watford Junction</b></p>	<p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p>	<p>Change is monitored</p> <p>Increasing use of cycling, walking, public transport and reduction in travel by car mode desired</p> <p>Progress of development is monitored</p>
<b>Policy T 7: Car clubs and charging points for low emission vehicles</b>	<b>Number of new electric charging points</b>		Reported annually through the AMR	Increasing trend
<b>Policy T 8: Cycle parking provision</b>		<p><b>Cycle route usage – number of trips and % change</b></p> <p><b>Amount of cycle route delivered in Watford</b></p>	<p>Reported annually through the AMR</p> <p>Reported annually through the AMR</p>	<p>Increasing trend</p> <p>Additional cycle route delivered is monitored</p>



Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
<b>Chapter 9. Urban Design and the Historic Environment</b>				
<b>Policy UD 4: The historic environment</b>		<b>Buildings on buildings at risk register</b>  <b>Listed buildings demolished</b>  <b>Conservation character area appraisals completed</b>  <b>Conservation Area Management Plan (adopted 8 July 2013)</b>	Reported annually through the AMR  Reported annually through the AMR  Reported annually through the AMR  Reported annually through the AMR	Decreasing trend desired - National Register updated every 5 years  To be reviewed annually  Appraisals to be updated every five years (original target of 100% of all appraisals achieved by 31/3/2012)  Conservation Area Management Plan to be updated every five years (original target of 'consultation draft document by 2013 achieved')
<b>Policy UD 5: Design policy: Residential Design Guide and optional technical housing standards – Nationally described</b>		<b>Building for Life Assessments – on sites of 10 or more housing units</b>	Reported annually through the AMR	Trend of scores of increasing quality desired

Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
space standard				
<b>Chapter 10. Green Infrastructure</b>				
<b>Policy GI 5: Trees, woodlands and hedgerows</b>  <b>Policy GI 10: Managing biodiversity in new developments</b>		<b>Change in areas of biodiversity importance – to show losses or additions to biodiversity habitat.</b>  <b>In terms of biodiversity any Any method that follows <u>BS42020 “Biodiversity – Code of Practice for Planning and Development” and guidance provided by CIEEM.</u></b>	Reported annually through the AMR	No reduction in number and area desired Development will show net gain or as a minimum no net loss
<b>Policy GI 6: Protecting and enhancing the Grand Union Canal</b>  <b>Policy GI 7: Protection and restoration of river corridors and watercourses</b>	<b>River quality in Hertfordshire – improvement required</b>		Reported annually through the AMR	The Water Framework Directive sets a target for all rivers to have a ‘good’ ecological status or potential by 2027
<b>Policy GI 8: Sports facilities</b>  <b>Policy GI 9: Provision of open space and play space in residential</b>		<b>Change (in hectares) of total open space</b>  <b>Amount of eligible open spaces managed to Green Flag award standard</b>	Reported annually through the AMR  Reported annually through the AMR	No reduction in quantity or quality desired  No reduction desired

Local Plan Part 2: Chapter/Policy	Local Plan Part 2: Proposed Indicator	Existing complementary Core Strategy Indicator	Monitoring Mechanism	Target, if applicable
development				
Policy GI 11: Green belt		Maintain the general extent of the green belt	Reported annually through the AMR	Maintain the general extent of the green belt