

Regulation 22(1)(c) Statement of Watford Borough Council in support of the Final Draft Watford Local Plan 2018-2036

Contents

1 Introduction	4
1.1 Purpose	4
1.2 Background	4
1.2 Structure	4
2. Timeline.....	5
2.1 Key Local Plan Stages Undertaken	5
3. Narrative summary	5
3.1 Regulation 18 Overview	5
3.2 Main Issues from Regulation 19 and 20.....	6
3.2.1 Introduction	6
3.2.2 Core Development Area: Issues and modifications	6
3.2.3 Housing: Issues and modifications.....	7
3.2.4 Viability	8
3.2.5 Employment.....	8
3.2.6 Town and Local Centres	8
3.2.7 Design.....	9
3.2.8 Heritage.....	9
3.2.9 Climate Change	9
3.2.10 Environment.....	9
3.2.11 Transport.....	10
3.2.12 Infrastructure	10
3.2.13 Sites.....	10

3.2.14 Policies Map Changes	11
Outstanding Issues for EIP (In Progress)	11
Conclusion.....	14

1 Introduction

1.1 Purpose

This Consultation Statement sets out how Watford Borough Council has involved residents and key stakeholders in preparing the draft Local Plan 2018 – 2036 in accordance with Regulations 18 and 19 in the Town and Country Planning (Local Planning) (England) Regulations (2012). This statement meets Regulation (1)(c) and demonstrates that consultation on the preparation of the draft Local Plan has been undertaken in accordance with the relevant regulations and the adopted Statement of Community Involvement (SCI) (2020). The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. [The current SCI can be found here.](#)

1.2 Background

This Consultation Statement demonstrates how the Council has used community participation and stakeholder involvement in the production of the new draft Local Plan. It shows how much efforts have shaped the Local Plan and the main issues raised through representation in response to multiple consultations. Watford Borough Council began preparation for a new Local Plan in 2016. This Plan sets out the new strategic vision, objectives, spatial strategy and planning policies to guide future development up until 2036 when the plan period ends. This plan will establish areas for growth, put in place policies and guidance to ensure development is in accordance with National Planning Policy Framework (NPPF) and with other principles set locally. This Local Plan will replace the Core Strategy (2013).

1.2 Structure

The structure of this document is set out in sections.

Section 1: This is an introduction and provides background and purpose for the document.

Section 2: The timetable which demonstrates the Local Plan preparation in accordance with [Watford's Local Development Scheme \(2020\)](#).

Section 3: This section provides detail on the key issues brought up in consultation and how the responses have been considered and incorporated.

There is an additional table of issues which remain outstanding and will be brought to examination. This section is supported by the Appendices which detail the consultation processes, the responses and how comments have been reviewed.

Appendix 1: Explains who was invited to make representations and how. (In accordance with Regulation 22 (1)(c)(i) and (ii)). Summarises the main issues raised (Regulation 22 (1)(c)(iii)) in Plan order and how the issues were addressed (Regulation 22 (1)(c)(iv)).

Appendix 2: Explains how the regulation 19 Local Plan consultation was completed and how many representations were received. It includes a summary of issues (Regulation 22 (1)(c)(v) and a council response to issues raised.

2. Timeline

The timeline set out below indicates the main stages of the Local Plan consultation. This shows early and ongoing engagement with the local community, businesses, organisations and stakeholders to develop a comprehensive Plan specific to Watford's needs. The examination period is expected to run from summer Autumn 2021 to Spring 2022 and adoption is be anticipated for Summer 2022. This plan sets out the strategy for growth and supersedes Core Strategy 2013. It includes changes in national policy and guidance, new evidence and more ambitious targets reflective of current circumstance.

2.1 Key Local Plan Stages Undertaken

- Notification (December 2016)
- Issues and Options Consultation (September – October 2018)
- First Draft Local Plan Consultation, Preferred options (September – October 2019)
- Publication of the Local Plan, Final Draft Local Plan (January 2021)
- Submission to the Secretary of State (July 2021)
- Examination (Autumn 2021 to Spring 2022)
- Adoption (Summer 2022)

3. Narrative summary

Watford Borough Council consulted in three stages prior to submission which included Issues and Options, Regulation 18 and Regulation 19 consultation. The plan evolved and improved by responding to and incorporating responses at each stage. Below are the details of issues brought up through each regulation phase.

3.1 Regulation 18 Overview

In accordance with Regulation 18 of the Town and Country Planning Regulations (2012) took place in two stages. Firstly was an Issues and Options consultation which took place from 7 September to 19 October 2018. Secondly was a consultation on the first draft Plan which took place from 27 September 2019 and 8 November 2019.

Appendix 1 shows more detail on how the requirements of Regulation 18 were met. This includes respondents, representations and officer responses showing how this was taken into account. The main issues raised in the consultation related to the policies map, climate emergency, clarity on the growth strategy, infrastructure delivery, viability concerns, the green spaces evidence and the housing trajectory.

After receiving the responses and considering the issues and concerns mentioned, the Council has worked to improve the draft Local Plan and incorporate relevant suggestions into the plan. Policies have been further developed and progressed. Once these developments and improvements were completed the plan was ready to publish for Regulation 19 consultation.

3.2 Main Issues from Regulation 19 and 20

In accordance with Regulation 19 of the Town and Country Planning Act (2012) the final draft Local Plan consultation ran for 8 weeks from 18 January to 18 March 2021. From this came 438 comments from 82 different individuals or organisations. 32% of comments pertained directly to soundness and 68% did not. In addition, two comments were submitted after the deadline and 12 comments were not duly made responses. These have not been included in the list of formal consultation responses. Respondents were directly contacted with advice to make their responses compliant. Appendix 2 shows more detail on how the requirements were met. This includes respondents, representation and responses to demonstrate how comments were taken into account.

3.2.1 Introduction

Concern raised from residents on the scale of growth and development. General concern from multiple respondents that the plan should be delayed until after the effects of the Covid-19 pandemic are known. There were no changes made in response to these comments.

Soundness objections made in several representations state that the plan period should be extended to cover a 15 year time period from adoption. A comment from SADC suggested the plan start in 2021 rather than 2018 to reflect guidance. Changes to the plan period would also affect the housing trajectory. This is a proposed modification which will be considered by the Planning Inspector at Examination in Public as it is a major change.

3.2.2 Core Development Area: Issues and modifications

Comments requesting clarification on how the CDA will function and how it will deliver the scale of growth proposed.

Watford Gateway

Aggregate Industries and Mineral Products Association requested clarity to be provided on the Concrete Batching Plant being safeguarded and development in the area respecting the adverse effect associated with this.

Comments states stated that the Canada Life site and neighbouring Coal Pensions Properties site should not be used for residential purpose in the early part of the plan period but instead be reallocated to employment. Both sought clarity on the short-term employment redevelopment would be suitable in the first part of the plan with a transition towards mixed uses later in the plan period. Network stated that the rail line should be able to support high speed trains in the long term and measures needed to be in place to support this.

Town Centre

Developers commented that the site capacities were too low (currently proposed at 220dph, the mid-pint between 95-350dph) to adequately reflect the location and that building height of 5-6 stories is too restrictive to deliver sufficient housing and development.

Reference should be made for a 3FE primary school to be delivered in the area.

Reference to a transport hub at the southern end of the High Street should be included.

Proposed changes to include reference to the primary school and transport hub will be included. No changes with regards to building height and capacity.

In the Colne Valley area:

Suggestion that more detail about the size and location of the school in the area should be provided as the reference in the plan was seen as too vague, especially given the shortfall of school places.

Details related to school provision are dependent on an education strategy prepared by HCC. The other changes are to be addressed by additional text and amending the boundary of site MU21 to include the hospital site and support its redevelopment. A SoCG will be prepared with HCC and the NHS with regards to the hospital.

3.2.3 Housing: Issues and modifications

Objection to the timeline of the plan would affect the housing target and move the figure from 14,988 to 13,171 units.

Request for greater clarity on windfall development and how this will be achieved and that this would need to be reflected in the delivery of windfall sites as part of the housing trajectory.

Home Builders federation and other organisations consider that proposed housing figures are a minimum. This was raised as a soundness issue that the plan period should be extended to 2037 and the housing target increased accordingly. This is a soundness objection.

Concerns were raised that the discount on build to rent housing was too high and that operators should have nomination rights rather the local authority to be consistent with national guidance.

Several residents consider the number of additional homes too high, particularly in a post-COVID Watford. No change required, impacts of COVID will not be known for some time and when applicable updated evidence will be fed into a plan review. The Government have made it clear that Local Plans should not be delayed, the council is not able to amend housing targets.

Residents also query the scale of development and the impact on design, infrastructure and wellbeing of the community. Not a soundness issue. Design, infrastructure and wellbeing are covered by the Plan.

HBF do not consider the self-build requirement to be justified and lodged a soundness objection.

WBC should provide justification for the use of nationally described space standards as required by the NPPF.

WBC should provide justification for the accessible homes requirements.

3.2.4 Viability

HBF consider the 35% affordable housing target too onerous in light of the Local Plan viability assessment. Suggest a tiered requirement to reflect lower value areas in the north of the borough and objected in soundness to this.

HCC send responses about infrastructure delivery and funding which were not sent as objections but comments. These comments will be addressed through a Statement of Common Ground with HCC.

3.2.5 Employment

Request that retail should be permitted in designated employment areas to reflect job creation.

Request that office development should not be subject to an impact test.

A request was made for the Printworks site to be included as part of the Asda site and removed from the industrial designation.

3.2.6 Town and Local Centres

Include leisure destinations (such as Woodside) as areas for potential mixed use redevelopment to make a better use of land.

Retail impact assessment threshold should be amended. Threshold amended to reflect national policy, Watford specific evidence is not strong enough to require a lower threshold.

The council's approach to medium to large convenience retail should be explicitly outlined.

Policy VT5.3 Point F, which imposes a blanket ban on restaurants that include an element of hot food takeaway within 400-metres walking distance of a primary school entrance was challenged. Modifications proposed that require a Health Impact Assessment rather than a blanket ban.

3.2.7 Design

Concerns were raised about requiring all ground floor residential properties to have direct access to a public facing frontage and that there should be provisions for having more than 8 units per single core where this can be justified.

Request to include a design principle about sustainable design which was added.

Suggestion that base building height of 3 storeys outside of the CDA is too high.

3.2.8 Heritage

Text about archaeology should be more locally specific.

3.2.9 Climate Change

BREEAM standards seen as too difficult to achieve by two respondents (developers) and too low by the Environment Agency.

3.2.10 Environment

Flood zone clarification was brought up by multiple respondents and further wording on FZ3 was requested (EA, HCC, Three Rivers)

Objections that the Green Spaces Strategy is out-of-date and so cannot support the Plan effectively.

Request that Attenborough Fields be identified as green space.

Green space on Policies Map should be amended to include land at Backwell Drive and the proposed extension of the area identified as green space near Kytes Drive should be reduced to what it was in the existing Plan.

On-site provision of green space should be more flexible and allow a financial contribution instead. Evidence base does not support financial contributions with minimal shortfall of open space demonstrated in the borough at present low quantity per person required. CIL funds should be expected to provide for improvements.

Where an open space is proposed to be developed greater clarity about how the community benefit will be determined. Text amended to clarify that a proposal will need to identify the types of community benefit a proposal will provide.

3.2.11 Transport

The Sustainable Travel Town approach encouraging active and healthier lifestyles through increased walking and cycling received strong support. Significant existing parking issues around allocated garage sites raised concerns for residents.

Highways England, highlighted sites where Traffic Impact Assessments are required and the need to demonstrate that impacts on the strategic road network will be mitigated. Added to site considerations in table 13.2. Further work with HCC with regards to the COMET model to be discussed with results due at the end of May. SoCG to be progressed.

The safeguarded MLX route is supported but not reflected in neighbouring Three Rivers. Will be subject to SoCG/DtC discussions.

3.2.12 Infrastructure

Thames Water are generally supportive but flag that planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed. WBC Agreed that planning conditions can be used.

EA suggest changes to strengthen wastewater infrastructure. Suggested text agreed and will feature in the proposed modifications presented to the Inspector.

Infrastructure funding, there is an anticipated gap between infrastructure funding and the infrastructure required. Residential development should also demonstrate high quality digital connections.

HCC provided up to date information regarding infrastructure costs (waste, libraries, and education) and quantum of nursery places which will be reflected in the IDP.

3.2.13 Sites

School site – HCC Property object to the allocation of Former Meriden School as an education allocation (ED01) as they are progressing a housing scheme on the site. HCC Growth & Infrastructure Unit (with responsibility for education) support the allocation. This was raised as a soundness objection by HCC Property as landowner.

Challenging the indicative yield and the approach to capacities used for all allocated sites. Particularly in relation to sites MU23 Asda and MU14 Wellstones although the principle of allocation both sites is supported. (soundness objection)

Concern was raised by multiple residents at the number of supermarkets allocated for development.

Historic England have raised a soundness objection due to lack of heritage impact assessments on key site allocations which was a soundness objection.

Concrete batching plant at Watford Junction needs to be shown on map as a soundness objection and the map is going to be amended.

Riverwell allocation should include hospital site (WHHT) (soundness objection).

3.2.14 Policies Map Changes

The policies map has received minor modifications to reflect the changes listed above where relevant.

Conclusion

The above main issues have been dealt with accordingly by Watford Borough Council to the best of abilities.

Outstanding Issues (In Progress)

The following issues are currently outstanding but are being resolved wherever possible through Statements of Common Ground, proposed modifications or other relevant avenues prior to the Examination.

Plan Topic/ Chapter	Policy (if applicable)	Main Issues raised	Council Response	Council Action	Respondents' unique ID	Respondent's name
Green Spaces Strategy	Chapter 9: the Natural Environment	Objection that the Green Spaces Strategy is out-of-date and so cannot support the Plan effectively	No change required. Green Infrastructure Plan is not considered to be out of date as limited changes have been made to green	There are ongoing updates to the evidence base and once this document is deemed out of date it will be updated	1853 1936	Planning & Development Associates Ltd (Mr Alan Gunne-Jones,

			<p>infrastructure and open space since it was adopted. However, a new strategy is being undertaken and it is considered the policy is written in such a way that is flexible for updated documents to supersede the existing. The Green Infrastructure Plan can be found online and will be published as part of the examination library</p> <p>Improvements to smaller amenity spaces is set out as a priority project in the Green Infrastructure Plan and the Local Plan.</p>	to reflect any future changes.		Managing Director) [4045] Anchor Hanover Group [4086]
Flooding	Policy NE9.4: Flood Risk and Mitigation	Clarification on Flood zones 3a and 3b was requested by multiple respondents and further wording was requested.	Addition: Only water compatible and essential infrastructure are will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within FZ3b. Developers should seek to increase the extent of FZ3b where possible and appropriate.	This is being determined through Statements of Common Ground and will be posed to the Planning Inspector.	1913 2084	Three Rivers District Council (Mr Marko Kalik, Senior Planning Officer) [4085] Environment Agency (Hannah Malyon, Sustainable Places

						Planning Advisor) [4120]
Traffic Impact Assessments	Site allocations and new development	Highlighted sites where Traffic Impact Assessments are required and the need to demonstrate that impacts on the strategic road network will be mitigated.	Added to site considerations in table 13.2.	Further work with HCC with regards to the COMET model to be discussed with results due at the end of May. SoCG to be progressed.	2044	Highways England [3258]
Safeguarding	Metropolitan Line Extension	The safeguarded MLX route is supported by some respondents but not reflected in neighbouring Three Rivers		Subject to SoCG and DtC discussions and likely resolved at EiP.	1915	Three Rivers District Council (Mr Marko Kalik, Senior Planning Officer) [4085]
School Site	Site Allocations	HCC Property object to the allocation of Former Meriden School as an education allocation (ED01) as they are progressing a housing scheme on the site. HCC Growth & Infrastructure Unit (with responsibility for education) support the allocation. This was raised as a soundness objection by HCC Property as landowner.	It is seen that the need for a school outweighs the need for housing and this site is one of only two identified by HCC's school site search evidence base. Both have been allocated by the Local Plan but there is still a shortfall in school place capacity	A slight boundary amendment is proposed in the main modifications, it is hoped that an agreement can now be reached in a SoCG with HCC Property.	2055	Hertfordshire County Council [3751]
Watford Gateway Sites	MU07 & EM05	Concerns about future use east of Abbey Line and improving access to the area. Clarifying employment use in the short-term.	Requirement for landowners to work together.	Amend Policy CDA2.1 and site allocations MU07 and EM05 to state that there will not be a net loss of	1972 1976 2018 2076	Canada Life Asset Management

				<p>employment floorspace unless it is reprovided as industrial floorspace.</p> <p>Address issues though Statement of Common Ground.</p> <p>Safeguarded area, including the access road, to be added to the Policies Map and site allocation MU06. Agent of change principle to be referenced and identified. 250m consultation zone to be added to supporting text.</p>	<p>2077 1928</p>	<p>Aggregate Industries UK Ltd</p> <p>Gerald Eve LLP</p>
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Conclusion

Watford Borough Council has met the requirements of Regulation 22(1)(c)(i) to (iv) as demonstrated in the appendices. Appendix 1 explains which bodies and persons were invited to make a representation under regulation 18 and how they were invited to do so. This is in accordance with the plan-making regulations and Watford Borough Council's SCI (2020). Summaries and full representation report are provided and include explanations of how they were taken into consideration with the summary in Appendix 1.

Appendix 1: Regulation 18 Consultation Details

Preferred Issues and Options Statement

1. INTRODUCTION

1.1 The Local Plan

Watford Borough Council is preparing a Local Plan, which will guide new development to 2036. The New Watford Local Plan 2020-2036 is a comprehensive process involving the preparation of a large evidence base. Public consultation and stakeholder engagement is a critical component of this.

Public consultation took place between 27 September 2019 and 8 November 2019 on the First Draft Local Plan, informally known as a Preferred Options consultation. The document consulted on was a full draft of the Local Plan, as well as an accompanying Policies Map and Sustainability Appraisal. Comments were invited on the content of the documents.

This version of the Plan was prepared under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was the second formal stage of consultation for the New Watford Local Plan. The council had previously consulted upon Issues and Options (Regulation 18) during September-October 2018. The Issues and Options document represented asked questions related to aspirations for the borough on a number of planning related issues, such as housing and employment. Comments received during this consultation were used to inform the Draft Local Plan.

The intended timetable for the Local Plan production process is set out in the Local Development Scheme (2020) and can be found below.

Figure 1: Provisional timetable for Local Plan

Preparation stage of the Watford Local Plan	Indicative Date
Notification	December 2016
Issues and Options Consultation	September - October 2018
First Draft Local Plan Consultation (Preferred Options)	September - October 2019
Publication of the Local Plan (Final Draft Local Plan)	January 2021
Submission of the Local Plan to the Secretary of State	June 2021
Examination Hearing	July 2021 - December 2021
Adoption	February 2022

1.2 Purpose of this Report

As noted, the Preferred Options consultation ran from Friday 27 September to Friday 8 November 2019. This report details the methods used to consult with key stakeholders, including statutory consultees and the wider community in Watford. It also seeks to provide a summary of the comments received during the consultation and the council's response to each representation made.

2. NOTIFICATION AND ADVERTISEMENT

2.1 Methods of Engagement

A comprehensive effort was undertaken in advertising the consultation and working to better engage the community in the Local Plan process. The council's approach to consultation far exceeded statutory requirement to attempt to broader participation with the Local Plan.

Methods used to consult include:

- Use of a bespoke [Local Plan website](#) (which received 2,410 unique views during the consultation period)
- A short summary leaflet which was made available on the Local Plan website, as well as being displayed for takeaway at the Town Hall, the two libraries and Watford Museum. Further copies were also given out at the public exhibitions.

- Six digital posters on Watford High Street, as well as 55 posters in bus shelters across the borough. Two posters were also placed in the underpass at the northern end of the High Street (The Parade)
- [An animation providing information about the consultation, which was uploaded onto YouTube, the council's social media pages and the Local Plan website](#)
- [Six vox pops](#) featuring different members of Watford's diverse community, which were uploaded onto YouTube and the council's social media pages
- Two promotional panels placed in the Town Hall customer service centre
- A notification letter sent to all on the consultee database (approximately 350 residents, local businesses and organisations and statutory consultees)
- Features in two resident e-newsletters (approximately 1500 subscribers), as well as features in two of the Mayor's e-newsletters (approximately 5000 subscribers)
- Leaflet drops to 12,000 residents within certain proximities of the event venues
- A Local Plan footer added to the end of all external emails sent by the council (approximately 1500 sent daily)
- Copies of the Draft Local Plan, Draft Policies Map and the Sustainability Appraisal made available for viewing at the Town Hall, Watford Central Library and the North Watford Library
- A Public Notice (as required by the Town and Country Planning (Local Planning) (England) Regulations 2012) published in the Watford Observer
- A press release sent to 15 media outlets

In addition, the council used social media to publicise the consultation. Eight Facebook statuses were posted that had a total reach of 12,602 users combined. Seven Tweets were also sent out that appeared on the feed of an average of 1454 users per Tweet.

The Local Plan was covered in a number of media pieces, including an article published in the [Watford Observer and an interview with the Mayor in Property Week \(25 October\)](#). The First Draft Local Plan was also covered in an article on [Planning Resource](#), although this website is only accessible to those with a subscription.

2.2 Exhibitions and events

Six staffed exhibitions were held on:

- Thursday 3rd October, 12-2pm at the Town Hall (internal staff event)
- Tuesday 8th October, 5:30pm-7:45pm at Oxhey Community Hall
- Saturday 12th October, 11am-2pm at Cassiobury Hub
- Wednesday 16th October, 4:45pm-6:45pm at Café West, West Watford Free Church
- Tuesday 22nd October, 5pm-7pm, at Meriden Community Centre
- Thursday 31st October, 4:30pm-6:45pm at Watford Central Library

Exhibitions were generally well attended with approximately 25-50 people at each event. A minimum of three Planning Officers attended each event. The council's Communications and Engagement Manager also attended the events at Meriden Community Centre and Central Library to explain how the Plan and consultation portal could be accessed online.

The Mayor also gave a presentation on the First Draft Local Plan at the Watford Chamber of Commerce, where representatives from over 30 local businesses were present.

The main issues discussed at the staffed exhibitions were:

- Concerns about the impacts of new development and higher densities
- The number of flats coming forward as opposed to houses
- Specific development sites including recent planning permissions
- The provision of infrastructure to support new development
- Loss of pubs, retail facilities and garages in the Plan
- The future of the town centre and how its vibrancy can be retained
- Parking and congestion
- Poor public transport in Watford (particularly in the north of the Borough)
- More adaptable and affordable housing required

- Development located in areas of flood risk
- Achievability of climate change targets
- Support for locating new development in sustainable locations

2.3 Comment Submissions

Comments were invited on the First Draft Local Plan, Policies Map and Sustainability Appraisal using [JDI](#), a bespoke consultation software. However, the council recognises that some members of the community do not have access to the internet, or prefer to engage using different methods. Therefore, written responses including letter and email responses were also welcomed.

Physical copies of the documents were sent on request.

3. RESPONSE AND FEEDBACK

3.1 The Level of Response

This was considerably larger than historic Local Plan consultations, although lower than the previous Issues and Options consultation held in 2018. 842 individual comments from 223 respondents.

Those consulted on are listed in Appendix A. The consultation responses are summarised in Appendix B.

Regulation 18 First Draft Plan Consultation

Introduction

- 1.1 This Consultation Statement sets out how Watford Borough Council has undertaken consultation on the new Local Plan. The report identifies those consulted, the issues raised and how the council has responded to those issues to prepare the Final Draft Local Plan. The Statement seeks to assist the Inspector at the Examination in determining whether Watford's Local Plan complies with requirements for public participation.
- 1.2 The statement describes the consultation and engagement carried out by the Council and how it has complied with statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). It also demonstrates that public involvement is consistent with Watford's Statement of Community Involvement (SCI) adopted in 2020.

2. Background

- 2.1 In preparing the new Watford Local Plan, regular meetings have been held with members through the Planning Policy Advisory Group (PPAG), a cross-party group set up to advise on the Plan. Presentations have been made to the Developers Forum and Town Centre Group. The Local Economic Partnership (LEP) and Local Strategic Partnership (LSP) have been kept informed of the Local Plan consultation process. Direct discussions held with statutory bodies have also helped inform the drafting of the plan.
- 2.2 In December 2016, consultees were informed that the Council intended to prepare a new Local Plan and were invited to comment. Feedback was received from 6 statutory organisations – Environment Agency, Greater London Authority, Hertfordshire County Council, Historic England, St Albans City and District Council and Transport for London.
- 2.3 An Issues and Options Consultation was then undertaken between 7 September and 19 October 2018. The consultation was on a concise document which focussed on the key issues for comment.
- 2.4 A summary of these previous consultations and responses received is available in the [Issues and Options Consultation Statement](#) on the council website.
- 2.5 A full First Draft Local Plan was then prepared for consultation in 2019 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report summarises this consultation and the responses received.

3. First Draft Local Plan - September 2019

- 3.1 Public consultation took place between 27 September 2019 and 8 November 2019 on the First Draft Local Plan, informally known as a Preferred Options consultation. The document consulted on was a full draft of the Local Plan, as well as an accompanying Policies Map and Sustainability Appraisal. Comments were invited on the content of all three documents.

Engagement

- 3.2 A comprehensive effort was undertaken in advertising the consultation and working to better engage the community in the Local Plan process. The council's approach to consultation far exceeded statutory requirement to attempt to broader participation with the Local Plan.
- 3.3 Methods used to consult include:
- Use of a bespoke [Local Plan website](#) (which received 2,410 unique views during the consultation period)
 - A short summary leaflet which was made available on the Local Plan website, as well as being displayed for takeaway at the Town Hall, the two libraries and Watford Museum. Further copies were also given out at the public exhibitions
 - Six digital posters on Watford High Street, as well as 55 posters in bus shelters across the borough. Two posters were also placed in the underpass at the northern end of the High Street (The Parade)
 - An [animation](#) providing information about the consultation, which was uploaded onto YouTube, the council's social media pages and the Local Plan website
 - [Six vox pops](#) featuring different members of Watford's diverse community, which were uploaded onto YouTube and the council's social media pages
 - Two promotional panels placed in the Town Hall customer service centre
 - A notification letter sent to all on the consultee database (approximately 350 residents, local businesses and organisations and statutory consultees)
 - Features in two resident e-newsletters (approximately 1500 subscribers), as well as features in two of the Mayor's e-newsletters (approximately 5000 subscribers)
 - Leaflet drops to 12,000 residents within certain proximities of the event venues
 - A Local Plan footer added to the end of all external emails sent by the council (approximately 1500 sent daily)
 - Copies of the Draft Local Plan, Draft Policies Map and the Sustainability Appraisal made available for viewing at the Town Hall, Watford Central Library and the North Watford Library
 - A Public Notice (as required by the Town and Country Planning (Local Planning) (England) Regulations 2012) published in the Watford Observer
 - A press release sent to 15 media outlets
- 3.4 In addition, the council used social media to publicise the consultation. Eight Facebook statuses were posted that had a total reach of 12,602 users combined. Seven Tweets were also sent out that appeared on the feed of an average of 1,454 users per Tweet.
- 3.5 The Draft Local Plan was covered in a number of media pieces, including an article published in the [Watford Observer](#) and an interview with the Mayor in *Property Week* (25 October). The First Draft Local Plan was also covered in an article on [Planning Resource](#), a subscription magazine service.

Exhibitions

- 3.6 Six staffed exhibitions were held:

- Thursday 3rd October, 12-2pm at the Town Hall (internal staff event)
- Tuesday 8th October, 5:30pm-7:45pm at Oxhey Community Hall
- Saturday 12th October, 11am-2pm at Cassiobury Hub
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- Tuesday 22nd October, 5pm-7pm, at Meriden Community Centre
- Thursday 31st October, 4:30pm-6:45pm at Watford Central Library

3.7 Exhibitions were generally well attended with approximately 25-50 people at each event. A minimum of three Planning Officers attended each event. The council’s Communications and Engagement Manager also attended the events at Meriden Community Centre and Central Library to explain how the Plan and consultation portal could be accessed online.

3.8 A summary of the issues raised at the public events is set out in Appendix F.

3.9 The Mayor also gave a presentation on the First Draft Local Plan at the Watford Chamber of Commerce, where representatives from over 30 local businesses were present.

4. Summary of Consultation Responses

4.1 Comments were invited on the First Draft Local Plan, Policies Map and Sustainability Appraisal online using [JDI](#), a bespoke consultation software. Written responses including letter and email responses were also welcomed.

4.2 Individuals and organisations registered on the Planning Policy mailing list, as at 27 September 2019, were sent an email notification about the First Draft Local Plan consultation inviting comments.

The following organisations were consulted, those who responded have an asterix* after their name in Table 1:

Table 1 – Organisations consulted on the First Draft Local Plan	
Statutory Bodies	
Affinity Water*	Historic England*
Coal Authority	Homes and Communities Agency
Civil Aviation Authority	Marine Management Organisation
Dacorum Borough Council*	Natural England

Environment Agency*	Network Rail*
Greater London Authority*	Office of Rail Regulation
Hertfordshire County Council*	Thames Water Utilities Ltd*
Hertfordshire Local Enterprise Partnership	St. Albans City & District Council*
Hertfordshire Valleys Clinical Commissioning Group	Three Rivers District Council*
Hertsmere Borough Council*	Transport for London*
Highways England*	
Local Bodies / Other Organisations	
Abbots Langley Parish Council	London Borough of Hillingdon*
Aldenham Parish Council	London Midland
AMEC Environmental & Infrastructure UK	London Strategic Planning
Armstrong Rigg Planning	Luton and Leighton Area Quakers
Avison Young	Mercedes Benz Retail Group*
Barker Parry Town Planning	Ministry of Housing, Communities and Local Government
Boys and Girls Nursery	Mobile UK
Brasier Freeth	Montagu Evans
Broxbourne Borough Council	Nascot Grange Residents Association*
Cadent Gas	Nascot Wood Junior School
Campaign for Real Ale*	National Federation of Gypsy Liaison Groups*

Canal and River Trust*	Nexus Planning
Cassiobury Residents Association	NHS England
Castle Homes*	Obsidian Strategic
Centrica	One YMCA
Chiltern and South Bucks District Councils*	Pentagon Paint
Cordage Group*	Perry Holt & Co
Cornerstone Telecommunications	Pigeon Investment Management
Croxley Green Parish Council	Planware
Curtin&Co	PowerHaus Consultancy
Cushman and Wakefield	Royal Society for the Protection of Birds
DB Cargo UK Ltd	Rumball Sedgwick
DB Schenker Rail	Saint Gobain
Department for Education*	Savills
Dignity Funeral Directors	Sirius International Insurance Group
DLP Planning Ltd	Sport England*
EE	SSA Planning
Extinction Rebellion Watford*	Strutt and Parker
Farrington Care Homes	St Stephen's Parish Council
Firstplan	St William Property Developers

Friends of the Earth*	Stevenage Borough Council
GD Plant Hire	Tangent Trading Ltd
Gerald Eve*	Tannen Group
Gladman	Tellon Capital*
Goodman Logistics and Warehouses	Tesni
Heaton Planning	Tetlow King*
Hertfordshire Constabulary	Thakeham
Hertfordshire Local Enterprise Partnership	Thames Water Utilities*
Herts and Middlesex Wildlife Trust*	Theatres Trust
Herts Valleys CCG*	Three mobile
Hightown Housing Association	Troy Planning
Home Builders Federation*	UK Power Networks
Homes England	Wakelin Associates Architects
Inland Homes	Walker Morris LLP
Intouch Planning	Warner Bros Studios*
JLL*	Watford Community Housing Trust
John Wood Group*	Watford Field School Infants & Nursery
Just Plans	Watford Museum
LaSalle Investment Management*	Watford Rural Parish Council

Legal and General Investment Management*	Welwyn Hatfield Borough Council
Lichfields	Wenta*
London Borough of Barnet	West Herts Hospitals NHS Trust
London Borough of Harrow	West Watford Community Association

The following organisations were not contacted directly but did respond to the consultation:

Table 2 – Additional organisations that responded to the First Draft Local Plan Consultation	
Aggregate Industries UK Ltd	RDI REIT
APG Portfolio Management Ltd	Rentplus Ltd.
Berkeley Homes	S. Hille & Co Holdings
Cortland Partners	Solum
IDA London Holdings	Telereal Trillium
IDA Plymouth Holding	Watford Health Campus Partnership LLP
Indigo Planning	Watford Fields Resident Association
Newsteer	Woodland Trust
Nuveen Real Estate	Woolf Bond Planning
Punc Partners	

4.1 842 comments were received from 223 respondents. These are summarised alongside a Watford Borough Council summary response in Appendix G.

4.2 In response to the Regulation 18 First Draft Local Plan consultation various changes have been made to the document. Further alterations have also been made by officers ahead of the Regulation 19 consultation in order to present a clear and concise document and to avoid duplication of information available elsewhere.

First Draft Watford Local Plan Summary of Consultation Responses

Topic	Responses	Summary	Plan Update
<p><u>POLICIES</u> <u>MAP</u></p>	<p>20 comments, of which 2 support and 18 object</p>	<p>Historic England have expressed that the Policies Map is hard to read and some information should be illustrated in the body of the document e.g. designated employment sites Clarity sought for boundaries of the Strategic Development Areas. Key transport interchanges should be shown on the map. Attenborough Fields should be designated as a priority habitat. Watford Health Campus Partnerships object to the Safeguarded Routes running through and adjacent to the Watford Riverwell site. They also object to the designated Open Space/Priority Habitat designation to the west of the site. LaSalle Investment Management seek a defined boundary to the Priority Habitat areas to the east of the Colne Valley Retail Park. Warner Bros. request that the studio land is removed from the Green Belt – representations have been submitted to Three Rivers requesting the same. Many of the objections are duplications of those made under the relevant policy including: Objection to the Mothercare Headquarters on Cherry Tree Road as a Designated Employment Site. Objection to the Liverpool Road garage site (H27) for redevelopment on parking grounds. Objection to building on Bushey station car park. Erroneous ‘priority habitat’ designation. Lack of parking. Evidence sought to clarify how the sustainability zones were decided. Orphanage Road Rail Aggregates Depot should be safeguarded.</p>	<p>Policies map improved to provide greater clarity on the points raised. ‘Key Diagram’ added to the document to illustrate employment areas, safeguarded routes and transport interchanges. Note, safeguarded route remains through the Watford Riverwell site in line with recommendations of the 2019 Metropolitan Line Extension Alternatives Study. Green belt amended to remove the Warner Bros. site reflecting the planning permission and future studio expansion.</p>

<p>CHAPTER 1: INTRODUCTI ON General Comments</p>	<p>28 comments, of which 10 support and 1 object</p>	<p>General support for the vision and strategic objectives, in particular environmental objectives, intensification of land in sustainable locations and the delivery of housing to create balanced and mixed communities.</p> <p>Sport England support for the vision encouraging active and healthier lifestyles although consider that a standalone health and well-being policy should be added.</p> <p>Friends of the Earth consider that further references should be made to the pledge to make the borough carbon neutral by 2030 and further references to sustainability/environmental considerations.</p> <p>Warner Bros. would like explicit references made to the significant economic benefits the studios makes to the area.</p> <p>HCC Highways and Transport comment that improvements to public transport are necessary to support growth – it is not just about safeguarding existing infrastructure.</p> <p>Reference should be made to the Minerals and Waste Local Plans. The importance of safeguarding mineral infrastructure should be noted.</p> <p>Hertsmere BC seek clarification within the collaborative working section – Watford’s unmet need will not automatically be met by the other districts in the same Housing Market, the starting point is for authorities to meet their own needs in line with the NPPF.</p> <p>In addition minor wording changes are suggested by HCC to highlight Sustainable Drainage Systems, biodiversity and mitigation of transport impacts across South West Herts. These issues are dealt with in relevant chapters but HCC would like to see references in the Vision and Strategic Objectives.</p>	<p>This chapter has been significantly reworded to provide more clarity in response to comments. Vision for active and healthier lifestyles has been strengthen throughout the plan and the addition of ‘Chapter 12 – Healthy Community’.</p> <p>The significance of the studios is acknowledged, however virtually all of it lies outside the Borough in Three Rivers District aside from land at North Western Avenue and does not merit a standalone policy to protect it.</p> <p>Sustainable transport initiatives have been strengthened through the plan, as well as more explicitly in ‘Chapter 11 – Sustainable Travel Town’.</p> <p>Reference to the Minerals and Waste Local Plans added to the Introduction and Sustainable Construction sections.</p> <p>Engagement with neighbours continues as we progress ‘Statements of Common Ground’ with each district.</p>
<p>CHAPTER 2: SPATIAL STRATEGY FOR ACHIEVING SUSTAINABL E DEVELOPME NT General Comments</p>	<p>2 comments,</p>	<p>HCC state an interest in the Dome Roundabout SDA. Highways & Transport highlight the need for ongoing collaboration to understand the transport impacts of the Local Plan.</p> <p>Residents highlight the need for a modal transport shift and family housing.</p> <p>Comment 1211 suggest site.</p> <p>Wenta are supportive and would like to see office use encouraged in all areas not just designated employment areas.</p>	<p>This chapter has been significantly reworded to provide more clarity in response to comments. The significance of transport impacts and achieving modal shift have been strengthened throughout the plan.</p> <p>Suggested site was assessed through the HELAA but not considered suitable for allocation.</p>

<p><u>Policy SD2.1</u> <u>Planning for Growth</u></p>	<p>31 comments, of which 11 support and 2 object</p>	<p>Residents highlight concern around over-development and impacts on local amenities and pollution levels. Wenta and Berkeley Homes amongst others are fully supportive of the policy. RDI REIT and Legal & General Property Management consider policy SD2.1 should set out a framework to support retail growth. Neighbouring authorities (Dacorum and St Albans) and the Greater London Authority would like WBC to demonstrate a thorough approach to meeting its housing needs and understand alternative approaches considered. Home Builders Federation have concern over the amount (a fifth) of homes expected on windfall sites. It is considered that only small windfall sites will come forward and the 105 dwellings per annum figure should be reduced. In addition it is not considered a blanket requirement for school provision for large sites is appropriate – this should be set out in individual site allocations.</p>	
<p><u>Policy SD2.2</u> <u>Achieving Sustainable Development</u></p>	<p>13 comments, of which 5 support and 3 object</p>	<p>There is general support for achieving sustainable development through good design, making efficient use of land, providing new homes and reducing car dominance as set out in the policy. It is considered that this policy should be strengthened in light of WBC declaring a Climate Emergency. HCC would also like reference to the historic environment. Home Builders Federation consider that the policy is unnecessary inserting ambiguity as to what sustainable development is.</p>	<p>This policy has been strengthened, further detail also added to ‘Chapter 8 Climate Emergency’ and ‘Chapter 7 – Historic Environment’</p>
<p><u>Policy SD2.3</u> <u>Making Effective Use of Land</u></p>	<p>17 comments, of which 6 support and 3 object</p>	<p>Support for greater density development that can make sustainable transport initiatives viable. Comments have asked for clarification for the sustainability and accessibility zones. The density ranges require justification to ensure correct interpretation. Berkeley Homes consider the density ranges in the medium and high sustainability zones could be more ambitious. This is backed by comments suggesting that density restrictions should be assessed on each proposal.</p>	<p>The approach to sustainability zones has been simplified to sites with the ‘Core Development Area’ and those outside. Densities set out are a minimum but individual optimum site densities will be established through consideration of local character, context and access to amenities and public transport</p>
<p><u>Policy SD2.4</u> <u>Safeguarding Strategic Infrastructure</u></p>	<p>13 comments, of which 6 support and 0 object</p>	<p>HCC suggest that all transport interchanges be protected. The supporting text should refer not only to public transport use but also other more sustainable alternatives to single occupancy car travel. HCC also suggest clarification in defining the specific assets/land being safeguarded. Suggest the Ebury Way and Orphanage Road Rail Aggregates Depot also be safeguarded. Developers would like a flexible approach to the safeguarded land – exploring integration between infrastructure and new development.</p>	<p>Transport interchanges are identified on the Key Diagram The Rail Aggregates Depot is identified as safeguarded.</p>

		Generally there is considerable support for sustainable transport.	
<u>Policy SD2.5</u> <u>Protecting</u> <u>Green Belt</u> <u>Land</u>	5 comments, of which 2 support and 2 object	Support for the protection of the Green Belt and a call for the evidence base to be published.	Green Belt review will be published alongside the Local Plan consultation.
<u>Policy SD2.6</u> <u>Delivering</u> <u>the</u> <u>Strategy:</u> <u>Development</u> <u>Contributions</u>	12 comments, of which 4 support and 0 object	Watford Health Campus are seeking reassurance that the CIL charging schedule will not change. HCC are seeking contributions towards waste management infrastructure. Sports England request the inclusion of sports facilities as an example of where off site contributions may be acceptable. Department for Education suggest reference to securing developer contributions retrospectively where it is necessary to forward fund infrastructure projects.	Reference to how developer contributions will be collected and spent is strengthened in 'Chapter 10 – Infrastructure' CIL charging schedule will be reviewed in line with the regulations.
<u>Strategic</u> <u>Development</u> <u>Areas</u> <u>General</u> <u>Comments</u>	6 comments,	Cortland Partners consider the Western Gateway should be a Strategic Development Area. Clarification is sought around the level of development anticipated within the SDAs but outside in individual site allocations. Historic England would like Heritage Impact Assessments to inform redevelopment. HCC would like robust masterplans for the SDAs.	Further detail, including maps has been added to each of the SDAs. The strategy has been revised to place more focus on the Core Development Area and areas outside of this designation. This better reflect site allocations and provides an approach that is simpler to implement. As such, the Western Gateway will not be a designated Strategic Development Area.
<u>Watford</u> <u>Junction</u>	11 comments, of which 4 support and 1 object	General support for the intensification and redevelopment of this area as well as for the improved transport connection. HCC highlight the need for joint working in developing a masterplan. The safeguarded rail aggregates depot should be highlighted. Wenta support the provision of services for the surrounding employment and residential areas. Friends of the Earth seek requirement for no car parking and full cycle provision for the site. Provision of infrastructure is a key consideration on this site. Requirements should be flagged as a key development consideration as part of the site allocation.	Further detail, including maps, has been added to the SDA to address these comments. Development considerations as part of the site allocation have been strengthened.

<p><u>Bushey Station</u></p>	<p>8 comments, of which 2 support and 1 object</p>	<p>The site is crossed by high voltage overhead electricity lines – statutory clearance heights must be considered. Residents consider the character of this area is not suitable for high density development. RDI REIT object to consideration 6 and wish to see additional retail provision outside of the existing centre. TfL support development in this area.</p>	<p>Bushey Station falls into the revised Core Development Area, which is considered an area of high sustainability. Based on this, the area has been considered appropriate for higher density development. Retail provision will follow the sequential test taking a ‘town centre first’ approach to protect the High Street. Wording to ensure overhead lines are considered in proposals added to the policy on managing impacts of development.</p>
<p><u>Town Centre</u></p>	<p>13 comments, of which 4 support and 2 object</p>	<p>HCC consider the transport bullet could be worded more strongly with specific wording around bus services. This is backed by Friends of the Earth who also seek reference to cycle provision. General support for more efficient use of land in the town centre. Other comments relate to the North Hub proposals.</p>	<p>Additional detail on bus priority added to this SDA, with detail on schemes provided in the Infrastructure Delivery Plan.</p>
<p><u>Lower High Street</u></p>	<p>9 comments, of which 1 support and 1 object</p>	<p>General support for more efficient use of land in this area. Bus connectivity is a key consideration. The site is crossed by high voltage overhead electricity lines – statutory clearance heights must be considered. Nuveen Real Estate consider it unduly restrictive to seek only mixed-use development and would like reference to residential development added.</p>	<p>Additional detail on bus priority added to this SDA, with detail on schemes provided in the Infrastructure Delivery Plan. Wording to ensure overhead lines are considered in proposals added to the policy on managing impacts of development. Residential development is appropriate as part of mixed-use schemes.</p>
<p><u>Dome Roundabout</u></p>	<p>4 comments, of which 1 support and 0 object</p>	<p>Support for providing stronger transport links although this is a challenge if an incremental approach to development is taken. The existing waste site should be safeguarded.</p>	<p>This area falls outside of the Core Development Area and as such is not designated as an SDA. Transport issues in the area are recognised and have been discussed with the County Council who are the Highways Authority. Transport policies amended to reflect public transport priority routes and better provision for cyclists and pedestrians.</p>

<p>CHAPTER 3: SUPPORTING GENERAL SUSTAINABLE TRANSPORT</p> <p>General Comments</p>	<p>13 comments,</p>	<p>The GLA look forward to continue working with the council to work towards an alternative to the Metropolitan Line Extension. They also wish to see some of the Mayor’s Strategic transport policy objectives extended to Watford (promotion of Healthy Streets, improving air quality and rebalancing the transport system towards sustainable/active modes).</p> <p>The Canal and River Trust emphasises the importance of the tow path for active travel and welcome further engagement to better link the towpath to other strategic routes.</p> <p>HCC wish to see a section on bus and rail to include recent proposals e.g. A414 Strategy proposals, Watford Junction and Abbey Line upgrades, Pyramid site proposals. They would also like to see a policy to link new development to cycle/pedestrian routes. Some wording changes suggested.</p> <p>Comments from residents mainly related congestion and poor air quality worsened by traffic—solutions suggested include more flyovers and underpasses, reinstatement of a bus to Luton, a park and ride, providing residents who don’t own cars with discounted travel cards, improving cycle routes, promoting mixed use to reduce trips and banning diesel vehicles from the town centre.</p> <p>Concerns expressed from Friends of the Earth and some residents about safety when cycling in Watford and investment/improvement required.</p>	<p>Approach retained.</p>
<p>Policy ST3.1 Cycle Parking Storage</p>	<p>13 comments, of which 5 support and 4 object</p>	<p>Support from Sport England, Wenta, Friends of the Earth and Transport for London for the policy and the inclusion of minimum standards.</p> <p>HCC welcome the policy but note that it could go further to include other facilities needed by cyclists in workplaces such as showers and changing facilities. This was echoed by Extinction Rebellion Watford.</p> <p>Berkeley Homes and Castle Homes feel as though the standards are too high and the space requirement could compromise active ground floor uses. APG Portfolio Management Ltd. objects to the policy as they feel the standards are too high and have not been adequately justified.</p> <p>One comment of support and two objections to Figure 4 (table of cycle parking standards). Objections from a resident and Friends of the Earth as they do not consider the standards to be high enough.</p>	<p>Approach retained.</p>
<p>Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles</p>	<p>18 comments, of which 6 support and 5 object</p>	<p>General support for the policy. Transport for London and Telereal Trillium particularly support car free development in High Sustainability Zones. HCC support ongoing reviews of on street restrictions to support reduced car parking provision. Wenta also support the approach.</p> <p>Support for inclusion of car clubs in the policy from a resident, although Extinction Rebellion comment that the policy does not go far enough in supporting clean and green energy.</p>	<p>Approach retained.</p>

		<p>The Home Builders Federation query whether the policy is viable and technically feasible, and Berkeley Homes commented that requiring 10% of spaces to be dedicated to car clubs is too onerous.</p> <p>A number of comments received were from developers who queried the standards. It was raised the need for more parking spaces in High Sustainability Zones for commercial development and hotels, while it was also expressed that a minimum car parking standard of 0.3 in the medium zones is too high.</p> <p>3 objections related to the standards themselves in Figure 5. 2 objections are from residents who identify the standards as being too low. One of the respondents queries the Sustainability Zones and advocates future occupiers of new development being denied residents' permits should the development result in unacceptable pressure on the CPZ. Friends of the Earth also object to the standards and wishes maximum numbers to be included per square metre to make best use of land.</p>	
Policy ST3.3 Access, Travel Plans and Transport Assessments	8 comments, of which 2 support and 1 object	<p>General support for the policy, particularly from Wenta and Friends of the Earth.</p> <p>Comments from HCC consist of the need to refer to their Travel Plan and road design guide. Other comments were from residents, who felt that better public transport should be prioritised before travel plans. One resident wrote wishing to view an impact assessment of the new developments in the borough on traffic.</p> <p>The objection came from a resident based upon pedestrians and cyclists not being classed as vulnerable road users.</p>	
<u>CHAPTER 4:</u> <u>HOUSING</u> General Comments	32 comments, of which 1 support and 6 object	<p>National Federation of Gypsy Liaison Groups state that the consultation was unsound as there was no opportunity to comment other than online. In addition there should be a policy to deal with the needs of gypsies.</p> <p>Friends of the Earth request a BREEAM excellent or outstanding standard requirement. They and Highways England note the impact of Watford declaring a Climate Emergency. Highways England also highlight the potential impact of the proposals on the Strategic Road Network and provide guidance.</p> <p>Home Builders Federation want to see clear evidence that housing completions will begin within five years to support the five-year housing supply.</p> <p>HCC Children's Services identify need for six new primary schools from the proposed allocations. Department for Education notes that these should be included in the allocations.</p> <p>1 x 2f.e primary school at Riverwell/Health Campus (2f.e total) 2f.e through expansion of existing schools (2f.e total) 1x 2f.e & 1x 3f.e primary schools at Watford Junction (5f.e total)</p>	<p>The very small requirement for Travellers in Watford, as reflected in the evidence base, does not merit the need for a standalone policy. BREEAM Excellent is required in the sustainability policy.</p> <p>The housing trajectory has been updated to demonstrate those sites which will deliver housing within five years.</p> <p>Work is ongoing with HCC in order to provide school places to meet demand.</p> <p>Policy HE7.4 Archaeology is applicable to all site allocations.</p>

		<p>2 x 3f.e primary schools at Tesco/Waterfields Retail Park (6f.e total); or, 1 x 3f.e primary school at Tesco/Waterfields Retail Park in combination with an additional 3f.e site identified elsewhere (6f.e total). The county council will work with the borough council, in order to find a suitability located site.</p> <p>HCC Environment Resource Planning recommend archaeological assessments for the sites. Woolf Bond planning do not consider the HEELA to be robust without assessing sites in the Green Belt. They consider Green Belt sites necessary to accommodate growth and deliver 3 bed homes and seek a thorough Green Belt review - it is considered that land at North Western Avenue should be excluded. They also consider an uplift in the housing requirement necessary to reflect affordable housing needs in Watford.</p> <p>General comments state concerns of overdevelopment and a predominance of development proposed in areas already of high density and or more deprived. Ten comments recognise that Watford has insufficient land to meet its level of need.</p>	A thorough Green Belt Review has been undertaken and will be published alongside the Local Plan consultation.
Policy H4.2 Housing Mix	4 comments, of which 1 support and 1 object	<p>Support from neighbouring authorities that addressing housing need is not just about delivering numbers and acknowledgment of an oversupply of small units in recent years. Castle Homes object to the affordable housing target considering it unviable.</p> <p>There is significant number of comments from developers seeking more flexibility for housing mix and affordable housing provision on a site location basis but residents and Wenta supporting the amount of flexibility proposed. The requirements will need to be subject to viability testing.</p>	The policies have been subject to a robust viability assessment. The affordable housing mix has been adjusted to reflect this and the identified need in the borough.
Policy H4.3 Affordable Housing	10 comments, of which 1 support and 1 object	<p>Developers seek more evidence to justify the affordable housing target given that the existing 35% target is not considered viable.</p> <p>More flexibility sought to determine affordable housing provision on a case-by-case basis. Viability evidence sought to support requirement.</p>	The policies have been subject to a robust viability assessment which will be published alongside the Local Plan consultation.
Policy H4.4 Garage Site Development	3 comments, of which 0 support and 3 object	<p>Objections consider the significant parking and storage garages provide, particularly in Victorian terraced areas.</p>	The requirement to undertake a car parking survey has been added to the development considerations for these sites.
Policy H4.5 Accessible and	6 comments, of which 0 support and 0 object	<p>Extinction Rebellion consider requiring recognised design standard would provide clarity for 'good design'.</p> <p>The Home Builders Federation do not consider that the proposed policy complies with the NPPF and recommend reduced requirements.</p>	Policy amended do clarify requirements

Adaptable Homes		Clarification is sought regarding the relationship between sheltered/specialist housing and affordable housing.	
Policy H4.8 Residential Conversions	4 comments, of which 0 support and 0 object	Antisocial behaviour issues surrounding residential conversions raised as an issue and Article 4 suggested to overcome them.	Residential conversions form an important part of the housing market and are supported by Government. Antisocial behaviour is dealt with outside of the planning system.
CHAPTER 5: EMPLOYMENT NT Please note site comments are all compiled in the table at the end of the document. Policy E5.1 Designated Employment Sites	11 comments, of which 4 support and 3 object	Overall support for the policy and the no net loss of floor space approach from developers, HCC and Wenta. 3 objections from site owners/agents regarding their land being designated as an employment site (Hille Business Centre, Mothercare site, DDD site Rickmansworth Road) Concerns from a resident and Extinction Rebellion Watford about government policy and poor quality PDR conversions.	The Mothercare site has been removed as an employment allocation and allocated for residential development. The employment policies take a no net loss approach to stop any further losses employment floorspace, as such the remaining allocations are retained.
Policy E5.2 Economic Development Outside of Designated Employment Locations	3 comments, of which 3 support and 0 object	Support from developers and Wenta for the positive approach the policy takes towards encouraging economic development.	Approach retained.

Policy E5.3 Mixed Use Development	5 comments, of which 5 support and 0 object	Support from developers and Wenta for the wording of the policy and its regard to existing uses (agent of change principle). It also received support for making efficient use of land.	Approach retained.
CHAPTER 6: TACKLING CLIMATE CHANGE, ADAPTATION AND RESILIENCE General Comments	6 comments, of which 0 support and 3 object	Extinction Rebellion Watford object, they are seeking evidence relating to resilience to drought and combating water shortages as well as robust evidence based carbon targets. The Woodland Trust seek tree planting targets. The policy is supported by HCC. They suggest requiring Site Waste Management Plans or Circular Economy Statements to ensure effective management of construction, demolition and excavation of waste. This is supported by residents comments questioning materials used in construction. Three comments highlight that Watford has declared a Climate Emergency and support the aims of this policy but consider it could go further.	Policies have been strengthened with water and carbon based targets. Focussing development in the Core Development Area will ensure higher density is placed in appropriate areas with high accessibility.
Policy CC6.1 Sustainable Construction and Design	13 comments, of which 5 support and 1 object	Friends of the Earth support the policy but would like to see a sustainability statement required for every proposal. BREEAM excellent or outstanding is sought.	Policies have been amended to require sustainability statements. BREEAM Excellent is sought for non-residential development.
Policy CC6.2 Flooding and Resilience	8 comments, of which 1 support and 4 object	Sustainable drainage systems are supported but should be sought on all major developments. They should be multi-functional and could be innovative green spaces, trees could play a part. It is thought that the policy should also set out measures to mitigate the risk of flooding. HCC Environment Resource Planning Unit (Lead Local Flood Authority) have concerns that the policy focus is implicitly on flood risk associated with rivers and does not promote management of flooding from all sources and does not fulfil a long a term perspective adaptation strategy to take into consideration the impacts of climate change on flood risk. They also suggest wording for monitoring this policy.	Policies amended in consultation with the Lead Local Flood Authority to include: Points on all types of flood risk including surface flooding issues SFRA level 1 and level 2 recommendations where applicable More details SUDs policy
CHAPTER 7: QUALITY DESIGN AND CONSERVATION	3 comments	HCC request a clearer definition of what consists of a heritage asset and request a requirement to incorporate areas to store and collect waste in the design of new buildings. Dacorum Borough Council want further clarification on how the design objectives will interact with the aspired density approach.	Approach retained.

<p><u>G THE HISTORIC ENVIRONMENT</u> General Comments</p>			
<p>Policy DC7.1 Strategic Principles for High Quality Design</p>	<p>6 comments, of which 1 support and 1 object</p>	<p>Support from Wenta, who note that high quality design should seek to use land efficiently and take into account the surrounding context. Cortland Partners and Berkeley Homes express concerns about the feasibility of including 3 bedroom units with direct ground floor access in high density schemes, noting that this could compromise active frontages. HCC comment that SuDS should be a consideration in the policy text. Hertsmere Borough Council have concerns that the 95dph minimum density standard for High Sustainability Zones is too low. Objection from Sport England, who comment that the design principles should be amended to include reference to their Active Design guidance to support healthy environments.</p>	<p>Approach retained.</p>
<p>Policy DC7.2 Quality of Place</p>	<p>9 comments, of which 3 support and 1 object</p>	<p>Wenta and the Canal and River Trust support the policy. Wenta add that the policy focuses on residential design, which may not be appropriate for designing other uses e.g. a warehouse. Support was also given from a resident for the policy, who also wishes the policy to go further and ban cheap render (brick and timber acceptable). Berkeley Homes and Cortland Partners agree with the importance of active frontages in achieving quality places, but add that this can be achieved through other means than residential frontages including retail and community uses. HCC note that ground floor residential frontages may not always be suitable due to flooding. Sport England objected to the policy and require an additional design objective to be added to the policy to cover design that promotes active and healthy lifestyles.</p>	<p>Approach retained.</p>
<p>Policy DC7.3 Building Design</p>	<p>7 comments, of which 2 support and 2 object</p>	<p>Policy fully supported from HCC and Wenta, who note the criteria are robust. HCC welcome the inclusion of the ‘agent of change’ principle. Berkeley Homes and Cortland Partners comment that the policy’s requirement of a maximum of 6 units a floor sharing a core area is too restrictive and request that the unit number should be changed to 8. Extinction Rebellion Watford express the need to consider designing for waste minimisation and the embodied carbon of materials used in building design.</p>	<p>Approach retained.</p>

		Sport England object to the policy and request that an additional principle is included to support active and healthier lifestyles.	
Policy DC7.4 Tall Buildings	10 comments, of which 3 support and 1 object	<p>Mixed reactions to policy – broad support from the development industry, with concerns coming from residents.</p> <p>Objection from resident, who expresses support for low rise high density housing. Nascot Grange Residents Association voice similar concerns and advocate a return to the approach of the Skyline SPD, which clustered tall buildings in 3 locations (town centre, Watford Junction and Ascot Road). Historic England also feel that the plan should identify spatially areas where tall buildings may or may not be appropriate.</p> <p>IDA London Holdings and IDA Plymouth Holdings welcome the policy and would like the opportunity to comment on the revised design guide, a comment which is echoed by Telereal Trillium.</p> <p>Berkeley Homes and Cortland Partners support the policy and comment that it will have a positive effect on Watford’s skyline and work to cluster tall buildings in node locations near mass transit access. Wenta agree, although feel as though the blanket threshold of 10 storeys or 6 storeys higher than the surrounding buildings is too prescriptive.</p> <p>The Environment Agency request wording added to the policy to ensure there would be no overshadowing of the river, which could have an adverse impact on the ecology.</p>	Approach retained.
Policy DC7.5 Heritage Assets and the Historic Environment	4 comments, of which 1 support and 1 object	<p>IDA Plymouth Holdings support the policy as it balances protecting heritage assets and the public benefit regarding new development proposals.</p> <p>Historic England comment that the policy should be amended to clarify if it relates to all heritage assets (designated and non-designated) and to clarify the SPDs the policy refers to in the final sentence of the policy. HCC also request that it is clarified whether the policy refers to historic buildings or the historic environment.</p> <p>CAMRA object to the policy based upon there being no section on pub protection.</p>	Approach retained.
Policy DC7.6 Nationally Listed Buildings and Registered	2 comments,	2 comments received from Historic England, who ask that the policy is amended to reflect the hierarchy of taking measures to avoid harm before mitigating any negative impacts on nationally listed buildings. Historic England also request guidance about how applications that involve less than substantial harm would be treated.	Approach retained.

Parks and Gardens			
Policy DC7.8 Locally Listed Buildings	3 comments	Nascot Grange Residents Association express dissatisfaction with recent planning applications and the impact that this has had on locally listed buildings. Historic England ask that the local list is linked within the policy. They also recommend that the policy is amended to reflect the hierarchy of taking measures to avoid harm before mitigating any negative impacts on locally listed buildings.	Approach retained.
DC7.9 Archaeology	2 comments	Historic England recommend that the policy is amended to reflect the hierarchy of taking measures to avoid harm before mitigating any negative impacts on archaeological remains. HCC comment that the policy should convey that archaeological remains do not just refer to those below ground - archaeology can include historic buildings and landscapes.	Approach retained.
<u>CHAPTER 8: CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT</u> General Comments	2 comments, of which 0 support and 2 object	The Woodland Trust object to the chapter as they would like to see a target set in the Local Plan for tree cover in new development Extinction Rebellion Watford object to the chapter as there are no policies to improve green and blue infrastructure in existing dwellings.	The importance of trees is echoed throughout the document, particularly in Chapter 9. Increasing tree cover is considered to be factored into the biodiversity net gain approach (see Policy NE9.8 Biodiversity). Further guidance will also be provided in Supplementary Planning Guidance.
Policy NE8.1 The Green and Blue Infrastructure Network	4 comments, of which 1 support and 0 object	Slight wording changes/additions recommended by the Herts and Middlesex Badger Group and the Environment Agency to better incorporate biodiversity impacts e.g. native and appropriate planting to be expected. The Canal and River Trust support the inclusion of overshadowing in the policy and would welcome more emphasis on improving connections between the blue and green network HCC note that no word changes are required to the policy.	Policy amended to reflect minor wording changes proposed.
Policy NE8.2 Protecting Open Space	3 comments, of which 0 support and 1 object	Objection from a resident due to lack of clarification about the definition of open space typologies and how it will be determined if an area is deficient in open space.	Map from the Green Spaces Strategy added to the Draft Plan, further detail on typologies is available in the study which will be published alongside the Plan.

		HCC note that the policy should consider the importance of open space being safeguarded to minimise flood risk and further comment that an additional policy is required to encourage play areas being provided in new development.	Equipped play space is considered as open space under this policy - the policy refers to 'Open space and ancillary facilities used for leisure and recreation'. The role that open space and green infrastructure can play in managing flood risk and providing sustainable drainage has been included in the introduction as a strategic overview.
Policy NE8.3 Providing New Open Space	4 comments, of which 0 support and 2 object	2 comments received from Extinction Rebellion Watford that state that the policy doesn't go far enough in terms of ensuring that new open spaces have ecological value. 2 objections from Sport England as the first and third criteria do not fully accord with government policy. It is recommended that a fourth criterion should be added to align better with Paragraph 97 of the NPPF. Sport England also add that the policy should reference the Playing Pitch Strategy and Sport England design guidance.	The policy and supporting text have been amended to reflect these comments and in consultation with Sport England.
NE8.4 Biodiversity Net Gain	11 comments, of which 1 support and 1 object	General support for inclusion of a net gain policy to meet national guidance. The Environment Agency, Hertfordshire County Council and the Herts and Middlesex Badger Group request changes to the wording of the policy to better align with the contents of the Environment Bill. Extinction Rebellion Watford feel as though the 10% net gain requirement should be increased to 20%. The Home Builders Federation express concerns about the viability of the policy. The Woodland Trust object to the policy based on the lack of reference to ancient woodland.	The policy and supporting text have been amended to reflect these comments. The 10% gain figure has been retained to comply with emerging national policy. Reference to ancient woodland referred in the NPPF, not necessary to duplicate here.
Policy NE8.5 Managing Air Quality	4 comments, of which 1 support and 1 object	HCC support the policy, although recommend including further guidance to strengthen the policy. A resident queries what is meant by "acceptable levels" of air quality and that this should be defined in the policy. Extinction Rebellion Watford feel that the council could do more to address air pollution through taking action to reduce car use. The Woodland Trust object to the policy as it does not acknowledge the role of trees in managing air quality.	Acceptable levels are defined in national policy and referred to in the supporting text. The importance of trees is acknowledged throughout the document, further guidance will be through SPD.

Policy NE8.6 Managing the Impacts of Development	7 comments, of which 3 support and 0 object	HCC support the policy but request that flooding should be added to the list of impacts of development. The Environment Agency also feel that the vulnerability of groundwater should be reflected in the policy. Aggregates Industries support the policy but request the inclusion of an extra sentence to directly refer to the agent of change principle. The Woodland Trust emphasise the role that trees can lay in reducing pollution. Thames Water support the policy.	Policy CC8.5 Managing the Impacts of Development has been amended to reflect some of the proposed wording.
<u>CHAPTER 9: ENSURING THE VITALITY OF TOWN AND LOCAL CENTRES ...</u> General comments	1 comment,	General support for the provision of infrastructure alongside development.	Approach retained.
Policy V9.1 Vitality of the Town and Local Centres	6 comments, of which 1 support and 0 object	General support for the development of town centre uses within the defined centres, in accordance with the hierarchy. LaSalle Investment propose a revision to Policy to acknowledge the role of Strategic Development Sites delivering mixed use and not require a retail impact assessment on these. RDI REIT and Legal & General Property Management submitted the same comment. The threshold of 350 sq.m for 'town centre uses' outside of a centre is considered too low. They consider the national threshold of 2,500 sq. m appropriate given the health of Watford Town Centre making it resilient to out-of-centre retail parks. Public Health would like a policy to encourage healthy food choices in the town and local centres.	While the role of mixed use on Strategic sites is acknowledged, the priority is to protect the town centre by promoting town centre uses in line with the 'town centre first' approach of the sequential test. The section has undergone extensive redrafting in line with the changes to the Use Classes Order, the 350 sq.m threshold has been removed. No additional retail floorspace will be supported outside of the town centre – this is detailed in the development considerations for the mixed use sites. Wording has been added to restrict the clustering of take-away uses and prevent them opening close to school sites
Policy V9.4 District and	2 comments, of which 1 support and 0 object	S Hille & Co consider the threshold for A uses and proportion of A1 use overly prescriptive for the North Watford District Centre. Residents support the protection of local centres.	The section has undergone extensive redrafting in line with the changes to the Use Classes Order, the proportion of A uses is no longer applicable.

Local Centres			Local Centre protection remains.
Policy V9.5 Infrastructure Provision	16 comments, of which 3 support and 0 object	<p>General support for infrastructure provision and improvement to serve development. Particular support from Department for Education for the reference that developers ensure sufficient infrastructure capacity.</p> <p>Herts Valleys Clinical Commissioning Group highlight the shortfall of GP services and provide method to calculate the cost per dwelling for medical services. Developer contributions are sought.</p> <p>Home Builders Federation and IDA Plymouth Holdings Ltd highlight the importance of viability testing using the approach set out in PPG.</p> <p>Resident raising concerns over adequate provision of school and GP places in the Meriden area.</p> <p>Sport England wish to see reference to community outdoor sports facilities.</p> <p>Thames Water and HCC Highways & Transport support policy.</p>	<p>The Infrastructure chapter has been substantially revised.</p> <p>Policy 'IN10.1 Integrated Infrastructure Delivery' requires a comprehensive and future-proofed approach to the delivery of infrastructure in line with the Infrastructure Delivery Plan. The IDP cover projects in all of the categories identified in the comments. The draft IDP will be subject to thorough consultation with stakeholders.</p> <p>Policy 'IN10.2 – Providing Infrastructure to Support New Development' requires developers to explore existing infrastructure capacity and ensure sufficient provision in collaboration with appropriate providers.</p> <p>Policy 'IN10.3 – Developer Contributions' highlights the means by which the council will secure contributions towards infrastructure provision.</p>
Policy V9.6 Utilities and Digital Infrastructure	1 comment	<p>Thames Water suggest wording changes to make it clear that planning conditions will be used where necessary to ensure that development or a relevant stage of development is not occupied ahead of the delivery of any necessary infrastructure.</p>	<p>Policy 'IN10.3 – Developer Contributions' highlights the means by which the council will secure contributions towards timely infrastructure provision.</p>
Policy V9.7 Community Facilities	6 comments, of which 1 support and 2 object	<p>Residents considers that pubs (The Badger, Royal Oak Bushey) should be a protected community facility.</p> <p>HCC would like to see improved cycle routes, particularly where community facilities are serving young people.</p> <p>The Theatre Trust support the policy but encourage a robust criteria to justify loss.</p>	<p>Given the clear links between community facilities and health this policy has been relocated to 'Chapter 12 – Healthy Community' Criteria justifying the loss of facilities has been added, Appendix F Marketing Requirements is also applicable.</p> <p>Improved cycle routes are supported in the transport chapter.</p>

Site Code	Site Name	Support/Comment/Object	Summary of Representations
H1	Land and Garages at Lych Gate	4 objections 3 comments	<p>4 objections from residents all related to the impact of development upon parking stress in the area. Concerns about access and pollution from construction also expressed.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p>
H2	Land and buildings at 275 Sheepcot Lane	1 support 5 comments	<p>Support from site owner for its inclusion in the Plan (although 0-5 year timescale no longer deliverable). Resident expresses redevelopment of the site is a good idea as long as adequate parking provided and no access through Campion Close.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. However, the Minerals and Waste Planning team add that the site is safeguarded under the Waste Core Strategy Policy 5: Safeguarding of sites. The council must therefore demonstrate that this policy has been applied before allocating this site for housing.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Affinity Water must be notified of any future development proposed on the site.</p>
H3	Land and Garages adjacent to 1 Lavinia Avenue	3 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.</p>
H4 ¹	Land and buildings at 5 Sheepcot Drive	3 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required.</p>

			Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H5	Land at the Badger Public House	1 support 3 comments	Site owner supports inclusion of the site in the Plan, although thinks the 45-70dph requirement is too low. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. Site in Source Protection Zone 1 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H6	Land and Garages adjacent to 1-7 Heronslea	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H7	Land at the Former Meriden School	4 comments 1 objection	Sport England object to the allocation of the site based on its former use as a playing field, unless a development consideration is included requiring the loss to be mitigated through a financial contribution to deliver priority playing field projects in the area. Thames Water note the wastewater network may be unable to support the demand anticipated from this development, and that local upgrades to the existing drainage infrastructure may be required. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. They also add that limited bus services serve the site and development is not of a scale to contribute to bus service improvements. Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.
H8	Land at the Former Bill Everett Community Centre	4 comments	HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. They also add that the site is within 400m of a bus stop with regular services and that the nearest railway station is 1.2 miles away. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. Affinity Water must be notified of any future development proposed on the site.

H10	Land at the Longspring Car Park	3 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.</p>
H11	Land at 420 and 420a St Albans Road	3 comments	<p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.</p>
H12	Land to the rear of 53 Langley Way	3 comments	<p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Affinity Water must be notified of any future development proposed on the site.</p>
H13	16-18 St Albans Road	4 comments 1 objection	<p>1 objection to the site from a resident regarding overdevelopment in the area</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. The site also has good access to sustainable transport and so has potential to be a very sustainable site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and Affinity Water must be notified of any future development proposed on the site.</p>
H14	Land and Garages between 139-149 Queens Road	3 comments	<p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. The site also has good access to sustainable transport and so has potential to be a very sustainable site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and close to Source Protection Zone 1. Affinity Water must be notified of any future development proposed on the site.</p>

H15	Land to the rear of 125-127 The Parade	4 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site. Affinity Water must be notified of any future development proposed on the site.
H16	Land at the Corner of Park Avenue and Rickmansworth Road	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. Affinity Water must be notified of any future development proposed on the site.
H17	Land at 80 Cassio Road	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. Affinity Water must be notified of any future development proposed on the site.
H18	Land and Buildings at 87 Cassio Road	4 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site. Affinity Water must be notified of any future development proposed on the site.
H19	Land and buildings at 120-122 Exchange Road	3 comments	Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. Affinity Water must be notified of any future development proposed on the site.
H20	Land at Lower Derby Road	4 comments 1 objection	Sport England object to the policy as no provision is made in the development consideration for the re-provision of the skate park. Suggested wording provided. Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site. Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development. HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site.

H21	Land and buildings at 176-186 Rickmansworth Road	3 comments	<p>HCC note there are no fundamental ecological constraints on the site, although there is the potential for roosting bats.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and close to Source Protection Zone 1. Affinity Water must be notified of any future development proposed on the site.</p>
H22	Car Park at Junction of Vicarage Road and Exchange Road	4 comments	<p>The site is immediately adjacent to the Locally Listed Sikh community centre and across the street from a conservation area. Historic England require the preparation of further evidence regarding the potential impact on heritage assets. They expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction and close to Source Protection Zone 1. Affinity Water must be notified of any future development proposed on the site.</p>
H23	Crown Passage Car Park	2 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p>
H24	Land at Waterfields Retail Park	1 support 6 comments 2 objections	<p>2 objections from residents. One of the objections relates to the loss of retail, while the other objector expresses concerns about the ability of the infrastructure to support the redevelopment of the site and raises the current lack of parking in the area.</p> <p>Site owner supports the allocation of the site and its potential to be a sustainable location for high density residential development.</p> <p>Historic England note the site is immediately adjacent to heritage assets. Historic England require the preparation of further evidence regarding the potential impact on heritage assets. They expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction and on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p>

			HCC note there are no fundamental ecological constraints on the site, although may be the potential for roosting bats. The site also has good access to sustainable transport and so has potential to be a very sustainable site.
H25	Land at 18 Watford Field Road	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction and near contaminated land. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Historic England note the site is immediately adjacent to heritage assets. Historic England require the preparation of further evidence regarding the potential impact on heritage assets. They expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
H26	Land between 41- 61 Brightwell Road	3 comments	<p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats.</p>
H27	Land and garages to the rear of 5- 17 Liverpool Road	18 comments 87 objections	<p>87 objections and other comments from residents related to loss of parking, potential lack of access for emergency vehicles, overdevelopment in the area, potential impact of development on neighbouring properties (pollution and overshadowing), lack of infrastructure and potential loss of trees and habitats. One resident notes increased parking standards should be applied on this site as the IDP is out of date and the site performs poorly against objective SA3 in the Sustainability Appraisal.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although may be the potential for roosting bats. HCC also add that the site is 400m away from the nearest bus stop, but the site is only 0.6 miles away from the nearest train station and within walking/cycling distance from the town centre.</p>

H28	Land and Garages to the rear of 2-24 Elfrida Road	3 comments 25 objections	<p>25 objections from residents and the Watford Fields Residents Association who expressed concerns about potential loss of daylight and privacy, parking stress and traffic in the area, overdevelopment, effect on health, lack of affordable rental garage space nearby, potential disturbance from construction, access issues, effect on flood risk and the potential worsening of the subsidence issues of nearby Victorian properties.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats.</p>
H29	Land and Buildings at 247 Lower High Street	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats. HCC also add that the site is within walking/cycling distance from the town centre and is within 400m of a bus stop with high frequency services.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p>
H30	Land at Croxley View	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required. HCC also add that there is a bus stop with frequent services within 400m of the site. Maintaining the existing cycle/pedestrian networks through the site is important.</p>
H31	Land at Wighenhall Road Depot	5 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. The Minerals and Waste Planning team add that the site is safeguarded under the Waste Core Strategy Policy 5: Safeguarding of sites. The council must therefore demonstrate</p>

			that this policy has been applied before allocating this site for housing. The Highways and Transport team comment that although the site is not well served by bus links, the site is 0.6 miles from Bushey Station.
H32	41 Aldenham Road	3 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there may be the potential for roosting bats.</p>
H33	Land at the Car Park, Chalk Hill	2 objections 4 comments	<p>2 objections received from 1 resident. The respondent expressed concerns about overdevelopment and lack of infrastructure to support more housing/apartments.</p> <p>One resident supports the principle of bringing the vacant site back into use although expressed concerns about the ability to create a buffer between any development and the surrounding road network. The respondent adds that it will be challenging to mitigate the impacts from the A4008, including noise and air pollution.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p>
H34	Land at Car Park adjacent to 1 Chalk Hill	2 objections 4 comments	<p>One objection related to the overdevelopment in the area and lack of infrastructure to support new development. Another objection expressed concern that the loss of the car park would exacerbate parking issues in Oxhey village and that it would be challenging to mitigate impacts from the A4008 (noise and air pollution).</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site. They add that the site is less than 100m from bus stops with high frequency services and less than 200m from Bushey Station.</p>
H35	Land at Bushey Station	2 support 4 comments 3 objections	3 objections from residents, who raised issues such as loss of commuter car parking, the potential impact of the nearby GFL site, lack of infrastructure to support the new development, including the need for

			<p>more frequent services from Bushey Station. One of the objectors did express support for a car zero development at this location.</p> <p>2 comments of support received from Network Rail and Transport for London, who are the owner and leaseholder of the site respectively.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site. The site also has good access to sustainable transport and so has potential to be a very sustainable site.</p>
H36	Land at Kingsfield Court Garages	3 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
H37	Land and Garages at Riverside Road Garages	3 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Ecological Appraisal may be required.</p>
MXD01	Land at Woodside Community Centre	3 comments	<p>Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
MXD02	Land at 453 St Albans Road	3 comments	<p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p>

			HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots.
MXD03	Land at the Lemaire Centre	3 comments	<p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots.</p>
MXD04	Land at 501 St Albans Road	3 comments	<p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required.</p>
MXD05	Land at 94-114 St Albans Road	8 comments 1 objection	<p>Objection from a resident related to overdevelopment of the area and lack of parking. A further resident expressed concern that redevelopment of the site will increase traffic in the area.</p> <p>Berkeley Homes propose that the site should be in the High Sustainability Zone as the site is in close proximity to Watford Junction Station.</p> <p>Aggregate Industries comment that the site is within the Minerals Infrastructure Consultation Area for the Orphanage Road Rail Aggregates Depot and propose potential wording for a development consideration to be included to ensure that the agent of change principle is applied.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water comment that the scale of the proposed development is likely to require upgrades to the wastewater network and that the council should liaise with Thames Water to agree a housing and infrastructure phasing plan.</p> <p>Historic England note that the site falls into the Watford Junction Strategic Development Area and that further evidence regarding the potential impacts on heritage impacts is required. Historic England also expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p>

			<p>HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots. They also add the need for a School Travel Plan to encourage sustainable transport access to the school.</p>
MXD06	Land at Watford Junction	7 comments 1 objection	<p>Aggregate Industries object to the inclusion of the Concrete Batching Plant as a site allocation. The site also falls into the Minerals Infrastructure Consultation Area for the Orphanage Road Rail Aggregates Depot and Aggregate Industries propose potential wording for the inclusion of a development consideration to ensure that the agent of change principle is applied.</p> <p>Solum (owner) comment that the boundary of the proposed allocation doesn't fully align with their ownership, although they support the inclusion of the site in principle. They also include some suggestions for the rewording of the development considerations.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. Upgrades may be required ahead of the development. The developer should liaise with Thames Water to determine a drainage strategy.</p> <p>Historic England note that the site falls into the Watford Junction Strategic Development Area and that further evidence regarding the potential impacts on heritage impacts is required. Historic England also expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the nearby heritage assets.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is potential for bat roots. They also add that ongoing liaison will be required and that HCC would not support development proposals that reduce the capacity or quality of the interchange. The Minerals and Waste team wishes to see the development considerations make reference to the hoppers, conveyor, sidings and aggregates facilities at the good yards, which fall into the minerals safeguarding policy remit.</p>
MXD07	Land at Colonial Way/Clive Way	6 comments	<p>LaSalle Investment Management (land managers) query if the site is viable for medium to high density office led growth and the development considerations should be updated to reflect the diverse range of employment uses suitable at the site.</p> <p>Aggregate Industries comment that the site is within the Minerals Infrastructure Consultation Area for the Orphanage Road Rail Aggregates Depot and propose potential wording for a development consideration to be included to ensure that the agent of change principle is applied.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p>

			<p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. Upgrades may be required ahead of the development. The developer should liaise with Thames Water to determine a drainage strategy.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. They add that the nearest bus stop from the site is over 400m away and that developer contributions should be sought towards bus service improvements.</p>
MXD08	Land at Centre Point Community Centre	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment may be required. They add that there are infrequent bus services from a stop within 400m from the site, but that the site is 0.5 miles from Watford Junction and less than a mile from the town centre.</p>
MXD09	Land at the Telephone Exchange Car Park	5 comments	<p>Telereal Trillium (site owner) support the inclusion of the site in the plan but request clarification about the appropriate site density, as footnote 4 does not stipulate what is meant by access to a mainline mass transit connection. The respondent further emphasises the sustainability of the site.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site.</p> <p>Historic England comment that the site falls into the Town Centre Strategic Development Area and that a heritage impact assessment should be prepared.</p>
MXD10	Land at Tesco Lower High Street	5 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. The developer should liaise with Thames Water to determine a housing and infrastructure phasing plan.</p> <p>HCC note there are no fundamental ecological constraints on the site, although a Preliminary Roost Assessment and/or a Preliminary Ecological Assessment may be required. HCC add that the site is within</p>

			<p>400m of a bus stop with high frequency services and within walking/cycling distance of the town centre and High Street station.</p> <p>Historic England comment that the site falls into the Lower High Street Strategic Development Area and that a heritage impact assessment should be prepared.</p>
MXD11	44-56 Vicarage Road	4 comments	<p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is potential for roosting bats. HCC add that the site is within 400m of a bus stop with good combined service frequency and within walking/cycling distance of the town centre and High Street station.</p>
MXD12	Land at Riverwell	5 comments	<p>The Watford Health Campus Partners LLP support the allocation but request that the allocation is extended to reflect the extent of ownership. They also query the flood risk on the site.</p> <p>Thames Water comment that the wastewater capacity may be unable to cope with the anticipated demand from the development. The developer should liaise with Thames Water to determine a housing and infrastructure phasing plan.</p> <p>Site in Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>HCC note there are no fundamental ecological constraints on the site and ecological surveys have been completed, although there are known to be badgers in the vicinity. HCC add that there is a bus stop within 400m of the site but is only served by one infrequent bus route.</p>
MXD13	23-37 The Parade	5 comments	<p>IDA Plymouth Holdings (site owner) query location of Table 4.1. They also add that retaining the locally listed frontage may be unviable.</p> <p>Site in Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on the site.</p> <p>Thames Water envisage no infrastructure concerns regarding wastewater networks in relation to the development.</p> <p>HCC note there are no fundamental ecological constraints on the site, although there is the potential for bat roosts. HCC add that several bus stops are available within 200m of the site with access to a variety of routes. The site is also in the town centre and is within walking/cycling distance to Watford Junction.</p>

Table 3 – Policy numbering and Location from the First Draft Local Plan Consultation to the Revised Draft Local Plan Consultation.

First Draft Local Plan (Reg. 18)		Amendment	Revised Draft Local Plan (Reg. 19)	
Ref.	Policy		Ref.	Policy
Introduction				
SD2.1	Planning for Growth	Incorporated into Spatial Strategy Policy and figures set out in appropriate chapters	SS1.1	Spatial Strategy
SD2.2	Achieving Sustainable Development	Incorporated into new policy 'Spatial Strategy'	SS1.1	Spatial Strategy
SD2.3	Making Effective Use of Land	Merged with housing mix policy but principle remains the same	HO3.2	Housing Mix, Density and Optimising Use of Land
SD2.4	Safeguarding and Connecting to Strategic Transport Infrastructure	Revised text and further project areas identified	ST11.2	Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub
SD2.5	Protecting Green Belt Land	Incorporated into Spatial Strategy	SS1.1	Spatial Strategy
SD2.6	Development Contributions	Revised but intent remains the same	IN10.3	Development Contributions
SD2.7	Watford Junction Strategic Development Area	Principle remains the same but text revised	CDA2.1	Watford Gateway Strategic Development Area
SD2.8	Bushey Station Strategic Development Area	Incorporated into Colne Valley SDA with Lower High Street area	CDA2.3	Colne Valley Strategic Development Area

SD.2.9	Town Centre Strategic Development Area	Principle remains the same but text revised	CDA2.2	Town Centre Strategic Development Area
SD2.10	Lower High Street Strategic Development Area	Incorporated into Colne Valley SDA with Bushey area	CDA2.3	Colne Valley Strategic Development Area
SD2.11	Dome Roundabout Strategic Development Area	Removed as not part of the Core Development Area	N/A	N/A
ST3.1	Cycle Parking Storage	Revised but principle remains the same	ST11.4	A Walking and Cycling Infrastructure Improvement Town
ST3.2	Car Parking, Car Clubs and Electric Vehicles	Significantly revised but intent remains the same	ST11.5	Electric Vehicles, Car Parking and Car Clubs
ST3.3	Access, travel Plans and Transport Assessments	Principle remains the same but text revised	ST11.6	Managing the Transport Impacts of Development
H4.1	Allocated Housing Sites for Delivery	Sites added and removed	SA13.1	Allocated Sites for Delivery
H4.2	Housing Mix	Merged with housing density and intention remains the same	HO3.2	Housing Mix, Density and Optimising Use of Land
H4.3	Affordable housing	Revised requirement and tenure mix	HO3.3	Affordable Housing
H4.4	Garage Site Development	Deleted	N/A	N/A
H4.5	Accessible and Adaptable Homes	Carried forward with few changes except for wheelchair access requirements	HO3.10	Building Standards for New Homes

H4.6	Specialist Housing	Carried forward with few changes	HO3.5	Specialist Housing and Care Homes
H4.7	Self-Build and Custom Housebuilding	Carried forward with few changes	HO3.7	Self-build and Custom Housebuilding
H4.8	Residential Conversions	Principle remain the same but text revised	HO3.9	Residential Conversions
E5.1	Designated Employment Sites	Industrial uses and Office element split into separate policies	EM4.2 EM4.3	Designated Industrial Areas Office Development
E5.2	Economic Development Outside of Designated Employment Locations	Principle remains the same but text revised	EM4.4	Economic Development Outside Designated Employment Locations
E5.3	Mixed Use Development	Deleted	N/A	N/A
CC6.1	Sustainable Construction and Design	Revised so only includes non-residential developments	CC8.2	Sustainable Construction Standards for Non-Residential Development
CC6.2	Flooding and resilience	Split into two, includes fluvial flooding and groundwater protection separate to surface water management	NE9.4 NE9.5	Flood Risk and Mitigation Surface Water Management
DC7.1	Strategic Principles for High Quality Design	Revised but principle remains the same	QD6.2	Design Principles

DC7.2	Quality of Place	Revised into a public realm policy	QD6.3	Public Realm
DC7.3	Building Design	Revised but principle remains the same	QD6.4	Building Design
DC7.4	Taller Buildings	Significantly revised but intent remains the same	QD6.5	Building Height
DC7.5	Heritage Assets and the Historic Environment	Revised but principle remains the same	HE7.1	Enhancement and Protection of the Historic Environment
DC7.6	Nationally Listed Buildings and Registered Parks and Gardens	Revised but principle remains the same	HE7.2	Designated Heritage Assets
DC7.7	Conservation Areas	Included as part of designated assets policy	HE7.2	Designated Heritage Assets
DC7.8	Locally Listed Buildings	Included as part of non-designated assets policy	HE7.3	Non-Designated Heritage Assets
DC7.9	Archaeology	Carried forward	HE7.4	Archaeology
NE8.1	Green and Blue Infrastructure Networks	Split into green and blue infrastructure policies	NE9.2 NE9.3	Green Infrastructure Network Blue Infrastructure Network
NE8.2	Protecting Open Space	Text slightly revised but principle remains the same	NE9.6	Protecting Open Space
NE8.3	Providing New Open Space	Revised but principle remains the same	NE9.7	Providing New Open Space
NE8.4	Biodiversity Net Gain	Text slightly revised but principle remains the same	NE9.8	Biodiversity

NE8.5	Managing Air Quality	Slightly revised but principle remains the same	CC.8.4	Managing Air Quality
NE8.6	Managing the Impacts of New Development	Text revised but principle remains the same	CC.8.5	Managing the Impacts of New Development
V9.1	Vitality of the Town and Local Centres	Slightly revised but principle remains the same	VT5.1	Supporting Vibrant Retail Centres
V9.2	Retail Frontages	No longer applicable under use class changes, principle set out in new policy	VT5.2	Watford Town Centre
V9.3	Non-Retail Uses in the Shopping Centre	No longer applicable under use class changes, principle set out in new policy	VT5.2	Watford Town Centre
V9.4	District and Local centres	New approach to reflect use class changes	VT5.3	District and Local Centres
V9.5	Infrastructure Provision	Revised into a strategic policy	IN10.1	Integrated Infrastructure Delivery
V9.6	Utilities and Digital Infrastructure	Slightly revised but principle remains the same	IN10.2	Providing Infrastructure to Support New Development
V9.7	Community Facilities	Slightly revised but principle remains the same	HC12.3	Built Cultural and Community Facilities

Table 4 – All Policies in the revised Final Draft Local Plan

Revised Draft Local Plan All Policies	
Ref	Policy
SS1.1	Spatial Strategy
CDA2.1	Watford Gateway Strategic Development Area
CDA2.2	Town Centre Strategic Development Area
CDA2.3	Colne Valley Strategic Development Area
HO3.1	Housing Provision
HO3.2	Housing Mix, Density and Optimising Use of Land
HO3.3	Affordable Housing
HO3.4	Build to Rent
HO3.5	Specialist Housing and Care Homes
HO3.6	Student, Co-Living and Non-Self-Contained Accommodation
HO3.7	Self-Build and Custom Housebuilding
HO3.8	Gypsies and Travellers
HO3.9	Residential Conversions
HO3.10	Building Standards for New Homes
HO3.11	Private and Communal Outdoor Amenity Space

EM4.1	Providing New Employment
EM4.2	Designated Industrial Areas
EM4.3	Office Development
EM4.4	Economic Development Outside Designated Employment Locations
EM4.5	Different Ways of Working
EM4.6	Training, Skills and Professional Development
VT5.1	Supporting Vibrant Retail Centres
VT5.2	Watford Town Centre
VT5.3	District and Local Centres
QD6.1	Design for an Attractive Town
QD6.2	Design Principles
QD6.3	Public Realm
QD6.4	Building Design
QD6.5	Building Height
HE7.1	Enhancement and Protection of the Historic Environment
HE7.2	Designated Heritage Assets
HE7.3	Non-Designated Heritage Assets
HE7.4	Archaeology
CC8.1	Mitigating Climate Change and Reducing Carbon Emissions

CC8.2	Sustainable Construction Standards for Non-Residential Development
CC8.3	Sustainable Construction and Resource Management
CC.8.4	Managing Air Quality
CC.8.5	Managing the Impacts of New Development
NE9.1	The Natural Environment
NE9.2	Green Infrastructure Network
NE9.3	Blue Infrastructure Network
NE9.4	Flood Risk and Mitigation
NE9.5	Surface Water Management
NE9.6	Protecting Open Space
NE9.7	Providing New Open Space
NE9.8	Biodiversity
IN10.1	Integrated Infrastructure Delivery
IN10.2	Providing Infrastructure to Support New Development
IN10.3	Development Contributions
ST11.1	Sustainable Travel Town
ST11.2	Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub
ST11.3	Providing Sustainable Transport Infrastructure for Major Development
ST11.4	A Walking and Cycling Infrastructure Improvement Town

ST11.5	Electric Vehicles, Car Parking and Car Clubs
ST11.6	Managing the Transport Impacts of Development
HC12.1	Healthy Communities
HC12.2	Health Impact Assessments
HC12.3	Built Cultural and Community Facilities
SA13.1	Allocated Sites for Delivery

5. Conclusions and Next Steps

- 5.1 This consultation statement forms part of the supporting information for the publication of the Local Plan for Formal Consultation (under Regulation 19) of the Town and Country (Local Development) (England) Regulations 2012.
- 5.2 It demonstrates how the comments received on the First Draft Local Plan (Regulation 18 stage) have informed the preparation of the Final Draft Local Plan prior to Regulation 19 consultation.

Appendix 2: Regulation 19 Consultation Details

1. INTRODUCTION

This consultation document sets out how Watford Borough Council has undertaken consultation under Regulation 19 on the new draft Local Plan. The report identifies those consulted, the issues raised and how the council has responded to those to prepare the Local Plan. This statement seeks to assist the inspector at examination to determine whether Watford's Local Plan complies with requirements for public participation. It also describes the consultation and engagement carried out by the Council and how this complies with statutory requirements set out in the Town and Country Planning (Local Government) (England) Regulations 2012 (Regulation 19). It demonstrates that public involvement is consistent with Watford's Statement of Community Involvement (SCI) adopted in 2020.

The draft plan was subject to 8 weeks of consultation from 18 January to 18 March 2021. Section 1 of this Appendix includes who was consulted and how this was undertaken.

There were 448 comments made from 82 respondents. Of these 73 comments were in support of the plan, 60 objected and the remaining 315 were comments. The majority of responses are not related to soundness. Section 2 of this Appendix includes the main issues raised with the responses from the council.

2. Who was consulted under Regulation 19 and how was that undertaken?

Schedule 1: Details of the consultation undertaken (letters, press releases, etc) and details of who was part of the consultation (statutory bodies, interest groups, members of the public etc).

A comprehensive effort was undertaken in advertising the consultation and working to better engage the community in the Local Plan process. The council's approach to consultation far exceeded statutory requirement to attempt to broader participation with the Local Plan. Upon publication online, a formal e-mail or letter was sent to everyone registered on the consultation database to invite them to make representations on the consultation document. In addition to this, mail outs were also sent to everyone on the Council's min contact list, which includes hard-to-reach groups, and the museum's contact database.

Due to the COVID19 pandemic we were unable to hold public events, instead a concerted online effort was made to reach people. A designated website was designed with an easy to remember web address, this was linked from all the online communications. Young people were target with communications across the council and mayor's facebook, Instagram and tiktok accounts. The mayor prepared a YouTube video promoting the consultation and took part in an interview on local radio.

Press releases were published resulting in a feature in the Watford Observer. Posters were also displayed throughout the town centre and in all council venues. Documents were available to the public on request as the usual display venues of libraries and the Town Hall were closed to the public.

2.1 Informal Consultation

An informal consultation by questionnaire was undertaken alongside the formal consultation to make issues in the Local plan accessible to those that did not wish to read the full document. Questions were based on the issues set out in the leaflet that was distributed to all households in the borough. Caveats were used to make clear that responses did not ask people about soundness or legal issues and if they wished to partake in the examination they would need to respond to the formal consultation. While not part of the formal consultation response, the comments made provide useful insight and were given full consideration by officers prior to submission.

The SurveyMonkey questionnaire had 160 responses. 94% of responders were residents of Watford. The largest response rate was from Nascot, Central and Park. The lowest response rate was Woodside, then Leggatts and Oxhey were the same, then Stanborough and Vicarage were the same.

- 1) The most popular supported issues were;
 - a) Protecting the historic environment and heritage of Watford,
 - b) Better quality design of buildings and places,
 - c) The creation of new jobs, and
 - d) Becoming a carbon neutral town

- 2) Issues with the lowest levels of support were;
 - a) Building more new homes, and
 - b) Building homes in the town centre

2.2 Consultation Events

Young People (West Herts College)

Four consultation events were held with West Herts College. Feedback from students covered a variety of issues with the following being of interest (in no particular order):

- a) Housing in the High Street area was not particularly popular as it would change its character and be overly crowded, concerns about buildings being too tall, and the High Street should retain its retail focus
- b) Heritage in Watford compared to other areas is underwhelming and not a significant issue
- c) Support the need to address climate change and creative design
- d) People would cycle more if there was infrastructure in place that made them feel safe
- e) Support a wilder, more natural environment
- f) Access to well-maintained areas for recreational use and biodiversity supported

Older People (Older Peoples Forum)

The initial intention was to have a workshop with elderly people who did not have access to the internet or digital technology. Working with the Communications Team this proved unfruitful as not everyone contacted had the technology available to use. One workshop was held with a number of volunteers across the borough. The event facilitated a response to the draft Plan that was generally defensive and negative. Issues raised included:

- a) The scale of development was too much
- b) The number of offices proposed may not be required because of increased working from home
- c) Aspirations to reduce car use were unrealistic and more people would rely on electric vehicles
- d) The Local Plan should be detailed to better understand the impact of Covid-19

Organisations consulted on the Final Draft Watford Local Plan, those that responded are marked with an asterix *

Abbots Langley Parish Council

Hertfordshire Local Enterprise Partnership

Planware

Affinity Water	Hertfordshire Valleys Clinical Commissioning Group	PowerHaus Consultancy
Aggregate Industries UK Ltd*	Herts and Middlesex Wildlife Trust	Punc Partners
Aldenham Parish Council	Herts Valleys CCG	RDI REIT
AMEC Environmental & Infrastructure UK	Hertsmere Borough Council*	Rentplus Ltd.
APG Portfolio Management Ltd	Hightown Housing Association	Royal Society for the Protection of Birds
Armstrong Rigg Planning	Highways England*	Rumball Sedgwick
Asda*	Historic England*	S. Hille & Co Holdings
Avison Young	Home Builders Federation*	Saint Gobain
Barker Parry Town Planning	Homes and Communities Agency	Savills
Berkeley Homes*	Homes England	Sirius International Insurance Group
Boys and Girls Nursery	IDA London Holdings*	Solum Regeneration*
Brasier Freeth*	IDA Plymouth Holding*	Sport England*
Broxbourne Borough Council	Indigo Planning	SSA Planning
Cadent Gas	Inland Homes	St Stephen's Parish Council
Campaign for Real Ale*	Intouch Planning	St William Property Developers
Canal and River Trust*	JLL*	St. Albans City & District Council*
Cassiobury Residents Association*	John Wood Group	Stevenage Borough Council*
Castle Homes	Just Plans	Strutt and Parker
Centrica	LaSalle Investment Management*	Tangent Trading Ltd
Chiltern and South Bucks District Councils	Legal and General Investment Management*	Tannen Group
Civil Aviation Authority	Lichfields	Telereal Trillium*
Coal Authority	Local Bodies / Other Organisations	Tellon Capital
Cordage Group	London Borough of Barnet	Tesco*
Cornerstone Telecommunications	London Borough of Harrow	Tesni
Cortland Partners*	London Borough of Hillingdon*	Tetlow King
Croxley Green Parish Council	London Midland	Thakeham
Curtin&Co	London Strategic Planning	Thames Water Utilities Ltd*
Cushman and Wakefield	Luton and Leighton Area Quakers	Theatres Trust*
Dacorum Borough Council*	Marine Management Organisation	Three mobile

DB Cargo UK Ltd	Mercedes Benz Retail Group	Three Rivers District Council*
DB Schenker Rail	Ministry of Housing, Communities and Local Government	Transport for London*
Department for Education	Mobile UK	Troy Planning
Dignity Funeral Directors	Montagu Evans	UK Power Networks
DLP Planning Ltd	Nascot Grange Residents Association	Wakelin Associates Architects
EE	Nascot Wood Junior School	Walker Morris LLP
Environment Agency*	National Federation of Gypsy Liaison Groups	Warner Bros Studios
Extinction Rebellion Watford	Natural England	Watford Community Housing Trust
Farrington Care Homes	Network Rail*	Watford Field School Infants & Nursery
Firstplan	Newsteer	Watford Fields Resident Association
Friends of the Earth	Nexus Planning	Watford Health Campus Partnership LLP
GD Plant Hire	NHS England	Watford Museum
Gerald Eve*	Nuveen Real Estate	Watford Rural Parish Council
Gladman	Obsidian Strategic	Welwyn Hatfield Borough Council
Goodman Logistics and Warehouses	Office of Rail Regulation	Wenta
Greater London Authority*	One YMCA	West Herts Hospitals NHS Trust*
Heaton Planning	Pentagon Paint	West Watford Community Association
Hertfordshire Constabulary*	Perry Holt & Co	Woodland Trust
Hertfordshire County Council*	Pigeon Investment Management	

The following organisations were not contacted directly but did respond to the consultation:

Additional organisations that responded to the First Draft Local Plan Consultation	
Anchor Hanover Group [4086]	Planning & Development Associates Ltd [4045]
Canada Life Asset Management [4096]	Reach PLC [4069]
Drax Investments Ltd [4107]	Ridge Residents Association [4030]
Glyn Hopkin Holdings Ltd [4118]	tadpoles [4014]
Lidl Great Britain Limited [4112]	The Retirement Housing Consortium [4102]
McDonald's Restaurants Ltd [4111]	Watford Central Town Residents Association[4071]

Mineral Products Association [4058]	Watford Centre Limited [4088]
North Western Avenue Watford Ltd [4121]	

3. Main Issues raised in the Plan order including the Council response or action

Issue	Comment / Soundness	Officer Response
General		
Impact of COVID19 will affect the number of jobs and homes needed, therefore consider the homes and jobs targets in the plan to be unsound.	Although raised as a soundness issue by residents, it is not considered to be related to soundness.	No change required, impacts of COVID will not be known for some time and when applicable updated evidence will be fed into a plan review. The Government have made it clear that Local Plans should not be delayed.
Plan period - Several stakeholders consider the plan should start in 2021 (not 2018). NPPF requires strategic policies to look ahead over a minimum 15 year period from the date of adoption.	Soundness issue raised by Woolf Bond Planning and Home Builders Federation (HBF)	Plan period to be amended to 2021-2037 with discussion set out in topic paper. Do not agree with suggested change for LP to finish in 2038 based on the anticipated Examination and Adoption dates.
Number of additional homes is undeliverable. Consider that the assumed delivery from the allocations and windfall sites is not justified.	Soundness objection	This will be addressed through the Topic Paper evidence.
Taller buildings wanted by developers (challenging density calculations)	Soundness objection	The Local Plan does not prohibit taller buildings, rather it sets a base building height. Where buildings taller than the base building height are proposed these are subject to additional criteria including exceptional design and sustainability benefits.
Comments supported the focus on good design but raised concerns about delivery. Monitoring will be key to ensure good development. Several comments raised that the draft policies are	Comment	This is a new plan not a reflection on what is happening at the moment. Adopted policies will be monitored, if they are not being delivered this will trigger a plan review.

significantly different from the current situation and therefore will need careful monitoring.		
Housing 48 responses,		
HBF consider that the proposed housing numbers are a minimum. This was raised as a soundness issue that the plan period should be extended to 2037 and the housing target increased accordingly.	Soundness objection	The final draft Local Plan places emphasis on a designed approach and sets out indicative densities that are to be treated as a starting point.
Several residents consider the number of additional homes too high, particularly in a post-COVID Watford.	Comment	No change required, impacts of COVID will not be known for some time and when applicable updated evidence will be fed into a plan review. The Government have made it clear that Local Plans should not be delayed, the council is not able to amend housing targets.
Residents also query the scale of development and the impact on design, infrastructure and wellbeing of the community.	Comment	Not a soundness issue. Design, infrastructure and wellbeing are covered by the Plan.
HBF do not consider the self-build requirement to be justified.	Soundness objection	Justification to be provided in topic paper.
WBC should provide justification for the use of nationally described space standards as required by the NPPF.	Soundness objection	Justification to be provided in topic paper.
WBC should provide justification for the accessible homes requirements.	Soundness objection	Justification to be provided in topic paper.
Viability		
HBF consider the 35% affordable housing target too onerous in light of the Local Plan viability assessment. Suggest a tiered requirement to reflect lower value areas in the north of the borough.	Soundness objection	The 35% target is in line with the viability evidence base that recommend the “35% target be retained and applied on a ‘maximum reasonable proportion’ basis, taking site-specific circumstances into account. Setting a lower proportion of affordable housing is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so if the requirement is lowered.”

The approach of using development contributions to deliver new or improved infrastructure is supported.	Support	Support welcomed.
HCC make various comments about infrastructure delivery and funding (although not an objection).	Comment	These comments will be addressed through a Statement of Common Ground with HCC. Suggested amendments will be proposed to the Inspector where appropriate.
Employment		
Support for the protection of Clarendon Road office area, comments also highlighted the importance of the protection of industrial uses.	Support	Support welcomed.
Transport		
The Sustainable Travel Town approach encouraging active and healthier lifestyles through increased walking and cycling received strong support.	Support	Support welcomed.
Significant existing parking issues around allocated garage sites raised concerns for residents.	Comment	Development considerations require a parking survey to be undertaken when sites come forward for development.
Water		
Thames Water are generally supportive but flag that planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed.	Soundness objection	Agreed that planning conditions can be used.
EA suggest changes to strengthen wastewater infrastructure.	Soundness objection	Suggested text agreed and will feature in the proposed modifications presented to the Inspector.
Retail		
Agents acting on behalf of MacDonalds and KFC object to policy VT5.3 f) which imposes a blanket ban on restaurants that include an element of hot food takeaway within 400-metres walking	Soundness objection	The suggested policy wording came from Public Health at HCC.

distance of a primary school entrance. Examination of other plans have found similar policy approaches to be unsound.		
Sites		
School site – HCC Property object to the allocation of Former Meriden School as an education allocation (ED01) as they are progressing a housing scheme on the site. HCC Growth & Infrastructure Unit (with responsibility for education) support the allocation.	Raised as a soundness objection by HCC Property as landowner	The need for a school outweighs the need for housing and this site is one of only two identified by HCC's school site search evidence base. Both have been allocated by the Local Plan and there is still a shortfall in school place capacity. We will try to resolve this through the Statement of Common Ground with HCC but it will ultimately be for the Inspector to decide.
Challenging the indicative yield and the approach to capacities used for all allocated sites. Particularly in relation to sites MU23 Asda and MU14 Wellstones although the principle of allocation both sites is supported.	Soundness objection	Officers to consider whether 'indicative yield' should be changed to 'baseline scenario' to clarify that it is not the capacity of the site but a baseline figure to support WBC's wider assessment of housing supply.
Concern was raised by residents at the number of supermarkets allocated for development.	Comment	Commercial use is to be reprovided as part of the allocations.
Historic England have raised a soundness objection due to lack of heritage impact assessments on key site allocations.	Soundness objection	WBC is investigating further work on this.
Concrete batching plant at Watford Junction needs to be shown on map	Soundness objection	Agreed, map to be amended.
Riverwell allocation should include hospital site (WHHT)	Soundness objection	Agreed, map to be amended.

4. Conclusion

This consultation statement in conjunction with Appendix 2 Schedule 1 explains who was invited to make representations under Regulation 19 and how this was undertaken. It also shows how this is in accordance with the plan-making regulations and the Councils Statement of Community Involvement (2020). This demonstrates compliance with the Formal Consultation (under Regulation 19) of the Town and Country (Local Development) (England) Regulations 2012.

