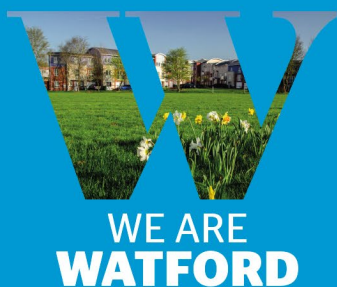


# Final Draft

## Watford Local Plan 2018-2036

### Consultation Responses

Monday 18 January 2021 – Thursday 18 March 2021



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



**WATFORD  
BOROUGH  
COUNCIL**

Record count: 439

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

1836

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere understands that the limited space available within Watford presents challenges when addressing large scale growth; in particular the provision of new infrastructure. Hertsmere understands that the limited space available within Watford presents challenges when addressing large scale growth; in particular the provision of new infrastructure. The provision of new high quality infrastructure will be vital to ensuring that Watford meets its sustainable development objectives, and given Watford's key role within South West Herts it is important the suitable consideration is given to improving the connectivity between Watford and the neighbouring boroughs.

## Full text:

Hertsmere encourages collaborative working between neighbouring authorities, and acknowledges that both authorities form part of the Housing Market and Functional Economic Market Areas for South West Herts, and thereby share a responsibility for creating an environment that meets the demands for growth in the area.

Hertsmere understands that the limited space available within Watford presents challenges when addressing large scale growth; in particular the provision of new infrastructure. The provision of new high quality infrastructure will be vital to ensuring that Watford meets its sustainable development objectives, and given Watford's key role within South West Herts it is important the suitable consideration is given to improving the connectivity between Watford and the neighbouring boroughs. The South West Hertfordshire Joint Strategic Plan will help to address help to address cross-boundaries issues towards the later phases of the Local Plan period and as Local Plans are reviewed. However, it is important the current relationships between the different districts are fully considered at the beginning of this Local Plan period along with the potential implications of any planned growth.

Paragraph 1.6 relating to the JSP does require amending as it does not reflect intentions. Rather than referring to the JSP not being a 'statutory document,' it should refer to it not being a 'statutorily required' document.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jj>

2096

Comment

Respondent: Stevenage Borough Council

Agent: Stevenage Borough Council

## Summary:

We have no substantive comments to make on the Local Plan.

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Stevenage Borough Council\_Redacted - <https://watford.oc2.uk/a/nd>

2097

Comment

Respondent: London Borough of Hillingdon  
Agent: London Borough of Hillingdon

## Summary:

I can confirm that the London Borough of Hillingdon does not have any comments to make on the Final Draft Watford Local Plan. It is noted that no request has been sent to the London Borough of Hillingdon to accommodate any of the identified need for development at this stage. If you deem that a statement of common ground is necessary to establish a position on any strategic matters then please send officers a draft version for review.

## Full text:

Letter received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: LB Hillingdon Consultation Response\_Redacted - <https://watford.oc2.uk/a/mx>

## South West Hertfordshire Joint Strategic Plan

1904

Support

Respondent: Three Rivers District Council

## Summary:

Paragraph 1.5 refers to the SW Herts Joint Strategic Plan as "not a statutory document". It may be worth clarifying this as the JSP is expected to be a statutory planning document.

## Full text:

Paragraph 1.5 refers to the SW Herts Joint Strategic Plan as "not a statutory document". It may be worth clarifying this as the JSP is expected to be a statutory planning document.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Preparation of the Local Plan and stakeholder engagement

1771

Comment

Respondent: R Kowalewski

## Summary:

Will the plan be finalised before or after the 2021 census? Will the plan be adjusted based on the findings of the census?

## Full text:

Will the plan be finalised before or after the 2021 census? Will the plan be adjusted based on the findings of the census?

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**First Draft Local Plan 2019**

1772

Comment

Respondent: R Kowalewski

## Summary:

Public transport is not mentioned Why? This featured heavily in the first draft. For the Borough to achieve any improvement in reducing car usage in Watford the coverage level and frequency of public transport must be increased significantly.

## Full text:

Public transport is not mentioned Why? This featured heavily in the first draft. For the Borough to achieve any improvement in reducing car usage in Watford the coverage level and frequency of public transport must be increased significantly.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: The first communication that I received about the long term planning. I mentioned the issue of public transport every time I received an invitation to comment on the plans.

Appear exam: Not specified

Attachments: None

**Final Draft Local Plan 2021**

1879

Comment

Respondent: Canal &amp; River Trust

## Summary:

Please find attached the Trust's full response to the Final Draft Plan.

## Full text:

Please find attached the Trust's full response to the Final Draft Plan.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Canal & River Trust Response - <https://watford.oc2.uk/a/yr>

1880

Comment

Respondent: Mr Aubrey Muchamore

## Summary:

Site H27 (HS25)

had, overall, the most local responses and although each of the 7 “themes” (12.2) were mentioned, it was parking that troubled the community most.

[12.3] Community Facilities - “A demonstrated demand”

Demelza Slaney has written to the Council a comprehensive proposal for the site and I fully endorse its solutions to help residents with parking issues and promote E charging vehicles.

The site would not sustain the proposed 11 dwellings.

The pandemic and its fallout will have changed so many things.

Will current office buildings be repurposed?

Will there be a need for all the dwellings proposed?

## Full text:

Site H27 (HS25)

had, overall, the most local responses and although each of the 7 “themes” (12.2) were mentioned, it was parking that troubled the community most.

[12.3] Community Facilities - “A demonstrated demand”

Demelza Slaney has written to the Council a comprehensive proposal for the site and I fully endorse its solutions to help residents with parking issues and promote E charging vehicles.

The site would not sustain the proposed 11 dwellings.

The pandemic and its fallout will have changed so many things.

Will current office buildings be repurposed?

Will there be a need for all the dwellings proposed?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As set out in Draft Proposal resident feedback H27

Appear exam: Not specified

Attachments: None

## Stakeholder engagement

1782

Comment

Respondent: Ridge Residents Association

## Summary:

Local residents object at every step on the over development of the area. Whatever the objections, however reasonable they are always rejected in favour of developers because the Council is fearful of the cost of legal cases from the developers. This makes stakeholder engagement with residents perfunctory at best.

## Full text:

Local residents object at every step on the over development of the area. Whatever the objections, however reasonable they are always rejected in favour of developers because the Council is fearful of the cost of legal cases from the developers. This makes stakeholder engagement with residents perfunctory at best.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1905

Support

Respondent: Three Rivers District Council

## Summary:

The approach to stakeholder engagement is supported. Watford Borough Council has proactively engaged with Three Rivers through the duty to cooperate process and the Council is satisfied with the robust evidence base and Sustainability Appraisal provided by Watford Borough Council in support of the Plan.

## Full text:

The approach to stakeholder engagement is supported. Watford Borough Council has proactively engaged with Three Rivers through the duty to cooperate process and the Council is satisfied with the robust evidence base and Sustainability Appraisal provided by Watford Borough Council in support of the Plan.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**A brief portrait of Watford**

1783

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

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

1784

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

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

2027

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

### Summary:

The Final Draft Local Plan identifies that the town centre contains a mix of chain and independent retailers, creating a varied mix of retail, restaurant and leisure provision that make the area a retail and leisure hub for South West Hertfordshire. The 'Sustainable Objectives' for Watford's economy state that the town and wider area will have an attractive range of activities available, reinforcing Watford's appeal as a destination for leisure and recreation. The Local Plan should recognise that out of centre destinations such as Woodside Leisure Park play an important role in meeting the leisure needs of residents and will ultimately contribute to meeting this sustainable objective. Please see enclosed representations letter for further detail.

### Full text:

Letter and form received via email

### Change suggested by respondent:

Legal & General request that the role and contribution that Woodside Leisure Park makes to the community and economy of Watford is recognised within the sustainable objectives set out at Paragraph 1.23 and the Key Diagram at Figure 1.2. Please see enclosed representations letter for further detail.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft)

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>

Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>

Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2098

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

### Summary:

Transport. The approach of future development being concentrated within the Core Development Areas that focusses on more easily accessible parts of the town is welcomed. This will enable joined up planning and sufficient scale to enable the delivery of transformative sustainable transport infrastructure.

### Full text:

Form and letter received via email

### Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Watford's economy and the key challenges

1785

Comment

Respondent: Ridge Residents Association

### Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

### Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

### Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

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

1773

Comment

Respondent: R Kowalewski

### Summary:

At the moment I do not see these aspirations happening, quite the opposite. Office space is being sacrificed, we have seen a lot of office space disappear in recent years. Despite changes in planning this trend must be stopped.

Industry seems to be a thing of the past in this town I do not see any evidence of any form of serious promotion to get industry back into the town after the decimation this sector suffered in the late seventies / early eighties.

### Full text:

At the moment I do not see these aspirations happening, quite the opposite. Office space is being sacrificed, we have seen a lot of office space disappear in recent years. Despite changes in planning this trend must be stopped.

Industry seems to be a thing of the past in this town I do not see any evidence of any form of serious promotion to get industry back into the town after the decimation this sector suffered in the late seventies / early eighties.

### Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: mentioned in the 2018 consultation.

Appear exam: Not specified  
Attachments: None



1821

Object

Respondent: Mrs Fran Clark

## Summary:

It is noted that the expected increase in jobs will be 11.4% but with impact of Covid the need for 14,988 additional homes and 136K sqm of office and industrial space is now unsound.

New ways of [home] working does not require the employed to work close to their place of residence. Why, when Watford has a high population density of 45 per hectare, do we need more homes now?

'New development will be of HIGH quality..' - how is 'high quality' to be regulated?

## Full text:

It is noted that the expected increase in jobs will be 11.4% but with impact of Covid the need for 14,988 additional homes and 136K sqm of office and industrial space is now unsound.

New ways of [home] working does not require the employed to work close to their place of residence. Why, when Watford has a high population density of 45 per hectare, do we need more homes now?

'New development will be of HIGH quality..' - how is 'high quality' to be regulated?

## Change suggested by respondent:

An economic objective - to help re build a strong, responsive and competitive economy, by reviewing the need for land of the right type is available, to support growth and improved productivity; and by identifying and coordinating the provision of infrastructure.

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

Legally Yes

compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1891

Comment

Respondent: T Norris

## Summary:

need to think carefully about the LT development and its impact on the neighbourhood overall - more expansion=less desirable=less skilled workforce=more crime=less attractive etc etc

Why is it central government dictate re housing quotas completely ridiculous - growth for growth sake - if there is a lack of housing tackle the new age landlords, the empty vacant houses and multiple house ownership by the few which actually causes the problems in the lack of housing

## Full text:

need to think carefully about the LT development and its impact on the neighbourhood overall - more expansion=less desirable=less skilled workforce=more crime=less attractive etc etc

Why is it central government dictate re housing quotas completely ridiculous - growth for growth sake - if there is a lack of housing tackle the new age landlords, the empty vacant houses and multiple house ownership by the few which actually causes the problems in the lack of housing

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**Watford's society and the key challenges**

1786

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

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

1804

Support

Respondent: Sport England

## Summary:

Support is offered for the sustainable objective relating to encouraging a public realm that encourages people to be active through walking and cycling as this objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Full text:

Support is offered for the sustainable objective relating to encouraging a public realm that encourages people to be active through walking and cycling as this objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes  
Raise LPA Why?: Preferred Options  
Appear exam: Not specified  
Attachments: None

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

1805

Support

Respondent: Sport England

## Summary:

Support is offered for the sustainable objective relating to improving the network of open spaces, parks and waterways and the connections between them in order to support increased recreational activities because this will encourage people to be active through walking and cycling. This objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Full text:

Support is offered for the sustainable objective relating to improving the network of open spaces, parks and waterways and the connections between them in order to support increased recreational activities because this will encourage people to be active through walking and cycling. This objective would encourage active and healthier lifestyles would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1822

Comment

Respondent: Mrs Fran Clark

## Summary:

Who is to monitor that the new development will be of high quality?

## Full text:

Who is to monitor that the new development will be of high quality?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1892

Object

Respondent: T Norris

## Summary:

The council states that it will:

The network of open spaces, parks and waterways, and the connections between them, will have been improved to support increased recreational activities.

Important biodiversity and wildlife habitats will have been protected and connections within the green and blue infrastructure networks improved, increasing their value for wildlife.

Yet the LT strategy and the small print goes against this headline.

## Full text:

The council states that it will:

The network of open spaces, parks and waterways, and the connections between them, will have been improved to support increased recreational activities.

Important biodiversity and wildlife habitats will have been protected and connections within the green and blue infrastructure networks improved, increasing their value for wildlife.

Yet the LT strategy and the small print goes against this headline.

## Change suggested by respondent:

Review plan and ensure that council mission is meaningful, fit for purpose and follows their commitment. This is because designated areas which fall into wildlife and green belt areas are actually considered high risk under the green belt review so the plan appears totally contradictory

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2099

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.2 Ecology. Reference to the NPPF and, correspondingly, to the inclusion of biodiversity as one of the three pillars of sustainable development is welcomed. This is a broad principle that should underpin development within the borough for the lifetime of the local plan and it is noted that this is given expression in 'Watford's environment in 2036 - the sustainable objectives' and 'Helping to create a better Watford in 2036 ...'. The main local plan Objectives are, of course, set at a high level, but are reasonable and proportionate and broadly reflect a contemporary vision for biodiversity.

5.3 However, the objectives could draw more on the emerging Environment Bill which is expected to receive Royal Assent this year. This is strongly expected to introduce the requirement to adopt biodiversity net gain (or net gain) and, as part of this, the establishment of a Nature Recovery Network (or NRN). Whilst the latter may have parallels with the more multi-functional green and blue infrastructure referred to in this vision, it will differ in having a clear statutory basis and (biodiversity) function. The potential for synergies between the two is obvious.

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore recommended that the text of the vision is amended accordingly, and consideration given to further explanation in the supporting text. Herts Ecology can advise on suitable wording if required. Reference to the NRN could also comfortably sit alongside some of the many references to the blue and green networks throughout the local plan where relevant. Establishment of an NRN may well require considerable effort to design and operate and so references should be worded accordingly.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Helping to make Watford a better place for everyone

1806

Support

Respondent: Sport England

## Summary:

Support is offered for the vision for Watford. This is because parts of the vision support the population being healthier through opportunities to get active, walking and cycling. Other elements of the vision such as the comprehensive network of cycle and walking routes, the conservation and green/blue infrastructure and high quality design will also help with encouraging active lifestyles. local people enjoying active lifestyles. The vision would therefore be consistent with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Full text:

Support is offered for the vision for Watford. This is because parts of the vision support the population being healthier through opportunities to get active, walking and cycling. Other elements of the vision such as the comprehensive network of cycle and walking routes, the conservation and green/blue infrastructure and high quality design will also help with encouraging active lifestyles. local people enjoying active lifestyles. The vision would therefore be consistent with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1823

Comment

Respondent: Mrs Fran Clark

## Summary:

The effects of Covid will cause a recession for many years to come and there is no need for extra homes as there will be a change of work patterns and Watford will no longer have a thriving retail town centre.

## Full text:

The target set by the Government should be negated with the effect of Covid - 'increasing [new homes] target three-fold' is ludicrous and will not be required if the population does not increase.  
 The effects of Covid will halt the need for new homes to cover the increase in population for the workforce as this will not grow at the rate envisaged. As the document notes that 'COVID-19 has greatly impacted the economy to date, effects..... economic recession period of high unemployment and vacancy before any long-term recovery'  
 Why when the increase in population is only expected to be around 400 - 96, 700 to 97,100 - do we need 14,988 extra homes?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1849

Comment

Respondent: Planning &amp; Development Associates Ltd

## Summary:

A separate Statement of Representations is attached containing comments on The Vision (page 15)

2.2.1 These Representations are considered consistent with the part of the Council's Vision which confirms that "green and blue infrastructure will be conserved and enhanced, maximising their value for biodiversity and other important ecosystem services".

2.2.2 The Vision is supported in principle, but these Representations indicate a missed opportunity to fully realise the vision.

## Full text:

A separate Statement of Representations is attached containing comments on The Vision (page 15)

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Watford Local Plan Representation REV 04.pdf - <https://watford.oc2.uk/a/k5>  
 Planning & Development Associates - email\_Redacted - <https://watford.oc2.uk/a/n5>

1893

Object

Respondent: T Norris

## Summary:

The council states that New development will provide opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community - we cannot grow continual in such a small area - it is inconceivable that the local council is not challenging central governments directive by stating that it will deliver new development for the immediate and long term future. It will result in a poor, densely populated, run down, unattractive and crime invested area.

## Full text:

The council states that New development will provide opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community - we cannot grow continual in such a small area - it is inconceivable that the local council is not challenging central governments directive by stating that it will deliver new development for the immediate and long term future. It will result in a poor, densely populated, run down, unattractive and crime invested area.

## Change suggested by respondent:

Review and challenge

Legally No  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

## Planning for growth

1787

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that. All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1824

Comment

Respondent: Mrs Fran Clark

## Summary:

New development provides opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community. Why not 'deliver' on what we already have? Much has been spent on the Town Centre - but now with the decline in retail stores surely these spaces can be changed [of use] to living accommodation.

## Full text:

New development provides opportunities to not only meet future need, but to also deliver facilities and improvements to support the existing community. Why not 'deliver' on what we already have? Much has been spent on the Town Centre - but now with the decline in retail stores surely these spaces can be changed [of use] to living accommodation.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1920

Support

Respondent: Three Rivers District Council

## Summary:

The focus on brownfield development and sustainability zones is welcomed.

## Full text:

The focus on brownfield development and sustainability zones is welcomed.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1937

Comment

Respondent: Berkeley Homes

## Summary:

The Spatial Strategy for Watford sets out a clear vision for the Borough and we welcome the continued aspiration to deliver exemplar development which will contribute towards Watford becoming a better place for everyone. The high degree of public transport infrastructure, including bus and train services, makes Watford a highly sustainable and accessible location. However, there is a conflict between Figure 1.1 and Strategic Policy SS1.1. Strategic Policy SS1.1 identifies the Core Development Areas as having excellent access to public transport and facilities and highlights the need to make the most effective and efficient use of the land. However, in Figure 1.1, part of the Watford Gateway Core Strategic Development Area (e.g. land immediately to the north of Watford Junction station) is designated as medium sustainability which contradicts with the aspirations of SS1.1.

## Full text:

-

## Change suggested by respondent:

Figure 1.1 should be revised to designate all land within the Watford Gateway area as high sustainability.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Representations were made on the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting this amendment.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

## A sustainable development strategy for Watford

1788

Comment

Respondent: Ridge Residents Association

## Summary:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Full text:

This plan needs to be postponed in light of the pandemic - it will change the town and we can't predict how yet. There will be less commuters, meaning less homes needed. More empty shops and offices that could be turned into housing meaning less developments will need to be built from scratch. We should be looking to "build back better" post pandemic - this plan won't achieve that.  
All plans need reviewing in light of what has happened in the last year and is likely to happen in the years ahead.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1921

Support

Respondent: Three Rivers District Council

## Summary:

The approach to sustainable development is in line with national policy and is supported.

## Full text:

The approach to sustainable development is in line with national policy and is supported.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**The Spatial Strategy**

1922

Support

Respondent: Three Rivers District Council

**Summary:**

Focusing development in locations where there is good access to services and facilities and encouraging a reduction in car travel is supported and is consistent with national policy.

**Full text:**

Focusing development in locations where there is good access to services and facilities and encouraging a reduction in car travel is supported and is consistent with national policy.

**Change suggested by respondent:**

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**Policy SS1.1: Spatial Strategy**

1775

Support

Respondent: R Kowalewski

**Summary:**

The strategy is very aspirational, but as with all such documents the "devil is in the detail" HOW are the planners going to entice industry office based companies to come to Watford bringing quality jobs. We do not need more "barristas" and "deliveroo" type employment here.

How will the reach of public transport be expanded, both routes but equally important time wise.

**Full text:**

The strategy is very aspirational, but as with all such documents the "devil is in the detail" HOW are the planners going to entice industry office based companies to come to Watford bringing quality jobs. We do not need more "barristas" and "deliveroo" type employment here.

How will the reach of public transport be expanded, both routes but equally important time wise.

**Change suggested by respondent:**

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None



1859

Comment

Respondent: Watford Central Town Residents Association

## Summary:

Covid19 will have a transformative effect upon the Town Centre SDA and Business district. Working from home, shopping online, is unlikely to change. Assumptions of office growth, floorspace required and retailing extent must be revisited to ensure a sound plan. Readdressing the plan's starting point could enable WBC to pursue more residential development in the Town Centre and other SDAs, reducing pressure of inappropriate development on areas outside these zones. SPDs such as the Character of Area study and Residential Design Guide must continue to be referenced in the new local plan as they are in the current local plan.

## Full text:

The past year has seen an extraordinary change in circumstances for Watford, as with other cities and towns across the UK. Covid-19 will have a transformative effect upon the Town Centre SDA and Business district. The experience of the past year has compounded the reduction in high street retail caused by E-Commerce. This sea change in the way people conduct business, from home, online, is unlikely to revert to normal. As a consequence, the assumptions of office growth and floorspace required and the extent of retailing need to be revisited in order to ensure that that Plan is sound.

We appreciate the need to release more land for housing. Readdressing the starting point of the plan could enable WBC to pursue more residential development in the most sustainable part of the Borough i.e. the core town centre area and other SDAs. This would reduce the pressure of inappropriate development upon areas outside of these zones. Ultimately, WBC needs to carefully consider what sort of town centre is needed, in terms of its mix of uses, to meet Watford's needs.

Respect for area character is referenced in many of the policies here, which we commend. Yet we have concerns that the failure to reference existing SPDs such as the Character of Area study and Residential Design Guide (as they are in the current local plan, e.g. policy UD 1) will remove well respected evidence bases from decision-making, and lead to more subjective interpretation of an area characteristics. Therefore, the above Supplementary Planning Documents need to continue to be referenced in the new local plan until such time as, if deemed necessary, updated guidelines are adopted in their place.

## Change suggested by respondent:

-  
 Legally Not specified  
 compliant:  
 Sound: Not specified  
 Comply with Not specified  
 duty:  
 Raise LPA: No  
 Appear exam: Not specified  
 Attachments: None

1894

Object

Respondent: T Norris

## Summary:

14,988 homes is not feasible to maintain a liveable environment without having and impact not only on health, the environment, community, air quality, open space, child welfare etc etc

## Full text:

14,988 homes is not feasible to maintain a liveable environment without having and impact not only on health, the environment, community, air quality, open space, child welfare etc etc

## Change suggested by respondent:

A substantially lower number of homes can be offered regardless of central governments directive people want to be able to live, breathe, be safe and above all have a community spirit in a place they call home

Legally No  
 compliant:  
 Sound: No  
 Comply with Yes  
 duty:  
 Raise LPA: No  
 Appear exam: Written Representation  
 Attachments: None

1898

Comment

Respondent: Miss Rachel McGall

## Summary:

La Salle support the Council's identification of Core Development Areas to promote the growth objectives for the Borough. Furthermore, recognising a holistic approach towards larger development sites is supported, it is suggested that the policy includes reference to the phasing of development to help achieve the holistic strategy for the wider Core Development Areas

## Full text:

La Salle support the Council's identification of Core Development Areas to promote the growth objectives for the Borough. Furthermore, recognising a holistic approach towards larger development sites is supported, it is suggested that the policy includes reference to the phasing of development to help achieve the holistic strategy for the wider Core Development Areas

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/ys>

1919

Support

Respondent: Three Rivers District Council

## Summary:

The Spatial Strategy is supported as it sets out that the needs of the area will be met in a sustainable manner.

## Full text:

The Spatial Strategy is supported as it sets out that the needs of the area will be met in a sustainable manner.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1943

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs between 2018 and 2036. Growth will be focussed in the "Core Development Area" and it is expected to support 80% of the allocated development within the Borough.

All development will take place on brownfield and previously developed land and only in exceptional circumstances will development on greenfield land be supported. Development in the London Metropolitan Green Belt will not be supported unless it can be demonstrated that exceptional circumstances apply, in accordance with paragraph 143 of the National Planning Policy Framework (NPPF) (2019).

Our client is supportive of the Council's "Vision" up to 2036, its plans for growth and the proposed spatial strategy. The Plan Period of circa 18 years (15 left from the date of this consultation) is also supported and is in accordance with the NPPF.

The recognition of the high affordability ratio of 12.2, alongside the Council's aim to tackle it through meeting its housing requirement, is welcomed. Our client is supportive of the provision of 14,988 homes over the Plan period, as this is in accordance with the Government's latest Standard Method calculation for housing requirements.

In order to be in full compliance with paragraphs 11b) and 59 of the NPPF, this figure should be expressed as a minimum requirement and the text adjusted accordingly to the following:

"The Local Plan makes provision for a minimum of 14,988 additional homes"

It is noted that the Local Housing Needs Assessment (2020), which is included in the accompanying evidence base, on page 5, states that the level of housing requirement calculated using the Standard Methodology would help support a considerably higher rate of job growth.

The Assessment sets out that this level of housing requirement would support 16,405 jobs between 2020 and 2036. The Plan only identifies provision for 11,500 additional jobs between 2018 and 2036. It is unclear as to how this discrepancy has occurred and why the Council is aiming for a significantly lower level of job creation.

In the interests of positive plan-making and in accordance with paragraph 80 of the NPPF, the Council should include consideration to scenarios which may provide more jobs. There is no justified rationale provided for reducing the additional number of jobs which can be created when the Council is already using the Government's Standard Method figures for housing provision.

The long-term impact of the COVID pandemic on the economy and on working patterns is still unclear. However, the Government has stressed the importance of getting the economy back on track. As such, the Council should plan positively for this recovery and not suppress job growth.

A letter from WBC sent to St Albans City and District Council (SADC) on 4 January 2021, suggests that WBC is unable to meet its employment need and is asking for SADC to assist in meeting this demand. However, it is not clear from the Plan that this is the approach the Council is taking, nor the level which they are unable to meet this demand.

We recommend that the Council makes provision for the higher level of job growth over the Plan period.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

In order to be in full compliance with paragraphs 11b) and 59 of the NPPF, this figure should be expressed as a **minimum** requirement and the text adjusted accordingly to the following:

"The Local Plan makes provision for a minimum of 14,988 additional homes"

We recommend that the Council makes provision for the higher level of job growth over the Plan period.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1965

Support

Respondent: Transport for London Commercial Development  
Agent: Transport for London Commercial Development

## Summary:

TfL CD broadly support the part of Policy SS1.1, Spatial Strategy which seeks to optimise density in areas of good access to public transport both within the Core Development Area and outside the Core Development area. The requirement for development to seek to make the most of its location, such as access to public transport, cycling and walking and seek to provide off-site infrastructure to enhance them, and facilitate access to services and facilities is also supported.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: TfL Commercial Development reps\_Redacted - <https://watford.oc2.uk/a/nh>

TfL Commercial Development site map - <https://watford.oc2.uk/a/nx>

1988

Object

Respondent: Mr Richard Walker

## Summary:

Concerns about whether quantity of homes in plan is deliverable. See written reps.

"1.23 To sum up, the key issue is whether the assumed delivery from the proposed allocations (assuming the sites are confirmed as being available) is justified and suitably evidenced. If not then the allocations will not be effective in delivery the spatial strategy, and the plan as a whole will not be effective. The evidential basis for the windfall allowance is also a matter that affects the soundness of the Plan. The Council's justification and balance sheet appears to be amiss in respect small site completions assumptions for the plan period."

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Richard Walker - document - <https://watford.oc2.uk/a/n7>

Richard Walker - form\_Redacted - <https://watford.oc2.uk/a/n8>

1996

Comment

Respondent: JLL

Agent: JLL

## Summary:

We note that the Special Policy Areas within the Core Strategy (2006) have been identified as Core Development Areas in the Draft Local Plan, with the exemption of the Western Gateway. Core Development Areas are areas where significant revitalisation and transformative change are expected to bring new investment in the town. The Western Gateway has not been carried forward as one of the Core Development Areas. We acknowledge this may be linked to the uncommitted situation relating to the Metropolitan Line extension to the Croxley area. However, given the approval and construction of Ascot Road Phase 1 and the wider aspirations of Phase 2 for a residential-led, mixed-use scheme, this should still be considered a sustainable location and an opportunity for revitalisation and regeneration. We consider that the Western Gateway should be designated as a Core Development Area in order to carry out the long-standing vision for this area that has already been implemented by virtue of Ascot Road Phase 1. Please refer to our covering letter for further information.

## Full text:

Form received via email

## Change suggested by respondent:

We consider that the Western Gateway should be designated as a Core Development Area in order to carry out the long-standing vision for this area that has already been implemented by virtue of Ascot Road Phase 1. Please refer to our covering letter for further information.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: First Draft (representations submitted November 2019)

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>

Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2002

Comment

Respondent: Drax Investments Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

the Local Plan period needs to be extended by at least one year to 2036/37 to comply with the 15-year minimum period from adoption under Para. 22 of the NPPF. Increasing the Plan period by a year would result in a new minimum housing requirement of 15,067 – meaning the currently identified provision of 14,988 would not suffice. The use of a 5% buffer is noted, but this may need to be increased to 20% to account for recent under-delivery. The new housing target – when calculated – should be clearly set in policy as a minimum target to encourage exceedance. This applies to Policies SS1.1 and HO3.1. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information

## Full text:

n/a

## Change suggested by respondent:

It is recommended: 1) the Plan period is increased to at least 2036/37 in both policies; 2) the minimum housing requirement is increased as a result (at least to 15,067 – but this may need to be increased further should a 20% buffer be applied); and 3) the new housing requirement is clearly stated as a minimum target. In light of the shortfall, it is recommended that Land at 7-15 Bridle Path ('the site') is allocated for residential-led development (a minimum of 65 dwellings) to help contribute to a potentially higher housing requirement. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Drax - Form\_Redacted - <https://watford.oc2.uk/a/zf>

Drax written reps - <https://watford.oc2.uk/a/zg>

2006

Support

Respondent: Dacorum Borough Council

## Summary:

Dacorum Borough Council broadly welcomes and supports the positive strategy of the new Local Plan. It is clear that a significant amount of work has gone into optimising the use of land across Watford borough, including the strategies for the core area/strategic development areas. Dacorum Borough Council welcomes the fact that Watford now seek to meet their housing needs in full through the Local Plan and are not looking to neighbouring authorities to address any un-met needs. While Dacorum Borough Council supports the positive strategy for delivering economic growth we welcome further discussion on the quantum and type of employment needs that the Local Plan seeks to deliver. Our comments are set out in more detail in our response to Strategic Policy EM4.1 below. We recognise that engagement continues to take place with the South West Hertfordshire authorities on this and other strategic matters. There is an expectation that effective outcomes can be agreed through a Statement of Common Ground prior to the formal submission of the Watford Local Plan in due course.

## Full text:

n/a

## Change suggested by respondent:

n/a

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: This matter has been raised through regular duty to cooperate meetings with Watford Borough Council and the wider South West Hertfordshire authorities.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Dacorum Borough Council - form\_Redacted - <https://watford.oc2.uk/a/zc>

Dacorum Borough Council - letter\_Redacted - <https://watford.oc2.uk/a/zd>

2028

Support

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

Legal & General support the identification that areas outside of the Core Development Area can make towards the delivery of the spatial strategy. Please see enclosed representations letter for further detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Yes  
Comply with Not specified  
duty:  
Raise LPA: Yes

## Raise LPA Why?: Preferred Options (first draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>  
Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>  
Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2063

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Glyn Hopkin Holdings Ltd ('GHH') – landowners of 252-272 Lower High Street, Watford, WD17, 277 (which is allocated for residential development under allocation HS22) – support the preparation of a new Local Plan for Watford, and support the residential allocation for the site. However, it is recommended that several changes are required in order to strengthen the Local Plan and enable it to be found sound. Firstly, the Local Plan period needs to be extended by at least one year to 2036/37 to comply with the 15-year minimum period from adoption under Para. 22 of the NPPF. This has ramifications in relation to the minimum housing requirement, which would increase to 15,067. This means that the currently identified provision of 14,988 would not be suffice to meet minimum objectively assessed needs. It is also recommend that the wider housing target is clearly described in policy as a minimum target so as to encourage exceedance of the target. It is also recommend that a 20% buffer is applied to the housing requirement (in accordance with NPPG Para. 022 Reference ID: 68-022-20190722) to provide flexibility and account for recent levels of under-delivery (as evidenced by the 2020 Housing Delivery Test results). This applies to Strategic Policies SS1.1 and HO3.1. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reprs\_FINAL' for more detail

## Full text:

Letter and form received via email

## Change suggested by respondent:

For Strategic Policy SS1.1, it is recommended that the Local Plan period is extended to at least 2036/37 to align with the requirement under Para. 22 of the NPPF for Local Plans to cover a minimum of 15-years from adoption. It is also recommended that the housing requirement is increased to a minimum of 15,067 in light of this change to the Plan period. It is recommended that the word minimum is added to the policy to encourage both developers and the LPA to ensure that objectively-assessed housing needs are not just met in full but exceeded.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Appearance at the examination

## Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>  
Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2090

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

Concerns regarding the Housing Requirement, Plan Period and robustness of supply.  
See letter for details.

The Plan therefore as currently prepared is not sound with respect of:

- a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and
- b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

To address these matters of soundness, several amendments are proposed. The changes assume an April 2020 start date. The proposed changes are:

1. That Strategic Policy SS1.1 is amended (as underlined) to read:

"The Local Plan makes provision for at least 14,988 additional homes and 11,500 additional jobs between 2020 and 2038, along with other supporting infrastructure. Proposals for new development will be supported, where they demonstrate that they will contribute towards the Local Plan's economic, social and environmental objectives, cumulatively achieving sustainable development.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

2094

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

Exceptional circumstances do exist and have been acknowledged by the Authority through their allocation of the land north of Russell Lane as a site for 93 dwellings in policy SA13.1. Whilst it is a matter of planning judgement, the Council is entitled to make such a judgement consistent with their statutory duty (section 39(2)) and the NPPF which they have correctly done.

5.86 The points raised above confirm that exceptional circumstances do exist, are soundly based and support revisions to the Green Belt at North Western Avenue, Watford thereby reflecting the stance of the Council in allocating the site for 93 dwellings in policy SA13.1.

## Full text:

Form and letter received via email

## Change suggested by respondent:

That the Authority includes a Topic Paper alongside the submitted Local Plan summarising how the various factors as detailed above support the exceptional circumstances to remove land from the Green Belt, reflecting the approach outlined in the Final Draft Local Plan.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

2100

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. Watford's vision of creating sustainable neighbourhoods within these Core Development Areas (with investment in public transport, walking and cycling infrastructure) has been translated into Policy SS1.1 and is fully supported. Wording for areas outside the Core Development Area emphasising the need for the provision of infrastructure to enhance public transport, cycling and walking is also welcome. However, priority should be in line with Transport User Hierarchy set out in LTP4 (and reproduced in Chapter 11). This includes passenger transport which should also be given priority over private cars.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Therefore, it is suggested that the following wording within Policy SS1.1 be modified to ensure it is compliant with LTP 4:

"Proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian, ~~and~~ cycling and passenger transport travel will be prioritised."

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Monitoring the Local Plan

1774

Comment

Respondent: R Kowalewski

## Summary:

I hope that the council will step up to the plate and properly monitor the developments. The council does not have a good track record in this department. I have seen planning permission creep regularly. Put in an initial small application and then submit the creep application. When looked at, the final developments it is very obvious that they would not have received PP but due to lack of proper council scrutiny the scope has been allowed to creep.

## Full text:

I hope that the council will step up to the plate and properly monitor the developments. The council does not have a good track record in this department. I have seen planning permission creep regularly. Put in an initial small application and then submit the creep application. When looked at, the final developments it is very obvious that they would not have received PP but due to lack of proper council scrutiny the scope has been allowed to creep.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None



1825

Support

Respondent: Mrs Fran Clark

## Summary:

Monitoring of the Local Plan is important to determine the effectiveness of planning policies.  
Please ensure that this is in line with the declining need for new homes.

## Full text:

Monitoring of the Local Plan is important to determine the effectiveness of planning policies.  
Please ensure that this is in line with the declining need for new homes.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1980

Support

Respondent: St Albans City &amp; District Council

Agent: St. Albans City &amp; District Council

## Summary:

SADC generally supports paragraph 1.43 which sets out:

“Where monitoring, particularly the updated housing trajectory that will be published in the Authority Monitoring Reports, demonstrates that there will not be sufficient progress towards meeting housing need, the Council will consider the reasons for this and whether the extent of under-performance is sufficient to trigger a partial or full review of the Local Plan.”

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>

St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

## Core Development Area

1802

Comment

Respondent: Mr John Snell

## Summary:

Your consideration of the Core Area ignores the events of the last 12 months: apart from the short-term effects of COVID, the medium and longer terms consequences cannot be ignored. For instance, the INTU mall now has significant empty premises which may be candidates for change of use from retail to residential. I suspect there are other medium/long term effects of COVID that professional planners should consider, even if only to appraise them and give reasons why they can be discounted.

## Full text:

Your consideration of the Core Area ignores the events of the last 12 months: apart from the short-term effects of COVID, the medium and longer terms consequences cannot be ignored. For instance, the INTU mall now has significant empty premises which may be candidates for change of use from retail to residential. I suspect there are other medium/long term effects of COVID that professional planners should consider, even if only to appraise them and give reasons why they can be discounted.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1837

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's proposals for higher density development in sustainable locations and proposals to reduce the reliance on the road network. Nevertheless, the mode of delivery for key services, with particular reference to healthcare and education provision, to support these growing communities would benefit from further explanation. The supporting text makes reference to community infrastructure proposals however the onus has been put on applicants to identify land and it would be helpful to further articulate how this will be secured and brought forward in a timely manner.

## Full text:

Hertsmere supports Watford's proposals for higher density development in sustainable locations and proposals to reduce the reliance on the road network. Nevertheless, the mode of delivery for key services, with particular reference to healthcare and education provision, to support these growing communities would benefit from further explanation. The supporting text makes reference to community infrastructure proposals however the onus has been put on applicants to identify land and it would be helpful to further articulate how this will be secured and brought forward in a timely manner.

Currently there is little reference to the interrelationship between facilities within Watford and neighbouring boroughs. Further information is required to establish the connection between existing neighbouring facilities and Watford. Hertsmere would want to be included as part of ongoing discussions relating to developer contributions (S106 and CIL) and infrastructure provision.

The Draft Local Plan defines three Core Development Areas, which will support 80% of the allocated development, including The Colne Valley. This area is in close proximity to Hertsmere and in particular Bushey. Whilst Hertsmere recognises that this area represents opportunities for growth in accessible and sustainable locations, the council would like for further clarification into the infrastructure provision for both of these sites. Policy CDA2.3 states that a new primary school will be provided as part of the development parcel and Hertsmere would seek further information on the size, location and timetable for this development.

All three Core Development Areas include the provision of public transport priority routes. Hertsmere support proposals to improve the public transport to the key facilities within these areas including to Watford Junction, Watford Town Centre, Vicarage Road Stadium, Watford General Hospital and Watford High Street Station. All of these facilities have large catchment areas which draw a significant proportion of residents from the neighbouring boroughs. Opportunities should be considered on how best to integrate these improvements into exiting and/or new public transport improvements in the wider area. Growth in these locations will have to be carefully designed and managed to ensure access to these key strategic facilities isn't inhibited.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jk>

## Watford Gateway Strategic Development Area

2009

Support

Respondent: Network Rail

Agent: Network Rail

## Summary:

Network Rail supports the Council's proposals in relation to the Watford Gateway Strategic Development Area. Network Rail owns a large area of land within the Watford Gateway and recognises the benefits of making more effective use of the land by introducing new employment, office and residential development to the area as well as the need to improve accessibility and permeability of the wider area, and around Watford Junction Station, which is a key transport hub.

The station and interchange will play a key role in unlocking and facilitating the development potential of the area, and therefore it is necessary to ensure that the station, interchange and associated facilities are fit for purpose. Network Rail is working in partnership to bring forward enhancements for Watford Junction Station as part of its Putting Passengers First programme including the potential option to relocate station car parking to the east of the Abbey line.

Network Rail acknowledges that enhancements to routes from Colonial Way will improve the overall connectivity of the area and improve pedestrian links to the station from the north. Network Rail supports proposals set out in site allocation EM05 Land at Colonial / Clive Way and within the Infrastructure Delivery Plan and Schedules and recommends including the protection and safeguarding of infrastructure developments to improve Clive Way to support the wider objectives of the Watford Gateway Strategic Development Area. These proposals will improve vehicular and pedestrian access to the station from the north, supporting modal shift, and to the land and sites to the east of Watford Junction Station, without which the potential of these sites may not be properly realised.

## Full text:

Letter received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Network Rail - document - <https://watford.oc2.uk/a/ns>

Network Rail - email - <https://watford.oc2.uk/a/nt>

2071

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

The Final Draft WLP currently fails to identify the safeguarded facility on the Policies Map. All that is provided is highly simplified diagrammatic representation on Figure 2.2 (page 24) of the Plan which does not in any way define the extent of the site or its relationship with proposed Site Allocations that currently adjoin and include part of the safeguarded site.

## Full text:

Form received via email

## Change suggested by respondent:

On this basis, and as stated in the previous submissions made, the Local Plan should in particular:

- Expressly identify the extent of the Orphanage Road site (including the access road and sidings) on the Policies Map.
- Ensure that any allocations or development proposals in the Watford Junction area are expressly required to ensure the on-going safeguarding of the site and operations it supports – with clear guidance on what will be expected.
- This should include policy wording that precludes the introduction of noise sensitive uses in close proximity to the safeguarded site, and which requires new development in the vicinity of the safeguarded area should be planned, laid out and designed with appropriate mitigation to ensure that they do not prejudice the existing or future use of the safeguarded site and operations in line with the 'agent of change' principle.

The following changes are required to be made to the Policies Map

- Full extent of the safeguarded facility (including access road and sidings) and in accordance with the Figure 1 of this objection statement to be identified on the Policies Map.
- Allocation MU06 to be amended to exclude the sidings which serve the safeguarded facility and which are included in the safeguarded area.
- Allocation MU06 to be amended to exclude the access road to the safeguarded facility – unless required changes to the text of the Site Allocation are agreed with regard to working collaboratively with the landowners of Site Allocations MU07 and EM05 to (a) facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way; and (b) until that is provided, detailing that appropriate vehicle access will be required to be maintained at all times from Orphanage Road;
- Ideally, the safeguarded facility would be additionally identified as 'industrial land' and included as an extension to the adjoining Imperial/Colonial Way Designated Industrial Area. This would accord with the evidence base which supports the Local Plan as detailed. However, subject to appropriate identification and safeguarding of the site for its rail/minerals function which is required to make the plan sound – failure to additionally identify the site as part of a designated industrial area is not considered sufficient in itself to make the plan unsound.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2073

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

There is limited referencing or provision of context in respect of the safeguarded rail aggregates depot and CBP within the draft WLP. Paragraph 2.14 and 2.15 provide the first introduction to the facility albeit to a limited degree only. In particular paragraph 2.15 is not sufficiently clear and gives the impression that there is potential for relocation of the facility. As already confirmed AI are clear that there is very limited if any prospect of relocation of their facility.

## Full text:

Form received via email

## Change suggested by respondent:

The following changes are required (and link in with those proposed for Strategic Policy CDA2.1: Watford Gateway Strategic Development Area) The concrete batching plant and rail aggregates depot (including road access from Orphanage Road and rail sidings running parallel to the Abbey Line) is safeguarded by the Hertfordshire Minerals Local Plan and subject to a 250m Minerals Infrastructure Consultation Area. The safeguarded facility makes a valuable contribution toward the sustainable transport of minerals by rail and supply of aggregate and batched concrete to service the local construction market. Relocation of the facility will be very challenging to achieve and will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria. New development coming forward in the surrounding area should assume that the facility will remain for the long term. New development will be required to be designed and mitigated to ensure that it will not prejudice existing or future use of the safeguarded site and associated operations in accordance with the 'agent of change' principle.

Legally compliant: Yes

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2101

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Minerals & Waste Planning. The text within this paragraph regarding the safeguarding of the concrete batching plant at Orphanage Road within the current Minerals Local Plan is supported, along with the statement saying that its relocation will only be supported where a suitable alternative location has been found. It should be noted that the county council is intending to safeguard this site in the revised Minerals Local Plan and has provisionally done so in the proposed submission draft, published in January 2019.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2102

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.8 Children's Services: (Early Childhood Services). The Watford Gateway Strategic Development Area includes the station car park where The Co-operative Childcare Watford Junction is located. The paragraph states that "as part of the redevelopment of the area, a childcare facility should be re-provided." This is also listed as a requirement under Strategic Policy CDA2.1.

5.9 To date, very little childcare is located in this area. A minimum requirement would be for this childcare facility to be re-modelled and extended to meet the new demand in the area. Ideally, another childcare facility would be created as well as extending the existing provision in the locality if possible. However, there is a requirement under Strategic Policy CDA2.1 for a new Primary school and this will cover the nursery class need for this area.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Watford Junction Station area

2011

Comment

Respondent: Network Rail

Agent: Network Rail

## Summary:

Watford Junction presently does not see many long distance trains stopping due to the intensity of use of the fast lines through the station and this is unlikely to change after HS2 opens due to similar numbers of 'Classic' services planned to use the West Coast Main Line. Network Rail has long aspired to build additional fast line platforms at the station to allow stops to be accommodated in the timetable and would like this provision incorporated into the framework for the Watford Gateway area. This will require earmarking or the protection of a wider West Coast rail corridor through the Gateway area to facilitate this provision without prejudicing the future development and enhancement of Watford junction as a major transport hub.

Watford Junction station requires other improvements to accommodate the already high passenger numbers. The station subway is inadequate for the current usage and Network Rail would seek, in conjunction with the Council, to redevelop the station to enhance the station environment and improve passenger facilities. This could incorporate the Council's aspirations for footbridges across the railway and the provision of improved interchange facilities with other transport modes.

## Full text:

Letter received via email

## Change suggested by respondent:

Network Rail has long aspired to build additional fast line platforms at the station to allow stops to be accommodated in the timetable and would like this provision incorporated into the framework for the Watford Gateway area. This will require earmarking or the protection of a wider West Coast rail corridor through the Gateway area to facilitate this provision without prejudicing the future development and enhancement of Watford junction as a major transport hub.

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: None

## Clarendon Road

1776

Comment

Respondent: R Kowalewski

## Summary:

If primarily and strongly targeted as a business area why place a primary school there? The worst place imaginable.

The message in 2.8 - 13 is confusing. More emphasis needs to be placed on not allowing non business use erode office space. We do not want sky scrapers in Watford.

## Full text:

If primarily and strongly targeted as a business area why place a primary school there? The worst place imaginable.

The message in 2.8 - 13 is confusing. More emphasis needs to be placed on not allowing non business use erode office space. We do not want sky scrapers in Watford.

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: First consultation paper about a planning application for the "junction triangle" was issued.

Appear exam: Not specified  
Attachments: None

1860

Comment

Respondent: Watford Central Town Residents Association

## Summary:

We support this statement that there should be a transition of height in developments along Clarendon Road (as well as Station Road and St. Albans Road) next to residential areas nearby of lower heights. We would like greater clarity on what 'lower height' means in these terms, since in a number of recent developments on these roads, lowest height remains some 3 times taller than these adjacent areas. We request an added statement that the step-up should occur entirely within this SDA, and proposals attempting to advance the step-up into nearby residential areas will not be tolerated.

## Full text:

We support this statement that there should be a transition of height in developments along Clarendon Road (as well as Station Road and St. Albans Road) next to residential areas nearby of lower heights. We would like greater clarity on what 'lower height' means in these terms, since in a number of recent developments on these roads, lowest height remains some 3 times taller than these adjacent areas. We request an added statement that the step-up should occur entirely within this SDA, and proposals attempting to advance the step-up into nearby residential areas will not be tolerated.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Community infrastructure

1931

Comment

Respondent: Cassiobury Residents' Association

## Summary:

re para 2.20 - There was supposed to be a new health facility on the Cassio College housing development site, but it never materialized (offset, no doubt). However that decision created havoc in the surrounding surgeries' lists which sky-rocketed. This affected the workload of GP surgeries and the GPs themselves, and their nurses and office staff, and last but not least the waiting times for an appointment; and saw mounting general public frustration over several years whilst trying to get an appointment to see their GP. This appalling situation should \*never\* be permitted to recur.

## Full text:

re para 2.20 - There was supposed to be a new health facility on the Cassio College housing development site, but it never materialized (offset, no doubt). However that decision created havoc in the surrounding surgeries' lists which sky-rocketed. This affected the workload of GP surgeries and the GPs themselves, and their nurses and office staff, and last but not least the waiting times for an appointment; and saw mounting general public frustration over several years whilst trying to get an appointment to see their GP. This appalling situation should \*never\* be permitted to recur.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Building height

1826

Comment

Respondent: Mrs Fran Clark

## Summary:

Where buildings of greater height than adjacent areas are proposed close to low lying residential areas, they will need designed so that they minimise their impact on the amenity of residents and demonstrate how they have embraced a transition from higher density development to areas of a different residential character. - Why was the new development approved at the TK Maxx site when the height is in excess of 10 storeys?

## Full text:

Where buildings of greater height than adjacent areas are proposed close to low lying residential areas, they will need designed so that they minimise their impact on the amenity of residents and demonstrate how they have embraced a transition from higher density development to areas of a different residential character. - Why was the new development approved at the TK Maxx site when the height is in excess of 10 storeys?

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

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

1769

Comment

Respondent: Watford Borough Council

## Summary:

TEST

## Full text:

TEST

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: TEST

Appear exam: Not specified

Attachments: None

1938

Comment

Respondent: Berkeley Homes

## Summary:

Site Allocations MU05: Land and Buildings at 94-98 St Albans Road and MU06 Land at Watford Junction recognise that the number of homes within the CDA may give rise to a need for two new primary schools (with one currently proposed on the Site).

## Full text:

-

## Change suggested by respondent:

It is suggested that the policy in CDA2.1 (c) should therefore be amended to read: “c) Two new Primary school sites to meet the demands generated by the development area unless it can be demonstrated that there is no need”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1944

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

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

This vision for Watford Gateway is broadly supported, however, the policy should clearly outline that only complimentary retail and services required to support new communities will be supported in any of these locations. It should state that any new town centre uses should be assessed against the sequential and impact tests of the NPPF as set out at paragraph 86 and paragraph 89. The Council needs to demonstrate that it has taken into consideration the potential impacts on existing town centres and their vitality and viability. This is to ensure conformity with national planning policy. We would recommend that an additional criterion added after criterion (j) which states:

“New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We would recommend that an additional criterion added after criterion (j) which states:

“New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

#### Summary:

A project team was engaged by Canada Life in July 2020 to review potential development options for Canada Life's site at Imperial Way known as Astral House (currently identified as site allocation MU07) and to advance discussions with Watford Borough Council. This was the first time that Canada Life had assessed the site in relation to the emerging local plan. No previous representations have been made to the Regulation 18 consultation stage or the Call for Sites.

At the time of engaging with the local authority in September 2020 we were informed that an infrastructure bid had been submitted to the Hertfordshire Growth Board to seek funding for various interventions in the Watford Gateway Strategic Development Area. Targeted projects identified included opening up

cycle and pedestrian bridge links from the west of the St Albans Abbey Branch Line ("Abbey Line") to the east, thereby providing access to and potential redevelopment opportunities for a wider range of land uses to the east of the Abbey Line.

On the basis of the high-level information provided, Canada Life expressed support, in principle, for the Watford Gateway Strategic Development Area and identified that the likely aspiration for the site would be to deliver a step change in scale and massing through the inclusion of tall buildings and mixed-use development; although the final mix was yet to be determined but would likely include residential, office and other E Class Uses. However, this approach would necessarily require further investigation with surrounding landowners.

Since that date, significant research has been undertaken by the Canada Life advisory Team to review the strategy for the redevelopment of the site.

These

representations are therefore submitted with the benefit of now having undertaken discussions with the surrounding landowners and additional engagement with Watford Borough Council. These recent and ongoing

discussions are important and have clarified Canada Life's position in respect of the future redevelopment potential for land east of the Abbey Line.

In summary, discussions have raised the following key matters:

1. The London Cement Batching Plant is highly unlikely to be relocated due to the lack of alternative sites, the planning and logistical difficulties of doing so (it is a safeguarded use under the Hertfordshire Minerals Local Plan), and because there is likely to be little / no value in doing so to justify the significant cost to its owners.
2. The Coal Board Pensions Land (site allocation EM05) has not been put forward for allocation as a mixed-use development opportunity and we understand that the site is now being brought forward for modern industrial uses which will maintain Clive Way.
3. The Redrow Land (known as Balmoral Storage, Clive Way) has not been promoted for redevelopment and will therefore be subject to allocation for its existing industrial use.
4. Network Rail is supportive of the principle of delivering a multi-storey car park ("MCSP") on land to the east of the Abbey Line. This is seen as a key move and a catalyst to unlock land around the station for regeneration via their partnership with Kier Construction, known as Solum Regeneration ("Solum").
5. Regeneration around the station to the west of the Abbey Line is going to be the main focus for regeneration during the lifetime of the emerging Local Plan.

The above key matters are germane to the delivery of the Watford Gateway Masterplan SDA and, in particular, how land to the east of the Abbey Line is now

likely to be redeveloped during the lifetime of the emerging local plan. It is therefore necessary for Policy CDA2.1 and associated supporting text at paragraphs 2.14 - 2.19 to be amended so that the plan meets the necessary tests of soundness in respect of being justified and effective. What this means in relation to land to the east of the Abbey Line is as follows:

- The policy must recognise that residential development and any associated infrastructure requirements such as a location for a primary school is very unlikely to happen during the lifetime of the emerging local plan. However, the wording of the policy should maintain flexibility to allow for these as part of a mix of uses if the cement batching plant relocates and adjacent landowners change their approach to the renewal of industrial units. This flexibility is required due to the clear environmental

constraints that have been identified in respect of the cement batching plant remaining in-situ, proposals that are underway for the renewal of older industrial units and ongoing retention of industrial / storage uses i.e. land that has not been promoted for redevelopment.

- It should be clear in the emerging local plan that the uses identified as appropriate for Canada Life's site through allocation MU07 can come forward as solus or mixed uses i.e. it can be redeveloped for a single type

or mix of employment uses and does not have to deliver a mixed-use scheme which includes residential uses. The opportunity for a mixed residential and employment scheme will only be possible if the batching plant relocates and adjacent landowners also seek a compatible mix of uses. While this opportunity may arise longer term, it is now clear that if a residential led mixed-use scheme was to happen it would be towards the

end of the new local plan period or, more likely, beyond. Development before then for beneficial solus or mixed employment uses cannot therefore be fettered if the policy was interpreted as only allowing a development if it includes a mix of uses (including residential).

- Key principles / physical interventions for unlocking and putting in place infrastructure to pave the way for the longer term regeneration of the area can be set by policy now. However, these principles and in particular

physical interventions, need to be refined to make best use of existing routes to avoid splitting development sites unnecessarily (making them unviable for redevelopment), losing existing employment land, and doubling up on infrastructure costs (see below for further discussion on this point).

- The construction of a MSCP with sustainable travel hub and pedestrian / cycle bridge to the station on land to the east of the Abbey Line and to the south of Clive Way is considered to be the main infrastructure and catalyst to further regeneration that will be deliverable during the lifetime of the emerging local plan.

At bullet point 3 we refer to the need to look again at what should constitute key infrastructure within the area to the east of the Abbey Line during the lifetime of

the plan, essentially putting in place key building blocks for longer term regeneration (or sooner if there is a substantial change in the current constraining factors identified through landowner discussions). Our conclusion, alongside that of Network Rail is as follows:

- Clive Way must be protected and extended through to Network Rail and Canada Life's land to the south of the east of the Abbey Line SDA area. This is the most appropriate route to bring mixed vehicular traffic

(alongside active travel options) through to a new MSCP and sustainable travel hub without unnecessarily sterilising substantial areas of developable land which would reduce the viability of projects seeking an

- uplift in employment densities.
- Canada Life will safeguard land at the end of a link from Clive Way and will collaborate with Network Rail for the construction of a MSCP / sustainable travel hub and linking bridge to the station (please refer to enclosed plan

SK08 which identifies the indicative area for safeguarding). As part of this approach the concrete batching plant traffic can be slightly re-routed, but still use the existing road through to Orphanage Road, without then needing costly re-routing to Imperial Way as suggested by Policy ST11.2.

- This MSCP / sustainable travel hub and linking bridge to the station is fundamental to cost effectively unlocking land between the Main Line and the Abbey Line for high density redevelopment. Furthermore, it is fundamental to alleviating the severe congestion experienced in the town centre due to all existing station parking being located in one area.

- In the longer term, a pedestrian and cycle bridge from Penn Road to allow further east west permeability for pedestrians and cyclists may be delivered.

With the batching plant retained, this new link could effectively

be routed just to the north of the batching plant and linked to the existing pedestrian infrastructure along Imperial Park.

We do not support a safeguarding policy objective to create a further, segregated vehicular link through the Canada Life site to the Network Rail land to the south / rerouting of batching plant traffic to Imperial Way via an extension of Imperial Way. This is not needed following further investigatory work with Network Rail, would double up on routes to the same point, and the associated costs of doing so would leave the Canada Life site undevelopable for employment uses (including industrial) during the emerging plan period. This is not acceptable to Canada Life and would lead to their withdrawal of support for the Masterplan



Area if it were to be maintained as a policy requirement (see additional representation in response to Policy ST11.2, Site Allocation MU07 and P202 of the Local Plan document).

The above analysis demonstrates that the current strategy for the Watford Gateway SDA needs to be amended for land to the east of the Abbey Line. Without amendments to respond to the evidence that has emerged through recent and ongoing landowner discussions, the policy is not justified. This is because it would not take into account the reasonable alternatives based on proportionate evidence that has been set out in these and other representations.

In addition, it would not be effective because Canada Life and Network Rail would not be in a position to safeguard land for an MCSP / sustainable travel hub on

land to the east of the Abbey Line. This is because the current strategy of extending Imperial Way / re-routing the batching plant traffic to Imperial Way would substantially and unnecessarily sterilise developable land within allocation MU07, where Class E(g), B2 and B8 employment uses are delivered, by splitting

the site and putting active travel users in conflict with secure yard areas etc. As stated previously, it is now considered that employment uses will be the most

likely form of development on land to the east of the Abbey Line during this local plan period. These uses are required due to the very high, objectively assessed

levels of need for employment uses, including industrial development, within the borough.

Full text:

-

Change suggested by respondent:

In light of the above, Policy CDA2.1 will require minor amendment as follows:

- Criteria g) - reword to state "Prior to the grant of planning permission for development proposals which include residential use on land east of the railway line, a pedestrian and cycle bridge for commuters and residents across the Abbey Line must be agreed before planning permission is granted". This is required to avoid preventing redevelopment of sites for employment uses during the plan period which should be allowed to come forward irrespective of the provision of the pedestrian bridge or not as long as land for the MCSP and access to it via an extended Clive Way is protected.
- Criteria i) - reword to state "The land east of the West Coast Mainline and west of the Abbey Line will support a mix of uses including replacement car parking, new homes, and employment uses and a replacement childcare facility as part of the commercial floorspace within this area." The replacement childcare facility will necessarily be required within the central part of the Masterplan area as it will not be appropriate to the east of the Abbey Line in light of the landowner discussions that have now taken place.
- Criteria j) reword to state "Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace (unless it is proven that the existing use is unviable) and the proposed use will not undermine existing uses through the Agent of Change Principle. As part of the commercial floorspace a replacement childcare facility should be provided." The replacement childcare facility will necessarily be required within the central part of the Masterplan area as it will not be appropriate to the east of the Abbey Line in light of the landowner discussions that have now taken place.
- Criteria K) reword to state "Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line. Applicants will be required to demonstrate this has been achieved as part of any proposal. The multi-storey car park to the east of the Abbey Line should be agreed prior to grant of planning permission for development to the west of the mainline";
- Criteria L) reword to state "New development will not compromise vehicle access from Colonial Way via Clive Way via Colonial Way into the site and access to the station." This is to provide clarity to the policy criteria which is unclear without the amendment.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

1985

Object

Respondent: Solum Regeneration  
Agent: Daniel Watney

## Summary:

## 6.0 Emerging Context

6.1 Application reference 19/00507/FULM (hereafter the St Albans Road Proposal) was approved on the 25th November 2020.

6.2 The application comprises building heights ranging between 8 to 28 storeys, reflecting a height, density, and scope beyond the policy parameters for the site at a local and regional level. Paragraph 6.48 of the Council's Committee Report stated that "it is unavoidable that the redevelopment of land at Watford Junction would not have at least moderate adverse effects in these views, particularly given the vision for high density, multi-storey development on this site", while the proposal was found to make "a high density, residential-led, mixed-use development on previously developed land in a highly sustainable location... the scheme accords with the vision and objectives of the Watford Junction Special Policy Area to provide major regeneration of land to the north of the station and will form the first phase of redevelopment that will form the catalyst for the development of the adjoining land within the special policy area".

6.3 The Draft Plan should adequately respond to the emerging context as defined by consented schemes within the CDA. With regards to the WGSDA, the above example demonstrates that the scale and density of development within will be inherently greater given the sustainability credentials of the site and the ability for developments within the area to assist the Borough in meeting its strategic objectives – not least, accommodating sufficient housing and supporting its delivery across the plan period. Any aspiration for a mid-rise development would have conflicted with the policy aspirations for the site at all levels.

6.4 This permission represents an important example as to the risk in setting baseline building heights through an indicative capacity study which relies heavily on notional assumptions. Draft Policy CDA2.1 fails to adequately reflect what this approved scheme has achieved and what should inform future schemes within the SDA, and the draft Policy now appears directly at odds with this proposal and any coherent approach to a masterplan across the WGSDA, which should include comparable or greater heights towards the gateway of Watford Junction station.

6.5 The Tall Buildings Study suggests that the baseline building heights within the WGSDA have been chosen in part as this would enable the consented St Albans Road scheme to sit more comfortably within a future higher density context. It is difficult to establish any reasonable comparison between the proposed baseline of between 8 to 10 storeys and the St Albans Road Proposal which spans up to 28 stories, clearly demonstrating that this reference is ineffective and unsound, and has the potential to limit development within the SDA.

## Full text:

Form received via email

## Change suggested by respondent:

Ensure that draft policies fully consider emerging context and consented development as part of their evidence base and reflecting the future scale of development within the Core Development Area.

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Solum - document - <https://watford.oc2.uk/a/n9>

Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

1986

Object

Respondent: Solum Regeneration  
Agent: Daniel Watney

## Summary:

## 5.0 Protection of Existing Employment Floorspace

5.1 Part j) of Policy CDA2.1 requires the protection of all existing employment floorspace. This wording is considered ambiguous. It is not clear as to whether the Council will accept a loss within the SDA in certain instances, or whether site specific circumstances such as the quality of the commercial offering or recent marketing evidence would be sufficient to demonstrate a loss.

5.2 In the absence of this explanatory wording, the policy may preclude or constrain development, resulting in retention of poor-quality employment floorspace in place of more meaningful floorspace.

## Full text:

Form received via email

## Change suggested by respondent:

Amend policy CDA2.1 to provide flexibility with regards to employment loss and how this can be justified.

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Solum - document - <https://watford.oc2.uk/a/n9>

Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

Respondent: Solum Regeneration  
Agent: Daniel Watney

#### Summary:

#### 2.0 Draft Strategic Policy

CDA2.1 'Watford Gateway Strategic Development Area' 2.1 The text of former Draft Policy SD2.7, concerning development within the WGSDA is set out in bold below. Proposals in this Strategic Development Area, as defined on the Policies Map, which contribute to achieving successful implementation of the development aims will be supported. Proposals for new development are expected to incorporate the following development considerations:

1. Transform the Watford Junction Station into a 21st century multi-modal public transport hub and enhance the visitor experience;
2. Create a new vibrant mixed use quarter to provide new homes and jobs in close proximity to Watford Junction station.
3. Reduce severance created by the railway lines and improve connectivity between different parts of the site and the wider area including the town centre;
4. Protect or reprovide existing bus related facilities on site.
5. Improve the public realm and create a safe and attractive network of streets and open spaces, incorporating the green infrastructure.
6. Ensure individual developments are planned in a comprehensive manner and contribute to the regeneration of the site as a whole.
7. Encourage high density development with school provision required to make it a fully sustainable location;
8. Support greater land use efficiency based on a mix of uses to benefit from the accessibility of the area;
9. Where necessary, Compulsory Purchase Orders may be applied.

2.3 This initial approach was supported, including the degree of flexibility within the policy and the inference that each site within the area would be subject to its own benefits and constraints, which could be managed as part of further detailed site specific assessment by the Council.

2.4 The text has since been heavily revised; the entirety of the original wording, in addition to the opportunity for some flexibility has been replaced. Notably, the first statement which set out the Council's in principle support for proposals that contribute to achieving the successful implementation of the developments aims has been removed. In addition, Criterion 7, and reference to the Council's encouragement of high-density development across the entirety of the WGSDA has been removed. This support has not been reprovided within the amended text.

2.5 These omissions are concerning. The amended text now risks stifling the development potential of the area and fails to sufficiently reflect the ambition and opportunity of the sites expressed by the Council and landowners.

2.6 The amended policy, Draft Strategic Policy CDA2.1, now requires Applicants to demonstrate how proposals make provision for and contribute towards thirteen new criteria. The policy is set out below. The Strategic Development Area will see co-ordinated change around Watford Junction railway station / bus station and the Clarendon Road area, creating a mixed use urban quarter of high quality design and place making, with excellent connectivity to support a mix of housing, employment and other subsidiary land uses and community orientated facilities. To achieve this, applicants will be required to demonstrate how proposals will make provision for and contribute towards the following criteria:

1. The regeneration of land north of Watford Junction railway station and how they will help transform the area into new, high density development providing homes, jobs and other uses;
2. In locations where new development is of a scale and is notably different in character to adjacent existing residential uses, proposals will need to be designed so that they demonstrate a transition of taller urban form to lower lying character and mitigate any significant impact on neighbouring residential or community amenity;
3. A new primary school site to meet the demands generated by the development;
4. Provision of a circa 1,300sqm of healthcare floorspace;
5. A high quality transport interchange hub located at Watford Junction connecting rail, bus, taxi, cycle and pedestrian facilities;
6. New walking, cycling and public transport infrastructure will be required to contribute towards the Local Transport Plan and supporting strategies;
7. On land east of the railway line, a pedestrian and cycle bridge for commuters and residents across the Abbey Line must be agreed before planning permission is granted;
8. A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded;
9. The land east of the West Coast Mainline will support a mix of uses including replacement car parking, new homes and employment uses;
10. Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace and the proposed use will not undermine existing uses through the Agent of Change Principle. As part of the commercial floorspace a replacement childcare facility should be provided;
11. Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line.

Applicants will be required to demonstrate this has been achieved as part of any proposal;

12. New development will not compromise vehicle access from Colonial Way and Clive Way into the site and access to the station;
13. The concrete batching plant and rail aggregates depot will be safeguarded as significant mineral infrastructure.

2.7 The proposed changes to the wording in this instance create a policy that is now prescriptive, including detailed floorspace expectations for new healthcare floorspace. Paragraph 21 of the National Planning Policy Framework sets out that Strategic Policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or non-strategic policies. The inclusion of detail is not appropriate and should therefore be removed.

2.8 The sites within the WGSDA represent some of the most sustainable sites for development across the entire Borough, intended as an opportunity to reinvigorate the Watford locale and lead on co-ordinated change around the railway station. The amendments to Draft Policy CDA2.1 do not reflect this ambition and miss a crucial opportunity to capitalise on these highly sustainable locations, conflicting with policy aspirations across all levels.

#### 3.0 Support for Higher Density Proposals

3.1 Planning policy across all levels advocates the effective use of land within highly sustainable locations. Paragraph 117 of the National Planning Policy Framework states that planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses. Strategic policies should set out a clear approach for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or brownfield land.

3.2 The Core Development Area (CDA) represents the primary location for growth within the Draft Local Plan. As set out within Draft Strategic Policy SS1.1, the CDA is expected to support 80% of allocated development in the borough and provides opportunities for further redevelopment. The three distinct locations within the CDA are included because of their character and the opportunities that each present.

3.3 Draft Policy CDA2.1 fails to capitalise on the potential of the CDA and does not sufficiently advocate the effective use of land. Criteria a) and b) are the only two that refer to density and taller urban form, set within the context of regeneration and neighbouring amenity. As mentioned above, the Council's encouragement of high-density development has now been omitted. The wording of the policy does not set out the in-principle support for higher density development within the CDA.

3.4 Given the recognised need for higher density development at this location, greater emphasis must be placed on the support for higher density schemes, sufficient to deliver the policy expectations for the area.

#### 4.0 Support for Taller Buildings

4.1 Draft Policy CDA2.1 does not explicitly confirm that taller buildings will be supported within the CDA in principle. Given the policy emphasis at all levels on the importance of making the most effective use of land in sustainable locations, this is a significant omission.

4.2 It is suggested that a sentence is included within the body of the policy to reflect the recognition of the Council's support for taller buildings. We would recommend that the following wording is incorporated: "Higher density proposals and taller buildings shall be supported in principle in the Strategic Development Areas, notwithstanding acceptability of their environmental impacts"

4.3 Draft Policy QD6.5 does not set out the Council's in principle support for taller buildings within the SDAs. This policy should be amended, as per the suggested wording above, so that it offers support for taller buildings in these locations and ensure that the opportunities presented by the SDA are fully realised in order to meet strategic objectives, and accordingly supported by policy.

4.4 The supporting text to Draft Policy CDA2.1 confirms that developments will be required to comply with Draft Policy QD6.5 where proposals meet the threshold triggers for a taller building. Figure 6.3 of the Draft Plan, 'Base Building Heights', as informed by the Tall Buildings Study (2021), sets out the base building height for development.

- 4.5 Within the WGSDA, the threshold is up to 8 storeys at street frontages, stepping up to 10 storeys to the rear. The Plan sets out that anything above these baselines shall be deemed a taller building and trigger Draft Policy QD6.5.
- 4.6 These heights have been identified following an indicative capacity study, which has recognised that the indicative development capacity supported through the preferred scenarios would have the potential to meet and exceed the notional capacities identified in the emerging Local Plan.
- 4.7 The methodology relies upon a series of notional assumptions related to environmental constraints, heritage sensitivities, development footprint, land use mix and conversion to housing numbers.
- 4.8 This notional approach undermines the primary purposes of the CDA and risks precluding taller schemes of more suitable density and design. The current capacity led approach is not considered appropriate and risks considerable restriction on development scope.
- 4.9 It is considered that Part b) of Draft Policy CDA2.1 is sufficient to inform proposals in the SDAs, having regard to character, heritage, and amenity. The base-line methodology, and therefore Figure 6.3 itself, is not necessary to guide development within the SDAs.
- 4.10 It is strongly encouraged that the definition of a taller building within the SDAs is amended to provide sufficient flexibility, reflecting their unique circumstances and opportunities. Higher density development within highly sustainable locations is inherently desirable and supported at a national level, particularly where this concerns the delivery of housing. Invariably, Draft Policies QD6.5 and CDA2.1 must reflect this support. Currently, they fail to do this.

Full text:

Form received via email

Change suggested by respondent:

- 1) It is suggested that a sentence is included within the body of the policy to reflect the recognition of the Council's support for taller buildings. We would recommend that the following wording is incorporated: "Higher density proposals and taller buildings shall be supported in principle in the Strategic Development Areas, notwithstanding acceptability of their environmental impacts"
- 2) Amend Draft Policies CDA2.1 and QD6.5 so that they adequately support schemes of increased height and density within the Core Development Area.

Legally No  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: Solum - document - <https://watford.oc2.uk/a/n9>  
Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

2010

Support

Respondent: Network Rail  
Agent: Network Rail

Summary:

Network Rail is required to ensure its operational and freight activities are not adversely affected by development and therefore welcomes and supports the safeguarding of the aggregate depot and associated concrete batching plant at Orphanage Way, which is a designated strategic freight site. Network Rail reiterates the importance of ensuring new development appropriately considers the concrete batching plant and rail aggregates depot including its access and the importance for early engagement with the site operator at design stage.

Full text:

Letter received via email

Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: None

2015

Object

Respondent: Mineral Products Association  
Agent: Mineral Products Association

## Summary:

Also affects policies ST11.2, CC8.5 and sites MU06 & 07

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

## Full text:

Form received by email

## Change suggested by respondent:

The Plan should accurately identify the Orphanage Road site (rail depot and concrete batching plant) on the Policies Map so the area that is safeguarded and to which safeguarding policy applies is clear. It should ensure that any allocations or proposals for development in the Watford Junction area are required to ensure that the site and operations at the rail depot and concrete batching plant are safeguarded. This should clearly set out how this is to be achieved including through not permitting noise-sensitive development in close proximity to the site unless it can be demonstrated that sensitivity can be mitigated, and so potential adverse effects and prejudicing of the operation of the site is avoided.

Policy CDA2.1 and supporting text should be amended to make it clear how safeguarding is to be applied including that proposals for development will be required to demonstrate that the proposed use will not undermine or prejudice the existing safeguarded uses, through application of the Agent of Change principle.

Legally Yes

compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>

2072

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

See letter for details

Inclusion of reference to the safeguarding of the rail aggregates depot and concrete batching plant within Policy CDA2.1 at criterion (m) is welcomed. However, this should be more robust and explicit in its requirements and consistent with the approach taken to protection of existing employment floorspace at criterion (j) of the same policy.

## Full text:

Form received via email

## Change suggested by respondent:

The following changes are required:

The Strategic Development.....To achieve this, applicants will be required to demonstrate how proposals will make provision for and contribute toward the following criteria:

a) The regen....

J) Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace and the proposed use will not undermine existing uses through the Agent of Change Principle. As part of...

m) The concrete batching plant and rail aggregate depot including its rail sidings and road access will be safeguarded as significant mineral infrastructure. Proposals for development will be required to demonstrate that the proposed use will not undermine the existing safeguarded uses through the Agent of Change Principle.

Legally Yes

compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2103

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Children's Services: (School Place Planning). The policy requirement under paragraph c) for a new primary school to be located within this Strategic Development Area is supported. However, it is suggested that the paragraph is modified as follows, in order to ensure that a new 2 form entry (2fe) primary school is delivered on site MU05: Land and Buildings at 94-98 St Albans Road (as stated within the supporting text for this allocation) and a 3fe primary school on site MU06: Land at Watford Junction (as stated within the supporting text for this allocation) , which both meet the minimum requirements of BB103 including external areas.

...Given the well-developed urban setting of Watford, if the primary school located at MU06: Land at Watford Junction is to be delivered as a standalone site i.e. not a building integrated within a wider development, a sub-optimal requirement may be acceptable, providing that a minimum area of 0.9ha which otherwise complies with the county council's site standards is allocated for a 3fe primary school in this area. However, consideration will need to be given to the availability and accessibility of offsite sports pitches where these cannot be provided onsite.

## Full text:

Form and letter received via email

## Change suggested by respondent:

However, it is suggested that the paragraph is modified as follows, in order to ensure that a new 2 form entry (2fe) primary school is delivered on site MU05: Land and Buildings at 94-98 St Albans Road (as stated within the supporting text for this allocation) and a 3fe primary school on site MU06: Land at Watford Junction (as stated within the supporting text for this allocation) , which both meet the minimum requirements of BB103 including external areas.

c) A site for a new 2fe primary school site within Site MU05: Land and Buildings at 94-98 St Albans Road and a site for a new 3fe primary school within Site MU06: Land at Watford Junction, that are BB103 compliant, including external areas, to meet demands generated by development;

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2104

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Minerals & Waste Planning. The county council supports the safeguarding of the concrete batching plant and rail aggregates depot at Orphanage Road within this policy. Its safeguarding is in line with the NPPF, Minerals Policy 10: Railheads and Wharves, of the adopted Minerals Local Plan (March 2007) and draft Policy 9: Safeguarding Bulk Transport and Bulk Handling and Processing Sites of the Proposed Submission Minerals Local Plan (January 2019). However, the safeguarding of this site, along with the surrounding mineral infrastructure consultation area1 needs to be shown on the draft Policies Map and referenced as such within the policy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore suggested that the policy is amended as follows:

m) The concrete batching plant and rail aggregates depot will be safeguarded as significant mineral infrastructure and is shown on the Policies Map.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2105

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. The policy measures are in line with the access strategy being developed as part of the Watford Junction master planning work.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Town Centre Strategic Development Area

2036

Comment

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

The Final draft Local Plan refers to the replacement and improvement of Watford Market within the Town Centre Strategic Development Area. Part of the Watford Market lies within our development area and we would support bringing forward a better market for the town centre. However we would envisage that this would only come forward as part of a comprehensive scheme and balanced with the viability of the wider redevelopment of the site.

## Full text:

Forms received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>  
IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2106

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.14 Children's Services: (Early Childhood Services). Childcare premises are mostly clustered in the top end of the high street. There is enough provision in this area which could cater for an increased demand for childcare provision. However, this needs regular reviews to ensure sustainability of provision to meet this new demand.

5.15 It is expected however that any proposed primary school either in this area or close by would fulfil the additional nursery class need.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2107

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. The South High Street Area presents an opportunity to develop a new transport hub at the southern end of the town centre.

## Full text:

Form and letter received via email

## Change suggested by respondent:

As the route of the Mass Rapid Transit system (MRT) has not yet been determined, it is suggested that this paragraph is be modified as follows:  
"This area acts as a gateway to the Town Centre from the Watford High Street Overground Station and opportunities to improve local transport with improved cycle, pedestrian and bus connections which could potentially be developed further as part of connections to a future a Mass Rapid Transit port System will be supported."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>



2108

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Improving connectivity (Paragraph 2.48)

5.17 Transport. Improvements to key junctions to prioritise non-vehicle users are welcomed. However, paragraph 2.48 should be modified so that buses aren't excluded. It is recognised that this is part of ongoing work being undertaken as part of the Watford Sustainable Transport Strategy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"...Of particular importance are improvements to key junctions that should prioritise non-vehicle users (except for buses), including the junctions at the High Street / Rickmansworth Road, Albert Road South / Beechen Grove, Clarendon Road / Beechen Grove, south part of the High Street / Beechen Grove and Market Street / Exchange Road."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2109

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Children's Services (School Place Planning). The county council welcomes the suggestion within this paragraph that a new primary school could be located within this strategic development area. However, at Regulation 19 stage, HCC would expect a site to be allocated within the strategic development area, or at the very least, be added as a requirement within Policy CDA2.2: Town Centre Strategic Development Area.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**A thriving Town Centre**

1827

Comment

Respondent: Mrs Fran Clark

## Summary:

Unfortunately the effect of Covid has now completely reversed Watford as being 'a thriving town centre' . Now the Plan needs to seek methods of reviving the Town Centre and maybe converting some retail outlets to residential homes.  
Watford [and Hemel Hempstead] is in the top 10 towns that have been ranked amongst the UK's most 'vulnerable' in the wake of the Covid-19 pandemic.  
The town centre needs to be reinstated before the Watford Plan is continued.

## Full text:

Unfortunately the effect of Covid has now completely reversed Watford as being 'a thriving town centre' . Now the Plan needs to seek methods of reviving the Town Centre and maybe converting some retail outlets to residential homes.  
Watford [and Hemel Hempstead] is in the top 10 towns that have been ranked amongst the UK's most 'vulnerable' in the wake of the Covid-19 pandemic.  
The town centre needs to be reinstated before the Watford Plan is continued.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Central High Street area**

1932

Comment

Respondent: Cassiobury Residents' Association

## Summary:

re 2.43 accessibility. Oftentimes for the elderly, disabled and infirm, using a private car or taxi isn't a 'choice' but a \*necessity\*, yet such people have been denied simple accessibility to their banks and shops in the central area as most of the drop-off and collection points that existed for this purpose have been systematically removed. This situation, some say discrimination against such groups, ought to be remedied.

## Full text:

re 2.43 accessibility. Oftentimes for the elderly, disabled and infirm, using a private car or taxi isn't a 'choice' but a \*necessity\*, yet such people have been denied simple accessibility to their banks and shops in the central area as most of the drop-off and collection points that existed for this purpose have been systematically removed. This situation, some say discrimination against such groups, ought to be remedied.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Improving connectivity**

1780

Comment

Respondent: R Kowalewski

## Summary:

So what did the council do to aide pedestrian connectivity??? Only fill in the underpass. Why, that goes totally against what the written aspirations are. Are we going to be faced with more acts of such ineptitude with this development plan?

Think beyond "anti car" think what can be done to enable both to co-exist, to enhance connectivity by foot without creating additional bottle neck where this is possible. e.g. that underpass. It would also have been cheaper to improve the underpass rather than fill it in.

## Full text:

So what did the council do to aide pedestrian connectivity??? Only fill in the underpass. Why, that goes totally against what the written aspirations are. Are we going to be faced with more acts of such ineptitude with this development plan?

Think beyond "anti car" think what can be done to enable both to co-exist, to enhance connectivity by foot without creating additional bottle neck where this is possible. e.g. that underpass. It would also have been cheaper to improve the underpass rather than fill it in.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

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

1945

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

The Town Centre Strategic Development Area encompasses 52 hectares of land at the heart of Watford, which also includes the Atria shopping centre. At paragraph 2.26, the supporting text to Policy CDA2.2 advises that Watford Town Centre will need to evolve and diversify in response to current and future retail and social trends, be adaptable to changes in technology, consumer behaviours and the shift from 9am-5pm towards longer, flexible, active hours.

The draft Plan, at paragraph 2.39, advises that that flexibility for retail and leisure uses will be required to help ensure the east side of the High Street and the shopping centre continue to make a positive contribution towards the town centre, while complementing the more traditional High Street retail offer. This represents a significant change in the Council's long-term policy position on protecting retail frontages and this step-change is strongly supported by our client.

The Plan, at paragraph 2.26, goes further to suggest that the need for adaptation and diversification, together with access to good public transport, makes the Town Centre appropriate for residential-led or mixed-use high-density development.

This position is supported by our client and reflects the need for flexibility in town centres as shopping and working patterns continue to change. It is also in accordance with paragraph 85 of the NPPF.

At paragraph 2.49 of the supporting text, reference is made to new development in the Town Centre Strategic Development Area, where it is anticipated that at least 546 new homes will be delivered.

There is no detail as to how the Council has calculated that 546 new homes will be delivered in the Town Centre Strategic Development Area or what source they will come from. The provision of these 546 new homes is also not included in the wording of Policy CDA2.2.

It is not clear if these homes are to be provided through an allocation or if the Council expect them to be delivered through windfall development. The Council needs to specify whether it expects these units to come forward as windfall sites or through allocations. This is to ensure that they are deliverable in line with the requirements of Annex 2 of the NPPF. Without this, the Plan cannot be considered to be sound.

The figure of 546 additional homes is a very low, specific, figure for the Town Centre. It is recommended that the Plan includes a table which sets out the sources for achieving the overall identified number of homes, including the 546 new homes in the Town Centre.

It is also considered that the Town Centre may have a greater capacity for residential development than is identified. As set out previously, there may be future opportunities at Atria shopping centre to consolidate the existing retail offer and provide housing in a highly sustainable location.

The Plan states, at paragraph 2.32, that developments within the Town Centre will need to consider how they relate to their surroundings, including heritage assets, and the impact they may have on the character and function of the area. Schemes will need to comply with policies set out in Chapter 6 'An Attractive Town' and consider how they relate to the existing built form.

At paragraph 2.5 of the Plan, it states that, informed by the Tall Buildings Study, the future base height in the Town Centre is considered to be five storeys. Proposed buildings taller than this will need to satisfy the requirements set out in draft Policy QD6.5 'Building Height'. It is considered that this is overly restrictive. More details on objections to the wording of this policy are set out in subsequent sections.

It is noted that paragraph 2.5 is not consistent with the base height stipulated at Policy QD6.5 for the Town Centre Strategic Development Area which states 5 storeys on the High Street, stepping up to 8 storeys to the rear. Therefore, it is suggested that paragraph 2.5 text is amended to the following: "future base height in the Town Centre is considered to be five storeys on the High Street stepping up to 8 storeys to the rear"

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

It is noted that paragraph 2.5 is not consistent with the base height stipulated at Policy QD6.5 for the Town Centre Strategic Development Area which states 5 storeys on the High Street, stepping up to 8 storeys to the rear. Therefore, it is suggested that paragraph 2.5 text is amended to the following: "future base height in the Town Centre is considered to be five storeys on the High Street stepping up to 8 storeys to the rear"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2037

Support

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

The principles of this policy are supported particularly where it relates to making the effective use of land to intensify town centre uses and increase the amount of people living in the town centre.

## Full text:

Forms received via email

## Change suggested by respondent:

We consider that the thrust of this policy should be continued throughout the remainder of the housing provision policies and site allocations for the town centre which we feel are currently not evident particularly in the town centre site allocations.

Legally Yes

compliant:

Sound: Yes

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2110

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.19 Children's Services: (School Place Planning). Following on from the above, it is noted that there is no requirement within this policy to provide a site for a new primary school, despite the supporting text under paragraph 2.50 stating that applicants are encouraged to work collaboratively to identify where a new primary school can be provided within this area.

...5.20 Given the well-developed urban setting of Watford, if the primary school located within this strategic development area is to be delivered as a standalone site i.e. not a building integrated within a wider development, a sub-optimal requirement may be acceptable providing that a minimum area of 0.9ha which otherwise complies with the county council's site standards is allocated for a 3fe primary school in this area. However, consideration will need to be given to the availability and accessibility of offsite sports pitches where these cannot be provided onsite.

## Full text:

Form and letter received via email

## Change suggested by respondent:

If this area is to provide one, it would improve the soundness of the plan if it were stated within the policy and therefore the following amendment is required:

"j) A site for a new 3fe primary school should be located within the strategic development area that is BB103 compliant, including external areas and applicants are encouraged to identify where a new primary school can be provided."

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2111

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. The wording within the policy should be modified as follows, in order to refer to the new transport hub at the southern end of the High Street. ...As parking is not mentioned in this policy, it would be expected that any development coming forward in this area would be "a car lite" development.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"f) Opportunities should be taken to reduce the vehicle dominance of the ring road, proposals that provide active frontages to the ring road will be supported, transforming the environment into a street that is a positive experience to use for pedestrians and cyclists that will support the use of the new transport hub at the southern end of the High Street, as well as vehicle users, will be a priority;

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Colne Valley Strategic Development Area

1803

Comment

Respondent: Mr John Snell

## Summary:

This comment is made in the context of the Colne Area but has a wider application. Thomas Sawyer Way has to be the most expensive and least cost-effective road built in Watford in living memory: it is a cul-de-sac only giving access to the hospital --- laudable but poor value. It should be extended so that a connection is made to the Ricky Road near the Premier Inn (via Croxley estate). This would relieve several roads around the town centre, with significant savings in time and journey costs. At a minimum, provide all turning movements at junction with Wiggshall Road

## Full text:

This comment is made in the context of the Colne Area but has a wider application. Thomas Sawyer Way has to be the most expensive and least cost-effective road built in Watford in living memory: it is a cul-de-sac only giving access to the hospital --- laudable but poor value. It should be extended so that a connection is made to the Ricky Road near the Premier Inn (via Croxley estate). This would relieve several roads around the town centre, with significant savings in time and journey costs. At a minimum, provide all turning movements at junction with Wiggshall Road

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1899

Comment

Respondent: La Salle Investment Management  
Agent: Miss Rachel McCall

## Summary:

In relation to building heights, the supporting text to Policy CDA2.3 stipulates that the base future building height in the area is 5 storeys. This however contradicts 'Policy QD6.5-Building Height' which confirms a base building height of up to 6 storeys in the Colne Valley Strategic Development Area, and we therefore suggest Policy CDA2.3 is updated to reflect heights up to 6 storeys.

Development of the wider area is likely to come forward in phases depending on landownership. The policy should recognise and consider the deliverability and future phasing of development coming forward in the area over the Plan period.

## Full text:

In relation to building heights, the supporting text to Policy CDA2.3 stipulates that the base future building height in the area is 5 storeys. This however contradicts 'Policy QD6.5-Building Height' which confirms a base building height of up to 6 storeys in the Colne Valley Strategic Development Area, and we therefore suggest Policy CDA2.3 is updated to reflect heights up to 6 storeys.

Development of the wider area is likely to come forward in phases depending on landownership. The policy should recognise and consider the deliverability and future phasing of development coming forward in the area over the Plan period.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/yt>

2112

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.23 Transport. The vision to transform this from a car dominated environment to a new mixed used quarter is supported but may be challenging to achieve, as it is traversed by a number of key vehicular routes into the town centre which divide the area into different sections. There are a wide variety of land uses within the area which again will be a challenge to its coherence as a defined quarter. It is noted that this is a diverse area which contains large developments in the River Colne area where masterplans have yet to be developed.

Watford Riverwell, Vicarage Road Football Stadium and Watford General Hospital area (Paragraph 2.68)

5.24 Transport. Safeguarding of the former Metropolitan Line Extension route is strongly supported.

## Full text:

Form and letter received via email

## Change suggested by respondent:

At this stage, as the route of the MRT system is not yet agreed, it is suggested the last paragraph should be modified as follows:

"This route offers the potential to provide a high quality sustainable transport link between West Watford and the High Street area which could potentially be ultimately used for a new public transport system such as a Mass Rapid Transit will form part of a Mass Rapid Transport system linking Watford High Street and Ascot Road to the west (on the boundary with Three Rivers District)."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2113

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.25 Children's Services: (School Place Planning). The text included in this paragraph (and repeated in paragraph. 10.11 of the local plan) states that: "For sites larger than 1,000 dwellings, education provision will be required on site'. However, in paragraph. 2.19 (and also repeated in different parts of the plan) the following comment leaves the possibility for developers to seek a solution away from the strategic development areas of Watford Junction, Town Centre and Colne Valley Retail, while being supported by the Local Planning Authority (LPA): 'If an alternative location for a new primary school is identified outside of the Strategic Development Area and will meet the needs of new residents this will be supported'. The two requirements appear to contradict to each other, and this approach should be clarified as the overall quantum of primary school provision in the plan is already under pressure. 5.26 Paragraph 2.70 further suggests that "For sites that are located in close proximity to each other and will have a cumulative impact that will generate demand for a new school, applicants are encouraged to work collaboratively with other landowners and the education authority to best meet this need. There is a need to identify where a new primary school can be provided that provides good amenity for young children." This does not seem to deal with the demand for primary education provision rather than a mere 'encouragement' for developers to find a solution.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

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

1850

Comment

Respondent: Planning & Development Associates Ltd

## Summary:

A Statement of the Representations is attached containing comments on this Policy. 2.3.1 Sub-paragraph d) which states that, "New development will contribute towards the creation of, and connections to a linear park along the River Colne, from Water Lane to Oxhey Park, enabling public access for pedestrians and cyclists and the enhancement of wildlife habitats" is supported in principle, but by designating the additional areas proposed in this representation, greater connectivity could be achieved. An opportunity has therefore been missed.

## Full text:

A Statement of the Representations is attached containing comments on this Policy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y4>

1946

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

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

The overarching vision is to transform it from a car-dominated environment with large retail and commercial sheds, into a new mixed-use urban quarter with a quality public realm and an enhanced and accessible river environment.

Paragraph 2.56 of the draft Plan advises that proposals should not increase the amount of retail floorspace on site unless small-scale provision is needed to support the local community. Existing retail floorspace can be re-provided, where appropriate, however, a reduction of retail provision will be supported to contribute towards the objective of transforming this area into a residential and mixed-use quarter.

New development in the Colne Valley Strategic Development Area, is anticipated to include 4,361 new homes. Of these, 1,383 form part of the Watford Riverwell scheme which already has planning permission.

Our client is supportive of the overall vision but consider that more clarity should be included in the policy wording and supporting text, in relation to the size of retail provision which is acceptable in this location.

Under criterion "a)" Strategic Policy CDA2.3, the policy wording states that "the redevelopment of retail and commercial land will be intensified with mixed used development. Where retail use is re-provided, this should not exceed the existing net retail floorspace on site". This suggests that large format retail could come forward alongside a new housing community, whereas the supporting text at paragraph 2.56 to the policy suggests that any retail provision should be small scale.

The policy should clearly outline that only complimentary retail and services required to support the new housing community will be supported. Any additional town centre floorspace should be assessed against the sequential and impact tests of the NPPF as set out at paragraph 86 and paragraph 89. This is to ensure conformity with national planning policy.

We would recommend that criterion a) is amended to state:

"New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test"

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We would recommend that criterion a) is amended to state:

"New town centre and employment generating uses should be assessed against the sequential test and any new floorspace over 250 sqm should be assessed against the impact test"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2065

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

The general direction of the policy - to make the most efficient use of land in this highly sustainable location - is supported. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Strategic Policy CDA2.3 ('Colne Valley Strategic Development Area') states (inter alia) that "development will be supported where it contributes towards the objectives for the area and is consistent with other policies in the Local Plan".

The site is located in the CVSDA and GHH generally support the direction of the policy and consider it

to align with the requirements of the NPPF. To help achieve the objectives for the CVSDA, we recommend that the residential potential of sites - particularly allocated sites such as 252-272 Lower High Street - should be maximised.

## Full text:

Letter and form received via email

## Change suggested by respondent:

It is recommended that the residential potential of sites - particularly allocated sites such as HS22 - should be maximised. It is recommended that wording is included within the policy that encourages residential development to exceed the 95 dwellings-per-hectare (as set out within Strategic Policy SS1.1) where appropriate. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>

Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>



2114

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.27 Children's Services: (School Place Planning). Following on from the comments that have been made in relation paragraph 2.70, it is assumed that the provision for new primary school sites that have been included in this policy under paragraph f) refers to the new primary school that is to be constructed within the Riverwell redevelopment area, along with an additional primary school that has been suggested for allocation at Site MU16: Land at Tesco, Lower High Street.

...Given the well-developed urban setting of Watford, if the primary school, located at MU16: Land at Tesco is to be delivered as a standalone site i.e. not a building integrated within a wider development, a sub-optimal requirement may be acceptable providing that a minimum area of 0.9ha which otherwise complies with the county council's site standards is allocated for a 3fe primary school. However, consideration will need to be given to the availability and accessibility of offsite pitches where these cannot be provided onsite

## Full text:

Form and letter received via email

## Change suggested by respondent:

Paragraph f) should therefore be modified as follows in order to reflect this:

"f) A site for a new primary school within Site MU21: Land at Riverwell and a site for a new 3fe primary school within Site MU16: Land at Tesco, Lower High Street that are BB103 compliant, including external areas, New primary school sites to meet demand generated by new development."

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2115

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Transport. Clarity is needed concerning the provision of new secondary schools as the county council as Highways Authority will need to ensure that sustainable links are in place. Reliance on off-site schools for large developments will potentially place pressure on the transport system.

5.30 The shared surface route that is mentioned in paragraph h) of the policy may not be a deliverable measure. Whilst the MRT is a major benefit, there may be other areas afforded a high level of connectivity and accessibility by other public transport options

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore suggested that paragraph h) is modified as follows, in order to ensure that walking, cycling and bus priority measures are included within the policy:

h) The Lower High Street should be prioritised for improved public transport (including bus priority measures) and the creation of an improved walking and cycling route, a shared surface route;

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2116

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.31 Children's Services: (Early Years). To date very little childcare provision is located in this area; therefore, a minimum requirement would be for this provision to be re-modelled and extended to meet the new demand in the area. Ideally, additional childcare provision would need to be created as well as extending the existing provision in the locality if possible. The new primary school sites that are to be delivered will potentially cover the nursery class need for this area.

## Full text:

Form and letter received via email

## Change suggested by respondent:

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Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2117

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.32 Ecology. Paragraphs (d) and (e) in respect of commitments to biodiversity enhancement including re-naturalisation of the Colne between Water Lane and Waterfields Way, is supported. Notwithstanding this, it is noted that item (d) states that: "New development will contribute towards the creation ... and the enhancement of wildlife habitats." Whilst this is welcomed, this wording is a little vague and it is questioned if this is sufficiently clear and robust to effectively influence development proposals beyond that specified elsewhere in the local plan or in the NPPF. Reference to the blue and green infrastructure could be useful here and, of course, any future NRN.

5.33 Furthermore, if the LPA has a genuine desire to secure biodiversity enhancement in this area above and beyond what is required by the existing policy and elsewhere, then the wording within this policy may not be adequate to either guide developers or the safeguarding of existing wildlife sites.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Homes for a Growing Community

1828

Object

Respondent: Mrs Fran Clark

## Summary:

Because of the effects of Covid, the growth will not be as per the Spacial Strategy. The Watford Plan needs to be reviewed with this in mind and certainly needs to remove the windfall number of 2095.

As the Plan notes" This forecasts the anticipated delivery of new homes each year to 2036 and provides a mechanism to evaluate the performance of the Plan." At what point does the 'mechanism' sweep into action?

## Full text:

Because of the effects of Covid, the growth will not be as per the Spacial Strategy. The Watford Plan needs to be reviewed with this in mind and certainly needs to remove the windfall number of 2095.

As the Plan notes" This forecasts the anticipated delivery of new homes each year to 2036 and provides a mechanism to evaluate the performance of the Plan." At what point does the 'mechanism' sweep into action?

## Change suggested by respondent:

The anticipated delivery of new homes of 2036 needs to be reduced to 1050. and the mechanism needs to evaluate the performance of the Plan.

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: More so, that the Watford Plan is revised in the light of Covid and how Watford can be removed from the 'most vulnerable town' list

Attachments: None

1838

Support

Respondent: Hertsmere Borough Council

## Summary:

Watford's Local Plan makes provision for 14,988 additional homes. Hertsmere supports the fact that Watford will be looking to fully address the identified local need though the government's standard methodology. Although the windfall assumptions within the plan are high, we consider that these are sufficiently justified by evidence.

## Full text:

Watford's Local Plan makes provision for 14,988 additional homes. Hertsmere supports the fact that Watford will be looking to fully address the identified local need though the government's standard methodology. Although the windfall assumptions within the plan are high, we consider that these are sufficiently justified by evidence.

The Local Plan proposes at least 35% affordable housing and a minimum of 60% of new affordable homes as homes for social rent. Whilst Hertsmere supports the principle of delivering a high number of homes for social rent, it is important to ensure that these levels are viable. It is understood that BNP Paribas have advised o this matter - and are also similarly advising HBC. For information, Hertsmere are considering a 40% requirement for affordable housing on schemes within Bushey. It is assumed that 40% has been proven to be unviable in Watford?

Whilst the Local Plan is clear about how the overall housing number is going to be met it lacks detail in terms of how the various different types of housing are going to be brought forward, and how the various needs of different groups are going to be met including:

- Specialist and care housing
- Student, Co-Living and Non Self Contained Accommodation
- Gypsies and Travellers

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jz>

1981

Comment

Respondent: St Albans City & District Council  
 Agent: St. Albans City & District Council

## Summary:

Based on the Planning Practice Guidance (as below), SADC queries whether it is right to start the calculation of housing need and delivery from 2018. As WBC's Reg 19 Plan has been published in 2021 and will be submitted in 2021 that would appear to be a more appropriate starting date. SADC notes that WBC appears to be starting from an 'under-delivery' position of circa 1,500 homes against the Reg 19 date of 2021, whereas the PPG explicitly sets out that there is no need to address 'under-delivery' when the Standard Method is used:

Can strategic policy-making authorities take account of past under delivery of new homes in preparing plans?

The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.

Where an alternative approach to the standard method is used, past under delivery should be taken into account.

Paragraph: 011 Reference ID: 2a-011-20190220

Revision date: 20 02 2019

Full text:

Received via email

## Change suggested by respondent:

SADC notes that WBC appears to be starting from an 'under-delivery' position of circa 1,500 homes against the Reg 19 date of 2021, whereas the PPG explicitly sets out that there is no need to address 'under-delivery' when the Standard Method is used

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>

St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

2069

Comment

Respondent: Greater London Authority  
 Agent: Greater London Authority

## Summary:

In terms of housing need, the Council is referring to the Government's standardised methodology for calculating need. It should be noted that our demographic modelling provides alternative population and household projections that could also be taken into account when applying this standardised approach. Our projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft new London Plan. They are available on the London Datastore: <https://data.london.gov.uk/dataset/2016-based-projections-national-outputs>.

We suggest the Council explores all options to accommodate its housing need. We also support the closer collaboration with the authorities in South West Hertfordshire and in particular the preparation of a Joint Strategic Plan.

Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options consultation from October 2018

Appear exam: Not specified

Attachments: Greater London Authority Nov 2019 response\_Redacted - <https://watford.oc2.uk/a/zn>

Greater London Authority Oct 2018 response\_Redacted - <https://watford.oc2.uk/a/zy>

Greater London Authority\_Redacted - <https://watford.oc2.uk/a/zp>

2091

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

See letter for details

The Plan therefore as currently prepared is not sound with respect of:

- a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and
- b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls;

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

That paragraph 3.1 is amended (as underlined) to read:

“The Spatial Strategy to 2038 seeks to deliver at least 14,988 new homes. This figure includes the amount of housing .....

3. That paragraph 3.3 is amended (as underlined) to read:

“As part of the housing to be provided to 2038, a windfall allowance of 1,624 units is included. This is based on a combination of three factors including the historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall development will contribute, on average, 116 new homes per year from April 2024 onwards as indicated in Appendix B.”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: The changes to the policies required are detailed in the attached Statement.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>  
North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>  
North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

2118

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.34 Transport. It is noted that the final draft local plan aims to deliver a total of 14,988 dwellings during the plan period during the 18-year plan period. It is also

13

noted that the windfall allowance of approximately 100dpa is potentially challenging (as it is significantly higher than the historic average of 70dpa). An additional buffer has also been assumed to be delivered through windfall (40 dpa).

5.35 The latest COMET (LPR6) run assumes 8,480 homes to be delivered on allocated sites and 2,550 from windfall and 3,543 through existing permissions. The total being modelled (including completions since 2014 rather than 2018) is 16,268. This compares with a total of 13,664 modelled as part of COMET Run 5.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HO3.1: Housing Provision

1830

Comment

Respondent: Mrs Fran Clark

## Summary:

As Covid has set the economic [retail, hospitality, leisure] and employment forecasts backwards this whole Plan needs to be delayed by 3 years to get the momentum back. The original requirement for nearly 15,000 new homes will not be needed if work place practices change to working from home. If the population increase was proposed to be 10,000 why is the requirement for new homes 150% of this?

Reduce the requirement for new homes to 8,750;  
review changing the use of retail outlets to residential; and  
postpone the period to 2040.

## Full text:

As Covid has set the economic [retail, hospitality, leisure] and employment forecasts backwards this whole Plan needs to be delayed by 3 years to get the momentum back. The original requirement for nearly 15,000 new homes will not be needed if work place practices change to working from home. If the population increase was proposed to be 10,000 why is the requirement for new homes 150% of this?

Reduce the requirement for new homes to 8,750;  
review changing the use of retail outlets to residential; and  
postpone the period to 2040.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1906

Support

Respondent: Three Rivers District Council

## Summary:

The Plan is aiming to meet the areas local housing need in full with a 5% contingency for flexibility and this is supported as neighbouring authorities will struggle to meet any additional needs beyond their own. The ongoing duty to cooperate process will offer local planning authorities the opportunity to consider how best to meet the needs of the wider area. The approach to Windfall seems justified based on historic delivery and increased densities.

## Full text:

The Plan is aiming to meet the areas local housing need in full with a 5% contingency for flexibility and this is supported as neighbouring authorities will struggle to meet any additional needs beyond their own. The ongoing duty to cooperate process will offer local planning authorities the opportunity to consider how best to meet the needs of the wider area. The approach to Windfall seems justified based on historic delivery and increased densities.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1939

Comment

Respondent: Berkeley Homes

## Summary:

Berkeley Homes is supportive of draft Policy HO3.1: Housing Provision, which notes that sustainable proposals for residential developments, where optimal use of the land is made, will be supported. The expectation of higher density development in Watford Junction is welcomed, and reflects the area's sustainable location well served by public transport and within walking distance of local facilities and services. An indicative density for the Watford Junction Strategic Development Area is noted at of at least 95 homes per hectare.

## Full text:

-

## Change suggested by respondent:

While the Borough's approach to setting a minimum, rather than maximum, density guide is supported, we consider that a more ambitious minimum density level could be set which better reflects the area's context and density precedents set by approved development proposals in the area.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made on the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting this amendment.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1947

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

Policy HO3.1 states that provision will be made for 14,988 new homes for the Plan period 2018- 2036. This figure includes the amount of housing required to meet local need as determined using the Government's latest Standard Method figure of 14,274 homes (December 2020) and an additional 5% allowance of 714 homes.

Whilst the use of the latest Standard Method calculation and the principle of an allowance on top is supported, the wording of the policy should explicitly state that this is a minimum target. This will ensure compliance with national policy and paragraphs 11b) and 59 of the NPPF. The text should be adjusted accordingly to the following:

"Provision will be made for a minimum of 14,988 additional homes"

At paragraph 3.1, it is noted that a 5% uplift has been included in order to "reduce the risk of sites identified in the plan not coming forward as anticipated". It is questionable whether a 5% buffer of 714 homes is enough, given the context of housing delivery in WBC.

Since the publication of the new NPPF (2019), the Government has set out the results of the Housing Delivery Test. This compares a local authority's housing completions versus housing requirement over the previous three monitoring years. In the 2018 test results, published in February 2019, Watford delivered 108% against its target. In the 2019 results (published February 2020) this fell to 70% and in the 2020 results (published January 2021), Watford only delivered 48% of its housing requirement. This significant reduction reflects that the housing requirement went up significantly in the monitoring year 2018/19 but housing delivery has continued to stay low. As Watford is delivering less than 75% of its housing requirement, the presumption in favour of sustainable development now applies (paragraph 11 of the NPPF), as well as a 20% buffer being added to Five Year Housing Land Supply (5YHLS) calculations.

The 5YHLS statement dated 31 March 2020 shows that based on a housing requirement of 787dpa plus a 20% buffer (bringing it to 944dpa), the Council can demonstrate a marginal land supply of 5.21 years. Therefore, moving forward the Council needs to significantly increase its housing delivery and a 5% buffer added to the minimum housing target is not considered to be sufficient. It is recommended that the housing target includes a 20% buffer in order to ensure the Council can maintain a 5YHLS throughout the Plan period, taking into account lapse rates.

Figure 3.1 of the Plan shows that 2,095 units will come from windfall sites and appears to show that the 5% buffer the Council has included to take account of sites not coming forward will be from these windfall sites. However, at paragraph 3.3, the Council states that its windfall allowance will be 2,132 units. It is not clear why there is this discrepancy in the figures. It is also questionable whether relying on windfall sites for a 5% buffer is a sound and justified approach.

The Plan states, at paragraph 3.3, that windfall will contribute on average 116 new homes per annum which will be made up of the historical annual average of 70 dwellings per year completed on sites of less than five units, development sites coming forward in density range identified in Housing and Economic Land Availability Assessment (HELAA, January 2021) but higher than projected and unidentified sites larger than five dwellings gaining permission. Combined, it is expected that windfall development will contribute, on average, 116 new homes per annum.

Paragraph 3.45 of the HELAA (January 2021) states that the 116 homes per annum windfall allowance has been calculated by taking the 70dpa baseline figure for developments from small sites and incorporating an uplift which uses densities of 220dph in some locations. This significant increase in density is not reflected in Policy HO3.2.

The housing trajectory at Appendix B includes a windfall allowance of 139 or 140dpa. It is not clear why this figure has been used, rather than the 116dpa identified in paragraph 3.3 of the Plan.

On 4 January 2021, WBC wrote to St Albans District Council (SADC) stating that:

"The Council intend to publish the final draft Local Plan setting out the intention to meet its housing need in full. However, should the appointed Planning Inspector consider that providing 835 homes, inclusive of the 5% buffer, through windfall development is not appropriate, St Albans City and District Council is asked if it could consider if it has the capacity to accommodate a proportion, or all, of the 835 homes identified as windfall over the plan period to 2036 as their Local Plan is progressed."

At a SADC Planning Policy Committee on 2 February 2021, it was confirmed that WBC no longer required SADC to take any up any of its unmet housing need but were asking for support to accommodate windfall development should an inspector find this approach unsound. SADC has reiterated its stance that it has no capacity to take any unmet housing need from Watford.

Therefore, it appears that WBC has concerns around the use of this windfall allowance. A sound approach would be to assume a windfall allowance of 70dpa. It is recommended that the Council amends this figure and seeks to meet its housing requirement through a greater number of allocated sites.

Figure 3.1 also identifies that 4,145 homes will be delivered through existing commitments. It is unclear from the housing trajectory table in Appendix B whether a lapse rate has been applied to this figure or not. As the Council has stated that it is increasing its housing target to mitigate for sites not coming forward, it would be positive plan-making to include an evidenced lapse rate to commitments.

The commitments column of the housing trajectory does not identify which permissions are expected to come forwards in which year. The blanket level of 676dpa between 2021/22 and 2025/26 is questionable as it is highly unlikely that the exact same number of dwellings will be completed for six years running.

Without a more detailed housing trajectory which clearly sets out which permissions are expected to come forward when and at what rate, the Plan cannot be considered to be sound and in compliance with the NPPF. Additionally, more details should be provided on the timings of delivery for site allocations, in order to determine whether the proposed number of dwellings can come forward as the Council have set out.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

Whilst the use of the latest Standard Method calculation and the principle of an allowance on top is supported, the wording of the policy should explicitly state that this is a minimum target. This will ensure compliance with national policy and paragraphs 11b) and 59 of the NPPF. The text should be adjusted accordingly to the following:

"Provision will be made for a **minimum of 14,988 additional homes**"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1979

Comment

Respondent: St Albans City & District Council

Agent: St. Albans City & District Council

## Summary:

SADC note that the WBC Local Plan Regulation 19 document is aiming to meet and deliver their housing need within their administrative boundary. SADC are generally supportive of this approach. However, SADC note that this needs to be fully justified in line with paragraph 35 of the NPPF 'test of soundness'.

It would welcome more detail on the proposed 5% buffer as outlined in Strategic Policy HO3.1, in particular in the reasoned justification text. Furthermore, it reiterates that SADC has no current capacity to meet any of WBC's housing need.

## Full text:

Received via email

## Change suggested by respondent:

Would welcome more detail on the proposed 5% buffer as outlined in Strategic Policy HO3.1, in particular in the reasoned justification text.

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>

St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

2007

Support

Respondent: Dacorum Borough Council

## Summary:

Dacorum Borough Council welcomes confirmation in the Local Plan that Watford Borough Council are able to meet their housing needs in full, incorporating a 5% buffer. As with Watford, Dacorum has a substantial level of growth to accommodate and, like the other authorities in South West Hertfordshire, is constrained by the Green Belt. However, unlike other neighbouring authorities in Hertfordshire a large part of Dacorum is covered by the Chilterns Area of Outstanding Natural Beauty (CAONB) and, uniquely amongst the authorities, Dacorum is home to the Chilterns Beechwoods Special Area of Conservation (SAC); a site protected under the Conservation of Habitats and Species Regulations 2017 (as amended). These represent substantial planning constraints for Dacorum if it is to meet its own housing growth requirements. You will be aware that the Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth was recently consulted on and sets out our intention to meet our objectively assessed development needs, working with adjoining authorities where this is not possible. The scale of growth required has led to the identification of Green Belt land around towns and villages with many of these sites in close proximity to the AONB. It should be noted that since the consultation started Government has confirmed its approach to calculating housing need, the result of which is to increase Dacorum's housing requirement from 922 per annum to 1,023 per annum. The Council will need to assess the implications for the additional growth and determine whether it is possible to meet these needs, in line with para 11 of the NPPF. Until further evidence is available the Council is unable to confirm the total level of growth that can be provided in Dacorum, including what level of, if any, unmet needs from other authorities can be accommodated. Dacorum Borough Council hopes further conclusions can be drawn on this later in 2021. Dacorum Borough Council wishes to remain in close contact with Watford and other South West Hertfordshire authorities on the findings of this work throughout 2021 and to confirm the implications this may have for accommodating future needs.

## Full text:

n/a

## Change suggested by respondent:

As highlighted above, any potential modifications would be addressed through a future Statement of Common Ground, to be agreed by the relevant authorities in South West Hertfordshire, and prior to the formal submission of the Watford Local Plan for examination.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: This matter has been raised through regular duty to cooperate meetings with Watford Borough Council and the wider South West Hertfordshire authorities.

Appear exam: Not specified

Attachments: Dacorum Borough Council - form\_Redacted - <https://watford.oc2.uk/a/zc>

Dacorum Borough Council - letter\_Redacted - <https://watford.oc2.uk/a/zd>



2058

Comment

Respondent: Home Builders Federation  
Agent: Home Builders Federation

## Summary:

The policy is unsound as the housing requirement is based on a plan period that is inconsistent with national policy.  
See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

The National Planning Policy Framework (NPPF) establishes at paragraph 22 that plans should look ahead over a minimum of 15 years from adoption. As such the Council should extend the plan period by at least one year to 2036/37. This would increase the requirement for this plan from 14,274 to 15,067 and lead to a shortfall in supply in Watford. This minimum requirement will also need to be set out in policy HO3.1, at present it is only set out in the supporting text at paragraph 3.1 of the Local Plan with the expected level of provision to meet its requirements being set out in policy.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>

Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

2064

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Glyn Hopkin Holdings Ltd ('GHH') – landowners of 252-272 Lower High Street, Watford, WD17, 277 (which is allocated for residential development under allocation HS22) – support the preparation of a new Local Plan for Watford, and support the residential allocation for the site. However, it is recommended that several changes are required in order to strengthen the Local Plan and enable it to be found sound. Firstly, the Local Plan period needs to be extended by at least one year to 2036/37 to comply with the 15-year minimum period from adoption under Para. 22 of the NPPF. This has ramifications in relation to the minimum housing requirement, which would increase to 15,067. This means that the currently identified provision of 14,988 would not be suffice to meet minimum objectively assessed needs. It is also recommend that the wider housing target is clearly described in policy as a minimum target so as to encourage exceedance of the target. It is also recommend that a 20% buffer is applied to the housing requirement (in accordance with NPPG Para. 022 Reference ID: 68-022-20190722) to provide flexibility and account for recent levels of under-delivery (as evidenced by the 2020 Housing Delivery Test results). This applies to Strategic Policies SS1.1 and HO3.1. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

For Strategic Policy HO3.1, again it is recommended that the Plan period is extended to at least 2036/37, and that provision is made for a minimum of 15,067 additional homes. It is also recommended that a 20% buffer is applied (as opposed to the current 5%) to take account of recent under-delivery (as evidenced by the 2020 HDT results, and the requirement under NPPG Para. 022 (see above ref ID) for Local Plans to take this into consideration. It is recommended that this increased housing requirement – when calculated – is stated as a minimum requirement in the policy. This updated minimum housing requirement should then be stated in both Strategic Policy SS1.1 and HO3.1. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>

Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2092

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

See letter for details

The Plan therefore as currently prepared is not sound with respect of:

- a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and
- b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls;

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

That Strategic Policy HO3.1 is amended (as underlined) to read:

“Provision will be made for at least 14,988 new homes, inclusive of a 5% buffer of 714 homes in Watford Borough for the period 2020 to 2038. Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development. Residential developments.....”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

## Housing mix, density and optimising use of land

2119

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.36 Transport. Higher density development within the core development areas is supported. This will ensure maximum opportunity is used in relation to those sites in the most accessible areas.

## Full text:

Form and letter received via email

## Change suggested by respondent:

In the light of this, it is suggested that the following wording is modified as follows:

“Higher density development will be particularly supported in areas where there is good access to the town centre and good access to transport services, ~~Mass Rapid Transport~~, such as at Watford Junction.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Design-led schemes and housing density**

1861

Comment

Respondent: Watford Central Town Residents Association

**Summary:**

There is an opportunity to revisit the availability of housing sites within the Core Development Area, due to the transformative changes brought by Covid, e-commerce and home working as stated in our comments under Policy SS1.1: Spatial Strategy above .

**Full text:**

There is an opportunity to revisit the availability of housing sites within the Core Development Area, due to the transformative changes brought by Covid, e-commerce and home working as stated in our comments under Policy SS1.1: Spatial Strategy above .

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Housing mix**

1789

Comment

Respondent: R Kowalewski

**Summary:**

Do not forget Gardens, very important for the well being of people. These need to be reasonable sizes, not courtyard size

**Full text:**

Do not forget Gardens, very important for the well being of people. These need to be reasonable sizes, not courtyard size

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Policy H03.2: Housing Mix, Density and Optimising Use of Land**

1862

Comment

Respondent: Watford Central Town Residents Association

**Summary:**

The replacement of Policy UD 1 means that specific reference to the Character of Area study and the Residential Design Guide has disappeared. We are therefore concerned that there is no definition of an area's character in policy and a prominent void in WBC's ability to define specific area character. As a result, we ask that mention of the Character Area SPD be reinstated into this policy and all other policies referring to character until such time as a replacement, if required, is devised, consulted upon and adopted.

**Full text:**

The replacement of Policy UD 1 means that specific reference to the Character of Area study and the Residential Design Guide has disappeared. We are therefore concerned that there is no definition of an area's character in policy and a prominent void in WBC's ability to define specific area character. As a result, we ask that mention of the Character Area SPD be reinstated into this policy and all other policies referring to character until such time as a replacement, if required, is devised, consulted upon and adopted.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1907

Comment

Respondent: Three Rivers District Council

## Summary:

The policy proposes a requirement of at least 20% of residential development to be family sized, however the Local Housing Need Assessment provides a further breakdown by number of bedrooms. It may be useful to include this in the policy.

The design-led approach and increased densities are supported and are consistent with national policy on making efficient use of land.

## Full text:

The policy proposes a requirement of at least 20% of residential development to be family sized, however the Local Housing Need Assessment provides a further breakdown by number of bedrooms. It may be useful to include this in the policy.

The design-led approach and increased densities are supported and are consistent with national policy on making efficient use of land.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1940

Comment

Respondent: Berkeley Homes

## Summary:

Draft Policy HO3.2 notes that residential developments will need to provide at least 20% of homes as family size units of three bedrooms or more. While it is acknowledged that larger family size homes are in need across the Borough, Watford has a chronic housing need and there is a forecast need for all housing sizes over the Plan period (as set out in the South West Hertfordshire Local Housing Needs Assessment 2020).

## Full text:

-

## Change suggested by respondent:

Berkeley Homes would support the Borough taking a more flexible approach to housing mix on a site-by-site basis, taking into account site specific locations and characteristics. We would suggest that Policy HO3.2 should be amended to acknowledge that there should be a focus on family accommodation within suburban areas, with lower occupancy homes in apartment-led developments being suited to more central locations in close proximity to public transport infrastructure.

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made on the Issues and Options and the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting this amendment.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1948

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

Policy HO3.2 states that residential development will be supported where provision is made for at least 20% of the total number of residential units to be family sized (at least three bedrooms).

Within the Core Development Area higher density development of at least 95 dwellings per hectare (dph) is expected. The policy also states that higher density development will be supported, particularly in areas where there is good access to Mass Rapid Transport, such as Watford Junction.

The higher development density of a minimum of 95dph within the Core Development Area reflects the sustainability credentials of the area and is considered to be appropriate and in accordance with national policy and the need to make the most efficient use of land.

Page 8

Within the policy wording, it should be acknowledged that some areas may be suitable for much higher levels of density. This should also reflect that the Council anticipates some windfall sites to be delivered at 220dph. It is recommended that the following changes are made to the second part of the policy.

“Residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher-density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings per hectare. However, in highly sustainable locations within the Town Centre, much higher levels of density may be appropriate in order to make the most efficient use of land. Outside of the Core Development Area, new residential developments are expected to achieve at least 45 dwellings per hectare, but the optimal density for individual sites should be established through careful consideration of local character, context and access to amenities and public transport.

The feasibility and viability of requiring 20% of dwellings to be at least three bedrooms, whilst also being a maximum of five storeys (or eight storeys in some limited locations – see Policy QD6.5) and a minimum of 95dph, is questionable.

There should be a greater level of flexibility within this policy to take into account of whether significant provisions of larger family units, in highly sustainable Town Centre locations, is appropriate.

Smaller units, rather than family units, are generally more desirable and suited to town centre locations. To require a minimum of 20% provision of family units across the whole Borough does not conduce itself to making the most efficient use of land in accordance with paragraph 122 of the NPPF. It is recommended that the first part of the policy wording for Policy HO3.2 is amended to read as follows.

“Proposals for new residential development will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms). However, it is acknowledged that a lower level of provision of family units will be acceptable in highly sustainable locations, such as the Town Centre”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

Within the policy wording, it should be acknowledged that some areas may be suitable for much higher levels of density. This should also reflect that the Council anticipates some windfall sites to be delivered at 220dph. It is recommended that the following changes are made to the second part of the policy.

“Residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher-density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings per hectare. **However, in highly sustainable locations within the Town Centre, much higher levels of density may be appropriate in order to make the most efficient use of land.** Outside of the Core Development Area, new residential developments are expected to achieve at least 45 dwellings per hectare, but the optimal density for individual sites should be established through careful consideration of local character, context and access to amenities and public transport.

It is recommended that the first part of the policy wording for Policy HO3.2 is amended to read as follows.

“Proposals for new residential development will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms). **However, it is acknowledged that a lower level of provision of family units will be acceptable in highly sustainable locations, such as the Town Centre”**

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1989

Object

Respondent: The Retirement Housing Consortium  
Agent: The Retirement Housing Consortium

## Summary:

Para 3.26 of the plan rightly recognises that specialist housing for older people takes a number of forms. These are also forms of grouped accommodation, normally based around some provision of communal facilities and services. A minimum number of units are required for such schemes to provide beneficial services is 25 – 30 units dependent on viability. The Policy as drafted in seeking to secure all forms of accommodation for the need which the plan identifies (which includes retirement housing ) is therefore not workable for all but the largest sites. Retirement housing is often provided on small windfall opportunities. It should also be noted that such housing has a very positive effect in addressing under occupation given the emphasis on the need to make available more family housing (see HO3.5 below)

## Full text:

Form received via email

## Change suggested by respondent:

The Policy should state that there is a specific policy for specialised housing for older and vulnerable people (HOU 3.5) and that such housing is therefore excluded from Policy HO.3.2

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

1997

Comment

Respondent: JLL  
Agent: JLL

## Summary:

Our client supports Watford Borough Council's ambition for new homes and the encouragement for a mix of homes including size, tenure and specialist adaptations. Both Ascot Road Phase 1 and Phase 2 seek to support the supply of new homes and mix of tenure within the Borough. Policy HO3.2 considers housing mix, housing density and optimising land, and protecting existing housing stock. Our client supports the need for family-sized housing, however in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. Watford has a relatively young population. This provides a high demand for smaller units for individuals leaving home and young professionals priced out of London. A demand also exists for elderly people downsizing from larger homes. There is still a great need for 1 and 2-bedroom properties particularly in Watford (as referenced in the South West Hertfordshire Local Housing Needs Assessment (2020).

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft (representations submitted November 2019)

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>  
Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2003

Comment

Respondent: Drax Investments Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Policy H03.2 – the need to provide 20% as 3+beds on all sites is not considered to be sound or flexible enough. Also considered that further flexibility needs to be built in to the policy to encourage developments to exceed 95 dwellings-per-hectare where appropriate. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information.

## Full text:

n/a

## Change suggested by respondent:

Recommended that this 'minimum 20% requirement for 3+ bedroom dwellings' is not applied rigidly across all sites, as some will be more appropriate for larger dwellings (in edge-of-town centre / settlement locations), whilst some will be more appropriate for high-density 1 and 2-bedroom dwellings (such as the site, which is in the CDA and High Sustainability Zone). Also recommended that an additional line is added to this policy that states "where appropriate, the density of sites within the Core Development Area should seek to exceed 95 dwellings-per-hectare." This approach is considered to be justified in the context of maximising the efficiencies of brownfield sites set out at Paras. 122 and 123 of the NPPF. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Reps' for further information.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Drax - Form\_Redacted - <https://watford.oc2.uk/a/zf>

Drax written reps - <https://watford.oc2.uk/a/zg>

2033

Support

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

We support this policy to optimise the density of sites through a design-led approach taking account of the context and sustainability of a site, focusing on higher density development within the Core Development Area. We do however consider that a higher minimum dwelling per hectare density should be supported in the Core Development Area in order to deliver more housing in the most sustainable locations.

## Full text:

Forms received via email

## Change suggested by respondent:

Consideration to a higher minimum density per hectare for key sustainable and accessible parts of the town centre core development area.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2066

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

The requirement for all sites to deliver 20% of the dwellings delivered as 3+ bedroom units – under HO3.2 – is not considered to be sound. This approach is not flexible enough., and therefore does not align with NPPF Para. 11. It also considered that further flexibility needs to be built in to the policy – under 'housing density and optimising land' to encourage developments to exceed 95 dwellings-per-hectare, where appropriate and compliance with other Local Plan policies can be demonstrated. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reprs\_FINAL' for more detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

For Policy HO3.2 – under 'housing mix – it is recommended that the requirement to apply a rigid 'minimum 20% requirement for 3+ bedroom dwellings' on all sites proposing to deliver residential development is amended. Applying this across all development sites is not considered to be appropriate – certain sites (such as those within the CDA) will be more suited for 1 and 2-bedroom dwellings, whilst sites in the urban fringe / suburban areas will be more suitable for 3+bedroom dwellings. For Policy HO3.2 – under 'housing density and optimising land' – it is recommended that text is added after “Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings-per-hectare” that states “Where appropriate, the density of sites within the Core Development Area should seek to exceed 95 dwellings-per-hectare”. This is to encourage the maximisation of sustainable, brownfield sites within the CDA and is considered to align with NPPF Paras. 122 and 123. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reprs\_FINAL' for more detail.

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>  
Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2120

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.37 Transport. This policy is supported, although given the potential increase in households with children, careful consideration needs to be given to the location of new schools and their access to them.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>



## Policy HO3.3: Affordable Housing

1908

Comment

Respondent: Three Rivers District Council

## Summary:

The 35% affordable housing requirement is in line with the evidence base and national policy, as is the requirement for 60% of new homes to be for social rent. However, there has been no reference to the NPPF's requirement for 10% of new homes to be available for affordable home ownership. This needs to be added for this policy to be consistent with national policy.

## Full text:

The 35% affordable housing requirement is in line with the evidence base and national policy, as is the requirement for 60% of new homes to be for social rent. However, there has been no reference to the NPPF's requirement for 10% of new homes to be available for affordable home ownership. This needs to be added for this policy to be consistent with national policy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1949

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

Policy HO3.3 states that residential developments including residential institutions of 10 or more will be supported where they provide at least 35% affordable housing (by habitable room).

A minimum of 60% of new affordable homes should be for social rent and they should prioritise family sized accommodation.

Affordable housing should be provided on site, other than in exceptional circumstances. Affordable housing is to be fully integrated and built to the same standard as market housing.

It states that in exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a late-stage review mechanism, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority) will be required. Where it is demonstrated the number of affordable units achievable on site is higher than previously agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development. The Town and Country Planning (Use Classes) Order 1987 (as amended), was updated on 1 September 2020. Although many changes were made, the definitions of residential uses have remained the same. Residential institutions are defined under Class C2 and include the provision of residential accommodation and care to people in need of care, hospitals and residential schools.

It is assumed that Policy HO3.3 does not require the provision of affordable housing in all uses under Use Class C2, as affordable housing products are not viable or appropriate. Therefore, it is recommended that the wording of the policy is amended to provide clarification as to which residential institutions the Council is referring to.

The South West Hertfordshire Local Housing Needs Assessment (2020), which forms part of the Council's evidence base, identifies the need for affordable home ownership equates to around 30% of the overall housing need.

The BNP Paribas Local Plan Viability Assessment (January 2021), which forms part of the evidence base, states that it is not unreasonable to require an allocation of 35% affordable housing for new developments within the Borough. The report recommends that the target in emerging Policy H03.3 be retained and applied on a 'maximum reasonable proportion' basis, taking site-specific circumstances into account.

As the BNP Paribas Viability Assessment was undertaken on a strategic basis, it does not provide a comprehensive assessment of all allocations coming forward having regard to individual site constraints and abnormal costs in respect of remediation and mitigation. It assesses sites at a generalised level based upon assumptions of residual valuation approaches. It is acknowledged that site-specific costs will generate additional costs that have not been incorporated.

Based on the above, it is recommended that the policy should explicitly refer to the provision of 35% being required subject to a viability assessment being submitted and if such a viability assessment demonstrates that 35% affordable provision is not achievable then the Council will allow a lower provision to be delivered. This will ensure flexibility within the policy and encourage development.

The level of affordable housing provision required on developments should be based on evidence of identified housing need over the plan period in line with Paragraph 65 of the NPPF. The affordable housing need identified in the South West Hertfordshire Local Housing Needs Assessment (2020) is 30%. However, in line with the PPG it requires that Council's set affordable housing policies on the basis of both proven need and viability. The BNP Paribas Viability Assessment states that they consider that it is not unreasonable to require an allocation of 35% affordable housing for new developments within the Borough. They recommend that the target in emerging Policy H.03.3 be retained and applied on a 'maximum reasonable proportion' basis, taking site-specific circumstances into account. Setting a lower proportion of affordable housing is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so if the requirement is lowered.

The BNP Paribas viability assessment does not provide a comprehensive assessment of all allocations coming forward having regard to individual site constraints and abnormal costs in respect of remediation and mitigation etc. They have assessed a very generalised level based upon assumptions of residual valuation approaches. It is acknowledged that site-specific costs will generate additional costs that have not been incorporated. It is considered that reducing the requirement will boost housing delivery and developer confidence.

As such, we recommend the following policy wording:

"Residential developments, including residential institutions (as defined in this policy) of ten homes or more will be supported where they provide at least 30% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application."

As set out in the following section of these representations, the Council should also consider different thresholds for different types of housing products, for example Build to Rent schemes.

The policy also refers to a late-stage review mechanism on developments where it can be demonstrated that 35% provision is not viable. This mechanism is triggered where 75% of units are sold or let. Our client supports the note that this trigger can also be a period agreed between the Council and the developer.

However, in order to incorporate greater flexibility into the policy, it should be noted that this requirement should be considered on a site by site basis.

Late-stage review mechanisms are usually negotiated and agreed through Section 106 agreements, in order to take account of site constraints and not inhibit the delivery of schemes.

Further, the policy should note that any uplift in affordable housing can be through a financial contribution towards off-site affordable housing provision.

This would place Watford in conformity with the Greater London Authority's London Plan, which the Council shares many similarities with. These changes should be recognised in the policy wording. Our recommended wording is set out below.

"In exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a

late-stage review mechanism, the trigger for which will be negotiated on a site by site basis, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority) will be required. Where it is demonstrated the number of affordable units achievable on site is higher than agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development either on site or in the form of a financial contribution.”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

As such, we recommend the following policy wording:

“Residential developments, including residential institutions (as defined in this policy) of ten homes or more will be supported where they provide at least 30% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application.”

Further, the policy should note that any uplift in affordable housing can be through a financial contribution towards off-site affordable housing provision. This would place Watford in conformity with the Greater London Authority's London Plan, which the Council shares many similarities with. These changes should be recognised in the policy wording. Our recommended wording is set out below.

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

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1990

Object

Respondent: The Retirement Housing Consortium

Agent: The Retirement Housing Consortium

## Summary:

Policy H0 3.3 seeks to apply 35% provision of affordable housing and the same tenure split over all new forms of residential development. The PPG “Viability” states “Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage” (Paragraph: 002 Reference ID: 10-002-20190509) “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. The characteristics used to group sites should reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan”. Paragraph: 004 Reference ID: 10-004-20190509. The Local Plan Whole Viability Study which must underpin the proposed affordable housing does not undertake any viability assessment of specialised housing for older people. It is well recognised that such housing has very different viability characteristics and inputs, as recognised by the PPG itself (Para 7 refers). To progress the Policy without viability testing being carried out or the policy including appropriate exemptions is therefore wholly unsound. Therefore either retirement housing should be properly assessed or the Recommendation below followed. NB: If viability testing is carried out, this must of course be reconulted upon and the Consortium reserves the right to comment.

## Full text:

Form received via email

## Change suggested by respondent:

Either Viability testing is carried out for all forms of specialised housing for older people as per those identified at Policy H03.5 and the policy amended accordingly to reflect (a) its findings (b) the actual tenure requirements for older persons housing OR the policy be amended to state that where appropriate to seek an affordable housing contribution from older persons housing, this will be subject to consideration at the application stage and therefore the policy and tenure requirements set out in policy H03.3 do not apply AND given these circumstances the late stage review mechanism of the policy do not apply to such housing. NB. If the Review clause remains, the Consortium reserves the right to present its position as to why this should not apply generally to specialised housing for older people t its position as to why this should not apply generally to specialised housing for older people 7)

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2059

Comment

Respondent: Home Builders Federation  
Agent: Home Builders Federation

## Summary:

The policy is unsound as it is not consistent with national policy.  
See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

Firstly, the Council should remove the term at least from the policy. The requirement in this policy must not be considered to be the lower end of a potentially higher level of delivery.  
Given that the Council's Viability Assessment concludes in paragraph 6.31 that many schemes in lower values areas are unviable then we would suggest that a greater degree of variability could have been introduced into the policy to reflect the evidence.  
... However, the third option, and one that would be more consistent with national policy, would be to require a lower level of affordable housing on schemes in the north of the Borough where viability is more challenging.

Legally Not specified  
compliant:  
Sound: No

Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

2067

Comment

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

While GHH recognise the importance of delivering affordable housing, it is considered that the inclusion of 'at least' is not appropriate, and lacks the necessary clarity required to accord with Para. 16 of the NPPF. The policy expects affordable housing to be provided on-site, and stipulates that "the Council will not support provision in lieu through commuted sums, other than in exceptional circumstances where it can be clearly demonstrated that it is not feasible to provide affordable housing on-site". The policy also states that "in exceptional circumstances, where it is demonstrated that it would not be viable to meet the affordable housing requirements set out in this policy, a late-stage review mechanism, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority), will be required. Where it is demonstrated the number of affordable units achievable on-site is higher than agreed, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development". The Viability Appraisal (2021) notes the differing levels of viability across the Borough, but the policy does not allow for a more flexible approach. The policy also proposes a late-stage review, but the wording of the policy – as drafted – does not allow for the event where the margins of viability may have tightened through worsening economic conditions. Greater flexibility and clarity in the policy – to align with Paras. 11 and 16 – is therefore required. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

## Full text:

Letter and form received via email

## Change suggested by respondent:

It is recommended that 'at least' before the 35% requirement is removed. Given the NPPF now requires viability testing to be undertaken at the plan-making stage, and the Government's position that decision-makers can assume that policy compliant development is viable, local policies must take account of situations where development may be more marginal. In this regard, GHH note that the Viability Appraisal (2021) [which forms part of the evidence base] concludes in Section 6 that the margins of viability fluctuate across the Borough, and that some developments in lower value areas are more likely to be unviable. The varying margins of viability across the Borough – as identified by the evidence base – therefore suggests the need for a greater degree of flexibility in policy terms, rather than applying a unilateral approach to viability. GHH consider that the late-stage review mechanism requires greater flexibility. As drafted, the policy does not allow for the event where economic conditions may have worsened, thereby further tightening the potential development margins. It is therefore recommended that the Council should also state under the same provisions that it will support reductions in affordable housing requirements where changing economic circumstances render a site unviable and unable to deliver affordable housing requirements. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes  
compliant:  
Sound: No

Comply with Yes  
duty:  
Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>  
Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

## Policy HO3.4: Build to Rent

1950

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

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

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

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

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

At paragraph 3.20, the Plan states that the discount on the market rent should be provided in line with the findings of the Local Housing Needs Assessment. It states that the Local Housing Needs Assessment (September 2020) identified that a discount of 26-34% would need to be applied to market rents for a person or family to afford a home in Watford. This is incorrect, the Assessment shows at Table 48 that this level of discount is required to make discounted home ownership affordable, not properties for rent. As such, this text should be removed.

In line with paragraph 5.179 of the South West Hertfordshire Local Housing Needs Assessment (September 2020) and paragraph 3 of the PPG (Reference ID: 60-003-20180913) affordable private rents should be set at least 20% below the private market rents. It is considered that this is a reasonable starting point for this type of housing.

It is therefore suggested that Paragraph 3.20 be amended to the following:

“discount rents should be set at least 20% below the private market rents in line with the South West Hertfordshire Local Housing Needs Assessment” Policy HO3.4 also states that affordable housing should be provided in accordance with Policy HO3.3 which sets a target for 35% affordable housing.

However, the PPG states that 20% affordable housing is a suitable benchmark for the level of affordable housing in Build to Rent schemes (Paragraph ID: 60-002-20180913). If a council wishes to decrease or increase this level then it should be justified using evidence from its local housing need assessment. This benchmark also should allow for viability assessments to be submitted as part of applications, where it is not possible to provide a policy compliant level of affordable housing.

The South West Hertfordshire Local Housing Needs Assessment (September 2020) states that councils should seek the maximum viable level of affordable private rental accommodation on build to rent schemes with a minimum contribution of 20% expected. However, no evidence is offered to suggest that this contribution should be any higher than 20%.

Therefore, it is recommended that both Policy HO3.4 and Policy HO3.3 are amended to require a 20% provision of affordable housing and this should be subject to a viability assessment and our suggested policy wording is set out below:

“Build to Rent residential developments will be supported where they provide at least 20% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application.”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

It is therefore suggested that Paragraph 3.20 be amended to the following:

“discount rents should be set at least 20% below the private market rents in line with the South West Hertfordshire Local Housing Needs Assessment”

Therefore, it is recommended that both Policy HO3.4 and Policy HO3.3 are amended to require a 20% provision of affordable housing and this should be subject to a viability assessment and our suggested policy wording is set out below:

“Build to Rent residential developments will be supported where they provide at least 20% affordable housing (by habitable room). Where development cannot meet this target, a viability assessment will need to be submitted alongside any application.”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

1998

Comment

Respondent: JLL

Agent: JLL

## Summary:

Cortland are pleased to see the introduction of Policy HO3.4 relating to Build-to-Rent ('BTR'). As experienced operators of product, careful review has been given to this section of the Draft Local Plan and particularly the wording of Policy HO3.4. We agree Discount Market Rent ('DMR') to be appropriate in place of other affordable tenures for BTR in accordance with Policy HO3.4. The Discount Market Rent approach is a truly tenure blind solution and provides a much simpler management. The NPPG guidance notes under the management of DMR schemes 'Affordable private rent homes should be under common management control, along with the market rent build to rent homes. They should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size' (Paragraph: 006 Reference ID: 60-006-20180913). Requiring a BTR operator to act fully as a registered provider, as the emerging policy suggests, is a misalignment of national guidance. In terms of eligibility, we note paragraph 3.22 of the Draft Local Plan states Discounted Market Rent units that are provided as affordable housing will be allocated to eligible households on Watford Borough Council housing register. However the NPPG eligibility criteria notes 'Final decisions over the occupancy criteria for affordable private rent homes should be made by the build to rent scheme operator, working with the authority, taking into account the criteria below... Eligibility should be determined with regard to local household income levels, related to local rent levels. Where authorities maintain an 'intermediate housing list' they may wish to suggest names from this, or potentially even their Statutory Housing list, taking into account the affordability of the homes to those on the list. Authorities should refrain from having direct nomination rights from their housing list' (Paragraph: 009 Reference ID: 60-009-20180913). It appears that authorities should not have direct nomination rights. The Draft Local Plan policy currently does not appear consistent with the NPPG and hence not at this stage consistent with national guidance in this respect. Please refer to our covering letter for further information.

## Full text:

Form received via email

## Change suggested by respondent:

The Draft Local Plan policy currently does not appear consistent with the NPPG and hence not at this stage consistent with national guidance in this respect.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

## Policy H03.5: Specialist Housing and Care Homes

1991

Object

Respondent: The Retirement Housing Consortium

Agent: The Retirement Housing Consortium

## Summary:

Whilst the Council is to be applauded in proposing a policy specifically in respect of Specialist Housing and Care Homes, as drafted it is criteria led, potentially restricting delivery, and fails to recognise the considerable need for such housing. The Housing for Older and Disabled people section of the National Planning Practice Guidance (NPPG – June 2019) identifies the need to provide such specialist housing as critical, recognising the ageing demographic and the benefits that such developments bring with them. These benefits are not just for residents but include the wider economic and societal benefits, not least in addressing isolation and loneliness and also reducing the burden on health and social services. Recent research undertaken between 2019 and 2021 by the “Homes for Later Living Group” has reinforced previous research identifying these benefits as follows: Health and well being: • Each person living in housing specifically designed for later life enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of c.£3,500 per year. • Those in specialist housing are half as likely to have falls with resulting fractures, injuries and costly inpatient bed stays. • Building 30,000 more retirement housing dwellings every year for the next 10 years, which is the estimated demand, would generate fiscal savings across the NHS and social services of £2.1 billion annually. • Based on a selection of established national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living, Assisting the housing chain and the intergenerational divide • c.3 million people in the UK over the age of 65 (or 25%) want to downsize. • 90 per cent of projected household growth in the coming decades is set to be amongst those aged 65 and over, taking the total number of homes owned by those aged 65 and over from 3.9 million today to at least five million by 2030. • If all the homeowners over the age of 65 in England who wanted to move were able to do so, they would directly release one million properties back onto the market and free up two million spare bedrooms. • Every retirement property sold generates at least two moves further down the housing chain. This frees up homes at differing stages of the housing ladder for different demographics. A typical Homes for Later Living development which consists of 40 apartments therefore results in 80 additional moves further down the chain. • Roughly two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market. Research has also shown that the care, support and organisation that such schemes bring means that people living in retirement housing, have been less susceptible to COVID-19 infection. Across the 441 retirement communities that McCarthy Stone currently manage, which support c.20,000 older people, infection rates among residents were 27% below the national average for over 65s, and four times below the national average for over 85s, which is the closet age group to our homeowners. This has shown the value of retirement living in supporting older people at this difficult time. Research has also once more confirmed the positive benefits of housing for older people in supporting local shops and facilities: • “Retirement housing creates more local economic value and more local jobs than any other type of residential development. • People living in each retirement development generate £550,000 of spending per year, £347,000 of which is spent on the local high street. Some £225,000 of this is new spending in the local authority, directly contributing to keeping local shops open. • For just one retirement development of roughly 45 units, a local authority could expect to see benefits of 85 construction jobs for the duration of the build, as well as six permanent jobs and £13m in GVA over the lifetime of the development, as opposed to not developing a site. These benefits are now all the more significant as the government and planning policy turns to supporting and regenerating the high street following the Covid 19 Pandemic. These findings are particularly significant in respect of three key objectives of the Plan (a) a healthy and happy community with housing being provided that meets needs and is fit for purpose (b) to make available more family housing (c) help the recovery of the economy and the High Street in particular. Given the considerable level of need that is identified in the SHMA and the benefits that such housing brings, the policy should be amended to remove criteria for development and be explicit in its encouragement and support for older persons housing.

## Full text:

Form received via email

## Change suggested by respondent:

Given the considerable level of need that is identified in the SHMA and the benefits that such housing brings, the policy should be amended to remove criteria for development and be explicit in its encouragement and support for older persons housing . The final paragraph should be amended to reflect recommended changes for Policy H03.3

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2121

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.38 Adult Care Services. The county council supports the protection of existing specialist and supported housing where it meets the standards that are set out in existing Hertfordshire County Council guidance.

...5.43 Along with above site size guidance, it is essential that new extra care housing is situated in close proximity to good public transport links, be a short walk to local amenities, local shops and health care, have private outdoor space as well as shared private gardens, a communal lounge, plus a range of staff facilities. They should also include a communal café/restaurant, activity and health and fitness spaces. HCC welcomes the opportunity to work with stakeholders at the early stages of design.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy H03.6: Student, Co-living and Non-Self-Contained Accommodation

2122

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.44 Transport. The county council seeks clarification as to where the statement of: 'or within 800 metres of a railway station located in the Core Development Area' comes from, as this effectively means within 800m of Watford Junction and/or Watford High Street stations.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2123

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.45 YCH Services for Young People. The definition of 'student' within this policy should be amended to 'young people.' The county council considers it to be important that young people can have the same access to affordable accommodation as adults and that they are supported throughout the process. HCC support enables young people to succeed by providing high quality informal education opportunities to promote their personal and social development. It supports young people who are challenged in education, their communities or home life to ensure a successful transition to adulthood.

5.46 The county council supports a number of young people / young adults who live independently of their parents for a variety of reasons (Care-Leavers; estrangement; wanting to live independently; being required to contribute financially at home etc), and this cohort is generally more represented within our NEET2 cohort, as well as existing within EET cohorts, which brings more challenges in terms of access to financial resources. Whilst these young people may not be homeless, they can share similar characteristics/ challenges, transient / no fixed address / sofa surfing; lack of access to ICT to support with benefit claims, accessing support online, job applications etc; lack of resources, therefore communal shared space and amenities would support with this, e.g. HCC could offer advertised drop-in support in communal space.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

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

2060

Comment

Respondent: Home Builders Federation  
Agent: Home Builders Federation

## Summary:

This policy is unsound as it has not been sufficiently justified.

Whilst the HBF support the encouragement of self-build housing through local plans, we do not consider the requirement for all development of 50 or more dwellings to set aside 1 in every 10 market houses to be delivered on serviced plots for self-build and custom housebuilding to be justified or consistent with national policy.

See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

Therefore, on the basis of the evidence presented we would suggest that there is insufficient justification for the adoption of policy HO3.7 and as such it should be deleted.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>



**Policy HO3.8: Gypsies and Travellers**

2124

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.47 Ecology. The reference to Biodiversity Net Gain is welcomed within this policy, but it is considered that it shouldn't be limited to just policy, or allocation within the final draft local plan.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Houses in Multiple Occupation**

1790

Comment

Respondent: R Kowalewski

## Summary:

Watford has to implement a rented accommodation registration scheme otherwise there will be no control with regard to overcrowding etc. Registration can be requested by a private landlord paying the cost of the council to visit the premises and carry out an inspection. Or reduced nominal fee if the inspection is carried out by an accredited (by the council) property managing agent.

## Full text:

Watford has to implement a rented accommodation registration scheme otherwise there will be no control with regard to overcrowding etc. Registration can be requested by a private landlord paying the cost of the council to visit the premises and carry out an inspection. Or reduced nominal fee if the inspection is carried out by an accredited (by the council) property managing agent.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Policy HO3.9: Residential Conversions

1978

Comment

Respondent: Ms Carol Mounfield

## Summary:

Paragraph 3.40 states that “only ten percent of the total number of dwellings along a residential frontage ... will be permitted.” A) the text set out in HO3.9 does not include the policy in paragraph 3.40 regarding the number of dwellings to be permitted; B) Many residential roads in Watford already have HMOs in excess of 10%. The policy is therefore ineffective and not equally applicable throughout the borough. All residents should be entitled to clarity of the policy in respect of their residential road, e.g. is the policy to reduce the number of HMOs where roads are in excess of 10%? are there differing thresholds in such circumstances, e.g. 25%? 50%? or are HMOs unlimited in such circumstances? Without clarity, the policy is ineffective and divisive; and C) The policy generically refers to HMOs. By not distinguishing between different types of HMO, the policy is misleading and unachievable through its implication that the council can control permission for ALL HMOs, both large and small. Under the Town and Country Planning (General Permitted Development) (England) Order 2015, permitted development includes development of a change of use of a building from class 3 (dwelling houses) to class 4 (HMOs). No planning permission is required for conversions to HMOs for upto 6 households in such circumstances. The council cannot therefore enforce its policy of limiting HMO development in residential roads. The policy is therefore ineffective and unachievable.

## Full text:

-

## Change suggested by respondent:

To make the policy sound, i.e. effective and achievable, the Council needs to: A) update the text in HO3.9 to include reference to the % threshold for HMOs in residential roads; B) clarify its policy in respect of residential roads where HMOs already exceed 10%. Is it a free for all in such roads? Are there different thresholds depending on level of development, e.g. 25%? 50%? Or is the Council's policy to reduce HMO development in all residential roads to 10%? C) To enable control on achieving the threshold(s), the Council needs to be able to control planning permission for ALL HMOs. This includes those arising through a change from class 3 (dwellings) to class 4 (HMOs). To do this, the Council needs to implement an article 4 direction under the Town and Country Planning (General Permitted Development) (England) Order 2015. An Article 4 direction restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development. An Article 4 direction could be used to control conversions to HMOs to achieve the Council's policy in paragraph 3.40 of ensuring that HMOs "are available in the right locations without having an adverse impact on the surrounding area". Given the Local Plan lasts until 2036, the policy should include reference to the Council intending to introduce or exploring the option of introducing an Article 4 direction. Without amendment, the Council's policy is incomplete, ineffective and unachievable.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: I made this representation as part of the series of roadshows on the Local Plan. I made my comments to one of the officers at the Library event and left a sticker. I can see my sticker as part on one of the slides in the summary pack on the first draft.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Carol Mounfield\_Redacted - <https://watford.oc2.uk/a/z9>

## Internal space standards

1791

Comment

Respondent: R Kowalewski

## Summary:

Unregulated permitted build and loophole office conversion accommodation can be successfully fought with a rental registration scheme. Whilst the council has no powers to stop office blocks being converted into matchbox studio apartments. It has the power to declare them below standard for rental. So can refuse to grant licence to rent. If known the large building companies won't start as they know that they would not be able to sell the resulting matchboxes. Private land lords attempting to sub divide houses to too small units would also be shut down, again impossible to sell, so the practice would stop.

## Full text:

Unregulated permitted build and loophole office conversion accommodation can be successfully fought with a rental registration scheme. Whilst the council has no powers to stop office blocks being converted into matchbox studio apartments. It has the power to declare them below standard for rental. So can refuse to grant licence to rent. If known the large building companies won't start as they know that they would not be able to sell the resulting matchboxes. Private land lords attempting to sub divide houses to too small units would also be shut down, again impossible to sell, so the practice would stop.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

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

1909

Comment

Respondent: Three Rivers District Council

## Summary:

The Local Housing Needs Assessment recommends 5% of market housing to be M4(3)(a) standard and up to 10% affordable dwellings to be M4(3)(b) standard. Further justification should be provided if the recommendation from the LHNA isn't followed.

## Full text:

The Local Housing Needs Assessment recommends 5% of market housing to be M4(3)(a) standard and up to 10% affordable dwellings to be M4(3)(b) standard. Further justification should be provided if the recommendation from the LHNA isn't followed.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2061

Comment

Respondent: Home Builders Federation

Agent: Home Builders Federation

## Summary:

Policy is not sound as elements have not been adequately justified.  
See letter for details

## Full text:

Letter received via email

## Change suggested by respondent:

...As such we would suggest that the requirement to meet NDSS is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.  
...Therefore, whilst we recognise that there is a need for some homes to be built to higher accessibility standards, we would suggest that the proposed level of delivery in policy HO3.10 has not been adequately justified.

Legally Not specified  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

2125

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.48 Adult Care Services. The county council welcomes the requirement in this policy that all new housing be designed and built to comply with M4(2) Building Regulations, unless they are built to comply with M4(3) and a minimum of 10% of new homes to comply to M4(3) building regulations.  
5.49 The requirement within this policy that developments of 10 or more homes will have at least 10% that are wheelchair adaptable, is also welcomed. It should be noted that PANSI data (accessed in January 2021) predicts that by 2035 there will be 3,109 adults living in Watford with impaired mobility. The Hertfordshire HIA, which administers disabled adaptations on behalf of Watford, has had 562 enquiries for adaptations to homes within Watford since 2018. This indicates that current housing stock is often unsuitable for people who have disabilities.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

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

1863

Comment

Respondent: Watford Central Town Residents Association

## Summary:

We agree with the sentiments of this policy but believe that far more should be said in reflection of the past year and the intrinsic importance of good quality open space for well-being. This policy should reaffirm what is stated in the Residential Design Guide (7.3.23) in terms of what the minimum acceptable communal open space should be, in order to provide clarity on what is expected, and to avoid accusations of having rowed back on previously higher standards.

## Full text:

We agree with the sentiments of this policy but believe that far more should be said in reflection of the past year and the intrinsic importance of good quality open space for well-being. This policy should reaffirm what is stated in the Residential Design Guide (7.3.23) in terms of what the minimum acceptable communal open space should be, in order to provide clarity on what is expected, and to avoid accusations of having rowed back on previously higher standards.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1992

Comment

Respondent: The Retirement Housing Consortium  
 Agent: The Retirement Housing Consortium

## Summary:

Support/Object/Comment not ticked on form.

As drafted, the Policy proposes a set open space requirement over all forms of housing and therefore does not recognise the very different characteristics of residents of specialised housing for older people and in turn the very different and much reduced amenity space requirements that will be based on quality communal spaces rather than private spaces. To apply this approach to such schemes for which the preferred locations are close to High Street and therefore hard to come by and often highly constrained will inhibit their delivery

## Full text:

Form received via email

## Change suggested by respondent:

The Policy should make clear that the policy requirement does not extend to specialised housing for older people and that such proposals will be considered on a case by case basis

Legally Yes  
 compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

**A Strong Economy**

1839

Support

Respondent: Hertsmere Borough Council

## Summary:

Watford's Local Plan makes provision for 111,175sqm of office floorspace and 40,759sqm of industrial floorspace. Hertsmere understands that limited land supply makes it difficult to meet the requirements for industrial floorspace. The overprovision of office floorspace needs to be balanced with wider needs for all types of employment space across the Functional Economic Market Area.

## Full text:

Watford's Local Plan makes provision for 111,175sqm of office floorspace and 40,759sqm of industrial floorspace. Hertsmere understands that limited land supply makes it difficult to meet the requirements for industrial floorspace. The overprovision of office floorspace needs to be balanced with wider needs for all types of employment space across the Functional Economic Market Area.

Hertsmere accepts that Watford is an important employment hub however evidence suggests that the need for office uses exists elsewhere within the SW Herts area. The strategy should look to also provide suitable employment facilities across South West Herts, reflecting the demand for employment space close to all areas of population.

## Change suggested by respondent:

.

Legally Not specified  
 compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jm>

## Policy EM4.1: Providing New Employment

1792

Comment

Respondent: R Kowalewski

## Summary:

These seem to new good words that are not being borne out in reality. I have seen a lot of office space demolished and replaced by housing in Watford in recent years. Even on Clarendon Road!

Similarly industrial units are also in some areas being turned in to apartments. Opposite The Range as an example.

Watford lacks both office space and is a shadow of its former industrial self.

More effort must be put into preserving the remaining industrial. DO not allow any more change of use from office or industrial use into residential AT ALL - NO EXCEPTIONS.

## Full text:

These seem to new good words that are not being borne out in reality. I have seen a lot of office space demolished and replaced by housing in Watford in recent years. Even on Clarendon Road!

Similarly industrial units are also in some areas being turned in to apartments. Opposite The Range as an example.

Watford lacks both office space and is a shadow of its former industrial self.

More effort must be put into preserving the remaining industrial. DO not allow any more change of use from office or industrial use into residential AT ALL - NO EXCEPTIONS.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: I cannot remember

Appear exam: Not specified

Attachments: None

1829

Object

Respondent: Mrs Fran Clark

## Summary:

This does not take into account the pandemic. Overall, as is said so many times this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

Train transport is being reduced by 30%

## Full text:

This does not take into account the pandemic. Overall, as is said so many times this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

Train transport is being reduced by 30%

## Change suggested by respondent:

Proposals for new employment floorspace will be supported after consideration of any identified employment need in the borough and Functional Economic Market Area.

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

Protecting existing employment land from inappropriate development;

Reviewing the need for the growth of new businesses and industries;

Supporting new models and ways of working, including more flexible working practices which will not require new buildings;

Ensuring employment land is reviewed as to changing use to residential to make the most effective use of land; and

Attracting new inward investment.

Legally No

compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1910

Support

Respondent: Three Rivers District Council

## Summary:

It is recognised that Watford Borough Council may not be able to meet all of the employment needs in the Borough. The Economic Study Update provides individual District/Borough breakdown of employment needs, however it states these are only indicative and that employment needs are expected to be met across the FEMA. As such, Watford may be able to assist neighbouring authorities with office provision, whilst neighbouring authorities may be able to assist Watford with industrial/warehouse provision. Ongoing DtC between the SW Herts authorities will result in an agreement on the best way to distribute employment uses across the FEMA.

## Full text:

It is recognised that Watford Borough Council may not be able to meet all of the employment needs in the Borough. The Economic Study Update provides individual District/Borough breakdown of employment needs, however it states these are only indicative and that employment needs are expected to be met across the FEMA. As such, Watford may be able to assist neighbouring authorities with office provision, whilst neighbouring authorities may be able to assist Watford with industrial/warehouse provision. Ongoing DtC between the SW Herts authorities will result in an agreement on the best way to distribute employment uses across the FEMA.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1982

Support

Respondent: St Albans City &amp; District Council

Agent: St. Albans City &amp; District Council

## Summary:

SADC notes that WBC considers that it cannot meet its own employment need in full. In particular, WBC have an under-provision in industrial floorspace (paragraph 4.4). As stated at previous Duty to Cooperate meetings SADC may be in a position to support South West Herts Authorities in meeting the shortfall in industrial land based on the current South West Herts Economic Study Update (2019). However, SADC Local Plan is at early stages and no decisions have yet been made. We generally support the commitment in in Strategic Policy EM4.1 Providing New Employment to work with the South West Herts Authorities in meeting the shortfall.

SADC, however, do raise a concern that WBC consider that the undersupply of industrial floorspace is compensated for through an overprovision of office space. Office space cannot readily compensate for industrial floorspace.

## Full text:

Received via email

## Change suggested by respondent:

SADC, however, do raise a concern that WBC consider that the undersupply of industrial floorspace is compensated for through an overprovision of office space. Office space cannot readily compensate for industrial floorspace.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>  
St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

Respondent: Dacorum Borough Council

Summary:

Dacorum Borough Council broadly welcome the strong economic growth planned for through the new Watford Local Plan. Dacorum welcomes in particular the emphasis on delivering significant new office floorspace which will likely make an important contribution towards addressing predicted shortfalls elsewhere in the wider South West Hertfordshire area. This is appropriately reflected in both the supporting text and strategic policy of the Local Plan. On employment needs, there are still some additional steps which should be addressed through the duty to cooperate and these are identified in some of the evidence supporting the new Local Plan and are expanded on below. The most up-to-date evidence for future employment needs in Watford is set out in the South West Herts Economic Study Update (2019). This study provides an update to existing work published in 2016 and forms the basis for identifying future employment needs across the functional economic market area (FEMA), which consists of Dacorum, Hertsmere, St. Albans, Three Rivers and Watford. The Update recognises that the FEMA is "based on evidence of strong commuting and migration relationships and shared leisure, retail and public sector catchment areas" (page i). In considering future growth scenarios for the area, the study concludes that the FEMA will need to identify a sufficient supply of land to deliver 188,000 sq.m of additional office space between 2018 and 2036, equating to around 11,000 full time equivalent (FTE) jobs in that same period. For Watford, the study determines an overall requirement of 37,600 sq.m of office space to be delivered, however it recognises that this figure "should only be treated as a guide" (page vi). For industrial space, the study identifies a need for 481,500 sq.m to be delivered between 2018 and 2036 (152,000 sq.m of B1c/B2 and 329,500 sq.m of B8 space), capable of supporting a further 7,400 new FTEs. For Watford, the study identifies a requirement for industrial floorspace of 98,400 sq.m, again as a guide. For both office and industrial floorspace requirements, the study recommends that the final decision on land requirements for industrial floorspace in each authority's local plan should be informed by duty-to-cooperate discussions which take account of the availability of land for new development across the FEMA. Dacorum note that the Watford Local Plan, through strategic policy EM4.1, seeks to allocate/safeguard sufficient employment land to deliver 111,175 sq.m of office floorspace and 40,759 sq.m of industrial floorspace. These figures are based on the outputs of the Housing and Economic Land Availability Assessment (2021), and recognises the over/undersupply in floorspaces relative to the 2019 economic study. The Land Availability Assessment also notes at paragraph 4.15 that "further discussions through the duty to cooperate process are required to identify the distribution". The need for duty to cooperate discussions on the distribution on employment land is further reinforced as a key recommendation/ conclusion in paragraph 5.9. Dacorum Borough Council considers it important that outcomes are agreed by the SW Herts authorities (to which the 2019 study relates) with respect to the overall distribution of employment land and how each Local Plan will contribute towards meeting future employment growth across the FEMA. As such, Dacorum Borough Council consider that, in accordance with national policy and guidance, a Statement of Common Ground is agreed with all the South West Herts Authorities confirming this position. Dacorum Borough Council recognises that cross boundary discussions are ongoing with an expectation that a Statement of Common Ground will be secured in due course. Such an agreement will need to be completed prior to any formal submission of the Local Plan (Regulation 22) in order for the plan to be considered to have met its legal obligations with respect to the Duty.

Full text:

n/a

Change suggested by respondent:

As highlighted above, any potential modifications would be addressed through a future Statement of Common Ground, to be agreed by the relevant authorities in South West Hertfordshire, and prior to the formal submission of the Watford Local Plan for examination.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: This matter has been raised through regular duty to cooperate meetings with Watford Borough Council and the wider South West Hertfordshire authorities.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Dacorum Borough Council - form\_Redacted - <https://watford.oc2.uk/a/zc>

Dacorum Borough Council - letter\_Redacted - <https://watford.oc2.uk/a/zd>



2020

Comment

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy focuses on industrial and office investment across the borough and seeks to create 11,500 new employment opportunities. The policy aims to do this by; protecting existing employment land; encouraging the growth of new businesses and industry; supporting alternative working methods; intensifying employment land; and, attracting new inward investment.

Lidl are supportive of investment in the borough, however, it is considered that the policy, as currently drafted, does not adequately accommodate for the changes in the Use Class Order.

It is suggested that the changes to the Use Class Order represents recognition, from national government, that retail development represents a meaningful positive contribute to the provision of employment opportunities.

Given this, it is considered that Policy EM4.1 should acknowledge that retail investment can be a key contributor to the borough's employment targets.

Moreover, it is considered that the convenience retail sector has shown considerably more resilience in the face of the Covid-19 pandemic than other sectors, which have generally seen a substantial downturn. This cements the argument for retail being considered more heavily for its employment benefits.

Given the above, it is considered that Policy EM4.1 should be amended to more accurately reflect the changes brought about by the revised Use Class Order, and allow for a more flexible approach to the use of designated employment sites, taking into account the employment benefits of alternative uses.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Given the above, it is considered that Policy EM4.1 should be amended to more accurately reflect the changes brought about by the revised Use Class Order, and allow for a more flexible approach to the use of designated employment sites, taking into account the employment benefits of alternative uses.

Legally No  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

## Designated industrial areas

1793

Support

Respondent: R Kowalewski

## Summary:

Permitted development is something that cannot be challenged but surely the council can block "change of use"? The developer can build all he wants but could not use the buildings for anything other than industrial use. Watford MUST keep what industrial space it has left. Why is Germany so successful? Because as a country they have retained industrial output, unlike the UK.

## Full text:

Permitted development is something that cannot be challenged but surely the council can block "change of use"? The developer can build all he wants but could not use the buildings for anything other than industrial use. Watford MUST keep what industrial space it has left. Why is Germany so successful? Because as a country they have retained industrial output, unlike the UK.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

## Policy EM4.2: Designated Industrial Areas

1895

Object

Respondent: Reach PLC  
Agent: Lichfields

## Summary:

Reach PLC object to the finalised allocation is set out below:

- The allocation does not reflect the mix of business uses currently on site as there is a substantial office function;
- The allocation does not consider the specific requirements of the property as a locally listed building, its setting and context in the future;
- The allocation does not reflect what is in the immediate area; and
- The allocation is more restrictive than that which was previously consulted on.

## Full text:

Reach PLC, objects to the allocation of land south of the A41 and immediately north of the Asda in the area known as the Dome Roundabout being allocated for purely industrial use on the Proposals Map (Designated Industrial Area of Sandown/Greycaine/Odhams) and the corresponding policy, Policy EM4.2: Designated Industrial Areas.

Reach plc is the largest national and regional news publisher in the UK with a leading portfolio in Ireland. Their portfolio includes the Daily Mirror, Daily Express, Daily Star, Daily Record and Sunday People as well as leading celebrity and entertainment magazine OK! They also publish leading regional titles including the Manchester Evening News, Liverpool Echo, Birmingham Mail, Western Mail and Bristol Post.

It is our view that the allocation of this site as a "Designated Industrial Site" does not fully reflect the current use of the site and is too restrictive. The Former Odhams Press Hall, now Reach Printing Services (Watford) Ltd, St Albans Rd, Watford is the property to which this representation relates. Our client notes that whilst an objection is lodged against the allocation of the site for industrial uses only, it not because they have any intention of vacating the property. Rather our client are looking to protect their position should circumstances change during the plan period - up to 2036 - and rectify what seems to be unjustifiable policy constraints that have been introduced new to the Submission Draft Plan. Reach plc as the building's owners are concerned to ensure that any future changes to the needs of a publishing business can be accommodated and ensure the flexibility exists in the plan to ensure the continued survival of a locally listed building.

The area of concern is the land south of the A41 and immediately north of the Asda in the area known as the Dome Roundabout. Please see the attached document which includes an excerpt from the Proposed Local Plan Proposals Map for clarification. Under the finalised Proposed Plan the area is covered under Policy EM4.2: Designated Industrial Areas, with the specific building being recognised as a locally listed building and covered by Policy HE7.3: Non-Designated Heritage Assets. This is a change from the First Draft Plan that identified this land via Policy E5.1 as a "Designated Employment Site". The First Draft Plan also identified this area as a Strategic Development Area. The land adjacent is now allocated as a site for the delivery of mixed use, Policy SA13.1: Allocated Sites for Delivery and it is important that the allocation of this site is considered in this context.

Reach plc object to the finalised allocation is set out below:

- The allocation does not reflect the mix of business uses currently on site as there is a substantial office function;
- The allocation does not consider the specific requirements of the property as a locally listed building, its setting and context in the future;
- The allocation does not reflect what is in the immediate area; and
- The allocation is more restrictive than that which was previously consulted on.

It is recognised that the print hall element of the property and the storage and distribution function of the building are currently industrial uses but a good proportion of this building is in office use and this is important given the recent changes to the Use Class order. The Office element of the building is clearly now Class E(g) and this does not sit well within an allocation that is solely for industrial uses. As stated above Reach plc have no intention of changing their operation on site in the short to medium term but recognise the long term nature of the plan and wish to ensure that any policies associated with this site reflect a reasonable future scenario. It is Reach plc's view that by limiting the future use of this site to Industrial uses only as now defined by the Use Class Order as a result of Policy EM4.2: Designated Industrial Areas this will not ensure a justifiable future for this site beyond its current use. This is explored further below.

Former Odhams Press Hall is a locally listed building, the property is valued by the local community and is a part of Watford's heritage that it is important to protect into the future. It is currently protected as part of Reach plc's operations but it is important that the policies of the new plan protect the future and setting of this locally important building. We do not believe that an industrial designation, which is much more narrowly defined in the revised Use Class Order, will do that should the building come up for redevelopment at some point in the future.

Industrial uses could have a significantly detrimental effect on the setting and the preservation of this building. In order to protect listed buildings and allow their conversion to new uses flexibility is required and the current designation the opportunities are far too narrow and could result in a detrimental impact on this asset in the future.

A review of the proposed Proposals Map shows that the site is isolated from the wider industrial area, largely segregated by the adjacent retail and the railway line. There is no logical reason to allocate this site for industrial use. Yes, it is part of an industrial use now but that doesn't mean other industrial uses would be suitable and acceptable for this site in the future given the adjacent allocation for mixed use development and the fact that the site is occupied by a locally listed building.

It is our view that rather than being a designated industrial area it would be better suited to be included in the MU23 allocation - Land at Asda Dome Roundabout allocation for mixed use development. This would not change its current status nor Reach plc's commitment to the site as their printworks but it would ensure that should it become available for redevelopment sometime in the future a suitable new use could be found that would sit appropriately with the adjacent mix of uses, enabling a suitable future to be found for the locally listed building that wouldn't be to its detriment. Furthermore, this is a prominent site on the A41 and future uses should also be considered in this context.

Policy E5.1 as set out in the First Draft Local Plan, previously consulted on, designated this site as an "employment" site not as an "industrial site". This is a much less restrictive allocation and included for B1, B2 and B8 uses. With B1 uses now becoming E(g) uses the Council have without justification dropped this use from the designation without proper consideration. We object to this overly restrictive designation for a site that is clearly stand alone, remote from other industrial allocations and adjacent to an area to be allocated for mixed use development. There is no justification provided for this and this is not a sound approach.

## Change suggested by respondent:

Based on the above Reach PLC propose the following modifications to ensure the soundness of the policy.

Consideration must be given to current uses which include a substantial office element and what would be suitable for the future. As set out above this site does not warrant an "industrial" only allocation as this neither reflects its current use nor what would be desirable in the future.

Rather this site would be much better suited to a "mixed use" designation and we would propose the extension of the already identified MU23 designation to include the Reach plc land and buildings. This is highlighted in Figure 2, red, below.

The Reach plc land and buildings are clearly separate from the adjacent industrial areas and there is no justification to include them in that designation.

Alternatively, we would support the removal of the "industrial" land designation without affording the site a subsequent allocation, leaving it as 'white land'. This would allow any potential development to be assessed against all other relevant local plan policies, ensuring a sustainable outcome for the locally listed building should it become available for a change of use in the future.

On this basis, we require the deletion of this site from the proposals map as an industrial designation and either the extension of the mix use designation to the south to include this area as illustrated on Figure 2 or no further allocation.

Related to this will be changes to the Final Draft Plan:

- Figure 1.2 Key Diagram
- Figure 4.1 Areas designated for office or industrial use
- Figure 13.1 Allocated sites for delivery
- Table 13.2 Mixed use sites, Site MU23 Land at Asda, Dome Roundabout – the key plan needs amended to include the Reach plc landholding and also the text needs amended to specifically state that this site is considered suitable for mixed use development to be consistent with the other entries in this table.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: Our participation in the hearing session(s) would be necessary as the designations significantly restricts the potential use of the site over the lifetime of the plan. In addition it is not necessarily compatible with surrounding designations and or with the existing uses which have a significant office component.

Attachments: Reach PLC - Watford Rep 1.pdf - <https://watford.oc2.uk/a/kd>

1924

Support

Respondent: Three Rivers District Council

## Summary:

Resisting a loss of industrial employment uses is supported as there are opportunities for these uses in the Borough.

## Full text:

Resisting a loss of industrial employment uses is supported as there are opportunities for these uses in the Borough.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

2126

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.50 Minerals & Waste Planning. The designated industrial areas within this policy that are shown on the Policies Map, also cover the following Employment Land Areas of Search (ELAS) that are identified in the adopted Waste Site Allocations DPD:

- ELAS221 Watford Business Park
- ELAS213 Odhams and Sandown
- ELAS214 Greycaine

5.51 These ELAS are identified as having potential compatibility with waste management uses. Whilst the Waste Local Plan does not rely on the need for all land within ELAS across the county for the delivery of waste capacity, the cumulative loss of ELAS to non-waste uses reduces the likelihood of such sites coming forward.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Whilst the revised Draft Waste Local Plan, which was published for consultation in January 2021, does not propose to identify specific employment land that may be suitable for waste management uses, it is requested that the above listed ELAS are shown on the Policies Map.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy EM4.3: Office development

1794

Support

Respondent: R Kowalewski

## Summary:

If this is the policy, than why have we seen non-office development in Clarendon road in the recent past???? Again words not reflecting what is going on. Also the council need to make Watford more attractive to bigger businesses. A lot of the office space in Clarendon road is "rent by the hour"

## Full text:

If this is the policy, than why have we seen non-office development in Clarendon road in the recent past???? Again words not reflecting what is going on. Also the council need to make Watford more attractive to bigger businesses. A lot of the office space in Clarendon road is "rent by the hour"

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Not sure

Appear exam: Not specified

Attachments: None

1925

Support

Respondent: Three Rivers District Council

## Summary:

This policy is consistent with national policy and the Economic Study Update and is therefore supported.

## Full text:

This policy is consistent with national policy and the Economic Study Update and is therefore supported.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No

Appear exam: Not specified

Attachments: None

1951

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

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

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

We challenge the requirement for an impact test for office development in the town centre. Offices are a main town centre use and so should be supported and should not therefore not be the subject of an impact test in line with the NPPF and the 'town centre first approach'. Regardless, the 250sqm cap seems very low and it is questioned how this figure has been formulated and we would request the reasoning behind this figure. It is suggested the policy wording be amended to the following:

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

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

Regardless, the 250sqm cap seems very low and it is questioned how this figure has been formulated and we would request the reasoning behind this figure. It is suggested the policy wording be amended to the following:

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

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2021

Comment

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy outlines the desired land use for the Primary Office location at Clarendon Road and states that any development at the site should not lead to a net loss in office space, unless it can be demonstrated that the site is no longer required for office use. The policy goes on to state that mixed-use development (including residential and commercial uses) will be accepted where the amount of office space is maintained. Lidl are supportive of this policy and agree that mixed-use development should be permitted in the area.

However, Lidl would like to stress the need for flexibility in planning policy and decision making. It is proposed that a reduction in office floorspace does not necessarily represent a reduction in the economic potential or function of the site, as measures such as office sharing and home working can allow a small floor plate to be utilised more effectively than 'traditional' office uses.

Given this, it is suggested that any mixed-use development (and indeed solely office development) on designated office sites is assessed based on the number of jobs created, as opposed to the floorspace created.

Moreover, this measure of potential employment opportunities should take into account all employment generating land uses, including retail, in line with the changes to the Use Class Order.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Given this, it is suggested that any mixed-use development (and indeed solely office development) on designated office sites is assessed based on the number of jobs created, as opposed to the floorspace created.

Moreover, this measure of potential employment opportunities should take into account all employment generating land uses, including retail, in line with the changes to the Use Class Order.

Legally No  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

2127

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.52 Transport. The designation of Clarendon Road as a primary office location is supported. As this is in a highly accessible location, it is advised that the policy should be modified by including the following text that minimises on-site parking provision given its highly sustainable nature and presence of nearby public car parks.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"On-site parking provision should be minimised, given its location within a highly accessible area."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2128

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Economic development outside of designed employment areas

5.53 Transport. The county council will support office locations outside the Core Development Areas where there is good accessibility to them by walking, cycling and public transport, in line with the county council's adopted LTP4.

## Full text:

Form and letter received via email

## Change suggested by respondent:

.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

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

2022

Support

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

**Summary:**

As currently drafted, Policy EM4.4 sets out the councils approach to the loss of 'traditional' employment sites outside of the designated employment designations, which allows for the loss of employment uses, provided that the loss can be justified in line with a set criteria.

Lidl support this policy in its entirety and believes that the proposed criteria allows for enough flexibility to ensure that potential investment can come forward.

**Full text:**

Form and letter received via email

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

**Policy EM4.5: Different ways of working**

2129

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

**Summary:**

5.54 Transport. Flexible workspace and communal offices should (where possible) be located where there are existing facilities (e.g. shops, cafes) and good transport connectivity. Opportunities should be taken to develop such spaces as part of evolving transport hubs.

**Full text:**

Form and letter received via email

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## A Vibrant Town

1795

Comment

Respondent: R Kowalewski

## Summary:

Applications are going in for development of apartments over the "night club area" of Watford. These must only be allowed with a covenant that residents cannot in the future demand club closure on account of noise. That has happened too many times in the past. Inappropriate development (usually) around an industrial site which is later forced to close on account of residents complaints. Don't let such a situation develop here.

## Full text:

Applications are going in for development of apartments over the "night club area" of Watford. These must only be allowed with a covenant that residents cannot in the future demand club closure on account of noise. That has happened too many times in the past. Inappropriate development (usually) around an industrial site which is later forced to close on account of residents complaints. Don't let such a situation develop here.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Not sure

Appear exam: Not specified

Attachments: None

1840

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere recognises the importance of Watford as a sub-regional retail centre. It is therefore important that any development gives due consideration to impact on existing linkages between Watford and the wider area, and the need for improved accessibility for those travelling from slightly further afield. Furthermore Bushey High Street is in close proximity to Watford and we ask that any impact assessment fully considers the potential implications on all local facilities not just those within the Borough Council boundary.

## Full text:

Hertsmere recognises the importance of Watford as a sub-regional retail centre. It is therefore important that any development gives due consideration to impact on existing linkages between Watford and the wider area, and the need for improved accessibility for those travelling from slightly further afield. Furthermore Bushey High Street is in close proximity to Watford and we ask that any impact assessment fully considers the potential implications on all local facilities not just those within the Borough Council boundary.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jn>



2030

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

Paragraph 5.9 of the Final Draft Local Plan refers to the potential for redevelopment of out-of-centre retail parks to make better use of land by providing new residential development alongside appropriate retail that is easily accessible and well integrated with the surrounding area. This wording should be expanded to include leisure destinations such as Woodside to recognise the potential for intensification and the optimisation of land.

## Full text:

Letter and form received via email

## Change suggested by respondent:

This wording should be expanded to include leisure destinations such as Woodside to recognise the potential for intensification and the optimisation of land.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>  
Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>  
Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2130

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.55 Transport. Redevelopment of out-of-centre retail parks to make better use of land is supported. In addition, recognition of the potential to redevelop sites such as Waterfields and Lower High Street and repurpose the road network is welcomed.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**The changing nature of retail in Watford**

1832

Comment

Respondent: Mrs Fran Clark

**Summary:**

This does not take into account the Covid pandemic which has halted any economic expansion for the last year and will be slow to return to anything like the fortunes of 2019.

There will not be a need for the nearly 15,000 new homes by 2036 - this should be reduced to 10,500 as there will not be the proposed increase in population. Or there should be at least a 2 year delay in the plan.

**Full text:**

This does not take into account the Covid pandemic which has halted any economic expansion for the last year and will be slow to return to anything like the fortunes of 2019.

There will not be a need for the nearly 15,000 new homes by 2036 - this should be reduced to 10,500 as there will not be the proposed increase in population. Or there should be at least a 2 year delay in the plan.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Policy VT5. 1: Supporting Vibrant Retail Centres**

1952

Comment

Respondent: Watford Centre Limited

Agent: WSP

**Summary:**

The Plan recognises that the retail environment is changing, with traditional retail declining and service sectors, such as food and drink, health and fitness, and hotels increasing in prominence.

The Plan emphasises the importance of retaining flexibility in retail policy to encourage footfall with popular uses, such as leisure and food and drink.

The Council is seeking to enhance the offer for families in the town and create a balanced centre that meets the needs of all residents and users at different times of the day and night. New proposals for cultural and social uses will be encouraged as appropriate town centre uses that can add vibrancy and activity. It is anticipated that a building may be in a number of different uses concurrently or at different times of the day.

In relation to the out-of-centre retail parks in Watford, the draft Plan advises that redevelopment of these sites, such as Waterfields and Lower High Street, should make a better use of land by providing new residential development alongside appropriate retail that is easily accessible and well-integrated with the surrounding area (as referenced in the Colne Valley Strategic Development Area above). In this chapter the draft Local Plan advises that the consolidation of retail floor space in such locations may be appropriate to support additional economic spend or investment in the Town Centre, Watford's primary retail destination.

Our client is supportive of the overall vision of Strategic Policy VT5.1: Supporting a Vibrant Retail Centre but stress the importance of the need to protect the town centre. Any additional town centre floorspace in edge or out of town centre locations should be assessed against the sequential and impact tests of the NPPF as set out at paragraph 86 and paragraph 89 and this should be included in the policy text. This is to ensure conformity with national planning policy. It is recommended that the policy be amended to the following:

“Where appropriate, a limited amount of retail development will be supported on strategic sites to provide for the new community, subject to: compliance with the Sequential Test; proposals being of an appropriate scale; provision of good accessibility by walking, cycling or public transport; and there being no significant adverse impact on the vitality and viability of the Town Centre or Local Centres in the vicinity. Any additional town centre floorspace of over 250 sqm should be assessed against the impact tests”

At paragraph 5.12, the draft Plan comments on the retail hierarchy, however, the description of the town centre includes reference to a regional centre rather than a sub-regional centre. This needs to be amended.

**Full text:**

Date received 15/03/2021 via email.

**Change suggested by respondent:**

It is recommended that the policy be amended to the following:

“Where appropriate, a limited amount of retail development will be supported on strategic sites to provide for the new community, subject to: compliance with the Sequential Test; proposals being of an appropriate scale; provision of good accessibility by walking, cycling or public transport; and there being no significant adverse impact on the vitality and viability of the Town Centre or Local Centres in the vicinity. **Any additional town centre floorspace of over 250 sqm should be assessed against the impact tests”**

At paragraph 5.12, the draft Plan comments on the retail hierarchy, however, the description of the town centre includes reference to a **regional centre** rather than a **sub-regional centre**. This needs to be amended.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Appearance at the examination  
Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>  
WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>  
WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2023

Comment

Respondent: Lidl Great Britain Limited

Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy sets out that town centre uses will be directed towards the defined District and Local Centres, provided that they are acceptable in terms of scale and function. Furthermore, the policy states that Watford Town Centre will be predominantly used for comparison retail, leisure, entertainment, civic and cultural activities.

The policy outlines that a 'town centre first' approach will be taken when making planning decisions, with limited retail development outside of the town centre, provided the proposal meets the sequential test and other material considerations. Additionally, retail development to provide local good and service local communities is considered to be appropriate through the policy.

Throughout the whole policy, great emphasis is put on ensuring the vitality and viability of designated centres. Convenience retail patterns over the past 10-20 years have changed substantially; medium to large store formats have become more popular and prevalent, and as such convenience retail has moved out from small format town/city centre locations to larger sites in out or edge of centre locations. Given that many customers now perform weekly shops, it is considered that this larger format in edge or out of centre locations more effectively meets the needs of the consumer.

With this in mind, it is considered that the town and city centres no longer perform a significant convenience retail function, and focus more heavily on comparison retail, leisure and services. Subsequently, it is considered that new edge or out of centre convenience retail development is unlikely to have a substantial impact on the vitality or viability of town centres. Moreover, it is proposed that edge and out of centre convenience retail almost exclusively impacts on other edge or out of centre convenience retail.

Policy VT5.1 does not list convenience retail as a primary town centre use, suggesting that Watford Council agree, at least in part, with the above assessment. Moreover, the policy allows for limited out of centre retail development, provided that the site is compliant with the Sequential Test and other material considerations.

However, the local planning authority still require a 'town centre first' approach to be taken for all retail and other town centre uses.

Overall, Lidl are supportive of the policy, and believe that it allows for a suitable level of flexibility and acknowledges the prevailing convenience retail pattern. However, it is considered that somewhere in the policy, the councils approach to medium to large convenience retail should be explicitly outlined.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Overall, Lidl are supportive of the policy, and believe that it allows for a suitable level of flexibility and acknowledges the prevailing convenience retail pattern. However, it is considered that somewhere in the policy, the councils approach to medium to large convenience retail should be explicitly outlined.

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>

2029

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

L&G's previous representations to the Preferred Options (First Draft) Local Plan requested that the Local Plan make specific reference to the fact that Watford is served by a number of retail and leisure parks which provide vital large format accommodation, land uses and occupiers not found within the designated centres.

Despite this request the Final Draft Local Plan still remains relatively silent on the role that such facilities play in contributing to the overall retail and leisure offer within the Borough. Whilst paragraph 5.9 of the Final Draft Local Plan does acknowledge the existence of "a number of out-of-centre retail parks in Watford" there is no specific reference made to Woodside being the only recognised out-of-centre 'leisure' destination in Watford.

L&G would request that Woodside is recognised to form part of the established retail and leisure hierarchy set out at Table 5.1 of the Final Draft Local Plan.

Woodside should be formally identified as an 'out of centre commercial destination' which performs a role in supporting the wider retail and leisure hierarchy. That is that it complements the offering found within designated retail centres and ensures that Watford has a comprehensive offer to meet the requirements of its immediate and wider catcher area population.

Paragraph 5.9 of the Final Draft Local Plan refers to the potential for redevelopment of out-of-centre retail parks to make better use of land by providing new residential development alongside appropriate retail that is easily accessible and well integrated with the surrounding area. This wording should be expanded to include leisure destinations such as Woodside to recognise the potential for intensification and the optimisation of land.

The potential for intensification or, in some cases, comprehensive redevelopment, of such facilities should also be incorporated into Strategic Policy VT5.1 or a separate new policy. This would ensure that the Local Plan recognises the potential that some existing commercial sites within the Borough provide in terms of land supply and opportunities for diversification through a greater mix of uses.

It is noted that the retail and leisure sector has experienced a material change in recent years which has been further accelerated by the current pandemic. A number of further changes to the overall function of these sectors is projected in the short and longer term given the different market forces and change in consumer trends. It is anticipated that demand for retail and leisure floorspace within the Borough, including at Woodside, will change (either in terms of overall demand, type of premises or size of requirements).

The policy framework should support the introduction of a mix of uses including retail, leisure and residential at sites such as Woodside to support the function of the existing floorspace and ensure they can adapt to the changing habits and needs of the consumers they serve. This accords directly with the objective of national policy to ensure that local plans apply a presumption in favour of sustainable development to meet development needs of the area and ensure they are sufficiently flexible to adapt to rapid change.

## Full text:

Letter and form received via email

## Change suggested by respondent:

Various; see summary/letter. See also comments for paras 5.9 and 5.11.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>

Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>

Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

## Retail hierarchy

1926

Support

Respondent: Three Rivers District Council

## Summary:

The proposed retail hierarchy is supported.

## Full text:

The proposed retail hierarchy is supported.

## Change suggested by respondent:

.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

2031

Comment

Respondent: Legal & General Investment Management  
Agent: Savills

## Summary:

L&G's previous representations to the Preferred Options (First Draft) Local Plan requested that the Local Plan make specific reference to the fact that Watford is served by a number of retail and leisure parks which provide vital large format accommodation, land uses and occupiers not found within the designated centres.

Despite this request the Final Draft Local Plan still remains relatively silent on the role that such facilities play in contributing to the overall retail and leisure offer within the Borough. Whilst paragraph 5.9 of the Final Draft Local Plan does acknowledge the existence of "a number of out-of-centre retail parks in Watford" there is no specific reference made to Woodside being the only recognised out-of-centre 'leisure' destination in Watford.

L&G would request that Woodside is recognised to form part of the established retail and leisure hierarchy set out at Table 5.1 of the Final Draft Local Plan.

Woodside should be formally identified as an 'out of centre commercial destination' which performs a role in supporting the wider retail and leisure hierarchy. That is that it complements the offering found within designated retail centres and ensures that Watford has a comprehensive offer to meet the requirements of its immediate and wider catcher area population.

## Full text:

Letter and form received via email

## Change suggested by respondent:

L&G would request that Woodside is recognised to form part of the established retail and leisure hierarchy set out at Table 5.1 of the Final Draft Local Plan.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>  
Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>  
Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

## Policy VT5.2: Watford Town Centre

1953

Support

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

Policy VT5.2: Watford Town centre, outlines the general considerations when considering applications that require permission for town centre uses including that town centre uses will be supported where they maximise the proportion of ground floor fronting a street as positive and / or active frontage and support the flexibility and adaptability to future proof for changing uses.

Our client is supportive of this policy in particular the need for future proofing development for changing uses.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>  
WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>  
WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

## Policy VT5.3: Local Centres

2019

Object

Respondent: McDonald's Restaurants Ltd  
Agent: McDonald's Restaurants Ltd

## Summary:

Please see letter for full details.

We have considered proposed Policy VT5.3 with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date.

1.2 Within these broad points we have the following policy objections to draft Policy VT5.3:

- A. The 400m exclusion zone is inconsistent with national planning policy
  - B. The policy is inconsistent, discriminatory and disproportionate.
  - C. Examination of other plans have found similar policy approaches to be unsound.
  - D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.
- 1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy VT5.3 Point F, which imposes a blanket ban on restaurants that include an element of hot food takeaway within 400-metres walking distance of a primary school entrance.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Point F is unsound it should be deleted from the plan.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: McDonalds\_Redacted - <https://watford.oc2.uk/a/mp>

2131

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.56 Transport. It is suggested that the following criteria is added to this policy, in order to ensure that potential communal office facilities and co working spaces in local centres are well connected to transport services.

## Full text:

Form and letter received via email

## Change suggested by respondent:

i) Communal office facilities and co working spaces in local centres are well connected to transport services.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## An Attractive Town

1841

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's proposals for high density development within Core Development areas, and recognises the potential benefits that high density development can bring. Nevertheless, suitable measures should be included to ensure that a high level of accessibility is retained for those travelling to or from places outside of Watford.

## Full text:

Hertsmere supports Watford's proposals for high density development within Core Development areas, and recognises the potential benefits that high density development can bring. Nevertheless, suitable measures should be included to ensure that a high level of accessibility is retained for those travelling to or from places outside of Watford.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jy>

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

1851

Comment

Respondent: Planning &amp; Development Associates Ltd

## Summary:

This representation identifies an omission and inconsistency in Figure 6.2

Figure 6.2 identifies all designated area of Open Space and Green Infrastructure and in paragraph 6.4 states that "Protected areas include all parks and open spaces (detailed map at Figure 9.1)". This is not only incorrect because the areas in Blackwell Drive are omitted, but Figure 6.2 needs to be amended to include the additional areas proposed in this representation and as shown on the proposals map.

## Full text:

This representation identifies an omission and inconsistency in Figure 6.2

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y5>

1864

Comment

Respondent: Watford Central Town Residents Association

## Summary:

For the section on Established Areas, 'gentle uplift' is an imprecise term for such a critical issue and requires a clearer definition. We suggest terminating the sentence as follows: "The degree of change will be more limited than in the Core Development Area". The Character of Area study and Residential Design Guide should be specifically named in this policy, and "existing characteristics" should be changed to read "existing design characteristics".

## Full text:

For the section on Established Areas, 'gentle uplift' is an imprecise term for such a critical issue and requires a clearer definition. We suggest terminating the sentence as follows: "The degree of change will be more limited than in the Core Development Area". The Character of Area study and Residential Design Guide should be specifically named in this policy, and "existing characteristics" should be changed to read "existing design characteristics".

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1885

Object

Respondent: T Norris

## Summary:

Medium sustainable labelled on Haydon Hill Pastures and Pond aka Attenborough Fields

## Full text:

Medium sustainable labelled on Haydon Hill Pastures and Pond aka Attenborough Fields

## Change suggested by respondent:

Attenborough Fields must be a designated green open space and protected area. It cannot be seen as an area for construction and at risk of development, whilst allotments in the same area are protected and give much less to the majority of the community, natural habitat, animals, environment and health and wellbeing of the population

Legally compliant: No

Sound: No

Comply with duty: Yes

Raise LPA: Yes

Raise LPA Why?: Yes but no response to my query was provided although they said it would be

Appear exam: Written Representation

Attachments: None

1911

Support

Respondent: Three Rivers District Council

## Summary:

The requirement for high quality and attractive design is supported. Following the Government's consultation on changes to the NPPF this month this is a policy area that is expected to be tightened.

## Full text:

The requirement for high quality and attractive design is supported. Following the Government's consultation on changes to the NPPF this month this is a policy area that is expected to be tightened.

## Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Raise LPA: No

Appear exam: Not specified

Attachments: None

1954

Support

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

Policy QD6.1 states that within the Core Development Area, high-density development will be supported, with the highest densities to be located in the most sustainable locations. Proposals for taller buildings will be of an appropriate height that reflects its location, role in the built-up area, contributes to wayfinding as a key marker in the townscape and which makes a positive contribution towards an attractive skyline. We support this policy for higher densities in sustainable locations and this is discussed further at Policy QD6.5.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

-

Legally compliant: Yes

Sound: No

Comply with duty: Yes

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>



2038

Support

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

This policy states that in the core development areas (that includes the town centre), higher densities will be supported particularly in sustainable locations. Tall buildings will also be supported where they are appropriately designed, support wayfinding, positively contributes to the skyline and other criteria.

## Full text:

Forms received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2132

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.57 Historic Environment. The county council welcomes the policy requirement, regarding the provision for the design of new developments in the borough to take into account heritage assets. It is recommended that the local plan encourages any new development to reference the local architectural styles and building materials, which should be sympathetic to historic buildings of the borough. It is considered that this will help Watford to be distinctive and create a sense of place and enable development to sit appropriately within the local area. Where possible, historic buildings should be kept and maintained to compliment this.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Design principles

1833

Comment

Respondent: Mrs Fran Clark

## Summary:

It is not clear as to who is going to agree and monitor 'the quality and distinctiveness of a place'?

## Full text:

It is not clear as to who is going to agree and monitor 'the quality and distinctiveness of a place'?

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No

Appear exam: Not specified

Attachments: None

## Policy QD6.2: Design Principles

1807

Comment

Respondent: Sport England

## Summary:

In view of the importance attached to supporting healthier communities in the plan's vision and sustainable objectives it is surprising that the Design Principles make no reference to designing new developments to promote active and healthier lifestyles and thereby contribute to the wider healthier communities objectives. This would be consistent with paragraphs 91/92 of the NPPF. It is therefore requested that the Movement and Connectivity principle is amended to require new developments to be designed provide the opportunity for people to be healthy and active. This would be consistent with Policy HC12.1 which expects developments to promote active design.

## Full text:

In view of the importance attached to supporting healthier communities in the plan's vision and sustainable objectives it is surprising that the Design Principles make no reference to designing new developments to promote active and healthier lifestyles and thereby contribute to the wider healthier communities objectives. This would be consistent with paragraphs 91/92 of the NPPF. It is therefore requested that the Movement and Connectivity principle is amended to require new developments to be designed provide the opportunity for people to be healthy and active. This would be consistent with Policy HC12.1 which expects developments to promote active design.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1927

Support

Respondent: Three Rivers District Council

## Summary:

The proposed Design Principles are supported.

## Full text:

The proposed Design Principles are supported.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

2133

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.58 Lead Local Flood Authority. It is suggested that this policy needs to be reviewed to show how it accommodates aspirations later in the local plan with regard to buildings with "Green roofs" and "Green Walls" which may be proposed as part of sustainability and managing the impacts of climate change.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy QD6.3: Public Realm

1808

Support

Respondent: Sport England

## Summary:

Support is offered for designing the public realm to improve health and well-being through encouraging physical activity. Criteria b, c and d in particular are welcomed as they would all contribute towards encouraging physical activity through the design of the public realm. This would be consistent with paragraphs 91/92 of the NPPF.

## Full text:

Support is offered for designing the public realm to improve health and well-being through encouraging physical activity. Criteria b, c and d in particular are welcomed as they would all contribute towards encouraging physical activity through the design of the public realm. This would be consistent with paragraphs 91/92 of the NPPF.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2134

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.59 Lead Local Flood Authority. It is suggested that this policy needs to be reviewed to show how it supports multifunctional greenspace as the emphasis is very much on recreation and aesthetics. Although it mentions green infrastructure, it is in the sense of individual use rather than the space providing an environmental service. Examples would be tree pits and rain gardens which would green and soften the public realm and also help with surface water management.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Building design

2135

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.60 Lead Local Flood Authority. It is considered that 'rainwater harvesting' should also be mentioned. This is in order to minimise the removal of excess water to a drainage network (which infers surface water sewers) rather than rainwater conservation and Sustainable Drainage Systems (SuDS) being integrated into building design.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Safe and attractive environments

2050

Comment

Respondent: Hertfordshire Constabulary  
Agent: Hertfordshire Constabulary

## Summary:

Crime prevention and security

By using Designing Out Crime techniques and ensuring that building developments achieve the police preferred minimum security standard: Secured by Design (SBD), secure, safer and sustainable environments are created, providing a better quality of life for the residents living in the area.

Commercial/industrial sites, footpaths, play areas, retail units, landscaping, car parking areas and lighting can all be designed to reduce criminal activity and the fear of crime, and have a significant impact on anti-social behaviour.

There are also substantial environmental benefits to Designing Out Crime; research indicates that the annual carbon cost of crime in the UK is approximately 6,000,000 tonnes of CO2 Independent academic research suggests that housing developments built to the Secured by Design standard have 25% less criminal damage, 25% less vehicle crime and 87% less burglary. Incorporating crime prevention and security considerations into the local plan would help to align police and planning department efforts in the future to provide safer environments for living, working and leisure.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Herts Constabulary\_Redacted - <https://watford.oc2.uk/a/m7>

## Policy QD6.4: Building Design

1809

Comment

Respondent: Sport England

## Summary:

Support is offered for new residential development being designed to provide spaces that support health and well-being. However, as criteria e-h do not specifically provide guidance on designing homes to encourage physical activity, it is requested that an additional criterion is added along the following lines:

- Buildings should be designed to promote the use of stairs and provide secure cycle parking in easily accessible locations.

This would be consistent with Policy HC12.1 which requires developments to promote active design by adhering to the 10 Principles of Active Design (one of which specifically covers Active Buildings).

## Full text:

Support is offered for new residential development being designed to provide spaces that support health and well-being. However, as criteria e-h do not specifically provide guidance on designing homes to encourage physical activity, it is requested that an additional criterion is added along the following lines:

- Buildings should be designed to promote the use of stairs and provide secure cycle parking in easily accessible locations.

This would be consistent with Policy HC12.1 which requires developments to promote active design by adhering to the 10 Principles of Active Design (one of which specifically covers Active Buildings).

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

## Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1941

Comment

Respondent: Berkeley Homes

## Summary:

Berkeley Homes supports the Borough's approach to requiring new developments to make a positive contribution to design and place making, including through the delivery of high quality and well-designed public realm (draft Policies QD6.2, QD6.3 and QD6.4). Design is critical in terms of ensuring that increased density across the Borough does not have a detrimental impact on the urban environment. The overarching principles set out in Policy QD6.4: Building Design are supported, however in Berkeley Homes' experience it is not always feasible or practical to meet some of the more restrictive requirements in part e) and h) without compromising the design of the building or the ability to optimise land for the delivery of homes and affordable homes. As has been demonstrated at 94-98 St Albans Road, through considered design, cores serving more than 8 homes can be achieved without hindering the amenity or environment of residents where these spaces are well ventilated and lit with core access which meets fire regulations.

## Full text:

-

## Change suggested by respondent:

Suggested amendments to these part of the policy are: "e) Ground floor homes should be designed with primary access directly onto the street where practical and feasible" "h) Internal cores are to serve no more than eight units unless it can be demonstrated that the internal living environment would not be compromised"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made on the First Draft of the New Local Plan by JLL on behalf of Berkeley Homes requesting greater flexibility on this Policy.

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>

Berkeley Homes (North East London) Reps - <https://watford.oc2.uk/a/z6>

Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1955

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The policy states that new building design should adhere to the following design principles for safe, healthy and attractive internal and external environments, and amongst other things:

- All ground floor units to be designed so that the primary access for each individual unit is directly on to the street;
- Include a high proportion of dual aspect units to create quality internal spaces, able to receive good light and air ventilation and, where possible, avoid using single aspect form; and
- Internal cores are to serve no more than eight units.

It is considered that meeting these design criteria although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these exceptional circumstances. We would advise that an exceptions criterion is inserted into the policy such as:

“It is acknowledged that meeting this design criteria is not always achievable due to site constraints and this should be negotiated on a site by site basis”

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We would advise that an exceptions criterion is inserted into the policy such as:

“It is acknowledged that meeting this design criteria is not always achievable due to site constraints and this should be negotiated on a site by site basis”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

## Building height and taller development

1831

Object

Respondent: Mrs Fran Clark

## Summary:

This not take into account the pandemic. As this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

So new homes need to take this into account

## Full text:

This not take into account the pandemic. As this is an 'unprecedented event' and the Watford Plan has not considered that we are now in a period of trying to get back to the same status as we were in 2019. There now needs to review:

Employment will be mainly home working and have no need to be close to the workplace.

Watford is no longer a thriving town with the closure of many retail outlets; Debenhams, John Lewis

So new homes need to take this into account

## Change suggested by respondent:

To meet the borough's need for new homes and jobs the Local Plan anticipates any development after Covid to continue at the same densities across the borough. This means Watford is more likely to decline new buildings that are taller than the existing prevailing height within an area.

Legally No

compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2039

Comment

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

It is recognised that the Tall Building Study 2021 has enabled the Council to establish a base height for areas across the Borough however as set out in the Study, there is only the more intense scenario of development in the town centre that can meaningfully achieve the housing requirements of this sustainable area. In the Town Centre this is given as 5 storeys on the High Street and stepping up to 8 storeys. Any proposals above these heights will fall to be assessed under policy QD6.5 which is a fair policy criteria for assessment. The site we have been promoting (draft allocation MU11) has been subject to discussions with officers under pre-application reference 19/01469/PREAPP where officers considered that there is scope for a taller building.

## Full text:

Forms received via email

## Change suggested by respondent:

Additional scenarios for taller buildings coming forward in the town centre should be assessed as they are clearly supported (subject to meeting certain criteria) in the wider policies of the local plan.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

## Policy QD6.5: Building Height

1865

Comment

Respondent: Watford Central Town Residents Association

## Summary:

The policy refers to table 6.1 but it is table 6.2, Base building heights, that should be referred to. We find the base building height of 4 storeys for 2-storey residential areas is not appropriate, and that the base building height should be reduced to a maximum of 3 storeys.

## Full text:

The policy refers to table 6.1 but it is table 6.2, Base building heights, that should be referred to. We find the base building height of 4 storeys for 2-storey residential areas is not appropriate, and that the base building height should be reduced to a maximum of 3 storeys.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1900

Comment

Respondent: La Salle Investment Management  
Agent: Miss Rachel McGall

## Summary:

La Salle support the objectives for high-density development across the borough to help meet the need for new homes and jobs.

Whilst appreciating the sensitivity of particular areas, La Salle consider greater flexibility could be included within the base building heights as set out in Table 6.3. For example, supporting text of Policy QD6.5 confirms that schemes may identify opportunities that maximise changes in topography to achieve additional height. It is therefore considered that Table 6.3 should offer greater flexibility and potential building height ranges which take into account variation in topography and other sensitivities to ensure development opportunities are maximised.

## Full text:

La Salle support the objectives for high-density development across the borough to help meet the need for new homes and jobs.

Whilst appreciating the sensitivity of particular areas, La Salle consider greater flexibility could be included within the base building heights as set out in Table 6.3. For example, supporting text of Policy QD6.5 confirms that schemes may identify opportunities that maximise changes in topography to achieve additional height. It is therefore considered that Table 6.3 should offer greater flexibility and potential building height ranges which take into account variation in topography and other sensitivities to ensure development opportunities are maximised.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/yy>

1956

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

The policy states that proposals for buildings that exceed the base building height set out in Table 6.1 will be classified as a taller building. We recommend submitting a representation requesting that this table is correctly labelled as Table 6.1 in line with text.

The policy states that proposals for taller buildings should clearly demonstrate:

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

Although we appreciate that tall buildings are only appropriate in some locations, we seek to challenge this policy in relation to town centres. Although the Policy is informed by the Tall Buildings Study (2021) we consider the base height for the Town Centre Strategic Development Area of up to 5 storeys on the High Street, stepping up to 8 storeys to the rear to be modest, especially for town centre locations where higher densities/building heights should be suitable providing there is no substantial harm (subject to heritage and townscape analysis). There should be areas identified for tall buildings beyond the site allocations and height should be considered on a site by site basis. Height caps will affect the viability of delivering brownfield sites in the borough and impact on housing delivery including the delivery of affordable housing which is not in line with national policy. The criteria for demonstrating a tall buildings acceptability is also quite onerous, especially the criteria to demonstrate significant public benefits above the base height and should be removed.

The building heights do not tie in with density requirements in HELAA or acknowledge capacity in Town Centre location and should be more flexible.

It is recommended that the policy wording be amended to the following:

"Proposals for buildings that exceed the base building height (and are not identified on sites suitable for a taller building) should achieve the following:

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



## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

The policy states that proposals for buildings that exceed the base building height set out in Table 6.1 will be classified as a taller building. We recommend submitting a representation requesting that this table is correctly labelled as **Table 6.1** in line with text.

It is recommended that the policy wording be amended to the following:

**“Proposals for buildings that exceed the base building height (and are not identified on sites suitable for a taller building) should achieve the following:**

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

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2034

Comment

Respondent: IDA Plymouth Holdings

Agent: Savills

## Summary:

In the town centre there is again support given for higher density development (which is also confirmed in Strategic Policy CDA2.2) subject to various criteria. The various criteria are relatively usual requirements for tall buildings however from the Allies and Morrison Tall Building Study 2021, there doesn't appear to be any scenarios tested for tall buildings in the town centre as taller development is considered to be contrary to a context-led approach. The Tall Building Study has assessed three scenarios of which only the more intense form of development option achieves the housing targets of the Local Plan. This therefore again confirms that the level of development and density requirement in the town centre needs to be higher through the future local plan in order to meet the Council's targets. The site we are promoting (draft allocation MU11) has been subject to discussions with officers under pre-application reference 19/01469/PREAPP where officers considered that there is scope for a taller building.

## Full text:

Forms received via email

## Change suggested by respondent:

The tall buildings study needs to reflect the wider policies in the local plan which are supportive of greater density developments coming forward in the core development areas and accessible locations in order to demonstrate deliverability of the local plan.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2136

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.61 Community Protection (HFRS). Hertfordshire Fire & Rescue considers there to be no issue with the proposals for taller buildings, as long as they comply with and satisfy Policy QD6.5: Building Height, local building regulations/restrictions, and fire protection legislation.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## The Historic Environment

1867

Comment

Respondent: Canal & River Trust

## Summary:

Sited along the Grand Union Canal within the Plan boundary are numerous locally and nationally listed buildings and structures, notably the Canal Cottage by Grove Mill Lane Bridge, Grove Park Ornamental Bridge and Lady Capel's Footbridge. We observe that the locations of these structures have been accurately depicted in Figure 7.2. Moreover, a section of the GUC lies within the Mill Grove Conservation Area, and the GUC can be considered as a non-designated heritage asset at various locations within the Plan boundary.

## Full text:

Sited along the Grand Union Canal within the Plan boundary are numerous locally and nationally listed buildings and structures, notably the Canal Cottage by Grove Mill Lane Bridge, Grove Park Ornamental Bridge and Lady Capel's Footbridge. We observe that the locations of these structures have been accurately depicted in Figure 7.2. Moreover, a section of the GUC lies within the Mill Grove Conservation Area, and the GUC can be considered as a non-designated heritage asset at various locations within the Plan boundary.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Referred to Historic Environment in response to First Draft Consultation.

Appear exam: Not specified

Attachments: None

2137

Comment

Respondent: Hertfordshire County Council  
 Agent: Hertfordshire County Council

## Summary:

5.62 Historic Environment. It is considered that the final draft local plan lacks an archaeological thread, as it often equates heritage assets with designated and locally listed buildings which is incorrect. There are below ground heritage assets with archaeological interest in the borough and these should also be discussed. The final draft local plan does not discuss the full range of local heritage assets or provide a local distinctiveness to its aspirations.

5.63 There are, however, some positive themes running through the plan. For example, a requirement that heritage assets revealed during development should be conserved, if necessary, by changes to the development scheme. It is important however that this is clearly applied to archaeological remains as well as buildings, and it is noted that the significance of previously recorded heritage assets may be better understood which may require similar provisions to be made.

5.64 The local plan is expected to recognise those archaeological remains with equivalent significance to a scheduled monument and make provision for both appropriate conservation of the heritage assets and include those that have distinctive local significance. It is also recommended that a requirement for access to a suitable depository to store archives and make them available to the public should be included in the supporting text.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
 compliant:  
 Sound: Yes  
 Comply with Yes  
 duty:  
 Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
 HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
 HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

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

1868

Comment

Respondent: Canal & River Trust

## Summary:

The Trust acknowledges the inclusion of Policies HE 7.1, 7.2, 7.3 and 7.4 within Chapter 7, as well as the accompanied supporting text. It is noteworthy that included within the list of the benefits associated with the historic environment there is an acknowledgement of the positive impacts heritage assets can offer in regard to health and well-being, as well as their fundamental importance in attractive place-making. We would welcome the encouragement of consultation with the Trust for proposals which may have an impact on the character of the canal corridor and on designated/non-designated waterway heritage assets.

## Full text:

The Trust acknowledges the inclusion of Policies HE 7.1, 7.2, 7.3 and 7.4 within Chapter 7, as well as the accompanied supporting text. It is noteworthy that included within the list of the benefits associated with the historic environment there is an acknowledgement of the positive impacts heritage assets can offer in regard to health and well-being, as well as their fundamental importance in attractive place-making. We would welcome the encouragement of consultation with the Trust for proposals which may have an impact on the character of the canal corridor and on designated/non-designated waterway heritage assets.

## Change suggested by respondent:

-

Legally Not specified  
 compliant:  
 Sound: Not specified  
 Comply with Not specified  
 duty:  
 Raise LPA: Yes

Raise LPA Why?: Historic Environment was referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

2138

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.65 This policy simply repeats parts of the NPPF rather than being locally distinctive and it also includes reference to Heritage Impact Assessments. This should be clarified. The information required to enable the planning authority to make an informed decision regarding the historic environment is more clearly contained in existing document types such as archaeological desk-based assessments, historic building assessments and Conservation assessments. The county council considers this lack of clarity has the potential to affect the relevance of archaeological information which is usually submitted alongside a planning application.

## Full text:

Form and letter received via email

## Change suggested by respondent:

.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Policy HE7.2: Designated Heritage Assets**

2042

Object

Respondent: Historic England  
Agent: Historic England

## Summary:

We welcome the inclusion of a comprehensive set of historic environment policies in the draft Plan and the changes which have been made since the Regulation 18 draft, but recommend the Council review the wording to make sure that it is consistent with the NPPF. As currently drafted, HE7.2 Designated Heritage Assets states infers that some level of (less than substantial) harm is to be expected ("proposals will be supported where they will not result in the loss of, or substantial harm....") whereas NPPF paragraph 193 is clear that any potential harm should be avoided, regardless of whether it amounts to substantial harm or not. The following text then needlessly repeats NPPF paragraphs 195 and 196 without adding to it.

## Full text:

Letter received via email

## Change suggested by respondent:

We suggest the Council delete the first sentence of HE7.2 to reflect the hierarchy of avoiding harm before mitigating as per NPPF paragraph 190, and replace with:

There is a presumption in favour of the preservation and enhancement of designated heritage assets and therefore substantial harm to or loss of an asset will be strongly resisted. Where appropriate proposals will be supported which enhance or better reveal the significance of designated heritage assets.

Legally Not specified  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Historic England\_Redacted - <https://watford.oc2.uk/a/m9>

**Non-Designated heritage assets**

1866

Comment

Respondent: Watford Central Town Residents Association

**Summary:**

There needs to be better reference to the immediate context of heritage assets here. Explicit reference should be made to the surrounding area of an asset.

We advance the case that 11-19 Monmouth Road should be considered as Non Designated Heritage Assets/Buildings of Local Historic Value as defined in the NPPF. When compared to several Locally Listed Buildings within the L- list (most of which are focused upon the Cassiobury Park Avenue area), these properties are very early examples of their type and of equal quality to the ones recognised in 2018.

**Full text:**

There needs to be better reference to the immediate context of heritage assets here. Explicit reference should be made to the surrounding area of an asset.

We advance the case that 11-19 Monmouth Road should be considered as Non Designated Heritage Assets/Buildings of Local Historic Value as defined in the NPPF. When compared to several Locally Listed Buildings within the L- list (most of which are focused upon the Cassiobury Park Avenue area), these properties are very early examples of their type and of equal quality to the ones recognised in 2018.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Policy HE7.3: Non-Designated Heritage Assets**

2139

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

**Summary:**

5.66 The wording within this policy should be amended as it currently only refers to Locally Listed Buildings. Non-designated heritage assets are not restricted to Locally Listed Buildings. The NPPF (Annex 2: Glossary) defines Heritage Assets as a "building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest". Although the paragraph notes that this includes local listing, it is a misunderstanding to apply this description solely to the local list.

**Full text:**

Form and letter received via email

**Change suggested by respondent:**

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Archaeology

2140

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.67 The text and policy for the section Archaeology repeats the NPPF and has no information distinctive to the borough. For example, it is considered that the supporting text should state what is the type and significance of heritage assets in the borough, what types of heritage assets might be found, as well as significance, and what local value might various heritage assets hold. This is an opportunity to discuss local archaeological finds that would make the subsequent policy and the local plan distinctive and effective that complements the guidance of the NPPF rather than repeating it.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy HE7.4: Archaeology

2141

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.68 The post of 'County Archaeologist' no longer exists and the wording within the policy should be modified as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

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

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Sustainable construction and resource management

1842

Support

Respondent: Hertsmere Borough Council

## Summary:

Along with Watford, Hertsmere declared climate emergency in September 2019. The council are encouraged by proposals within the Local Plan to tackle climate change. Where appropriate the Local Plan should consider the potential for cross boundary initiatives including resource management, transport improvements, waste management, and health and well-being initiatives.

## Full text:

Along with Watford, Hertsmere declared climate emergency in September 2019. The council are encouraged by proposals within the Local Plan to tackle climate change. Where appropriate the Local Plan should consider the potential for cross boundary initiatives including resource management, transport improvements, waste management, and health and well-being initiatives.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jp>

1869

Comment

Respondent: Canal &amp; River Trust

## Summary:

The Trust supports the use of renewable energies in new development/existing developments. Canal water can be used as a source of low/zero carbon energy, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. We would therefore request that the Local Plan include reference for this for developers who may wish to explore this technology.

## Full text:

The Trust supports the use of renewable energies in new development/existing developments. Canal water can be used as a source of low/zero carbon energy, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. We would therefore request that the Local Plan include reference for this for developers who may wish to explore this technology.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

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

1957

Comment

Respondent: Watford Centre Limited  
Agent: WSP

## Summary:

Policy CC8.2 states that applicants should provide a BREEAM pre-assessment completed by a suitably qualified assessor as part of an application. The submission of a Compliance Certificate to the Local Planning Authority upon completion will be secured through planning conditions.

In our experience it is extremely difficult to achieve an Excellent rating when assessing 'Shell only' commercial units. When you assess the 'Shell only' there are large number of credits that are not available, mainly due to the required assessment credits not necessarily being specified (M&E for performance, commissioning and monitoring for example).

We request an amendment to the above wording is sought that states that

"development should achieve BREEAM very good for 'Shell only' commercial developments, with best endeavours to reach excellent target for Fit out"

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

We request an amendment to the above wording is sought that states that

"development should achieve BREEAM very good for 'Shell only' commercial developments, with best endeavours to reach excellent target for Fit out"

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

2024

Object

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy sets out (inter alia) that all proposals should be designed to reduce their impact on the environment and in the case of major non-residential developments achieve a BREEAM rating of 'excellent'.

Whilst Lidl aim to ensure that their stores are as sustainable as possible, it is considered that the BREEAM accreditation process is overly complicated and costly, and as such represents a significant barrier to investment.

The Council would be better placed to identify an alternative energy / CO2 reduction target within their policy. It is considered that an equivalent target would achieve the same goal of reducing carbon emissions and increasing sustainability across the borough, without adding additional burden to the developer and allowing greater flexibility in scheme design and more efficient construction.

This would bring non-residential development more in line with the requirements of residential development set out in Policy CC8.3, which sets energy and water efficiency targets and aims to reduce waste.

## Full text:

Form and letter received via email

## Change suggested by respondent:

The Council would be better placed to identify an alternative energy / CO2 reduction target within their policy. It is considered that an equivalent target would achieve the same goal of reducing carbon emissions and increasing sustainability across the borough, without adding additional burden to the developer and allowing greater flexibility in scheme design and more efficient construction.

This would bring non-residential development more in line with the requirements of residential development set out in Policy CC8.3, which sets energy and water efficiency targets and aims to reduce waste.

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>

Lidl written reps - <https://watford.oc2.uk/a/mn>



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

1912

Comment

Respondent: Three Rivers District Council

## Summary:

Current national planning guidance only allows local authorities to require approx. 20% improvement (equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes) over the target emission rate in Building Regulations Part L (2013). The requirement for a 35% improvement from 2025 needs to be justified.

## Full text:

Current national planning guidance only allows local authorities to require approx. 20% improvement (equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes) over the target emission rate in Building Regulations Part L (2013). The requirement for a 35% improvement from 2025 needs to be justified.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1960

Support

Respondent: Thames Water Utilities Ltd

Agent: Savills

## Summary:

Thames Water support the requirement for water efficiency measures and for new residential development to meet the technical standards of 110litres per person per day. It is noted that, in order for this standard to be secured through Part G of the Building Regulations, planning conditions will be required to ensure the optional standard is applied. Paragraph 2.8 of Part G of the Building Regulations states: "The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission.". As such it is clear that planning conditions will need to be used to ensure the aims of the policy in relation to water efficiency are achieved.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Consultation CC6.1

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2079

Comment

Respondent: Environment Agency

## Summary:

## Water Efficiency

Our concerns about water resources have been addressed by the requirement for water efficiency measures for new residential and non-residential development. However, we recommend you are consistent throughout the local plan in applying the same water efficiency standard, and so it should be encouraged that all development should achieve BREEAM standards of excellence.

In order to be consistent with Policy CC8.2. and paragraph 8.6., we recommend the following amendment to Policy CC8.3:

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

We are pleased to see the inclusion of a higher standard of a maximum of 110 litres per person per day is applied to all residential developments, due to Watford being an area of serious water stress (as identified in our report (Water stressed areas - final classification).

In regards to evidence base, Affinity Water's Water Resource Management Plan (2020) identifies how Affinity will work to provide a reliable, resilient, efficient and affordable water supply between now and 2080, whilst also protecting the environment. It shows what demand and supply measures will be introduced to manage the longer term challenges of population increase, climate change, drought resilience and growing environmental needs. Reducing levels of water consumption is crucial to ensuring sustainable water supplies in future. In response, reducing the levels of consumption will help to counteract the reduction in resource availability as well as other proactive alterations.

Wastewater

The soundness issue of provision for wastewater is mainly discussed later in this response in relation to infrastructure delivery policy (Chapter 10). However, wastewater is a strategic issue that also relates to issues of climate change and sustainable development.

In our response to Regulation 18 we stressed the importance of ensuring water quality and provision of infrastructure for wastewater is captured in the Local Plan. We require a strategic position, based on evidence, within Local Plan policy to make it clear to developers the standards expected of them. Accordingly, we recommend Policy CC8.3. should be amended to include a new sub-heading for Wastewater:

Wastewater

Development must demonstrate that the local water supply and wastewater infrastructure have adequate capacity, both on and off site, to sufficiently serve the development, taking into consideration the cumulative impacts of current and proposed development. Developers are required to undergo pre-application engagement with infrastructure providers, and demonstrate consideration of the need to conserve and sustainably use natural resources.

Policy CC8.5.

Full text:

-

Change suggested by respondent:

In order to be consistent with Policy CC8.2. and paragraph 8.6., we recommend the following amendment to Policy CC8.3:

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

Accordingly, we recommend Policy CC8.3.

should be amended to include a new sub-heading for Wastewater:

Wastewater

Development must demonstrate that the local water supply and wastewater infrastructure have adequate capacity, both on and off site, to sufficiently serve the development, taking into consideration the cumulative impacts of current and proposed development. Developers are required to undergo pre-application engagement with infrastructure providers, and demonstrate consideration of the need to conserve and sustainably use natural resources.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: during Regulation 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

## Managing air quality

2142

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.69 Public Health. It is suggested that the following supporting text is added at the start of this section, before paragraph 8.22:

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Objective 8b of the NPPF states that the planning system has a social objective to support strong, vibrant and healthy communities and to support communities’ health and social wellbeing. This has been retained from the previous version of the NPPF and should be seen as an equal consideration to environmental and economic objectives. Paragraph 91 aims to achieve healthy places. Physical health and mental wellbeing can be positively influenced by well-designed developments with consideration of the location, density and mix of land uses that offer services to the community (NPPF, paragraph 70.)  
Air pollution causes more harm than passive smoking and is responsible for the early deaths of an estimated 40,000 people in the UK.3 Every new development will have an impact on air quality, usually by increasing emissions from buildings or from traffic generation. The links between poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk alongside cancer, heart disease and obesity.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2143

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.70 Public Health. It is suggested that the text within the paragraph is modified as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

The exposure of vulnerable residents, such as children, the elderly, and those with respiratory issues to poor air quality, is a particular concern. These include:

- Long-term exposure is linked to reduced life expectancy, increased cardiovascular disease, poor lung function and mental health issues.
- Short-term exposure (over hours or days) to elevated levels of air pollution can also cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality.
- The impacts of air pollution on our health can be felt throughout our lifetime.

Air pollution can affect anyone’s health; nevertheless, some individuals can be more susceptible than others. These include:

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

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2144

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.71 Transport. The paragraph should be modified as follows, in order to ensure provision is made for Electric Vehicle and bike charging facilities to be provided.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"Air quality is often managed through soft measures, such as active modes of travel, urban greening and the use of sustainable construction methods.  
3 <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>.

21

The ways new developments are designed can also assist in mitigating against the negative impacts of poor air quality. For instance, strategically planting trees and hedges between major roads and residential development can create a barrier to shield residents from poor air quality caused by traffic. Measures such as these will be supported as part of the Plan. However, to ensure that national and international objectives for ambient air quality are met, additional steps must be taken to guide new development, including provision being made for electric vehicle and bike charging facilities."

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2145

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.72 Public Health. It is suggested that the text within the paragraph is modified as follows. Further details can be viewed using the following link:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/937341/Principal\\_interventions\\_for\\_local\\_authorities-air\\_quality\\_public\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/937341/Principal_interventions_for_local_authorities-air_quality_public_health.pdf)

## Full text:

Form and letter received via email

## Change suggested by respondent:

Development should seek to achieve overall improvements to air quality and minimise the potential adverse impacts. Development should adopt Public Health England's 2019 'net health gain' principles to improve outdoor air quality and public health. These principles should be incorporated in design to reduce emissions and contribute to better air quality management - applicable irrespective of air quality assessments.4 Local health data in the form of the Public Health Outcomes Framework should also be used and referred to.

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

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy CC8.4: Managing Air Quality

2146

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.73 Transport. Air quality management areas are located within or adjacent to the Core Development Areas (Watford Junction – St Albans Road), Colne Valley CDA (Vicarage Road / Hornets gyratory and Bushey Arches) which creates a tension and a risk of worsening air quality unless new (petrol and diesel based) vehicle trips are minimised as far as possible.

5.74 It is suggested that all developments within the CDAs will be required to demonstrate whether traffic from them is likely to travel through the AQMA.

## Full text:

Form and letter received via email

## Change suggested by respondent:

In addition, the policy should be modified and refer to provision for electric vehicle charging where parking is provided as follows:

“Development will be supported where it does not contribute towards a worsening of existing air quality and, where possible, seeks to improve existing air quality. Appropriate mitigation measures will be required to address any potential impact on air quality, along with encouraging the provision of electric vehicle charging where parking is provided.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zg>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

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

1870

Comment

Respondent: Canal & River Trust

## Summary:

Policy CC8.5 'Managing the Impacts of Development' ensures that developments must be designed to minimise any significant detrimental impact of external lighting on... biodiversity... and watercourses. The canal corridor provides a popular habitat for bats and other nocturnal species, and as such regard should be had to the Bat Conservation Trust's "Bats and Lighting" paper which stipulates Lux levels lower than 5 to be bat safe (though the Trust would prefer Lux levels to be of 0), the spectrum to be 'warm' (2700-300K) and for no external lighting to spill over the water surface from the development.

## Full text:

Policy CC8.5 'Managing the Impacts of Development' ensures that developments must be designed to minimise any significant detrimental impact of external lighting on... biodiversity... and watercourses. The canal corridor provides a popular habitat for bats and other nocturnal species, and as such regard should be had to the Bat Conservation Trust's "Bats and Lighting" paper which stipulates Lux levels lower than 5 to be bat safe (though the Trust would prefer Lux levels to be of 0), the spectrum to be 'warm' (2700-300K) and for no external lighting to spill over the water surface from the development.

## Change suggested by respondent:

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Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

1961

Support

Respondent: Thames Water Utilities Ltd  
Agent: Savills

## Summary:

The policy is necessary to ensure that developments are not located in positions where future occupiers will be affected by existing sources of noise, light pollution or odour without mitigation for any adverse impacts being secured.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan response comments on policy NE8.6

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2016

Object

Respondent: Mineral Products Association  
Agent: Mineral Products Association

## Summary:

See also policies CDA2.1 & ST11.2, also sites MU06 & 07

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

## Full text:

Form received by email

## Change suggested by respondent:

Policy CC8.5 and supporting text should also clarify what the Agent of Change principle involves, including making it clear that development must not prejudice the operation of existing uses in its vicinity through introducing noise sensitive uses.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>

2074

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

References in Policy CC8.5 to the Agent of Change Principle are welcomed. However, they are not particularly clear in defining what is expected under the Agent of Change Principle - this being that critically new development should not result in the curtailment of existing activities. The clear issue of concern in the context of the active rail aggregates depot/CBP is the introduction of sensitive uses in close proximity. It is acknowledged that the implications of the 'Agent of Change Principle' is more clearly set out at supporting paragraph 8.30 – this should translate through to the policy itself.

## Full text:

Form received via email

## Change suggested by respondent:

The following changes are required:

Development should be designed to protect the amenity of adjacent land uses and their occupants and local amenity, and to enhance public realm. In accordance with the 'Agent of Change Principle', new development must ensure it does not cause existing uses in the vicinity to curtail their activities. New development will be required to assess its potential impacts on neighbouring land uses, including the cumulative effects and set out mitigation measures where appropriate. To achieve this....

Light Pollution:

Developments must be designed....

Noise pollution and vibration:

Where development is noise sensitive, noise-generating, or the surrounding area is sensitive to noise and vibration, applicants must undertake a noise assessment to identify potential issues and the required attenuation measures to achieve acceptable noise levels, as defined in national guidance. Noise assessments should....

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2080

Comment

Respondent: Environment Agency

## Summary:

Contamination, including contamination of groundwater

We are pleased to see the requirement for a comprehensive ground investigation report and appropriate remediation measures have been included in Policy CC8.5. In order to strengthen this position, we suggest the following additional information is included in the policy wording:

Development that could adversely affect the groundwater quality flow or volume will not be granted permission. Where sites are situated in a vulnerable groundwater area within a Source Protection Zone (SPZ) and/or principal and secondary aquifers, proposals must be dealt with in a way that protects the underlying groundwater. No infiltration based SuDs should be constructed on land affected by contamination to avoid the mobilisation of contaminant and consequent groundwater pollutions.

Recommended additional justification text:

Developers should address any risks to controlled waters from contamination at the site following the requirements of the NPPF and the Environment Agency's Guiding Principles for Land Contamination. Reports and Risk Assessments are expected to be prepared in line with The Environment Agency's Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM).

Flood Risk and Climate Change

One of the key impacts of the climate emergency is the increased frequency of extreme weather events, including rainfall. The Local Plan should require all new development to undergo an assessment of the impact of climate change on flood risk. This assessment is required to identify the appropriateness of the location for the development, finished floor levels, safe access/egress and the potential need for floodplain storage compensation. This is in line with paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the NPPF (2019) which states the requirement to demonstrate development is 'safe' for its lifetime.

We recommend Policy CC8.5 is amended to include flood risk and climate change:

Development must take into consideration the future impacts of climate change within planning proposals. In particular, all new development within flood zones require an assessment of the impact of climate change on flood risk.

Full text:

-

Change suggested by respondent:

we suggest the following additional information is included in the policy wording:

Development that could adversely affect the groundwater quality flow or volume will not be granted permission. Where sites are situated in a vulnerable groundwater area within a Source Protection Zone (SPZ) and/or principal and secondary aquifers, proposals must be dealt with in a way that protects the underlying groundwater. No infiltration based SuDs should be constructed on land affected by contamination to avoid the mobilisation of contaminant and consequent groundwater pollutions.

Recommended additional justification text:

Developers should address any risks to controlled waters from contamination at the site following the requirements of the NPPF and the Environment Agency's Guiding Principles for Land Contamination. Reports and Risk Assessments are expected to be prepared in line with The Environment Agency's Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM).

We recommend Policy CC8.5 is amended to include flood risk and climate change:

Development must take into consideration the future impacts of climate change within planning proposals. In particular, all new development within flood zones require an assessment of the impact of climate change on flood risk.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>



2147

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.75 Ecology. Item (a) in respect of reducing light pollution and its impacts on biodiversity is supported. Reference to guidance from the Institute of Lighting Professionals<sup>5</sup> on reducing light pollution should be made in any supporting text.  
5.76 Lead Local Flood Authority. It is noted that flood risk is not mentioned within this policy. It is therefore suggested that the policy is modified as follows to state that other impacts (including flood risk) should be taken into account when managing the impacts of development.

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Other impacts (including flood risk) should be taken into account when managing the impacts of development.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Conserving and Enhancing the Environment

1843

Support

Respondent: Hertsmere Borough Council

## Summary:

The level of growth suggested is going to generate additional pressures on the natural environment. A number of important natural habitats exist along the border between Hertsmere and Watford including the River Colne. It is important that all development considers the wider impact on these areas and that the cumulative impact of development along this boundary is fully considered. Hertsmere would want to be included as part of any discussions relating to habitat and environmental enhancements along this route and any measures that relate to the wider green and blue infrastructure networks including any potential water management schemes.

## Full text:

The level of growth suggested is going to generate additional pressures on the natural environment. A number of important natural habitats exist along the border between Hertsmere and Watford including the River Colne. It is important that all development considers the wider impact on these areas and that the cumulative impact of development along this boundary is fully considered. Hertsmere support Watford's proposals for a strategic green infrastructure link along the Borough boundary. Hertsmere would want to be included as part of any discussions relating to habitat and environmental enhancements along this route and any measures that relate to the wider green and blue infrastructure networks including any potential water management schemes along the River Colne.

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/jg>

1852

Comment

Respondent: Planning & Development Associates Ltd

## Summary:

A separate Statement of Representations is attached

## Full text:

A separate Statement of Representations is attached

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y6>

2148

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

HCC welcomes some of the recommendations that have been adopted. However, when considered within the context of the entire Plan we believe it would benefit from further modifications.

## Full text:

Form and letter received via email

## Change suggested by respondent:

See document for details

At present, use of the phrase within paragraph 9.33: "Other locally important but non-designated wildlife sites also make a significant contribution towards biodiversity in the area." is therefore considered inadequate and could be taken to rank LWS (for instance) alongside any semi-natural habitat in the wider countryside or urban settings.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy NE9.1: The Natural Environment

1882

Object

Respondent: T Norris

## Summary:

Whilst the council has stated that it supports and recognised the importance of green space, not only to the environment but also its economic and social benefits, it does not recognise Haydon Hill Pastures and Pond as a green space. The area is down as an established area which means it can be developed, yet it is also green belt and wildlife area.

## Full text:

Whilst the council has stated that it supports and recognised the importance of green space, not only to the environment but also its economic and social benefits, it does not recognise Haydon Hill Pastures and Pond as a green space. The area is down as an established area which means it can be developed, yet it is also green belt and wildlife area.

## Change suggested by respondent:

Haydon Hill Pastures and Pond is a crucial area to the neighbourhood, a green corridor to wildlife and migrating birds, well used by the people, enhances the area and yet is not deemed as a green space as well. How is it the the allotments are in the green zone and not this area which provides more benefit to more people, children, local schools, promotes long term promotion of sustainable health and social inclusion and yet it is at higher risk of development (as outlined in the green spaces review) than paddock close allotments, allotment gardens or colne valley linear park which provide no wildlife benefit nor do they have ancient oak trees on them. This area should not be deemed as an established area but as a green space.

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2081

Comment

Respondent: Environment Agency

## Summary:

To strengthen Policy NE9.1. we recommend the following amendments:

- c) Ensuring all ~~new~~ development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, following the mitigation hierarchy of avoidance, mitigation or compensation ~~locally, where possible~~;
- e) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, as required under the Water Framework Directive
- f) ~~Minimising~~ Reducing the risk of flooding, including surface water flood risk;
- j) ~~Where necessary~~ Ensuring that protected species and their habitats are a key material consideration when determining planning applications;
- l) Considering the cumulative impacts of development on green and blue infrastructure. Where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.

## Full text:

-

## Change suggested by respondent:

To strengthen Policy NE9.1. we recommend the following amendments:

- c) Ensuring all ~~new~~ development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, following the mitigation hierarchy of avoidance, mitigation or compensation ~~locally, where possible~~;
- g) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, as required under the Water Framework Directive
- h) ~~Minimising~~ Reducing the risk of flooding, including surface water flood risk;
- j) ~~Where necessary~~ Ensuring that protected species and their habitats are a key material consideration when determining planning applications;
- l) Considering the cumulative impacts of development on green and blue infrastructure. Where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2149

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.82 Ecology. It is considered that although perhaps unlikely, the risk that existing or proposed Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites in neighbouring districts/boroughs could be adversely affected also merits protection (from, for instance, an increase in recreational pressure).

## Full text:

Form and letter received via email

## Change suggested by respondent:

5.83 It is suggested that the text in paragraph c) should be modified as follows and should also be include a reference to Policy NE9.8 which deals with net gain in more detail:

- c) ~~Ensuring all new development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, locally, where possible~~; Proposals that would adversely affect the notified features of a Site of Special Scientific Interest, Local Nature Reserve, Local Wildlife Site, Regional Geological Site, a Species or Habitat of Principal Importance or any other valuable feature (eg those identified in the Biodiversity Action Plan) will only be permitted where the benefits of the development clearly outweigh the impact on the feature of interest. Proposals that would adversely affect irreplaceable habitats should be refused unless there are wholly exceptional reasons. Proposals that adversely affect features created as biodiversity net gain compensation or enhancement sites should also be refused. In terms of Special Areas of Conservation, Special Protection Areas and Ramsar sites, development will only be permitted where the assessment indicates that the proposal either on its own or in combination with other plans or projects, would have no adverse effect on the integrity of the site. Development which cannot satisfy this test will only be permitted in exceptional circumstances.”

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2150

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.84 Ecology. Reference to the mitigation hierarchy in paragraph (d) is welcome, however, the requirement for 'avoidance' can be given greater emphasis if it is to align fully with national policy.<sup>9</sup> This should underpin not only the strategic allocation of sites but also the corresponding development proposals.

5.85 This is considered to be an important principle, especially, the need for 'avoidance' (as the first step in the process) and this should be explained clearly in the supporting text, for those projects which require an Environmental Impact Assessment.

5.86 It should be noted that as the hierarchy requires, it should be used before reliance on mitigation and compensation which can be interpreted, incorrectly, as the outcome of net gain. However, compelling evidence of its use is often lacking, especially at the planning application stage.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy NE9.2: Green Infrastructure Network

1853

Comment

Respondent: Planning & Development Associates Ltd

## Summary:

A separate Statement of Representations is attached explaining the reasons for the comments.

2.6.1 The policy requirement of NE9.2 for the 'proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided' is supported. Similarly, the recognition in paragraph 96 that 'trees also make an important contribution and should be protected where possible' is welcomed, and reflects the role that trees and native vegetation have in climate change mitigation. In addition, this policy approach is consistent with the ambitions of the climate change emergency declared by Watford Borough Council on the 9th July 2019. Areas such as the urban woodland belt in Character Area C play an invaluable role in amenity as well as climate change mitigation, and their ecological value is such that they should be protected.

2.6.2 Whilst the principle of improving the green infrastructure network, as referenced in paragraph 9.5 is welcomed, it is noted that the extent to which this is illustrated in Figure 9.1 is questioned further to the inconsistency cited in Section 2.5 of this representation. Furthermore, where Policy NE9.2 states that 'priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan' this should also recognise the importance of smaller green amenity spaces around the borough which have an invaluable role in promoting residents' amenity. In addition, it is noted that the Green Infrastructure Plan is dated from 2011, and as such there should be sufficient flexibility in the policy wording to recognise the importance of other areas which may have further developed over the past decade, and therefore not been sufficiently assessed within the Green Infrastructure Plan. It should also be noted that the Watford Green Infrastructure Plan is not included in the local plan evidence documents - only the appendices are currently published and available for online inspection.

## Full text:

A separate Statement of Representations is attached explaining the reasons for the comments.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y7>

1883

Object

Respondent: T Norris

## Summary:

As previously outlined Haydon Hill Pastures and Pond has not been included as a green open space area

## Full text:

As previously outlined Haydon Hill Pastures and Pond has not been included as a green open space area

## Change suggested by respondent:

Haydon Hill Pasture and Pond must be included as if anything it supersedes the importance of allotments and should take priority. There is no clear reason in the document why these areas are open space and Haydon Hill Pastures and Pond is not (other than the people who live near these areas)

Legally No  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Written Representation  
Attachments: None

1886

Object

Respondent: T Norris

## Summary:

A proposed loss or damage of non-protected trees, woodland or hedgerows must be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. Native planting should be prioritised. Priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan, of which some are not included such as Attenborough Fields

## Full text:

A proposed loss or damage of non-protected trees, woodland or hedgerows must be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. Native planting should be prioritised. Priorities for green infrastructure focus on the projects identified in the Green Infrastructure Plan, of which some are not included such as Attenborough Fields

## Change suggested by respondent:

In today's environment we must maintain green space and improve air quality therefore no tree should be seen as not important and must be protected especially more so than ever when there is evidence that without the natural environment we as a species will not survive and neither will our planet

Legally No  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Written Representation  
Attachments: None

2082

Comment

Respondent: Environment Agency

## Summary:

To strengthen policy NE9.2, we recommend that the following amendments:  
A proposed loss or damage of non-protected to trees, woodland or hedgerows should be avoided will be refused. If demonstrated as being unavoidable, a measurable net gain assessment will be required to provide appropriate adequate replacement and compensation will be required. Native planting should be prioritised used in any proposed new open spaces or habitat creation. Non-native species planting should be kept to a minimum and should be carefully assessed to ensure no impact to native flora and fauna. Where invasive non- native species are found on site, prior to site enabling and clearing works, developers should create a long-term management plan to stop the spread, and where feasible, eradicate the species.

## Full text:

-

## Change suggested by respondent:

To strengthen policy NE9.2, we recommend that the following amendments:  
A proposed loss or damage of non-protected to trees, woodland or hedgerows should be avoided will be refused. If demonstrated as being unavoidable, a measurable net gain assessment will be required to provide appropriate adequate replacement and compensation will be required. Native planting should be prioritised used in any proposed new open spaces or habitat creation. Non-native species planting should be kept to a minimum and should be carefully assessed to ensure no impact to native flora and fauna. Where invasive non- native species are found on site, prior to site enabling and clearing works, developers should create a long-term management plan to stop the spread, and where feasible, eradicate the species.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2151

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.87 Ecology. Recognition of the ecological benefits that the green infrastructure network can provide is welcomed. In addition, the county council welcomes the need for new development to consider the impact on it by taking account of lighting, noise and other urban-edge effects, and the need for suitable mitigation.

5.88 However, it is not clear why this policy does not require measures proposed in Policy NE9.3 which requires the production of management plans and habitat creation.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2152

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.89 Lead Local Flood Authority. It is suggested that flood risk's role for green infrastructure should not be overlooked, and reference should be linked to the Watford Borough Green Infrastructure Plan (Final Report Prepared for Watford Borough Council by Land Use Consultants March 2011).

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**The blue infrastructure network**

2153

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.90 Lead Local Flood Authority. This paragraph should include a definition of blue infrastructure, in order for it to be consistent with paragraph 9.3 that includes a definition of 'green infrastructure.'

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

**Policy NE9.3: Blue Infrastructure Network**

1871

Comment

Respondent: Canal & River Trust

## Summary:

Welcome the emphasis on interconnectivity between blue and green infrastructure networks. A buffer strip of 8 metres is a requirement of the Environment Agency; the Trust would consider each proposal on its own merit. In some instances, building closer to the canal may be appropriate, but it is entirely dependent on location/application type.

Any work to deculvert a watercourse adjacent to the Trust's network must ensure that suitable access is provided for the Trust to inspect remaining culverted sections under the canal. Adequate measures will be needed to ensure that any rubbish/vegetation/other debris does enter the Trust's culverts.

## Full text:

The Trust welcomes the emphasis on interconnectivity between blue and green infrastructure networks contained within Policy NE9.3 'Blue Infrastructure Network'. Furthermore, we note the identification with Policy NE9.3 of the need for the maintenance of an undeveloped and unobstructed buffer strip of 8 metres from the top of the bank of all watercourses. We advise that an undeveloped and unobstructed buffer strip of 8 metres is a requirement of the Environment Agency, though the Trust would consider each proposal on its own merit. That is to say, in some instances, building closer towards the GUC would serve as better place-making, but it is entirely location dependent, as well as dependent on the type and nature of the proposal.

Policy NE9.3 supports the deculverting and the re-naturalisation of watercourses to improve the water environment. It should be known that any work to deculvert a watercourse adjacent to the Trust's network must ensure that suitable access is provided in order for the Trust to be able to inspect remaining culverted sections under the canal. Moreover, adequate measures will need to be in place in order to ensure that any rubbish/vegetation/other debris which enters opened up watercourses does not find its way into the Trust's culverts.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

Respondent: Environment Agency

Summary:

Policy NE.9.3. reflects our comments made during Regulation 18 that there should be recognition of the waterbodies that run through Watford, and the inclusion of their WFD status. Within the justification text for this policy, we recommend that the Revitalising the River Colne through Watford scheme is highlighted as key opportunity that the Council and partners are working to implement.

To strengthen Policy NE9.3, we recommend the following amendments: Development proposals in close proximity to watercourses must support the strategic importance of Watford's blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits.

Where development is adjacent to watercourses, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives. Development proposals in close proximity to, or that include a watercourse must:

a) Maintain an undeveloped and unobstructed buffer strip of at least eight metres from the top of the ~~bank of all watercourse~~ bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Buffer zones should be natural in character, distinct from the built environment, with no light pollution greater than 2 lux, and with native species. ~~Where this enables public access~~ Proposals should be accompanied by a management plan.

b) Conserve and enhance the biodiversity value of the watercourse and its corridor by including WFD action measures within the proposal. Action measures could include but are not limited to, ~~through the inclusion of~~ in-channel enhancements, the creation of priority wetland habitats, the removal of hard engineering, ~~prioritising native planting schemes and by~~ addressing misconnections, and the eradication and management of Invasive Non-Native Species;

c) Enhance the role of the watercourse corridors as an accessible active travel and leisure route for pedestrians, cyclists and boaters and increase connectivity along the length of the watercourse...

e) Open and re-naturalise modified watercourses, including culverted and piped waterways. New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A WFD assessment should be submitted as part of proposals and should include an assessment of the works to preventing future improvement, in addition to how the proposal will impact WFD status.

f) Address misconnections and ensure strong protection to water quality issues both on and offsite, such as the need for a surface water management plan and inclusion of SuDs.

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

Policy NE9.3. - Justification text

Paragraph 9.7. identifies the Grand Union Canal, Berkhamstead to Maple Lodge (Rivers Bulbourne, Gade and Colne) (GB70610185) as an ordinary watercourse within Watford. However, it is important to note that this watercourse is still a WFD waterbody and therefore the WFD requirements still apply. We would expect no deterioration of the watercourse through any works of development upstream or within the vicinity of the waterbody. We would also expect to be informed of any works on the section of Grand Union Canal (GB70610185) that runs through Watford.

In reference to paragraph 9.9, we support your commitment to seize opportunities to enhance the quality of watercourses and to support the achievement of WFD 'good' status, as well as the consideration of the impact of development on the water environment.

Full text:

-

Change suggested by respondent:

To strengthen Policy NE9.3, we recommend the following amendments: Development proposals in close proximity to watercourses must support the strategic importance of Watford's blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits. Where development is adjacent to watercourses, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives. Development proposals in close proximity to, or that include a watercourse must:

d) Maintain an undeveloped and unobstructed buffer strip of at least eight metres from the top of the ~~bank of all watercourse~~ bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Buffer zones should be natural in character, distinct from the built environment, with no light pollution greater than 2 lux, and with native species. ~~Where this enables public access~~ Proposals should be accompanied by a management plan.

e) Conserve and enhance the biodiversity value of the watercourse and its corridor by including WFD action measures within the proposal. Action measures could include but are not limited to, ~~through the inclusion of~~ in-channel enhancements, the creation of priority wetland habitats, the removal of hard engineering, ~~prioritising native planting schemes and by~~ addressing misconnections, and the eradication and management of Invasive Non-Native Species;

f) Enhance the role of the watercourse corridors as an accessible active travel and leisure route for pedestrians, cyclists and boaters and increase connectivity along the length of the watercourse...

g) Open and re-naturalise modified watercourses, including culverted and piped waterways. New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A WFD assessment should be submitted as part of proposals and should include an assessment of the works to preventing future improvement, in addition to how the proposal will impact WFD status.

h) Address misconnections and ensure strong protection to water quality issues both on and offsite, such as the need for a surface water management plan and inclusion of SuDs.

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

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>



2154

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.91 Ecology. Paragraph (a), (b), (c) and (e) are supported as these will all encourage beneficial biodiversity outcomes. There are clear links with (the suggested amendment that the county council has proposed) to Policy NE9.1. However, it is not clear why Policy NE9.3 does not require measures proposed in Policy NE9.2 which implies use of the mitigation hierarchy by seeking to prevent the avoidable loss of a range of named features and the need for compensation.

5.92 Lead Local Flood Authority. Culverted and piped waterways is mentioned in this policy, but not building over culverted watercourses. It is recommended that Policy 7 and Policy 8 page 96 of the Local Flood Risk Management Strategy for Hertfordshire should be referred to as a reference. The presumption is, under this policy is that all culverted streams and rivers that are underneath development sites will be opened up.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Flood risk and groundwater management

1881

Object

Respondent: T Norris

## Summary:

There is one area which should be designated as a flood area and that is Haydon Hill Pastures and Pond. T

## Full text:

There is one area which should be designated as a flood area and that is Haydon Hill Pastures and Pond. T

## Change suggested by respondent:

The area should be a designated as a flood zone to ensure that the neighbourhood is kept safe from flooding During rainy periods the tributary it overflows badly, the ground is heavily saturated and therefore serves as a flood relief zone.

Legally No  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: No

Appear exam: Written Representation

Attachments: None

## Policy NE9.4: Flood Risk and Mitigation

1913

Comment

Respondent: Three Rivers District Council

## Summary:

Recommend the policy includes reference to the risk of flooding 'elsewhere'. Recommends adding text referring to SuDS. Recommends referring to both Flood Zones 3a & 3b rather than just Flood Zone 3.

## Full text:

The policy could include stronger wording firstly to discourage residential development in areas at higher risk of flooding and secondly to include a presumption against development where it would exacerbate flooding on site or elsewhere. Paragraph 155 of the NPPF states that "Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The policy, therefore, needs to include reference to the need to avoid flood risk elsewhere and not just in the context of Flood Risk Assessments needing to consider cumulative impacts.

The policy should include a requirement for SuDS on major sites, as stated in paragraph 165 of the NPPF, and should seek SuDS on minor sites wherever possible. The SW Herts Level 1 SFRA recommended that policies on SuDS are incorporated into Local Plans but there is no reference to SuDS in the policy or supporting text.

The policy should also refer to Flood Zones 3a and 3b rather than just Flood Zone 3. Development in Flood Zone 3b should not be permitted unless it is water-compatible or introduces a less vulnerable use.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2084

Comment

Respondent: Environment Agency

## Summary:

The Local Plan must support effective management and reduction of surface water, fluvial, and groundwater flooding. As stated in the Level 1 SW Herts SFRA, "It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the SFRA)" and also, that "where possible, development will reduce flood risk overall".

Floodplains

It is noted that Flood Zones and compatibility are mentioned in the justification text paragraphs 9.14 and 9.18. However, as outlined in the NPPF and SW Herts SFRA, flood risk policy should provide further detail about development in functional floodplains (amendment below).

Sequential and Exception Test

In accordance with the NPPF (paragraph 158), development should not be permitted if there are reasonable available sites appropriate for the proposed development in areas with lower probability of flooding. It is the responsibility of the local planning authority to determine if the sequential test has been applied and whether or not there are other sites available at lower flood risk.

The Sequential and Exception Tests are mentioned in paragraphs 9.19 and 9.20, as well as the NE9.4 policy. The wording in the policy specifically regarding passing the Exception test could be strengthened by adding a wording from the SFRA which states development must provide wider sustainability benefits, as well as reduce flood risk where possible. (The suggested amendment included below).

Flood risk and climate change

As mentioned in relation to Policy CC8.5., in order to demonstrate that the development is 'safe' for its lifetime, an assessment of the impact of climate change on flood risk on site and elsewhere is required. Although climate change is mentioned in Paragraph 9.18, it would be good to include the need to assess climate change within Policy NE9.4 itself. This assessment is required to identify the appropriateness of the location for the development, finished floor levels, safe access/egress and the potential need for floodplain storage compensation. (The suggested amendment is included below).

Buffer zones

There is no mention of a need for an 8 metre buffer zone between any main river and new development within Policy NE9.4. Whilst buffer zones are referenced elsewhere in the Local Plan, it is important to note their critical importance for managing the impact of flood risk on floodplains, the impact of development on the structural integrity of flood defences and also provides adequate space for access for maintenance/emergency works along the river. Buffers are also critical to minimising disruption to the environment along rivers and encouraging biodiversity, supporting WFD objectives and the TRBMP. The SFRA also states the 8m buffer requirement. Therefore we recommend that this policy is amended to include the buffer zone requirement (wording provided below).

Culverts

We are pleased to see policy NE.9.4. supports de-culverting and improving WFD status of waterbodies. Firstly, the policy should include a presumption against the use of hard engineering, including gabions. Secondly, we suggest the additional detail is added to strengthen your position concerning culverts, which we have included in the amend policy text wording below.

Flood defences

The wording around development proximity to flood defences requires some more detail. Flood defences and Main Rivers adjacent to a development should be maintained whether they are within the site boundary or not, for example the developer may assume riparian responsibilities. Additionally, any development within 8 metres of a main river must demonstrate that access to the river and banks will still be possible for maintenance and emergency works. We have provided suggested wording to cover these points in the amended policy text below.

Flood Risk justification text

We are pleased to see that flood risk betterment has been recommended, both within the site and in the surrounding area. We recommend Paragraph 9.15 is amended to include the need to assess the impact of climate change on flood risk as follows:

"Applicants are expected to consider how their proposals affect, or could potentially impact other sites in the vicinity and the cumulative impact on flood risk, taking into account climate change."

Whilst Paragraph 9.18 mentions the need to assess climate change, it would be good to also identify the need for flood mitigation of both existing and new developments through the use of flood resilience and resistance measures. For example, resilience measures such as installing easy-to-clean hard floors and installing electrical sockets above the modelled flood level to reduce the potential impacts of flooding. Flood resistance measures can include installing flood doors, barriers or windows for example to reduce the likelihood of flood water entering a building

## Full text:

-

Change suggested by respondent:

Policy NE9.4 suggested amendments

Based on the comments above, to strengthen Policy NE9.4. we recommend the following amendments:

**Fluvial flooding**

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

Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. Only water compatible and essential infrastructure are will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within FZ3b. Developers should seek to increase the extent of FZ3b where possible and appropriate. To demonstrate compliance with the Exception Test, a flood resilient design and emergency planning considerations will need to be accounted for, over the lifetime of the development including:

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

Any development within Flood Zones 2 and 3, and those over one hectare in Flood Zone 1, should use a Flood Risk Assessment to show how they have considered flood risk beyond the site boundaries, including cumulative impacts arising from other developments. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the SFRA) and that where possible, development will reduce flood risk overall. Proposals for development in the floodplain must ~~show~~ demonstrate that suitable flood compensation storage will be provided ~~is available~~ to avoid any net loss in floodplain. Additionally, all new development within flood zones require an assessment of the impact of climate change on flood risk on site and elsewhere.

Developers should seek to provide an undeveloped buffer zone of 8 metres between the top of the bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Proposals located in areas where waterways have been culverted or altered should seek to re-naturalise the river and surroundings, improve water storage and enhance riparian habitats, in line with requirements to meet Water Framework Directive objectives and the Thames River Basin Management Plan. There is a presumption against the use of hard engineering, including gabions. For any development within 8 metres of a culvert, the developer must demonstrate that they have sought to de-culvert, as well as undertake a survey of the culvert to assess its exact location, condition and whether it is commensurate with the lifetime of the development or demonstrate how it will be repaired/upgraded. Flood defences and Main Rivers ~~within the site boundary~~ adjacent to development sites must be maintained, repaired or replaced by the developer for the lifetime of the development. For any development within 8 metres of a main river, the developer must demonstrate that access to the river and banks will still be possible for maintenance and emergency works.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2085

Comment

Respondent: Environment Agency

Summary:

**Groundwater Protection**

New development could result in the pollution, especially for sites situated in vulnerable groundwater areas with Source Protection Zones (SPZ) or on principal or secondary aquifers. In particular, sites where the previous land use suggests the potential presence of contamination or the proposed land use is potentially contaminative will need to be dealt with in a way which protects the underlying groundwater.

Full text:

-

Change suggested by respondent:

To strengthen Policy NE9.4. we suggest the following amendments are made to the groundwater protection section:

Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), ~~deep infiltration~~ infiltration via deep borehole soakaways ~~should be the last resort~~ will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated. Certain discharges into the ground may require an Environmental Permit.

Secondly, Paragraph 9.16 should be amended as follows:

~~'minimise~~ avoid these potential negative impacts on the ground source'.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2155

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.93 Ecology. Where watercourses have been culverted, the re-naturalisation of the surroundings (including, presumably the de-culverting of channels) is supported.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Surface Water Management

1872

Comment

Respondent: Canal & River Trust

## Summary:

We welcome that the discharge of water direct to a watercourse is included within the list and is considered to be a more preferable option that discharging rainwater to any public sewer.

Our waterways may well be able to receive runoff from future development sites. This will require careful design and assessment, and mitigation works to the canal infrastructure may be necessary to cope with this. The Trust is not however a land drainage authority and any such direct discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.

## Full text:

We note the inclusion of a hierarchical list (paragraph 9.23) which sets out the approach that should be considered where a development scheme could use single or multiple methods of surface water management. The discharge of water direct to a watercourse is included within the list. We welcome that this option is included within the list and is considered to be a more preferable option that discharging rainwater to any public sewer.

Our waterways may well be able to receive runoff from future development sites. This will require careful design and assessment, and mitigation works to the canal infrastructure may be necessary to cope with this. The Trust is not however a land drainage authority and any such direct discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

**Policy NE9.5: Surface Water Management**

1781

Comment

Respondent: Ms Sarah Baxter

## Summary:

Any planning of rewilding to alleviate surface water run off should be doubles/ tripled to take into account that further up the country we have 108 ancient woodlands being destroyed for HS2 and the impact of that devastation on flooding is unknown. This could be catastrophic for our community. Any influence our council has on stopped HS2 would be even more preferable. Its a very massive concern on a number of aspects in the area.

## Full text:

Any planning of rewilding to alleviate surface water run off should be doubles/ tripled to take into account that further up the country we have 108 ancient woodlands being destroyed for HS2 and the impact of that devastation on flooding is unknown. This could be catastrophic for our community. Any influence our council has on stopped HS2 would be even more preferable. Its a very massive concern on a number of aspects in the area.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1962

Support

Respondent: Thames Water Utilities Ltd

Agent: Savills

## Summary:

Thames Water support the policy requirements in relation to sustainable drainage. Following the drainage hierarchy set out in the supporting text will help to ensure that surface water is dealt with as close to source as possible and will reduce surface water entering the sewerage network thereby helping to reduce the risk of sewer flooding.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Consultation comments on policy CC6.2

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2086

Comment

Respondent: Environment Agency

## Summary:

Policy NE9.5. and Paragraph 9.22. have incorporated our previous concerns raised during Regulation 18 about the need for multifunctional SuDS, rather than its previous inception of alleviating surface water flooding only. However, with reference to the Hertfordshire Water Study's (2017) statement that to ease the pressure of the drainage systems, rainwater harvesting and retrofitting of SuDS should be required in planning policies, we feel this opportunity is missed in the current policy wording.

## Full text:

-

## Change suggested by respondent:

We suggest the following amendment to strengthen Policy NE9.5:

Sustainable Drainage Systems should be designed and integrated into the proposal to effectively manage the existing surface water flow paths on the site, protect and enhance water quality, and help to mitigate other flood risks.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2156

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.94 Ecology. The policy which states that sustainable drainage systems should make effective use of land by being multifunctional, to maximise ecological benefits is supported.

5.95 Lead Local Flood Authority. The content of this policy is supported by the Lead Local Flood Authority (LLFA). The term: lead flood risk authority should be amended to: 'Lead Local Flood Authority', as there is not a separate authority within HCC that deals with flood risk.

## Full text:

Form and letter received via email

## Change suggested by respondent:

"Measures should be agreed with the ~~lead flood risk authority~~ Lead Local Flood Authority and be consistent with the Hertfordshire Local Flood Risk Management Strategy."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Protecting open space

1887

Support

Respondent: T Norris

## Summary:

Whilst you state that there are a variety of open space and acknowledge the important contribution they make to green infrastructure network and offer valuable space and amenity as well as contributing to flood management you fail to include protection for Attenborough Fields, a place with high value to the neighbourhood, an area for wildlife to roam, beneficial to health and wellbeing and air quality. Attenborough fields should be a safe haven and a tribute to David Attenborough as a way of acknowledging the importance of maintaining green, wildlife inhabited space rather than a potential development area

## Full text:

Whilst you state that there are a variety of open space and acknowledge the important contribution they make to green infrastructure network and offer valuable space and amenity as well as contributing to flood management you fail to include protection for Attenborough Fields, a place with high value to the neighbourhood, an area for wildlife to roam, beneficial to health and wellbeing and air quality. Attenborough fields should be a safe haven and a tribute to David Attenborough as a way of acknowledging the importance of maintaining green, wildlife inhabited space rather than a potential development area

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

**Policy NE9.6: Protecting Open Space**

1810

Comment

Respondent: Sport England

## Summary:

The policy is broadly supported. However, a minor amendment is requested to improve clarity. It is requested that references in the policy to “assessment” are amended to “assessment of needs” to avoid potential misinterpretations of what the assessment relates to and for consistency with paragraph 96 of the NPPF which clarifies that what such assessments relate to in this context. It is also requested that the reasoned justification to the policy refers to the Council’s recent Playing Pitch Strategy as this justifies and supports the implementation of the policy.

## Full text:

The policy is supported as it seeks to safeguard open spaces which would include outdoor sports facilities and playing fields used for formal and informal sport and active recreation. The criteria in the policy are considered to broadly accord with Government policy in paragraph 97 of the NPPF.

However, a minor amendment is requested to improve clarity. It is requested that references in the policy to “assessment” are amended to “assessment of needs” to avoid potential misinterpretations of what the assessment relates to and for consistency with paragraph 96 of the NPPF which clarifies that what such assessments relate to in this context.

It is also requested that the reasoned justification to the policy refers to the Council’s recent Playing Pitch Strategy as this provides the current evidence base that helps justify the policy and will be used for assessing proposals against the policy in relation to outdoor sports facilities.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1854

Comment

Respondent: Planning &amp; Development Associates Ltd

## Summary:

A Statement of Representations is attached.

2.7.1 The importance of Watford’s open spaces outlined in paragraph 9.26 is supported and reflects the borough’s high number of amenity spaces that residents can access and should be duly recognised within this Local Plan. Paragraph 9.26 highlights that “open space can make an important contribution to the green infrastructure network and offer valuable space for recreational and amenity space.” Similarly, the role of open space also performs a broader environmental purpose which is also recognised in paragraph 9.26 where it states that “open spaces can also contribute towards flood risk management schemes and sustainable drainage systems.” In light of the importance that open space has in supporting the borough’s environmental objectives, the protection afforded to such spaces under Policy NE9.6 is supported.

2.7.2 Whilst the policy indicates that, “the absence of identification of an open space on the Policies Map does not imply that development is appropriate”, the basis of this representation is that the identification of existing open spaces is not technically sound or sufficiently robust to provide a confident basis that all opportunities for increasing open space designations have been explored. This representation proposes additional areas of open and green space which are of much higher quality than the existing designated area and already perform a function in terms of air quality mitigation, amenity, environmental and ecological value.

## Full text:

A Statement of Representations is attached.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Planning & Development Associates - document - <https://watford.oc2.uk/a/y3>

2087

Comment

Respondent: Environment Agency

## Summary:

Open spaces provide many benefits to the wider community beyond that which development may offer, such as mental and physical health and well-being, biodiversity, flood risk management, social/community benefits, air quality, climate regulation/carbon capture and so on. Therefore, Policy NE9.6. requires further clarification in regards to the following statement:

'Development proposals for alternative open space uses will be supported where an up-to-date assessment clearly shows the benefits outweigh the loss'. A clear position on which benefits outweigh the loss is necessary for ensuring development does not prevent opportunities for improved green and open spaces.

## Full text:

-

## Change suggested by respondent:

Policy NE9.6. requires further clarification in regards to the following statement:

'Development proposals for alternative open space uses will be supported where an up-to-date assessment clearly shows the benefits outweigh the loss'. A clear position on which benefits outweigh the loss is necessary for ensuring development does not prevent opportunities for improved green and open spaces.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

## Providing new open space

1811

Comment

Respondent: Sport England

## Summary:

The policy is supported. The clarification in the paragraph 9.31 of the reasoned justification that contributions will be sought for outdoor sport facilities through the Playing Pitch Calculator in line with the Playing Pitch Strategy is welcomed.

For accuracy, it is requested that paragraph 9.30 refers to financial contributions being secured through planning obligations rather than planning conditions as it is not lawful to secure financial contributions through conditions.

The reference to the design of new play areas and formal open spaces accounting for Active Design in paragraph 9.32 is welcomed.

## Full text:

The policy is supported as it should help ensure that new residential development makes provision for the open space (including outdoor sports) needs that it generates. The clarification in the paragraph 9.31 of the reasoned justification that contributions will be sought for outdoor sport facilities through the Playing Pitch Calculator in line with the Playing Pitch Strategy is welcomed as this is supported by the Council's evidence base and is the appropriate form of provision for this type of open space.

For accuracy, it is requested that paragraph 9.30 refers to financial contributions being secured through planning obligations rather than planning conditions as it is not lawful to secure financial contributions through conditions.

The reference to the design of new play areas and formal open spaces accounting for Active Design in paragraph 9.32 is welcomed.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None



**Policy NE9.7: Providing New Open Space**

1958

Comment

Respondent: Watford Centre Limited

Agent: WSP

**Summary:**

Policy NE9.7 states that development proposals of 10 dwellings or more will be required to provide publicly accessible open space on site.

It is noted that this policy although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these exceptional circumstances. It is recommended that the Council includes an exceptions criterion to this policy which states that, if open space cannot be provided on-site, then a financial contribution to off-site open space can be made as an alternative. The following wording could be accommodated:

“It is acknowledged that providing open space on development sites is not always achievable due to site constraints and if this cannot be accommodated then an open space contribution will be sought”

**Full text:**

Date received 15/03/2021 via email.

**Change suggested by respondent:**

It is recommended that the Council includes an exceptions criterion to this policy which states that, if open space cannot be provided on-site, then a financial contribution to off-site open space can be made as an alternative. The following wording could be accommodated:

“It is acknowledged that providing open space on development sites is not always achievable due to site constraints and if this cannot be accommodated then an open space contribution will be sought”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

**Biodiversity**

1888

Object

Respondent: T Norris

**Summary:**

I object to 9.36 in particular where: Compensatory measures will only be considered when no other measures are demonstrated to be feasible as set out in the mitigation hierarchy (Figure 9.4). In such an instance, Biodiversity Offset Agreements must be secured through Section 106 Agreements. The process for this will be set out in a Supplementary Planning Document.

**Full text:**

I object to 9.36 in particular where: Compensatory measures will only be considered when no other measures are demonstrated to be feasible as set out in the mitigation hierarchy (Figure 9.4). In such an instance, Biodiversity Offset Agreements must be secured through Section 106 Agreements. The process for this will be set out in a Supplementary Planning Document.

**Change suggested by respondent:**

Biodiversity must take precedence over manmade infrastructure as we only have one planet

Legally No

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2157

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Ecology. Net Gain is a vital component of how the planning system can hope to maintain biodiversity and deliver the expectations of local and national policy, and law, as expressed in the final draft local plan, NPPF and the Environment Bill. Whilst Policy NE9.8: Biodiversity effectively explains the requirements of biodiversity net gain, this is largely absent from the supporting text. It is therefore suggested that the addition of the following text which draws heavily on existing best practice, could be included within the supporting text and would provide some useful context for the policy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

“The Government’s 25 Year Environment Plan aims to ensure we leave ‘the environment in a better state than we found it’. In terms of new development, best practice and policy apply the mitigation hierarchy which seeks to ensure harmful effects are first avoided before mitigation and compensation are considered.

Furthermore, national policy encourages new development to achieve an overall biodiversity net gain. The emerging Environment Bill currently requires that each development should compensate for unavoidable losses and deliver a 10% net gain to be measured by means of a ‘biodiversity metric’, a standardised tool developed by Defra/Natural England that quantifies losses and gains in terms of biodiversity ‘units. Where enhancement measures, and compensation for unavoidable losses cannot be secured on-site, this can be delivered beyond the application site boundary preferably nearby and/or within a borough-wide Nature Recovery Network.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy NE9.8: Biodiversity

2088

Comment

Respondent: Environment Agency

## Summary:

We note our suggested amendment to Policy NE9.8. about referencing the most recent version of the Defra Biodiversity Metric has been taken on board. To clarify, the Natural England Biodiversity Metric and the Defra Biodiversity Metric are the same tool, which has been renamed The Biodiversity Metric. We expect version 3.0 to be published later this spring, alongside updated guidance.

We recommend the following aspects of this policy should be strengthened: explaining that Net Gain should be sought even if the development is not proposing loss; consistency and proportionality; thresholds and exclusions; and timescales for management and maintenance requirements

## Full text:

-

## Change suggested by respondent:

Policy NE.9.8 could be amended to include greater detail and best practical as follows:

‘Development should not lead to the loss or degradation of sites of local, national or international importance. Developments likely to cause harm to sites of nature conservation importance will be refused except in exceptional circumstances. New developments should seek to achieve an overall net gain in biodiversity. All development proposals are required to:

- ◆prepare a proportionate ecological survey and assessment report;
- ◆demonstrate minimising the impacts of development on biodiversity in accordance with the mitigation hierarchy;
- ◆demonstrate that any off-site measures proposed seek to enhance locally and nationally important priorities;
- ◆demonstrate a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss; and
- ◆prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on- and off-site measures.’

Additionally, Policy NE9.8. should reference supporting information, such as the Hertfordshire State of Nature Report 2020, which provides evidence for the latest data on biodiversity across the country and supports the argument that the Local Plan should play a significant role in protecting and improving biodiversity.

We recommend you review Box 4.1 of the CIEEM practical guide, which is a quite helpful checklist for putting together a strong biodiversity net gain policy. Ultimately, Natural England are the authority on Biodiversity Net Gain and we recommend they are consulted for better judgement of any other requirements.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Not specified

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>  
Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>

2158

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.97 Ecology. It is considered that the policy should be modified as follows to better reflect the decision-making process and the primacy of the mitigation hierarchy. It should be noted that the final paragraph within the policy which relates to habitats and species has been deleted as it would best be delivered via Policy NE9.1: Managing the Impacts of Development

## Full text:

Form and letter received via email

## Change suggested by respondent:

New development should apply the mitigation hierarchy to firstly avoid and then if this is not possible to mitigate harmful effects on biodiversity. Where harmful effects are unavoidable, these should be compensated effectively.  
New development should also seek to achieve an overall net gain in biodiversity. This must be measured by the latest Defra/Natural England biodiversity metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.  
Where it is not possible to avoid, mitigate, compensate or provide enhancements within the application site, an offsite Biodiversity Offset Agreement should be submitted. Offsite measures should be located close by and/or within the Nature Recovery Network.  
~~Where there is a reasonable likelihood of the presence of a protected species or its habitat, applications must be supported by an ecological survey. If present, the proposal must mitigate or compensate appropriately in accordance with the legislation that protects them.~~

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Infrastructure

1844

Support

Respondent: Hertsmere Borough Council

## Summary:

Details of Watford's infrastructure requirements are set out within Watford Infrastructure Delivery Plan (IDP). HBC consider that the Local Plan could benefit from transferring across some of that detail to explain more fully exactly what infrastructure improvements are being proposed, both in terms location and size of facility, to enable the growth scenario to be delivered. Hertsmere understand that constraints on land generate additional complications when securing the land required for infrastructure improvements. However, further information is required to address role that services and facilities outside of Watford play in meeting the needs of local Watford residents.

## Full text:

Details of Watford's infrastructure requirements are set out within Watford Infrastructure Delivery Plan (IDP). HBC consider that the Local Plan could benefit from transferring across some of that detail to explain more fully exactly what infrastructure improvements are being proposed, both in terms location and size of facility, to enable the growth scenario to be delivered. For example, the policy map shows land allocated for education facilities yet this is not referenced within the plan, and whilst the site specific site policies provide detail on where new facilities are likely to be located it would be useful to have a summary table and map showing the level of provision and the potential locations.

Hertsmere understand that constraints on land generate additional complications when securing the land required for infrastructure improvements. However, further information is required to address role that services and facilities outside of Watford play in meeting the needs of local Watford residents. Ongoing discussions between Hertsmere and Watford will be encouraged so to better understand the connections between neighbouring facilities and Watford and how these may evolve over time. Hertsmere would want to be included as part of the process relating to developer contributions (S106 and CIL) and infrastructure provision.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/kr>

1968

Comment

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

TfL supports the intention to safeguard the disused rail line from Croxley Green to Watford High Street station for a potential mass transit link in place of the former proposals for the Metropolitan Line Extension (MLX). Although powers to construct the MLX have now lapsed and it will not be going ahead in the original form, TfL is working with partners including Watford Borough Council and Hertfordshire County Council to explore alternatives and we will be happy to continue to provide advice. Safeguarding of the route will enable the Councils to take forward these options in the future.

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

2049

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

We also note that an Infrastructure Delivery Plan (IDP) has not yet been prepared to accompany the Local Plan and without this the plan may be challenged. The Local Plan does not provide any details of infrastructure funding, which may be unknown at this stage if the specific infrastructure schemes that are required have not yet been identified. It is important that once the schemes are identified that the funding method for each is outlined, including any Central Government or Local Government funding that is available, the amount that could be collected from developers and any shortfall that could occur. It is recommended that an IDP is prepared to provide further details regarding the infrastructure provision and funding. We welcome an opportunity to comment on the IDP when available.

As outlined above, there is a high level of development proposed within this Local Plan and it should be ensured that the transport evidence base for the Local Plan, following this consultation, provides an indication as to what the residual impacts of the development would be on the SRN. We would anticipate that this is clarified prior to submission of the updated plan for examination, to enable us to make an informed decision as to the soundness of the plan at the appropriate time. We would expect to make a representation to the Plan EIP and also anticipate agreeing a SOCG with yourselves.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2160

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.98 The county council has concerns regarding the funding of critical infrastructure that is outlined in the draft IDP. The reliance on CIL to fund the many projects that are outlined in the Infrastructure Funding Schedules that are listed in Appendix A of the IDP (particularly education and transport) will not be able to cover the cost of these projects, resulting in a major funding gap. These are detailed further within this representation. If other sources of funding are not able to be sourced, the deliverability of some of these critical projects to support the intended growth within the final draft local plan is questionable.

5.99 Although the county council supports the LPA's commitment to producing an Infrastructure and Funding Strategy in the light of these concerns, the soundness of the plan could be improved, and HCC is keen to explore future modifications to the plan that may include identification of key critical infrastructure which is required to be in place, prior to development taking place.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2162

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.110 Waste Management Unit. None of the county's 17 Recycling Centres (RC) are located within the borough. The closest is Waterdale, which is located to the north of the borough, within Three Rivers District. The site contains a waste transfer station, along with a separate RC that is predominantly used by Watford Borough residents.

5.111 At this point in time, the county council is looking to make improvements to Waterdale RC in order to anticipate the increase in demand, due to the housing growth that is expected to take place within the centre's catchment area. Appreciating the pressure on future CIL this form of infrastructure is one where the county council is likely to request a CIL contribution, in order to facilitate improvements to the site.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2163

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.112 Lead Local Flood Authority. The term: 'flood prevention' that is contained within the second bullet point in this paragraph should be amended to: 'the management of flood risk' as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

• Physical infrastructure: roads, footpaths, cycleways, water provision and treatment, sewerage, ~~flood prevention~~ the management of flood risk and drainage, waste disposal, electricity, gas and electronic communications networks.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2165

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.118 Transport. References to contributions towards projects identified in the Infrastructure Delivery Plan, Local Cycling and Walking Infrastructure Plan and Watford's Sustainable Transport Strategy is welcomed.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2166

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Metropolitan Line Extension (Paragraph 10.14)

5.119 Transport. Reference to the Metropolitan Line Extension (MLX), or a comparable alternative to it, is welcomed. The MLX should be identified, and land safeguarded within the plan (as shown as a Safeguarded Transport Route on the Policies Map) for the implementation of a transport scheme. Although it is recognised that this will not be considered as critical infrastructure in this local plan, the long-term ambition is the use of this corridor for major sustainable transport use.

5.120 It is suggested that the wording within the paragraph is modified as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Watford Borough Council continues to support the Metropolitan Line Extension, or a comparable alternative, and considers that the route along the disused former Croxley Rail Line is safeguarded and provides the opportunity for a walking and cycling link and a potential future route a potential future route for a Mass Rapid Transit, as well as an opportunity for a walking and cycling link.”

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy IN10.1: Integrated Infrastructure Delivery

1963

Comment

Respondent: Thames Water Utilities Ltd  
Agent: Savills

## Summary:

Thames Water supports the aims of both Policies IN10.1 and IN10.2. In particular, the requirement to engage early with infrastructure providers is welcomed together with the supporting text in paragraph 10.7 which states that infrastructure should be well integrated alongside new development with the phasing agreed, alongside providers, as part of a planning application. It will be important for sewerage upgrades that may be necessary to support new development to be delivered ahead of the relevant phase of development. However, Thames Water are unable to prevent connections to the sewerage network, as such where there is a need to phase development and infrastructure, planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed.

## Full text:

Form received via email

## Change suggested by respondent:

See also IN10.2

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Policy V9.5

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

Respondent: Environment Agency

Summary:

Water efficiency

We acknowledge that the IDP will reference Affinity Water's Water Resource Management Plan, however this concerns water resources and not wastewater. As previously mentioned, our concerns about water resources have been addressed through the inclusion of water efficiency requirements in Policy CC8.3.

Provisions for wastewater

We note the Council's request for us to direct our comments about wastewater infrastructure to the Infrastructure Delivery Plan (IDP). IDP will need to evidence how wastewater capacity considerations have been taken into account in the planning for growth and that the infrastructure will be in place to support this, at the right time, without detriment to the water environment.

In our response to Regulation 18 we stressed the importance of ensuring water quality and provision of infrastructure for wastewater is captured in the Local Plan. We made it clear that wastewater infrastructure is a strategic issue for the Local Plan, and set out our requirement for a strategic position, based on evidence, within a policy to make it clear to developers the standards expected of them. Wastewater provision is a soundness issue, because (a) it is included in the NPPF (paragraph 20), and (b) it is not justified if you have not used an evidence base to inform your Local Plan. As the IDP is an evidence document for the Local Plan, your position on wastewater needs to be reflected in the planning policies themselves. Furthermore, the Local Plan currently fails to highlight the sensitivities around sewage trunk capacity as highlighted in the Hertfordshire Water Study (2017). The Water Study also highlights that the immediate strategic intervention is necessary from 2021.

**To find the Local Plan sound, this issue must be resolved by having text and policy within the plan that explain how you will tackle wastewater provisions.**

In our Regulation 18 consultee response we expressed the importance of liaising and working closely with Thames Water to ensure the existing sewage network and wastewater treatment infrastructure have enough capacity for the proposed new development. We note that Thames Water have identified sites that may require upgrades to their wastewater network, and as a result the following standardised sentence has been applied to site allocations MU05, MU06, MU07, MU09, MU13, MU16, MU18, MU21, MU22, MU23, HS22:

"Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided".

Within Local Plan policy, developers should be encouraged to undertake early pre-application engagement with the wastewater infrastructure provider and the Council, to ensure there is capacity for their development. Lack of wastewater capacity, could lead to backing up of foul water in to buildings. Furthermore, overburdening of the sewerage system, will lead to more prevalent overflows in Combined Sewerage Overflows (CSOs) in times of dry weather and low flows, impacting water quality. Additionally, we require a policy within the Local Plan that endorses the approach that the wastewater infrastructure needs to be in place prior to development, and this is the responsibility of the developer to ensure this happens.

Full text:

-

Change suggested by respondent:

In light of the above, we suggested the following amendments to Policy IN10.1. to address this issue of wastewater provisions:

**Policy IN10.1. Integrated Infrastructure Delivery**

Proposals should demonstrate a comprehensive integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and:

- a) Contributes appropriately and proportionately towards required infrastructure identified in Watford's Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan;
- b) Where applicable, connects to area-wide infrastructure and enables future connections;
- c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the Watford's Infrastructure Delivery Plan, Site Allocations and / or other policies in the Local Plan;
- d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; it is the responsibility of the developer to ensure that this will be delivered on site prior to development. Where there is a capacity constraint, the Council will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.
- e) Is appropriately designed into development from the outset, so that it complements and does not unduly restrict development on adjacent or connected sites. Water supply and provisions for wastewater must be taken into consideration, and development should improve and not cause harm or deterioration to the water environment

Developers will be expected to undergo early pre-application engagement with the Council and infrastructure service providers to discuss their requirements and to demonstrate that there is sufficient infrastructure capacity, both on and off site, to support the proposed development from commencement. The Council will work with infrastructure providers, the Environment Agency and neighbouring planning authorities to explore the mitigation of issues surrounding water supply and wastewater capacity caused by development.

Developer contributions will be sought where needs arise, in line with the policy requirements of this plan; where provision is made on site, this will be considered in the context of the other developer contributions.

Legally compliant: Yes

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Yes, during Regulation 18 consultation.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Environment Agency - document\_Redacted - <https://watford.oc2.uk/a/zh>

Environment Agency site allocations review - <https://watford.oc2.uk/a/zx>



2164

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.113 Children's Services (School Place Planning). It is considered that the following wording within Policy IN10.1 should be modified, due to the lack of availability of new secondary school sites within the borough, or acknowledgement within the supporting text that additional secondary capacity is required. The final draft local plan needs to explicitly reference where the funding will be sourced from developments arising within the borough.

...Currently, the closest potential site for a new secondary that should be able to accommodate some of Watford's demand is the county council owned site at Carpenter's Park. This is being promoted by HCC for a new secondary school site and is located within both Hertsmeare Borough and Three Rivers District...

...Another site for a secondary school could potentially be located within the Bushey area and this is currently being discussed with Hertsmeare Borough Council for potential allocation in their emerging local plan...

## Full text:

Form and letter received via email

## Change suggested by respondent:

Proposals should demonstrate a comprehensive integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and:

a) Contributes appropriately and proportionately towards required infrastructure identified in Watford's Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan;

d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; this will be delivered on site, at the earliest opportunity. Where infrastructure that is not able to be delivered on site, such as a secondary school, then the relevant local authorities should work together to find a satisfactory solution, to ensure the associated infrastructure will be in place;

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Providing infrastructure to support new development

1800

Comment

Respondent: Mrs Jessica Webb

## Summary:

Being a local area with only a couple of non selective secondary schools, what are the plans to create a new secondary school (or more than one) that will create the spaces needed for the ever growing population. And where would this likely to be as currently all of the local schools are in "huddles" so a new school doesn't need to be placed close to existing ones. What about a compulsory purchase order on the Langleybury site which has to be used for educational purposes and already has the infrastructure in place?

## Full text:

Being a local area with only a couple of non selective secondary schools, what are the plans to create a new secondary school (or more than one) that will create the spaces needed for the ever growing population. And where would this likely to be as currently all of the local schools are in "huddles" so a new school doesn't need to be placed close to existing ones. What about a compulsory purchase order on the Langleybury site which has to be used for educational purposes and already has the infrastructure in place?

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2161

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.109 YCH Services for Young People. The county council considers it to be important that young people and young adults have appropriate and accessible support and any new development should take into account young people as a user, with associated community facilities offered on-site where possible. The co-location of services in the same premises should also be considered where possible in order to ensure maximising support and shared costs.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2175

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.134 The equivalent policy (Policy V9.5 Infrastructure Provision) in the First Draft Local Plan, made reference to the need for future-proofed communications, in particular broadband, when it came to approving new developments. This has been omitted from Policy IN10.2. The final draft local plan should aim to expand gigabit connectivity in the borough, through the role-out of 'Fibre To The Premises' (FTTP) for all qualifying developments...

5.139 Whilst the county council welcomes the support the LPA has given to future-proofed, high quality digital infrastructure to support well-functioning employment areas, it is essential that all new developments (including residential) are supported by superfast broadband....

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore requested that the wording within both paragraph 10.17 and Policy IN10.2 are modified as follows:

10.17 Future-proofed, high quality digital infrastructure is considered vital to support well-functioning employment and residential areas. The National Planning Policy Framework requires planning policies to set out how high quality digital infrastructure is expected to be delivered.

Policy IN10.2: Providing Infrastructure to Support New Development

"Proposals for employment uses and new residential areas should demonstrate that provision is made for high quality digital facilities as part of the application. All qualifying developments shall deliver Fibre to the Premises (FTTP)."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Health facilities

1933

Comment

Respondent: Cassiobury Residents' Association

### Summary:

NB of comment re Health facilities made re para 2.20 - Where the need for a new health facility is identified it should not be offset to the detriment of existing health facilities, but should fully materialize in order to wholly and appropriately meet the anticipated local level of need.

### Full text:

NB of comment re Health facilities made re para 2.20 - Where the need for a new health facility is identified it should not be offset to the detriment of existing health facilities, but should fully materialize in order to wholly and appropriately meet the anticipated local level of need.

### Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Education

1914

Comment

Respondent: Three Rivers District Council

### Summary:

There are concerns about potential primary school provision with limited locations and capacity available locally. Ongoing duty to cooperate discussions between Watford and its neighbouring authorities may lead to some secondary school education capacity being provided outside the Borough.

The requirement for sites larger than 1,000 dwellings to provide education on site is consistent with Hertfordshire County Council's requirements for Tier 3 sites (PDL with a dominance of 1-2 bed flatted development). Sites providing family homes, as per the housing mix requirement, should require the lower threshold of 500 dwellings.

### Full text:

There are concerns about potential primary school provision with limited locations and capacity available locally. Ongoing duty to cooperate discussions between Watford and its neighbouring authorities may lead to some secondary school education capacity being provided outside the Borough.

The requirement for sites larger than 1,000 dwellings to provide education on site is consistent with Hertfordshire County Council's requirements for Tier 3 sites (PDL with a dominance of 1-2 bed flatted development). Sites providing family homes, as per the housing mix requirement, should require the lower threshold of 500 dwellings.

### Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2159

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

Children's Services (School Place Planning).

...With the allocation of both the former Meriden School Site and the former Bill Everett Centre for future education need (which the county council supports and considers that two 3fe primary schools may be able to be accommodated on each allocation, subject to detailed feasibility), along with the possible expansion of Orchard and Holywell primary schools by 1fe each, there will still be a shortfall of 11fe within the borough.

## Full text:

Form and letter received via email

## Change suggested by respondent:

5.107 It is therefore requested that additional primary school sites (each up to 3fe) are allocated within the following sites:

- Site: HS21 Land at Waterfields Retail Park;
- Site: MU23 Land at ASDA, Dome Roundabout;
- The wider Town Centre Strategic Development Area (as suggested within paragraph 2.50 of the final draft local plan).

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Metropolitan Line Extension

1915

Comment

Respondent: Three Rivers District Council

## Summary:

Support the approach to keeping the route safeguarded, however there have been no discussions about safeguarding the section of MLX in Three Rivers.

Is the intention to include the Three Rivers section?

## Full text:

Support the approach to keeping the route safeguarded, however there have been no discussions about safeguarding the section of MLX in Three Rivers.

Is the intention to include the Three Rivers section?

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

## Policy IN10.2: Providing Infrastructure to Support New Development

1964

Comment

Respondent: Thames Water Utilities Ltd  
Agent: Savills

## Summary:

Thames Water supports the aims of both Policies IN10.1 and IN10.2. In particular, the requirement to engage early with infrastructure providers is welcomed together with the supporting text in paragraph 10.7 which states that infrastructure should be well integrated alongside new development with the phasing agreed, alongside providers, as part of a planning application. It will be important for sewerage upgrades that may be necessary to support new development to be delivered ahead of the relevant phase of development. However, Thames Water are unable to prevent connections to the sewerage network, as such where there is a need to phase development and infrastructure, planning conditions may need to be used to ensure the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed.

## Full text:

Form received via email

## Change suggested by respondent:

In order to ensure the policies are effective at aligning the delivery of development alongside any necessary infrastructure upgrades it is considered that the wording of policy IN10.2 should be amended as follows: "Planning permission, except for householders, will be granted where it is demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from proposed development. Where necessary planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades."

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft Local Plan Policy V9.5

Appear exam: Not specified

Attachments: Thames Water\_Redacted - <https://watford.oc2.uk/a/nj>

2167

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

Infrastructure Delivery Plan (IDP)

5.121 The county council considers that the IDP published alongside the final draft local plan should have been consulted separately. It is likely that comments made to the IDP may lead to changes in wording, and subsequent modifications will be required to be made to the plan....

5.125 . On this basis, coupled with preliminary forward projections of CIL receipts, the county council has concerns that adequate funding will be secured to ensure a reasonable prospect of infrastructure schemes being delivered....

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2168

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Early Years Education

5.127 Paragraph 4.3.16 of the Watford IDP states that no further provision of early years education is required at this stage; however, the county council believes further provision will be required across the plan period. At Watford Gateway, there is currently very little in terms of childcare facilities. The final draft local plan states that as a part of the redevelopment of the area, a childcare facility should be re-provided. At a minimum, there is a requirement for childcare provision here to be remodelled and extended to meet the new demand in the area. New childcare provision should be created. At Colne Valley the minimum requirement is for the current childcare facility to be remodelled, and extended, to meet the new demand in the area. Ideally, provision for another childcare

33

facility would be created, as well as extending the local provision. The need for increased provision at Watford Gateway and Colne Valley should therefore be identified in the IDP, the funding source identified, and the plan viability tested to ensure its delivery. It should be noted that the average build cost per place, per the latest Draft Hertfordshire County Council Developer Contributions Guidance (February 2021), is £9,250.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2169

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

Primary Education

5.128 The quantum of primary provision in the IDP broadly aligns with that identified in the local plan, subject to the amendments that are outlined within the comments that relate to Chapter 10 of the final draft local plan. The costs that are presented in Appendix A of the IDP are not aligned with those that we would expect for Hertfordshire, based on the Department of Education scorecards.

## Full text:

Form and letter received via email

## Change suggested by respondent:

See document for details

The IDP should be updated to reflect these costs

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2170

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Secondary Education

5.129 The IDP recognises that there are no sites within the LPA area that are suitable and that the need will be met in neighbouring authorities. Developer contributions will be sought from new units in Watford to fund places that arise from that growth and the final draft local plan needs to explicitly reference where the funding will be sourced from developments arising within the borough. The costs presented in the IDP, associated with delivering new secondary school sites should be presented in the IDP. The costs below are taken from the Department of Education scorecard.

## Full text:

Form and letter received via email

## Change suggested by respondent:

See document for details

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2171

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.130 Adult Care Services. The IDP recognises the need to deliver a quantum of housing for older people, and adults with disabilities that is in alignment with the need set out by Adult Care Services colleagues. The IDP is not clear where or how this identified need will be delivered.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2172

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.131 YCH Services for Young People. The recognition of the need for youth services to be provided in the IDP is welcomed, however, the likely scale of expected contribution should be set out in Appendix A with a link to the emerging Developer Contributions Guidance (February 2021).

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2173

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.132 Libraries. HCC has no plans to provide additional libraries in Watford, so any required increase in provision will be met by increasing the capacity of service provision in the most appropriate library or libraries nearest to any new housing developments. HCC will therefore seek contributions from developers or CIL for service improvements appropriate to the scale and nature of proposed developments. As stated in this representation, the county council is open to opportunities to re-provide North Watford Library in partnership or as part of a co-location with other facilities. The value identified in Appendix A that is to be required for the improvement of library facilities is £9000. The emerging developer contributions guidance places a cost of £38.85 per person where it is necessary for libraries to increase resource requirements and a cost of £123.54 per person where a project has been identified to expand or provide a new centre. It is therefore suggested that the value in the IDP is too low.

## Full text:

Form and letter received via email

## Change suggested by respondent:

...It is therefore suggested that the value in the IDP is too low.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>



2174

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.133 Waste Management. There are no specific projects identified in the IDP, as none of the county's Recycling Centres that are operated by the county council are located within the borough. However, the Waterdale Recycling Centre is located close to the borough's boundary and it is conceivable that CIL contributions could be directed towards improvements to this facility. It is therefore suggested that the figure of £10,000 within the IDP is too low.

## Full text:

Form and letter received via email

## Change suggested by respondent:

...It is therefore suggested that the figure of £10,000 within the IDP is too low.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Development contributions

2013

Comment

Respondent: Network Rail  
Agent: Network Rail

## Summary:

this wider plan with suitable legal and property agreements being required to allow Network Rail to potentially release or develop lands. Network Rail also need to understand what level of Section 106 allocations will be provided to provide much needed station and access enhancements at the station. This should include funding to wider infrastructure elements such as footbridge that links across the railway to facilitate further access and help to release plots of land identified within the local plan.

## Full text:

Letter received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: None

2176

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.140 Transport. The paragraph should refer to onsite provision of high-quality walking and cycling access as part of the onsite works to deliver a sustainable development. There will likely also be off site infrastructure identified at later planning stages that will be required for each site (e.g. Transport Assessments).

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## Policy IN10.3: Development Contributions

1812

Support

Respondent: Sport England

## Summary:

The policy is supported as this makes provision for the Council to seek new or improved infrastructure (potentially including sport and physical activity related infrastructure) on site or through financial contributions secured through CIL or section 106 agreements. The Council's Playing Pitch Strategy provides the evidence base for outdoor sport which supports this approach.

## Full text:

The policy is supported as this makes provision for the Council to seek new or improved infrastructure (potentially including sport and physical activity related infrastructure) on site or through financial contributions secured through CIL or section 106 agreements. The Council's Playing Pitch Strategy provides the evidence base for outdoor sport which supports this approach.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2177

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document for details

5.141 It is considered that the policy needs to be more explicit on how “infrastructure necessary to support the growth outlined in this plan” will be secured.

5.142 Policies IN10.3 a), b) and c) are rather ambiguous in their current form...

5.151 As stated in section 1 of this representation, the county council has concerns regarding the funding of critical infrastructure that is outlined in the draft IDP. The reliance on CIL to fund the many projects that are outlined in the Infrastructure Funding Schedules that are listed in Appendix A of the IDP (particularly education and transport) will not be able to cover the cost of these projects, resulting in a major funding gap. If other sources of funding are not able to be sourced, the deliverability of some of these critical projects to support the intended growth within the final draft local plan is questionable.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2178

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.152 Transport. It is suggested that the wording within paragraph d) should be amended to include provision for cycling and walking as follows:

## Full text:

Form and letter received via email

## Change suggested by respondent:

“d) Securing off-site highway works including provision for cycling and walking where necessary;”

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

## A Sustainable Transport Town

1845

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's proposals for sustainable travel, modal shift, reduced car dependency and the use of Hertfordshire's transport hierarchy. The plan also includes the provision of shared mobility initiatives and Hertsmere would be open to having discussions about how these services could be facilitated within the wider area including Bushey and Borehamwood.

## Full text:

Whilst Watford's compact form does generate significant potential for more walking and cycling within the town centre consideration needs to be given to improving commuter flows and trips to key regional infrastructure from locations outside of Watford. The South West Herts Growth and Transport Plan (2018) make reference to the linkages between the wider area and particular Watford and Bushey and this should be reflected within the wider transport strategy. Given the location of Core development Areas this could have a detrimental impact on the accessibility of the town centre for Hertsmere residents unless suitable transport improvements are brought forward. Policy ST11.3 highlights this point and Hertsmere would want to be included as part of the process relating to sustainable transport initiatives for major development on the eastern side of Watford with particular reference to the Colne Valley and Bushey Arches. These are known congestion hotspots that could have significant impacts on some of the major links between Watford and Hertsmere; this especially important given the correlation between the location and provision of key facilities and movement patterns.

Hertsmere supports Watford's proposals for sustainable travel, modal shift, reduced car dependency and the use of Hertfordshire's transport hierarchy. Policy ST11.2 suggests the protection and enhancement of certain routes within Watford with a number of these areas forming part of wider routes from Watford to other large settlements including Bushey and Borehamwood. Consideration should be given to how these improvements could link into the wider route network for the area. The plan also includes the provision of shared mobility initiatives and Hertsmere would be open to having discussions about how these services could be facilitated within the wider area including Bushey and Borehamwood.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/ks>

1873

Comment

Respondent: Canal &amp; River Trust

## Summary:

Over 20,000 (23%) of Watford's population live within 1km of the canal, i.e. within easy reach for walking and cycling, either as part of a commute/utility journey or for leisure and recreation.

The canal is well linked with stations at Rickmansworth, Watford (Metropolitan Line) and Croxley, as well as the town centre, hospital and commercial/employment areas. The GUC provides residents with active travel routes that assists in getting them where they want to be in a way that is safe, efficient and enjoyable as desired within the Plan. This should be acknowledged within the supporting text of Chapter 11.

## Full text:

It is disappointing that reference to the GUC and the wealth of sustainable transport opportunities it offers is absent entirely. Whilst the GUC is rural in setting – located to west of the city centre, of Watford's resident population of 90,000, over 20,000 (23%) live within 1km of the canal, i.e. within easy reach for walking and cycling, either as part of a commute or utility journey or for leisure and recreation.

The canal is well linked with stations at Rickmansworth, Watford (Metropolitan Line) and Croxley. The canal is within 2km of Watford Town Centre and Watford General Hospital by road routes, and neighbours the commercial/employment areas of Holywell and Watford Business Park. As such, the GUC provides residents with active travel routes that would assist in getting them where they want to be in a way that is safe, efficient and enjoyable as desired within the Plan. This should be acknowledged within the supporting text of Chapter 11.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

1967

Comment

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

The Mayor's Transport Strategy was published in March 2019 and the London Plan was published on 2 March 2021. We would be grateful, given the amount of cross boundary travel if you would consider extending some of the Mayor's strategic transport policy objectives to Watford including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

1983

Support

Respondent: St Albans City & District Council  
Agent: St. Albans City & District Council

## Summary:

SADC notes that the WBC Local Plan recognises the importance of the Abbey Line. Paragraph 11.11 states that the route should be safeguarded, which SADC is supportive of.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: St Albans City and District Council - document\_Redacted - <https://watford.oc2.uk/a/nb>  
St Albans City and District Council - email\_Redacted - <https://watford.oc2.uk/a/nc>

2048

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

It has been brought to our attention by Hertfordshire County Council that a Park and Ride Facility is proposed, at the Berry Grove Interchange M1 J5, to serve Watford Town Centre. However, the Local Plan appears to make no reference to this. A proposal of this nature could have a significant impact on the SRN, most notably on Junction 5 and would be a concern for us. Could you please provide some detail about this proposal and indicate where it is covered in the Local Plan? We are interested in having a discussion about a potential P & R site ahead of any further local plan work.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2070

Comment

Respondent: Greater London Authority  
Agent: Greater London Authority

## Summary:

Given Watford's good access to the motorway network (M1 in particular), it would be useful to understand the Council's broad consideration of land for industry and logistics in the context of related requirements for the wider area.

Watford is located within the new London Plan's Strategic Infrastructure Priority called 'Midlands and West Coast Mainline (London – Luton – Bedford / Milton Keynes)' (see Policy SD3 and Figure 2.15).

We support in principle the South West Hertfordshire Growth and Transport Plan measures for the Watford area.

Although the Metropolitan Line Extension (MLX) project in its original form is not currently being progressed and the powers granted by the Transport and Works Act Order are no longer in place, Transport for London is supporting Hertfordshire County Council's and Watford Borough Council's assessment of potential alternatives and we look forward to continuing to work with you on this.

In the light of Watford's proximity to London, we would be grateful, if you would consider extending some of the Mayor's strategic transport policy objectives set out in the Mayor's Transport Strategy to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options consultation from October 2018

Appear exam: Not specified

Attachments: Greater London Authority Nov 2019 response\_Redacted - <https://watford.oc2.uk/a/zn>

Greater London Authority Oct 2018 response\_Redacted - <https://watford.oc2.uk/a/zy>

Greater London Authority\_Redacted - <https://watford.oc2.uk/a/zp>

2179

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.153 YCH Services for Young People. Climate change was the top priority identified by young people in the 2019/2020 YCH Services for Young People's survey. It is considered that it's important that environmental friendly travel options are explored at every opportunity. In addition, it is important that young people grow up in the habit of utilising sustainable travel options to access education and leisure facilities.

5.154 Transport. The county council supports the approach taken within this section of the final draft local plan, as it clearly emphasises that the local plan will support the LTP and it reiterates the Transport Hierarchy.

## Full text:

Form and letter received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>

HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>

HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2180

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.155 Transport. It is recommended that the paragraph is modified to include reference to the now adopted Speed Management Strategy (2020).

## Full text:

Form and letter received via email

## Change suggested by respondent:

“Additional county-wide transport strategies, to which development should align, include the Intalink Bus Strategy (2019), draft Rail Strategy (2020), the Speed Management Strategy (2020) and forthcoming Highways Network Management Strategy.”

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Growth and Infrastructure Unit - document - <https://watford.oc2.uk/a/zq>  
HCC Growth and Infrastructure Unit - form\_Redacted - <https://watford.oc2.uk/a/mr>  
HCC Growth and Infrastructure Unit email\_Redacted - <https://watford.oc2.uk/a/ms>

2181

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.156 Transport. It should be noted that the Mass Rapid Transit that is mentioned within this paragraph, is unlikely to be delivered during the plan period. Suggesting that development is dependent on it may lead to viability issues.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

**Policy ST11.1: Sustainable Travel Town**

1813

Support

Respondent: Sport England

## Summary:

The policy is supported as it promotes active travel which will encourage physical activity as well as meeting other sustainability objectives as recognised in paragraph 11.3 of the reasoned justification. Criterion b is particularly welcome as it expects neighbourhoods to be created that encourage people to walk or cycle through high quality walking/cycle routes that enhance connectivity and reduce severance. This is consistent with Sport England's Active Design principles which are referenced in policy HC12.1.

## Full text:

The policy is supported as it promotes active travel which will encourage physical activity as well as meeting other sustainability objectives as recognised in paragraph 11.3 of the reasoned justification. Criterion b is particularly welcome as it expects neighbourhoods to be created that encourage people to walk or cycle through high quality walking/cycle routes that enhance connectivity and reduce severance. This is consistent with Sport England's Active Design principles which are referenced in policy HC12.1.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2182

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.157 Transport. References to LTP4 and Growth and Transport Plan packages and STS and LCWIP is welcomed.

## Full text:

Form and document received via email

## Change suggested by respondent:

However, it is suggested that the following modifications to the policy are made:

- d) Supporting the development of a potential mass rapid transit in Watford by providing high quality cycle and pedestrian links along with bus priority where appropriate to enable future development of the system
- j) Produce Travel Assessments and Travel Plans where required by, and in line with, Hertfordshire County Council's relevant guidance, along with the borough council's parking standards.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None



## Protecting and enhancing future public transport routes and Watford Junction station area as a transport hub

2183

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

### Summary:

5.158 Transport. The title of the report that is listed within this paragraph should be amended as follows:

### Full text:

Form and document received via email

### Change suggested by respondent:

“As such, the route and access to it should be safeguarded to maintain the possibility of its use by these modes; details of the land to be preserved are set out within the Watford ~~Mass Rapid Transit~~ Metropolitan Line Extension Safeguarding ~~Technical~~ Report.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2184

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

### Summary:

5.159 Transport. It is worth noting that it is unlikely that a preferred route for the mass rapid transit will have been identified prior to the examination of the local plan. It may therefore be difficult to prevent development along a proposed route that has not yet been identified. (other than for the MLX alignment).

5.160 Reference to the Intalink Bus Priority Feasibility Study should be included as this also includes suggestions for bus priority which forms an important part of the Enhanced Partnership that the county council has developed with bus operators. The introduction of the Enhanced Partnership measures and priority schemes in the feasibility study forms the first step in moving towards a network with the MRT.

### Full text:

Form and document received via email

### Change suggested by respondent:

“Hertfordshire County Council is developing plans for a new, mass rapid transit system to significantly increase connectivity across the county. This will bring significant benefits to Watford, and it is expected therefore that proposed routes for this system will not be prevented by new development although a route has yet to be finalised. The introduction of the Enhanced Partnership measures and priority schemes in the feasibility study, forms the first step in moving towards a network with the mass rapid transit.”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2185

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.161 Transport. The county council supports the need to provide new pedestrian / cycle bridges across the railway line. There is a potential ransom strip with the proposed bridge between Penn Road and Colonial Way which may lead to viability issues.

5.162 The need to keep the bus station and railway station together at Watford Junction is strongly supported, as this allows making bus use more attractive. Ongoing work, and consultation with bus operators, is required and welcomed to enhance our understanding of public transport measures coming forward.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub

1974

Comment

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

### Summary:

Paragraph 11.15 states:

"A key requirement in developing Watford Junction as a transport hub is ensuring the existing bus station is well integrated with Watford Junction Station, as well as making travelling by bus as attractive as possible. Opportunities for improved infrastructure and facilities for passengers and bus operator staff should be preserved, and the bus and rail station should not be separated. A further element to the redevelopment of the area is a new multi-mobility hub, containing a multi-storey car park as well as facilities for a range of other modes, to be located immediately east of the station, space for which should be preserved. Improvements to the road network through an extension of Imperial Way, to provide a connection with the new proposed mobility hub and the rerouting of vehicle access to the concrete batching plant via Imperial Way, should also be facilitated." [Emphasis added by Williams Gallagher].

The supporting text at Paragraph 11.15 in relation to land east of the Abbey Line is then translated into Criteria h) of Policy ST11.2 which states:

"h) Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub."

Criteria h sets a policy requirement for the extension of Imperial Way to provide a connection to the station and the rerouting of vehicle access to the concrete batching plant via Imperial Way.

We do not support a safeguarding policy objective to create a further, segregated vehicular link through the Canada Life site to the Network Rail MSCP area / rerouting of batching plant traffic to Imperial Way via an extension of Imperial Way. This is not needed following further investigatory work with Network Rail, would double up on routes to the same point, and the associated costs of doing so would leave the Canada Life site undevelopable for employment uses (including industrial) during the emerging plan period. This is not acceptable to Canada Life and would lead to their withdrawal of support for the Masterplan Area if it was to be maintained as a policy requirement.

The most appropriate and logical routing for connecting Imperial Way to a new MSCP is to extend Clive Way, which is already an adopted highway with sufficient

width to accommodate pavements with cycle ways, through a very small section of land owned by Redrow Plc which is formed of internal access road and a hand

car wash (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding as an extension to Clive Way).

Utilising the Clive Way access would result in the need to construct only 25-30 metres of new road in a location that does not stymie future development opportunities but in fact enhances opportunities. This is in comparison to 200 + metres of new road and associated services and the stymieing of development potential if inappropriately required through site MU07.

Full text:

-

Change suggested by respondent:

The supporting text at Paragraph 11.15 should be amended as follows:

"A key requirement in developing Watford Junction as a transport hub is ensuring the existing bus station is well integrated with Watford Junction Station, as well as making travelling by bus as attractive as possible. Opportunities for improved infrastructure and facilities for passengers and bus operator staff should be preserved, and the bus and rail station should not be separated. A further element to the re-development of the area is a new multi-mobility hub, containing a multi-storey car park as well as facilities for a range of other modes, to be located immediately east of the station, space for which should be preserved.

Improvements to the road network through an upgrade of the Colonial Way / Clive Way junction and an extension of Clive Way ~~Imperial Way~~, to provide a connection with the new proposed mobility hub ~~and the rerouting of vehicle access to the concrete batching plant via Imperial Way~~, should also be facilitated."

In light of the above and the representations to the following elements of the Local Plan, there will be a requirement for amendments to the infrastructure table at page 202 of Appendix C:

- Para 2.14 - 2.22 and Policy CDA2.1
- Para 3.5 and Appendix B
- Para 11.15 and Policy ST11.2
- Allocation MU07
- Allocation EM05

The comments made in respect of these elements of the plan provide evidence that justifies the requirement for the emerging local plan to safeguard a route via Clive Way to facilitate access to a new Eastern Mobility Hub. The route for safeguarding is annotated on enclosed Plan SK08. The comments made also identify the need to amend the approach to key infrastructure delivery within SDA land to the east of the Abbey Line. To summarise the key points are as follows:

essentially putting in place key building blocks for longer term regeneration (or sooner if there is a substantial change in the current constraining factors identified through landowner discussions). Our conclusion, alongside that of Network Rail is as follows:

- Clive Way must be protected and extended through to Network Rail and Canada Life's land to the south of the east of the Abbey Line SDA area (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding as an extension to Clive Way). This is the most appropriate route to bring mixed vehicular traffic (alongside active travel options) through to a new MSCP and sustainable travel hub without unnecessarily sterilising substantial areas of developable land which would reduce the viability of projects seeking an uplift in employment densities.
- Canada Life will safeguard land at the end of a link from Clive Way for the construction of a MSCP / sustainable travel hub and linking bridge to the station and will continue to collaborate with Network Rail. As part of this approach the concrete batching plant traffic can be slightly re-routed, but still use the existing road through to Orphanage Road, without then needing costly re-routing to Imperial Way as suggested by Policy ST11.2. This is fundamental to cost effectively unlock land between the Main Line and the Abbey Line for high density redevelopment. Furthermore, it is fundamental to alleviating the severe congestion experienced in the town centre due to all existing station parking being located in one area.
- In the longer term, a pedestrian and cycle bridge from Penn Road to allow further east west permeability for pedestrians and cyclists may be delivered. With the batching plant retained, this new link could effectively be routed just to the north of the batching plant and linked to the existing pedestrian infrastructure along Imperial Park.

In light of the above, the text at p202 of Appendix C: Transport and Infrastructure will require amending in line with the table provided as part of written representations attached.

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

2012

Comment

Respondent: Network Rail  
Agent: Network Rail

## Summary:

sustainable rail transport solution for a large area of the borough, and would recommend not using the valuable railway corridor for other uses in the interim such as a cycleway or footpath.

Network Rail require further engagement with WBC and HCC to determine the potential use of its land to support

## Full text:

Letter received via email

## Change suggested by respondent:

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Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: None

2017

Comment

Respondent: Mineral Products Association  
Agent: Mineral Products Association

## Summary:

See also policies CDA2.1 & CC8.5, also sites MU06 & 07

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

## Full text:

Form received by email

## Change suggested by respondent:

Policy ST11.2 and supporting text should also make clear that if the access to the rail depot and concrete batching plant is to be re-routed this must not result in any disruption to operations and exports from the site, which needs to be reflected in the text in Site Allocations MU06 and MU07.

Legally Yes  
compliant:  
Sound: No  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>

2045

Support

Respondent: Highways England  
Agent: Highways England

## Summary:

We would like to note that we support a number of the policies within the Local Plan, most notably those that are relevant to transport impacts, including:

- ST11.2: which prevents development that would compromise future mass transit, bus prioritisation, walking, and cycling infrastructure.

## Full text:

Received via email

## Change suggested by respondent:

-

- Legally Not specified compliant:
- Sound: Not specified
- Comply with Not specified duty:
- Raise LPA: Not specified
- Appear exam: Appearance at the examination
- Oral exam why: n/a
- Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2075

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

Supporting paragraph 11.15 and Policy ST11.2 seek to protect the potential for an extension of Imperial Way to enable the re-routing of vehicle access to the concrete batching plant (by which it is assumed is also meant the aggregates rail depot). Whilst there is no objection in principle to the re-routing of vehicle access this has the potential to prejudice the future use of the safeguarded facility if not appropriately planned for and secured. Notably no reference is made to this 'route protection' or potential re-routing in the relevant Site Allocations which it can only be assumed will be expected to facilitate the re-routing and which would need to be co-ordinated with development of Site Allocation MU06 – though which the existing access route (forming part of the safeguarded facility) currently traverses. Further commentary and required changes are detailed in the context of the relevant Site Allocations.

## Full text:

Form received via email

## Change suggested by respondent:

For the purposes of Policy ST11.2 referencing in full to the 'safeguarded aggregate depot and concrete batching plant' is required principally for clarity and consistency as follows:  
To prevent development that .....the following routes will be protected from development whose designs would compromise their ability to prioritise public transport and active travel routes:

- The disused, former....
- Extension of Imperial Way to provide connection to the station and the rerouting of vehicle access to the safeguarded rail aggregates depot and concrete batching plant via Imperial Way;

- Legally Yes compliant:
- Sound: No
- Comply with Yes duty:
- Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>  
Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2186

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.163 Transport. As mentioned in previous comments, it is unlikely that a preferred MRT route (as stated in paragraph e) would be identified by the time of the Local Plan examination.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Providing sustainable transport infrastructure for major development

2043

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

We note that you have taken account of our response to Regulation 18 consultation on 7th November 2019. We are pleased to see that Highways England has been referenced within the Local Plan document in "Chapter 4: Housing", which states that Highways England highlights the potential impact of the proposals on the Strategic Road Network and provides guidance. However, as we stated in our response to the Regulation 18 consultation, we would request transport evidence and modelling to be undertaken to determine what the cumulative impact of these developments could be on the SRN and therefore, what measures may be required to mitigate these impacts. This should be submitted as a Strategic Transport Assessment. It is therefore unclear at this stage whether it will be possible to sufficiently mitigate the impact of the allocated development locations or whether the impact will be too great to feasibly ensure that the network operates within capacity at the end of the plan period. If it is the intention of Watford not to produce such a document I would be grateful if you could submit to me the reasons why you consider this should not be done. Until this has been submitted, Highways England is not in a position to offer further comments as to the soundness of the plan. I would be happy to have a conversation on this if it would be helpful.

If a Strategic Transport Assessment is produced it should be in accordance with Circular 02/2013. We require suitable measures to be considered and evidenced in the Local Plan to manage demand of future traffic levels and growth. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound. The evidence base should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates for interim assessments to show when mitigation action will be required.

The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs over the Plan period, along with other supporting infrastructure. It is thought that there are a number of developments that could impact the SRN, particularly the 'Allocated Sites for Delivery', where Watford has identified developable land to support 8,748 new homes and made an allowance for an additional 2,095 homes to be delivered through windfall sites not allocated in the Local Plan.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2187

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Paragraph 11.18

5.164 Transport. Walking and cycling routes need good connections to the existing network and the Colne Valley Transport Area, as shown in Figure 11.3 an should be aligned to the proposed future development of the network as set out in the LCWIP.

Paragraph 11.19

5.165 Transport. It is important to stress that routeing of the MRT is not yet defined. It is suggested that wording should be modified to reflect this.

## Full text:

Form and document received via email

## Change suggested by respondent:

"Lower High Street should be seen as a corridor primarily for sustainable transport, preserving the current high frequency bus service, as well as helping to link the potential future Mass Rapid Transit system ~~accommodating mass rapid transit, plus being a key walking and cycling route for the site.~~"

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2188

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Bushey Arches (Paragraph 11.20)

5.166 Transport. The importance of minimising vehicular movements from development needs to be emphasised.

## Full text:

Form and document received via email

## Change suggested by respondent:

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Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2189

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Watford Riverwell (Paragraph 11.21)  
5.167 Transport. The following text should be included to make reference to safeguarding of land to provide access to former MLX route (and a potential station area).

## Full text:

Form and document received via email

## Change suggested by respondent:

“Land should be safeguarded to provide access to the former metropolitan line extension route (and a potential station area).”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2190

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Town Centre (Paragraph 11.27)  
5.168 Transport. As the Mass Rapid Transit route has not yet been identified, wording within the paragraph should be modified to read:

## Full text:

Form and document received via email

## Change suggested by respondent:

“This would ~~should~~ include bus priority interventions along and in the vicinity of the ring road which in future could develop to potentially support the provision, as well as preserving its ability to become part of a mass rapid transit route system...”

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2191

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.169 Transport. In addition, the transport hub should also mention links to the High Street station, and the need to enhance pedestrian and cycle facilities at key junctions with the ring road.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None



**Policy ST11.3: Providing Sustainable Transport Infrastructure for Major Development**

1901

Comment

Respondent: La Salle Investment Management  
Agent: Miss Rachel McGall

## Summary:

La Salle support the Council's objectives to promote sustainable transport infrastructure in accessible locations such as Colne Valley Strategic Development Area.

## Full text:

La Salle support the Council's objectives to promote sustainable transport infrastructure in accessible locations such as Colne Valley Strategic Development Area.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/y8>

1999

Support

Respondent: JLL  
Agent: JLL

## Summary:

Further to the text in Policy ST11.3, paragraphs 11.22 and 11.23 provide more detail into the Council's aspiration that development should contribute positively towards Ascot Road becoming a sustainable transport corridor through new and significantly enhanced bus priority measures and pedestrian / cycle infrastructure. Improvement to active travel permeability and routes should include significant enhancement to links between Croxley View and Greenhill Crescent, to Tolpits Lane, to Watford Station, overcoming the severance of Rickmansworth Road, and to the Ebury Way; which we fully support.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: First Draft (representations submitted November 2019)

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>  
Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2046

Support

Respondent: Highways England  
Agent: Highways England

## Summary:

We would like to note that we support a number of the policies within the Local Plan, most notably those that are relevant to transport impacts, including:

- ST11.3: which states major developments should maximise opportunities for sustainable transport, protecting and supporting current and future active and public transport routes.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2192

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Colne Valley Strategic Development Area

5.170 Transport. With regard to the paragraph relating to the Colne Valley Strategic Development Area, the term: 'car-lite' needs defining or cross referencing with the Parking Standards in Appendix E. Colne Valley needs to be defined on the supporting sites figure, so it does not get confused with the entire Colne Valley Strategic Development Area.

5.171 Cycle access into the site along with good, safe and secure cycle parking within it should also be mentioned. It is also not clear what bus prioritisation on key access links means within this paragraph (is it related to Lower High Street?).

Bushey Arches

5.172 Transport. Links from the site north towards the town centre needs to be included in the paragraph.

Watford Riverwell

5.173 Transport. The text should be modified to include links to the potential upgraded MLX corridor, along with an opportunity to provide for bus priority along Vicarage Road itself.

## Full text:

Form and document received via email

## Change suggested by respondent:

"Permeability for active travel should be substantially improved, linking to bus stops, Watford General Hospital, Vicarage Road, Stripling Way, Thomas Sawyer Way and Ebury Way, along with the potential upgraded former metropolitan link extension corridor. Developments should contribute to bus priority or cycle infrastructure on Vicarage."

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## A walking and cycling infrastructure improvement town

1874

Comment

Respondent: Canal & River Trust

## Summary:

Towpaths make excellent places for people to walk and cycle considerably, providing attractive active travel routes for residents.

Improved access, wayfinding and relatively simple improvements to the towpath can have a big impact on people's propensity to use it for walking and cycling as part of their daily routine. We are keen to work with key stakeholders in Watford (including the Council) to better link the towpath to the strategic East and West routes and would welcome further engagement on how we could achieve this.

## Full text:

Towpaths make excellent places for people to walk and cycle considerably. The towpath in Watford has a variety of loose gravel, bound aggregate, and tarmac surfacing, with some grass/rough tracks in places further north. It provides a rural, flat, quiet, traffic-free route suitable for most cyclists and walkers and is an excellent option for those learning to ride or with lower confidence of cycling in traffic. It provides attractive leisure and recreational routes both close to Watford and with access further afield for longer rides. In places the towpath surface has been upgraded to provide facilities for year-round access. In places the network would benefit from further investment/ improvements to the surface making it accessible all year round.

Improved access, wayfinding and relatively simple improvements to the towpath can have a big impact on people's propensity to use it for walking and cycling as part of their daily routine. We are keen to work with key stakeholders in Watford (including the Council) to better link the towpath to the strategic East and West routes and would welcome further engagement on how we could achieve this.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Referenced in response to First Draft consultation.

Appear exam: Not specified

Attachments: None

2193

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Cycle parking in residential developments (Paragraph 11.34)

5.174 Transport. Paragraph a) needs to emphasise the location of convenient, accessible and secure locations for cycle parking that are close to buildings. Some provision for bikes with trailers and potential charging facilities for e-bikes should be mentioned. Opportunities to incorporate within the shared cycle scheme should be explored. It would be ideal if a requirement to fund allocated spaces for a stand in developments over a certain size.

## Full text:

Form and document received via email

## Change suggested by respondent:

a) In large apartment complexes, single, large, communal storage does not provide sufficient security. Multiple cycle storage areas or individual storage compartments located outside the apartment, within the blueprint of the building, that are capable of taking cycles, prams and other large items, should be provided, in close proximity to buildings;

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2194

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.175 Paragraph c) should be modified as follows, as –cycle parking at the front of houses should not be ruled out as it is often the most convenient location.

## Full text:

Form and document received via email

## Change suggested by respondent:

c) For houses, cycle storage should preferably be at the rear, the side or within the building, as storage at the front can be unsightly, and tends to advertise to thieves that cycles are there. Where adequate cycle parking cannot be provided within residential developments, alternative cycle parking arrangements for residents should be provided, such as the provision of a provision of a cycle hangar on the highway in a location agreed with the Council.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2195

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Bicycle hire and share schemes (Paragraph 11.39)

5.176 Transport. Bike share provision within larger developments is supported and this requirement can be linked to the site-specific policies.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy ST11.4: A Walking and Cycling Infrastructure Improvement Town

1814

Support

Respondent: Sport England

## Summary:

The policy is supported as it supports developments being designed to encourage walking and cycling through a variety of measures which are broadly consistent with Sport England's Active Design guidance.

## Full text:

The policy is supported as it supports developments being designed to encourage walking and cycling through a variety of measures which are broadly consistent with Sport England's Active Design guidance.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1969

Support

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

Given the number of cross boundary journeys between London and Watford, many of which are relatively short and capable of being cycled, we welcome the setting of minimum cycle parking standards for new developments

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

1993

Object

Respondent: The Retirement Housing Consortium  
 Agent: The Retirement Housing Consortium

## Summary:

The Policies makes reference to providing cycle and car parking in accordance with Appendix D but Appendix D does not recognise the very different characteristics of older persons housing and lead to significantly reduced requirements. This is not inappropriate given, not least that most residents will be over the age of 75 years

## Full text:

Form received via email

## Change suggested by respondent:

The Policies should make clear that the policy requirement does not extend to specialised housing for older people

Legally Yes  
 compliant:  
 Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2196

Comment

Respondent: Hertfordshire County Council  
 Agent: Hertfordshire County Council

## Summary:

5.177 Transport. The text should be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

All development proposals will be required to provide on-site cycle parking facilities in line with the cycle parking standards detailed in Appendix D. Secure and convenient cycle parking facilities should be designed at the outset of the scheme. Should the standards for visitor cycle parking mean a requirement in excess of ten spaces, part of this provision can be replaced with a contribution to publicly accessible bike share bays in a suitable location nearby, further detail on this is provided in Appendix D.

Legally Yes  
 compliant:  
 Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Car parking, car clubs and electric vehicles

2197

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

## Electric vehicle charging

5.179 Transport. Clarification is sought by the county council, regarding the meaning of 'passive provision' in relation to active charging infrastructure for electric vehicles.

## Car club parking

5.180 It is considered that the ratio of one parking space per 50 units that would be designed for car club use only seems relatively low.

## Managing the transport impacts of development (Paragraph 11.61)

5.181 Transport. Recognition for future development of MRT is welcomed but it is important to see whether this approach is applicable under the viability test requirements of the NPPF. It is understood that this approach has been used elsewhere (e.g. in Hampshire) with regard to contributions sought for measures off site which could potentially be diverted when MRT comes forward.

## Travel Plans (Paragraph 11.62)

5.182 Transport. The wording within the paragraph should be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

~~“A Travel Plan is required in all cases where a Transport Assessment is needed, as well as other circumstances where local factors make one necessary as determined by the Council. Travel Plans should be produced to support all developments generating significant amounts of movement and/or where other local circumstances make one necessary. For smaller developments, a Travel Plan Statement, with a reduced quantity of detail, may be sufficient to accompany the planning application. For smaller developments a Travel Plan Statement will be required instead of a Full Travel Plan. It will contain less detail to reflect the scale of development and focus primarily on implementing site measures and action targets, and monitoring is generally more limited. Travel Plans should be produced in accordance with regard to Hertfordshire County Council’s Travel Plan guidance. A Draft Travel Plan should be submitted with relevant planning applications. It should set out objectives, measures and targets linked to the analysis contained within the Transport Assessment. It could, for example, use the maximum permissible trip rates to inform target setting. It should also explicitly state the agreed trigger points for producing and submitting a Full Travel Plan, including baseline monitoring. Where the travel behaviour of the end user is unknown at the time of the planning application submission, applications will be expected to prepare draft Travel Plans with indicative modal shift targets for the planning application, before agreeing to update the Travel Plan with site specific data upon occupation”~~

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Car parking standards

1916

Comment

Respondent: Three Rivers District Council

## Summary:

Paragraph 106 of the NPPF states that:

“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres...”

Although maximum parking standards may be justifiable in the case of Watford Borough, potentially further justification could be provided for their use.

## Full text:

Paragraph 106 of the NPPF states that:

“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres...”

Although maximum parking standards may be justifiable in the case of Watford Borough, potentially further justification could be provided for their use.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

**Electric vehicles**

1875

Comment

Respondent: Canal &amp; River Trust

## Summary:

In the same way that there is a contemporary movement towards the provision of electric charging points for motor vehicles, there could be similar opportunities for electric charging points for boats subject to discussion with the Trust and the identification of suitable locations.

## Full text:

In the same way that there is a contemporary movement towards the provision of electric charging points for motor vehicles, there could be similar opportunities for electric charging points for boats subject to discussion with the Trust and the identification of suitable locations.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

2218

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

Transport. This section should be aligned with HCC's Electric Vehicle strategy

## Full text:

document and form received via email

## Change suggested by respondent:

it is suggested that this is referenced at the end of this paragraph:

"Hertfordshire County Council's Local Transport Plan (adopted in May 2018) supports the uptake of Ultra Low Emission Vehicles (ULEV)."

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

**Policy ST11.5: Electric Vehicles, Car Parking and Car Clubs**

1970

Support

Respondent: TfL Planning

Agent: TfL Planning

## Summary:

Given the number of cross boundary car journeys between London and Watford, TfL has an interest in ensuring that car parking at new developments is limited. We welcome the setting of maximum car parking standards that vary according to the area and support car free or car lite development in the Core Development Area. We also welcome the requirement to provide for electric vehicles at all developments

## Full text:

Email received

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

1994

Object

Respondent: The Retirement Housing Consortium  
Agent: The Retirement Housing Consortium

## Summary:

The Policies makes reference to providing cycle and car parking in accordance with Appendix D but Appendix D does not recognise the very different characteristics of older persons housing and lead to significantly reduced requirements. This is not inappropriate given, not least that most residents will be over the age of 75 years

## Full text:

Form received via email

## Change suggested by respondent:

The Policies should make clear that the policy requirement does not extend to specialised housing for older people

Legally Yes  
compliant:  
Sound: No

Comply with Yes

duty:  
Raise LPA: No

Appear exam: Not specified

Attachments: Retirement Housing Consortium rep form\_Redacted - <https://watford.oc2.uk/a/n6>

2025

Object

Respondent: Lidl Great Britain Limited  
Agent: Lidl Great Britain Limited

## Summary:

As currently drafted, the policy sets out the parking standards for new developments across the borough, and sets out (inter alia) the following requirements of new development:

- 20% of any scheme's parking spaces should provide active electric vehicle charging provision, with all other spaces providing the opportunity for passive charging provisions;
- development proposals must meet the parking standards set out in Appendix E, and all development in the 'Core Development Area' should incorporate car-lite parking provisions;
- for non-residential development the disabled parking spaces must be accurately estimated on a case-by-case basis through a transport assessment/statement, and should be provided within 50m of the entrance; and,
- one 'powered two wheeler' parking space should be provided for every 30 car parking spaces, with a minimum of two per site.

With regards to EV charging points, it is argued that the policy does not adequately take into account the difference in quality between different types of charging points. It is considered that it is useful to set a minimum percentage of charging points, however, the percentage should be reflective of the speed and efficiency of the type of charging point.

For example, a rapid charging point could charge more than 10 cars in the time a fast charging point could charge 2-3 cars and in the time it takes a slow charging point to charge a single car.

The percentages in the policy should be amended and staircased on this basis, for example:

- Slow Chargers – 20% of parking spaces;
- Fast Chargers – 5% of parking spaces; and
- Rapid Chargers - 2% of parking spaces.

It is considered that in its current form the policy has the potential to act as a substantial barrier to future development and the role out of EV charging points. Whilst there are some schemes that wont be greatly impacted by the 20% EV parking space requirement, it is considered that such a large proportion of EV charging points could jeopardize many future investments in the borough. It is considered that the proposed staircased percentages; 1) allows developers more flexibility to select the most appropriate EV charging facilities; and, 2) reduces the likelihood of the policy making a development proposal unfeasible.

In terms of the car parking standards outlined through the policy and Appendix E, it is considered that the proposed parking figures are much too restrictive. The parking standards sets the maximum parking figures for all shops (Use Class E) at car-free in the 'Core Development Area' and 1 space per 100sqm in all other locations across the borough.

Whilst the 'car-free' and 'car-lite' model is suited to numerous retail types, it is considered that convenience retail, and particularly larger groceries stores, require adequate parking provisions in order to meet the needs of customers. Lidl acknowledges and accepts that a part of their customer base is performing a 'top-up' shop of goods, which can, and often are, undertaken by the use of public transport or through walking or cycling. However, a typical weekly shop is both bulky and heavy to transport. It would be unreasonable to assume that simply not providing parking would force these types of trips onto the abovementioned modes to achieve this identified target.

Moreover, Lidl raise concerns over the potential impacts of fewer parking spaces at future retail developments. Although a reduction in parking spaces may reduce the number of customers traveling by car, and increase the use of alternative modes of transport, it is considered that the proposed 'car-free' and 'car-lite' model may drive customers to travel further to alternative stores, which provide adequate parking facilities. Additionally, the reduction in parking spaces may well result in more on-street parking, as customers struggle to find a parking space, this will undoubtedly undermine the safety and efficiency of the existing highways network.

Given this, it is considered that the policy and Appendix E should be reconsidered to either allow for greater parking numbers for large convenience retail or allow for more flexible parking standards, which take into account all aspects of each development proposal and can be decided on a case-by-case basis between the council, the applicant and any other relevant stakeholders.

Lidl do not have any issues with the policy with regards to Disabled or Powered Two Wheeler Parking.

## Full text:

Form and letter received via email

## Change suggested by respondent:

Given this, it is considered that the policy and Appendix E should be reconsidered to either allow for greater parking numbers for large convenience retail or allow for more flexible parking standards, which take into account all aspects of each development proposal and can be decided on a case-by-case basis between the council, the applicant and any other relevant stakeholders.

Lidl do not have any issues with the policy with regards to Disabled or Powered Two Wheeler Parking.



Legally compliant: No  
Sound: No  
Comply with duty: Yes  
Raise LPA: No  
Appear exam: Not specified  
Attachments: Lidl representation form\_Redacted - <https://watford.oc2.uk/a/mm>  
Lidl written reps - <https://watford.oc2.uk/a/mn>

2062

Object

Respondent: Home Builders Federation  
Agent: Home Builders Federation

## Summary:

Objection on the basis of inconsistency with national policy.  
See letter for details.

## Full text:

Letter received via email

## Change suggested by respondent:

...As such we would suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric vehicles.

Legally compliant: Not specified

Sound: No

Comply with duty: Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: We have raised the matters set out in our reps at the previous reg 18 consultation

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Home Builders Federation - document\_Redacted - <https://watford.oc2.uk/a/my>  
Home Builders Federation email - additional info\_Redacted - <https://watford.oc2.uk/a/mb>

## Managing the transport impacts of development

2198

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.183 Transport. In the light of the amendments that have been suggested for paragraph 11.63, wording within paragraph 11.64 should also be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

~~The Travel Plan should demonstrate how site users are being encouraged to travel in a sustainable manner, with a package of measures to support this. Highways Travel Plans are unique to each development and identify a package of measures for a specific location to improve accessibility and encourage use of sustainable modes of travel. Travel Plan implementation is an ongoing process requiring regular monitoring, review and adjustment to ensure agreed objectives are delivered. Potential Travel Plan measures and objectives are provided within Hertfordshire County Council's guidance, measures that would support take up of the Council's sustainable transport schemes – bike share and on demand bus service – will be encouraged. They should set targets or objectives, with accompanying monitoring, management and enforcement approaches. Monitoring of the Travel Plan's progress should take place on an annual basis for a minimum of five years following full occupation for residential developments, or first occupation for workplace or commercial developments. Travel Plans for educational establishments should be monitored for a minimum of seven years following first occupation through the Modeshift STARS National Accreditation Scheme online system or, another accreditation scheme recognised by the county council. This is a mandatory requirement of all educational establishments. For residential developments, monitoring of the Travel Plan's progress should take place on an annual basis from first occupation to a minimum of five years post full occupation. For workplace or commercial developments, monitoring should take place for a minimum of 5 years post first occupation. Hertfordshire County Council recognises the need for a standardised approach to monitoring and has historically used the TRICS Standard Assessment Methodology for Travel Plan monitoring ("SAM"), however it acknowledges that "SAM" is not always financially proportionate, particularly for smaller, non-strategic sites. For smaller, non-strategic sites annual questionnaire surveys would be deemed appropriate. Thresholds for larger developments requiring TRICS SAM monitoring are outlined in Hertfordshire County Council Travel Plan Guidance, Appendix A.~~

A Travel Plan Review document, covering results, implementation updates and recommended revisions, should be shared with HCC within 30 days of data collection, and this will be assessed and recorded in Hertfordshire's Travel Plan monitoring system. Travel Plans must be secured via Section 106 agreements with an Evaluation and Support Contribution in accordance with development thresholds within Hertfordshire County Council Travel Plan Guidance (March 2020), Appendix A. This is to ensure that all the key elements of the approved travel plan are effectively protected and to facilitate monitoring and compliance with the outcomes anticipated. The standard level of Travel Plan Evaluation and Support Contribution is outlined in Hertfordshire County Councils Travel Plan Guidance (March 2020), section 3. The Council will secure a fee as part of the financial obligations of the planning permission to cover Travel Plan monitoring. Potential Travel Plan measures and objectives are provided within Hertfordshire County Council's guidance, measures that would support take up of the Council's sustainable transport schemes – bike share and on demand bus service – will be encouraged.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

## Policy ST11.6: Managing the Transport Impacts of Development

1971

Comment

Respondent: TfL Planning  
Agent: TfL Planning

## Summary:

Taking into account the large number of cross boundary journeys by road and public transport, we welcome the requirement for comprehensive assessment and mitigation of transport impacts.

## Full text:

Email received

## Change suggested by respondent:

-  
Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: Not specified  
Appear exam: Not specified  
Attachments: Transport for London - Richard Carr\_Redacted - <https://watford.oc2.uk/a/nk>

2047

Support

Respondent: Highways England  
Agent: Highways England

## Summary:

We would like to note that we support a number of the policies within the Local Plan, most notably those that are relevant to transport impacts, including:

- ST11.6: which states that a Transport Statement or Transport Assessment is required to support planning applications for all developments that will impact upon the transport network, in accordance with Hertfordshire County Council (HCC) thresholds. A Travel Plan that encourages sustainable travel behaviour should be developed for all developments, meeting the requirements set out by the HCC. Significant negative impacts on the transport network as a result of new development must be satisfactorily mitigated. Developers will be required to contribute to and deliver appropriate transport infrastructure or other mitigation measures, with financial contributions required through planning conditions.

## Full text:

Received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

## A Healthy Community

1846

Support

Respondent: Hertsmere Borough Council

## Summary:

Hertsmere supports Watford's health and well-being policies and consideration of the benefit these schemes can have on the local area. Where cultural and community facilities are being provided the catchment areas of these facilities should be fully considered and efforts should be made to improve accessibility of these facilities by public transport to serve residents travelling from slightly further afield.

## Full text:

Hertsmere supports Watford's health and well-being policies and consideration of the benefit these schemes can have on the local area. Where cultural and community facilities are being provided the catchment areas of these facilities should be fully considered and efforts should be made to improve accessibility of these facilities by public transport to serve residents travelling from slightly further afield.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/kt>

2199

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.184 Public Health. It is considered that the link between health and planning should be more explicit within the supporting and the wording should be added at the beginning of this section.

## Full text:

Form and document received via email

## Change suggested by respondent:

Our health is determined by our genetics, lifestyle, the health care we receive and our wider economic, physical and social environment. Although estimates vary, the wider environment (by this we mean everything outside of health care and genetics) has the largest impact. The principle of health inequalities states that those who are most economically, environmentally and socially disadvantaged are also those more likely to experience poorer health, live longer with chronic conditions and have lower life expectancy. This is a fundamental concept that must underpin urban development and regeneration.

The Watford Local Plan seeks to recognise that inequalities can be identified according to where people live, and that this is particularly true in some areas where there are high levels of deprivation and need. Action on health inequalities requires improving the lives of those with the worst health outcomes, fastest.

People who have good quality and secure jobs and housing in the communities where they have families and social networks stay healthier, feel happier and live longer. In order for them to secure work, homes and relationships, they need a good start in life, support when they have problems, and care when they need it. When these conditions exist, areas are attractive to investors and visitors, creating more opportunities for residents, and more resources that can be directed to support the most vulnerable.

Building health into our urban environments is a vital step towards delivering longer term improvements in health across the whole of society by tackling some of the biggest drivers of health inequality: housing, how places work and how people use them. This can be as important as investment in medical interventions.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2200

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.185 The wording within paragraph 12.1 should be modified as follows:

## Full text:

Form and document received via email

## Change suggested by respondent:

Good masterplanning and the high-quality design of buildings, outdoor spaces and the relationship between them make an important contribution towards health and wellbeing. It can lift the spirits or have a negative impact on people both in terms of their physical health and their mental wellbeing. Internal living spaces, personal and shared, and access to open space are known to help people relax and counter the stress of modern urban life.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2201

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.186 The wording within paragraph 12.2 should be modified as follows, in order that the NHS document: "Putting Health Into Place" is referred to. This document is a signpost for developers which sets out 10 principles, along with clear guidance on building health into place shaping and development:

## Full text:

Form and document received via email

## Change suggested by respondent:

Considering health and wellbeing as an opportunity can help to improve the quality of a scheme for both its marketability for people occupying a building. Figure 12.1 shows factors that contribute towards health and wellbeing while the Health and Wellbeing Planning Guidance (Hertfordshire County Council, 2017), sets out seven themes that should be considered and incorporated into the planning of new developments to ensure they are promoting health and sustainability including: air quality, movement and access, open spaces, design, employment and education, and healthy food choices. The NHS document: "Putting Health into Place" should also be referred to. The Coronavirus pandemic has further highlighted how important both public open space and quality internal living spaces within a home are to people.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

2202

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Paragraph 12.3  
5.187 It is worth noting that some of the data that has been used to inform this paragraph has been updated on the Public Health Outcomes Framework as follows:  
[https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/12/gid/1000041/pat/6/par/E12000006/ati/301/are/E07000103/cid/4/page-options/ovw-do-0\\_ine-vo-0\\_ine-yo-3:2017:-1:-1\\_ine-ct-9\\_ine-pt-0](https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/12/gid/1000041/pat/6/par/E12000006/ati/301/are/E07000103/cid/4/page-options/ovw-do-0_ine-vo-0_ine-yo-3:2017:-1:-1_ine-ct-9_ine-pt-0); <https://fingertips.phe.org.uk/static-reports/public-health-outcomes-framework/at-a-glance/E07000103.html?area-name=Watford>.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination  
Oral exam why: n/a  
Attachments: None

## Policy HC12.1: Healthy Communities

1815

Comment

Respondent: Sport England

## Summary:

This policy is supported due to its support for development that will create high quality environments that encourage physical activity and its requirement for developments to adhere to Sport England's Active Design principles.

As Sport England's Active Design guidance is intended to be applicable to a range of development sizes including small scale proposals, it is requested that "major" is deleted from the policy however to avoid potential misinterpretations that the guidance does not apply to schemes that are not considered to be major.

## Full text:

This policy is supported due to its support for development that will create high quality environments that encourage physical activity. The part of the policy relating to an active population is particularly supported as it expects development to promote active design by adhering to Sport England's Active Design principles. The policy is considered to accord with paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy.

As Sport England's Active Design guidance is intended to be applicable to a range of development sizes including small scale proposals, it is requested that "major" is deleted from the policy however to avoid potential misinterpretations that the guidance does not apply to schemes that are not considered to be major.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

## Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2203

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.188 Ecology. The commitment to promoting 'Healthy Eating' within this policy is supported, in respect of the provision of allotment, community orchards and the planting of fruit trees in open spaces. These have powerful cultural benefits, in addition to biodiversity (blossom, pollination, horticultural diversity), local climate and hydrology, landscape and visual amenity, in addition to local food production, which as an activity has physical and mental health benefits.

5.189 Consideration could also be given to providing sensory gardens, similar to herb gardens which are related but provide a diversity of colour, patterns, smells, touch, taste and even sounds to present experiences of benefit physical relaxation or mental stimulation of benefit to a wider range of the community.

## Full text:

Form and document received via email

## Change suggested by respondent:

5.190 Public Health. The following wording within the second paragraph of Policy 12.1 should be modified as follows:

"The council will seek to deliver development and growth which has a positive impact on the health and well-being of residents and addresses issues of health deprivation and health inequality in the borough. New development will be supported where it will contribute towards an inclusive and healthier community through delivering the following these objectives:"

5.191 It is also requested that the paragraph titled: 'A healthy older population' is also modified as follows:

"Providing homes and facilities to meet the needs of an aging population such as adaptable and specialist homes and access to health facilities, in locations which enable residents to remain active members of the community."

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Health Impact Assessments

2204

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.192 Public Health. The following amendments should be made to paragraphs 12.4-12.6 that relate to the supporting text to Policy HC12.2: Health Impact Assessments:

## Full text:

Form and document received via email

## Change suggested by respondent:

**Health Impact Assessments**

The Watford Local Plan seeks to ensure that positive opportunities from development are optimised and that any unintended consequences do not have a disproportionate impact upon the population especially those more at risk from health inequalities.

A Health Impact Assessment (HIA) is an essential assessment for any development proposal to demonstrate that it will not have negative implications for the physical health and mental wellbeing of both existing communities in the vicinity, as well as the future residents of the new development. HIAs is a tool through which development can:

- Understand the local community health needs and demonstrate how it can support these;
- Demonstrate how it has considered health inequalities;
- meet the requirements of the 2017 EIA regulations for human health;
- meets the policy requirements of the Watford Local Plan that major development proposals undertake an HIA;
- demonstrate the opportunities of a proposal and how a development has been positively planned.

~~12.4 A Health Impact Assessment seeks to inform and influence decision making, ensuring that health impacts, and the distribution of those impacts, are considered as part of the planning policy process. They provide a mechanism to understand more broadly how a wider range of economic, social and environmental factors can combine to affect a development.~~

~~12.5 In November 2019, Hertfordshire County Council adopted a HIA Position Statement.13 This sets out when a HIA should be undertaken and frameworks to use for each stage of the HIA process. The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units. The HIA Position Statement sets out a threshold for different types of development, including a threshold for the development of 100 residential units or more to be subject to a HIA. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of HIA Health Impact Assessment that may be required. The two types of HIA Health Impact Assessment are:~~

- Rapid Assessment for simpler proposals;
- In-depth (comprehensive) assessment for more complicated or larger proposals.

~~12.6 Large development proposals can benefit from undertaking an HIA objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth, or comprehensive HIAs will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid HIA Health Impact Assessment to support their planning application.~~

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy HC12.2: Health Impact Assessments

1816

Support

Respondent: Sport England

## Summary:

The policy is supported in principle as it requires HIAs to be prepared for all major development and part of a HIA would be expected to include the consideration of the opportunities for encouraging physical activity through the design of a development.

## Full text:

The policy is supported in principle as it requires HIAs to be prepared for all major development and part of a HIA would be expected to include the consideration of the opportunities for encouraging physical activity through the design of a development.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1889

Object

Respondent: T Norris

## Summary:

Only carrying out an assessment when there are 100 units are more is criminal - do we not want to make watford a more desirable place to be and be more attractive?

## Full text:

Only carrying out an assessment when there are 100 units are more is criminal - do we not want to make watford a more desirable place to be and be more attractive?

## Change suggested by respondent:

Any construction proposed should have a HA associated with it

Legally No  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

2205

Comment

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

5.193 Public Health. The first paragraph, sub paragraph a) should be modified as follows and an additional sentence added to the final paragraph within this policy:

## Full text:

Form and document received via email

## Change suggested by respondent:

Health Impacts Assessments are required for proposals that may are likely to have an impact on health of the population in adverse impact on the immediate area and affect people living in the development and close by. More specifically, Health Impacts Assessments are intended to highlight both the opportunities as well as the unintended consequences of development and should be provided as part of a planning application submitted for the following types of applications:

a) All developments ~~Major residential proposals~~ of 100 units or more, or 1,000m<sup>2</sup> of floor space or more;

Where a Health Impact Assessment has identified an issue that may have a significant adverse impact, the applicant should set out how this has been addressed and mitigated as part of the proposal. Applicants should engage early the planning authority and the county council, in order to agree the appropriate Health Impact Assessment scope and methodology.

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None



**Policy HC12.3: Built Cultural and Community Facilities**

1817

Comment

Respondent: Sport England

**Summary:**

The policy is broadly supported as it supports new community uses (including sports facilities) and seeks to safeguard existing facilities. The policy would be considered to broadly accord with Government policy in paragraph 97 of the NPPF in relation to sports facilities.

It is requested that "suitable" is added before "alternative facilities" in criterion (b). As well as providing consistency with paragraph 97 (b) of the NPPF, this would avoid potential misinterpretations of the policy that it would be acceptable to provide a re-provided community facility in any alternative location regardless of its relationship to the community it serves.

**Full text:**

The policy is broadly supported as it supports new community uses (including sports facilities) and seeks to safeguard existing facilities. The policy would be considered to broadly accord with Government policy in paragraph 97 of the NPPF in relation to sports facilities.

It is requested that "suitable" is added before "alternative facilities" in criterion (b). As well as providing consistency with paragraph 97 (b) of the NPPF, this would avoid potential misinterpretations of the policy that it would be acceptable to provide a re-provided community facility in any alternative location regardless of its relationship to the community it serves.

**Change suggested by respondent:**

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1848

Object

Respondent: CAMRA (Watford &amp; District Branch)

**Summary:**

CAMRA feels that the policy does not fulfil NPPF paragraph 92(c) because there is no procedure for testing whether a community facility (e.g., public house) is no longer needed.

**Full text:**

CAMRA feels that the policy does not fulfil NPPF paragraph 92(c) because there is no procedure for testing whether a community facility (e.g., public house) is no longer needed.

**Change suggested by respondent:**

The CAMRA Model Planning Policy says that claims of unviability should be supported by trading accounts over three years, evidence that measures were taken in this time to improve trading and diversify use, and that the CAMRA Public House Viability Test or similar objective method was used to assess viability. We would like these viability tests in the Local Plan.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: We raised the issue in the First Draft Local Plan consultation, referring to the Draft London Plan, which has a Policy HC7 which requires 'authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future'.

Appear exam: Written Representation

Attachments: CAMRA representation Draft Watford Plan 2018-2023 - Policy HC12.3 Built Cultural and Community Facilities.docx - <https://watford.oc2.uk/a/k4>

1903

Support

Respondent: The Theatres Trust

## Summary:

The Trust supports and welcomes this policy, which provides strong protection for the town's valued cultural assets including its theatres, reflecting paragraph 92 of the NPPF (2019).

## Full text:

The Trust supports and welcomes this policy, which provides strong protection for the town's valued cultural assets including its theatres, reflecting paragraph 92 of the NPPF (2019).

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues & Options and Preferred Options

Appear exam: Not specified

Attachments: None

## Site allocations and new development

1798

Comment

Respondent: tadpoles

## Summary:

Dear Watford,

I would like to bring to your attention site which should be part of the site allocations and new development, Garages between 56 and 58 Radlett rd, WD24 4LL

i LOOK FORWARD TO HEARING FROM YOU

## Full text:

Dear Watford,

I would like to bring to your attention site which should be part of the site allocations and new development, Garages between 56 and 58 Radlett rd, WD24 4LL

i LOOK FORWARD TO HEARING FROM YOU

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: YES I RAISED THIS BEFORE AND HAVE NOT HAD A RESPONSE

Appear exam: Not specified

Attachments: Untitled.png - <https://watford.oc2.uk/a/jx>

1799

Object

Respondent: Mr David Agnew

## Summary:

Watford has been over developed already with large blocks of flats going up all over the town, without adequate park allowances being made. It is now ridiculous to decide that all the large shopping areas in the town are suitable areas for further development. If these supermarkets etc are demolished where are the replacement supermarkets going to be built to help feed the thousands of extra people that will be living on the areas where the supermarkets once were?

## Full text:

Watford has been over developed already with large blocks of flats going up all over the town, without adequate park allowances being made. It is now ridiculous to decide that all the large shopping areas in the town are suitable areas for further development. If these supermarkets etc are demolished where are the replacement supermarkets going to be built to help feed the thousands of extra people that will be living on the areas where the supermarkets once were?

## Change suggested by respondent:

Stop over developing Watford! If you must build on site then adequate parking should be proved and not use the excuse that because the flats are close to a train station then nobody will need to own a car. Unbelievably naive if you really think this is the reality.

Legally No

compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: .

Attachments: None

1801

Comment

Respondent: Hertsmere Borough Council

## Summary:

The interactive policies map is excellent but it would be preferable to be able to view surrounding areas in adjoining boroughs. This isn't possible other than for a brief moment when zooming in and out.

## Full text:

The interactive policies map is excellent but it would be preferable to be able to view surrounding areas in adjoining boroughs. This isn't possible other than for a brief moment when zooming in and out.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1847

Support

Respondent: Hertsmere Borough Council

## Summary:

The site allocations policy lists all of the proposed sites to be allocated within Watford's Local Plan. Whilst Hertsmere appreciate that it is difficult to predict the exact build out rates of development parcels, it would be useful to get some further clarification in terms of the timeframes for development coming forward, so that suitable consideration can be given to how this may affect the programme works for Hertsmere. This is particularly important when it comes to programming infrastructure projects and community facilities.

## Full text:

The site allocations policy lists all of the proposed sites to be allocated within Watford's Local Plan. In terms of presentation it would be beneficial if the site references were displayed on the policies map (including the interactive map). Whilst Hertsmere appreciate that it is difficult to predict the exact build out rates of development parcels, it would be useful to get some further clarification in terms of the timeframes for development coming forward, so that suitable consideration can be given to how this may affect the programme works for Hertsmere. This is particularly important when it comes to programming infrastructure projects and community facilities.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: As part of Hertsmere's continual close collaborative working with Watford on strategic planning matters representations were made at both the Issues and Options and Preferred Options stages.

Appear exam: Not specified

Attachments: HBC response to WBC Reg 19 Plan\_March21.pdf - <https://watford.oc2.uk/a/k3>

1890

Comment

Respondent: T Norris

## Summary:

Will the council be considering other services on mixed development sites such as GP/schools/Nurseries?

## Full text:

Will the council be considering other services on mixed development sites such as GP/schools/Nurseries?

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1959

Comment

Respondent: Watford Centre Limited

Agent: WSP

## Summary:

There are few site allocations for mixed use development including housing within the town centre. Our client supports new housing development in the town centre but requests that all site allocations being brought forward should be the subject of transport assessments and parking surveys to ensure that they do not result in parking stress and harmful highways impact.

Although it is noted that the draft Plan is far advanced, our client would like the southern end of the Shopping Centre to be included for consideration for allocation for a range of uses including residential.

As we are suggesting that Watford should increase their housing supply to include a 20% buffer, then the site should be included as part of this buffer. If an Inspector were to tell the Council that more sites should be included in the Local Plan, then our site would be available for consideration.

A council's priority should be to deliver the required housing within its boundaries before looking to other councils within the Housing Market Area to meet their need (formed of LPAs which share similar characteristics in terms of their housing market). There is a relatively small and limited amount of potential development land and Watford needs to be able to keep up with its increased housing targets. We therefore hope that the Council will support some repurposing of underutilised land for residential and a mix of uses.

## Full text:

Date received 15/03/2021 via email.

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: WSP for Watford Centre Ltd - document\_Redacted - <https://watford.oc2.uk/a/ny>

WSP for Watford Centre Ltd - email\_Redacted - <https://watford.oc2.uk/a/np>

WSP for Watford Centre Ltd - form\_Redacted - <https://watford.oc2.uk/a/nq>

Respondent: Drax Investments Ltd  
Agent: Glyn Hopkin Holdings Ltd

## Summary:

Please see above comments on the need to increase the Plan period and the housing requirement shortfall. In order to strengthen the Plan and enable it to be found sound, additional sites may be required.

## Full text:

n/a

## Change suggested by respondent:

The site forms part of the Core Development Area (and, within this, the Watford Gateway Strategic Development Area ('SDA')); the Clarendon Road Primary Office Location; and a Transport Improvement Area. The site is also identified as being located in the 'High Sustainability Zone'. Drax consider the site to represent a deliverable and developable residential development opportunity. The NPPF requires new Local Plans to provide a five-year supply of deliverable land for housing. 'Deliverable' and 'developable' is defined within the NPPF as follows: Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years; Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged." The site has strong potential and represents a deliverable and developable residential development opportunity. The site is available; offers a suitable location for development; and delivery is achievable within the first five-years of the Local Plan. Para. 67 of the NPPF requires policies to identify a sufficient supply and mix of sites, and emphasises the importance of identifying deliverable sites for the first five years of the plan period. In addition to this, Para. 68 underlines the important role small and medium-sized sites can make in contributing to the housing requirement of an area. Part (a) of Para. 68 states that LPAs should "identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless it can be shown that there are strong reasons why the 10% target cannot be achieved". The site represents a logical allocation that would align with the requirement in national policy to ensure sufficient sites are identified for delivery in the first five years of the Local Plan, as well as helping to ensure that the Council meet the 10% small-medium sized sites requirement. The NPPF stipulates that for sites for housing to be considered deliverable, "they should be available now; offer a suitable location for development now; and be achievable with a realistic prospect that housing will be delivered on-site within five years". To be considered developable, "sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged". Below is our assessment in respect of the site's availability, suitability and achievability. Available – The site is in a single land ownership (Drax). There are no identified issues in bringing forward the site for development, and there are no constraints or restrictions in terms of ownership which mean the site cannot come forward in the first five years of the new Local Plan period. Although the site benefits from an implemented hotel use planning permission, the difficulties in this sector following the Covid pandemic now mean it is unlikely that this land use will come forward. It is therefore available for residential-led development. Suitable – The site is suitable for residential development. The site is located within the Watford Gateway SDA – this area is expected to witness significant transformation over the Local Plan period, with new high-density development expected to deliver homes, jobs and other uses. The site's central position within the SDA and close proximity to local services and facilities (including public transport) therefore renders it an appropriate and sustainable brownfield site that is able to contribute to the wider strategic objectives of the Local Plan. It is a logical location for residential-led development, and would align with the recently approved development proposals at Clarendon House – located immediately adjacent to the north – to demolish the existing building and redevelop the site to provide 1,800sq.m of office floorspace and 41 residential dwellings. Furthermore, the principle of re-developing the site has already been established under the implemented hotel permission. This permission also establishes buildings heights of 5-9 storeys. The suitability of the site for redevelopment has already been established – the only change sought is the land use (which is acceptable within the SDA and wider CDA). Achievable – Development on the site is considered to be achievable. There are considered to be no insurmountable constraints to development. We consider that development would be able to commence on-site within the first five years of the new Local Plan. Summary Comments – We consider that the site could make an important contribution to ensuring the Borough's housing land needs are met in full, and would also align with the strategic requirements of national planning policy by identifying a mix of sites (including smaller sites) that can be prioritised for immediate delivery. The site is able to accommodate a minimum of c.65 dwellings, and given its location within the Clarendon Road Employment Area, would also be able to provide commercial floorspace at ground floor level. We consider that the site could either be allocated individually – which, as detailed above, is available, suitable and achievable – or could potentially form part of a wider allocation comprising the neighbouring sites to the north (Holiday Inn and Clarendon House) and south (Apex House). Notwithstanding a potential wider allocation, the site is able to make a compelling contribution to the Borough's development needs and is therefore recommended for allocation. Please see submitted representations titled '2020 03 18\_7-15 Bridle Path Local Plan Repls' for further information.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Drax - Form\_Redacted - <https://watford.oc2.uk/a/zf>

Drax written reps - <https://watford.oc2.uk/a/zg>

2041

Object

Respondent: Historic England  
Agent: Historic England

## Summary:

The identification of potential sites for development within a Local Plan is an important step in establishing where change and growth will happen across a local authority area, as well as the type of development and when it should occur. It is important that the sites that are selected as allocations are based on an understanding of their potential impact upon the historic environment. At regulation 18 we identified that several the proposed sites and Strategic Development Areas have the potential to impact on heritage assets and strongly advised that Heritage Impact Assessments (HIA) be prepared for:

- CDA2.1 (Watford Gateway Strategic Development Area)
- CDA2.2 (Town Centre Strategic Development Area)
- CDA2.3 (Colne Valley Strategic Development Area)
- MU05 (Land at 94 - 114 St Albans Road);
- MU06 Land at Watford Junction); MD09 (Land at the Telephone Exchange Car Park);
- MU16 (Land at Tesco Lower High Street);
- HS18 (Car Park at Junction of Vicarage Road and Exchange Road);
- HS21 (Land at Waterfields Retail Park); and
- MU15 (Land at 18 Watford Field Road).

To our knowledge this work has not been done, and while development of these sites may be feasible, HIAs are required to confirm their suitability, to determine their extent and capacity, and to inform any development criteria that may be required in order to avoid or mitigate any harm identified. Without this evidence base these sites are not justified. This is because the allocations are not based on an understanding of potential impacts on the historic environment. Furthermore, they are not effective. This is because without HIAs are needed to determine what impact the historic environment has on site capacity and in turn deliverability. Finally, while we welcome that there are specific measures for the historic environment in these policies, their content, the lack of contextual information means that the historic environment is vulnerable to inappropriate development. As currently drafted, we find these policies unsound.

## Full text:

Letter received via email

## Change suggested by respondent:

To ensure the soundness of the Plan the sites listed above will need to be subject to Heritage Impact Assessment (HIA) prior to allocation. The HIAs should assess the suitability of each site for development and the impact on the historic environment. Should the HIA conclude that development could be acceptable, and the site be allocated, then any specific measures required to remove or mitigate any harm to assets identified within the HIA should be included in the corresponding site-specific policies.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: Historic England\_Redacted - <https://watford.oc2.uk/a/m9>

2044

Comment

Respondent: Highways England  
Agent: Highways England

## Summary:

There are several allocated sites that are either of significant scale or in proximity to the SRN, which we have provided comments on below:  
MU23 Land at Asda, Dome Roundabout allocated for 442 units is located close to the M1 at Junction 5 and therefore, there is potential for this site to have an impact on the SRN. Traffic impact assessments would need to be undertaken as part of any planning application; these should include an assessment of the impact on the SRN.

MU05 Land and Buildings 94-98 St Albans Road and MU06 Land at Watford Junction allocated for a combined 2,446 units, 21,292sqm office floorspace and 4,960sqm commercial land. These sites are located close to Watford Junction Station, and therefore will likely promote travel by sustainable transport modes. However, these sites are of a substantial size and are located near to the M1 at Junction 5, and therefore have the potential to impact on the SRN. A traffic impact assessment would need to be undertaken as part of any planning application, which should consider the impact on the SRN.

MU16 Land at Tesco, Lower High Street and MU18 Land at Colne Valley Retail Park allocated for 1,338 and 466 units respectively. These sites are located close to Watford High Street Station, Bushey Station and the town centre, and will therefore likely promote travel by sustainable transport modes. However, these sites are substantial in size and are also located in proximity to the M1 Junction 5, and therefore have the potential to impact on the SRN.

A traffic impact assessment would need to be undertaken as part of any planning application, which should consider the impact of the proposals on the SRN.

## Full text:

Received via email

## Change suggested by respondent:

Various, see summary/email

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Highways England\_Redacted - <https://watford.oc2.uk/a/m8>

2206

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.194 Adult Care Services. The county council is concerned that the provision of housing for older people, or adults with disabilities is not mentioned in any of the allocated sites that are listed within this chapter. Due to the shortage of suitable housing for older people currently in Watford and based on the predicted increase, there is an additional need for 444 extra care homes (equating to around 4-5 new schemes depending on location and facilities) of which 105 should be affordable for people who have fully funded care packages from HCC. Older people should be allowed an alternative to remaining in under-occupied homes, or moving into residential care, which may not meet their needs or aspirations. As stated previously, such provision for older people and

50

people with disabilities should be close to public transport links, local amenities, shops and health care.

5.195 Ecology. Site specific comments that are made in relation to the allocations listed within Chapter 13 are contained within the tables in Appendix A.

5.196 Historic Environment. There is no in principle objection to any of the sites that have been allocated within the final draft local plan. Some of the sites will require an archaeological assessment, prior to the submission of a planning application, as they have the potential to contain heritage assets which may be a constraint on development.

5.197 Lead Local Flood Authority. It is considered that the recommendations regarding flood risk are appropriate with welcome references to surface water and groundwater flood risk as well as the requirements of fluvial flood zones 2 and 3.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2216

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

See document appendix A for a large table of site-specific ecology comments

## Full text:

Form and document received via email

## Change suggested by respondent:

See document appendix A for a large table of site-specific ecology comments

Legally Yes  
compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: See document appendix A for a large table of site-specific ecology comments

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Policy SA13.1: Allocated sites for delivery

2032

Comment

Respondent: Legal &amp; General Investment Management

Agent: Savills

## Summary:

L&G requests that Woodside is identified as an allocated site by Strategic Policy SA13.1 to include a mix of uses including: leisure, retail, health and fitness, entertainment and residential.

Recognising these additional functions within the emerging Local Plan will be vital to Woodside's long term sustainability. It will empower L&G to act decisively to meet future opportunities and capture some of the substantial expenditure growth expected within the north.

The Site should be afforded a site reference and should be identified on the Proposals Map. A red line boundary map which illustrates the Site is enclosed as part of these representations.

Optimisation of land at Woodside accords with the overarching objective of the NPPF to deliver sustainable forms of development and would ensure that the Site can make an important contribution towards meeting the strategic objectives of the Local Plan.

L&G requests that the potential for the introduction of residential uses at the Site is formally recognised by the Local Plan. It is noted that this should be a longer term policy ambition in which flexibility is provided for the delivery of comprehensive mixed use development and retains an element of the existing commercial uses.

Any allocation should not jeopardise the existing commercial uses and the active asset management of Woodside in the medium term. In particular, we propose that the policy text which relates to the redevelopment of the Leisure Park read as follows:

“Should the Leisure Park come forward for comprehensive redevelopment during the Plan period then the council will seek a mix of uses such as; leisure, business, residential and retail “.

This would enable any future development scheme to respond appropriately to market forces in terms of what is viable and ensure that the Plan is positively prepared and makes the most effective use of previously developed land.

## Full text:

Letter and form received via email

## Change suggested by respondent:

Any allocation should not jeopardise the existing commercial uses and the active asset management of Woodside in the medium term. In particular, we propose that the policy text which relates to the redevelopment of the Leisure Park read as follows:

“Should the Leisure Park come forward for comprehensive redevelopment during the Plan period then the council will seek a mix of uses such as; leisure, business, residential and retail “.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options (First Draft) consultation

Appear exam: Not specified

Attachments: Legal & General Investment Management Location Plan - <https://watford.oc2.uk/a/mj>

Legal & General Investment Management Response Form\_Redacted - <https://watford.oc2.uk/a/mk>

Legal & General Investment Representations\_Redacted - <https://watford.oc2.uk/a/mz>

2040

Comment

Respondent: IDA London Holdings

Agent: Icen Projects

## Summary:

See letter for details. Site MU12

The allocation of the wider site as a standalone site for a residential development is welcomed and we are in agreement that the site is suitable, available and achievable, as acknowledged in draft policy.

The site has excellent levels of accessibility to local services and facilities by foot and cycle, being located within the town centre. The site is also excellently located in terms of public transport links to bus routes and Watford Junction Station, with links to central London and beyond. We believe that this location can support a higher density of development.

Our client is currently engaged in a pre-application process with Watford Council, and has presented a high-density residential-led scheme through this, including making a presentation to the Design Review Panel. Although there are naturally some points of detail to work through before a planning application can be submitted, it is clear from this process that the site is considered as suitable to deliver a high number of residential dwellings.

Through this Local Plan Review, the site has been allocated for only 14 units, we are of the understanding that this figure should be greatly increased.

Through these representations we would request that the site allocation within the draft Local Plan is updated to reflect an increased capacity of 100-120 units. This density is consistent with other recent permissions, or successful developments on sites of similar characteristics around Watford town centre.

## Full text:

Letter and form received via email

## Change suggested by respondent:

As such, it is considered that the allocation within Strategic Policy SA13.1: Allocated sites for delivery should be updated to read as follows (update shown in red):

“The Site is suitable for mixed-use development, including residential and commercial uses, **due to its highly sustainable location within the Centre of Watford. The Site can therefore achieve an indicative yield of between 100 – 120 units.**”

Legally Yes  
compliant:

Sound: No

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA London Holdings - form\_Redacted - <https://watford.oc2.uk/a/mc>

IDA London Holdings reps\_Redacted - <https://watford.oc2.uk/a/md>

IDA London Holdings site plan - <https://watford.oc2.uk/a/mw>



Respondent: North Western Avenue Watford Ltd

Agent: Woolf Bond Planning

Summary:

See letter for details

...Taking account of the assessment above, policy SA13.1 is sound (particularly with respect of the specific requirements for land north of Russell Lane (site ref HS06) other than the 3rd requirement for on-site compensatory measures associated site HS06 which is inconsistent with paragraph 138 of the NPPF which seeks these to be off-site on other land retained in the Green Belt.

Full text:

Form and letter received via email

Change suggested by respondent:

See letter for details

That the detailed requirements for site HS06 are revised to omit the third item - "incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy".

And replaced with:

"A proportionate contribution for compensatory improvements to the environmental quality and accessibility of remaining parts Watford's Green Belt which include areas of existing "Open Space and Green Infrastructure" via a Section 106 agreement."

...For the reasons set out above the site's allocation for around 93 dwellings should be retained and confirmed through the Submitted Draft Local Plan.

The Green Belt boundary should be revised as envisaged in the Final Draft Local Plan to exclude the site.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: The changes to the policies required are detailed in the attached Statement.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

## Table 13.1: Housing sites

1777

Object

Respondent: Ms susan wilkins

Summary:

The original parking spaces were sealed off unlawfully? by XXX denying residents parking as per leases and land registry plans when flats and maisonettes were built in 1962. By whose authority allowed XXX to do this as none of the residents where notified or compensated of this Land Grab. This has denied the residents the right to park in this space. Now you want to build properties which will only compound parking issue, we already have issues with emergency services, deliveries and essential services gaining access.

Full text:

The original parking spaces were sealed off unlawfully? by LPM denying residents parking as per leases and land registry plans when flats and maisonettes were built in 1962. By whose authority allowed LPM to do this as none of the residents where notified or compensated of this Land Grab. This has denied the residents the right to park in this space. Now you want to build properties which will only compound parking issue, we already have issues with emergency services, deliveries and essential services gaining access.

Change suggested by respondent:

The plan of proposed housing needs to be rejected and the land restored back to its original source Residential Parking as per Original Land Registry Plans when properties were built in 1962

Legally No

compliant:

Sound: No

Comply with No

duty:

Raise LPA: Yes

Raise LPA Why?: I submitted my feedback/comments at the first draft plan back in October 2019

Appear exam: Appearance at the examination

Oral exam why: I have been a resident for over 27 years additional residential development will destroy the environment in which I am living it will have a huge impact not only on my property but all the other properties in Lychgate

Attachments: Susan Wilkins\_Redacted - <https://watford.oc2.uk/a/nw>

1778

Object

Respondent: Mr Bill Jacobs

## Summary:

The parking situation is already ridiculous in lych gate and the glebe.

## Full text:

The parking situation is already ridiculous in lych gate and the glebe.

## Change suggested by respondent:

Do not build extra housing in lych gate

Legally No  
compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1779

Comment

Respondent: tadpoles

## Summary:

Hi, I would like to bring to your attention an additional site for potential housing. Land and Garages between 56 and 58 Radlet rd WD24 4LL there is easily potential for housing on this site,

I look forward to hearing your response if you support my suggestion to add the site to your local plan.

Thank you

## Full text:

Hi, I would like to bring to your attention an additional site for potential housing. Land and Garages between 56 and 58 Radlet rd WD24 4LL there is easily potential for housing on this site,

I look forward to hearing your response if you support my suggestion to add the site to your local plan.

Thank you

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1818

Comment

Respondent: Sport England

## Summary:

Site Allocation HS20: Land at Lower Derby Road

No objection is made to this allocation as the skate park on this site has now been reprovided at Oxhey Park North.

## Full text:

Site Allocation HS20: Land at Lower Derby Road

No objection is made to this allocation as the skate park on this site has now been reprovided at Oxhey Park North.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1834

Object

Respondent: Mr Paul Elfick

## Summary:

I object strongly to the redevelopment of the TK Max and the Range site. The proposed plans are out of character to the surrounding areas and this will have an adverse effect on the local environment in terms of aesthetics, infrastructure, traffic, pollution, density of people, wellbeing of the community and not forgetting the upheaval in regard to the building works which will also affect the environment.

## Full text:

I object strongly to the redevelopment of the TK Max and the Range site. The proposed plans are out of character to the surrounding areas and this will have an adverse effect on the local environment in terms of aesthetics, infrastructure, traffic, pollution, density of people, wellbeing of the community and not forgetting the upheaval in regard to the building works which will also affect the environment.

## Change suggested by respondent:

I do understand the need and the pressures to build new housing. However, no one ever seems to mention that the growing population is the issue. As our local Council you need to push back to Central Government and raise this important issue.

Building and redeveloping areas is not the solution. The plan needs to explore the maintaining of existing buildings are redevelop these into suitable and affordable housing.

Any redevelopment or buildings need to fit into the already developed environment.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

1835

Support

Respondent: CPC Planning Consultants

## Summary:

Punch Partnerships (PML) supports the proposed housing site: HS05 Land at the Badger Public House. Punch's intention is to redevelop the site for housing in accordance with Policy HC12.3 'Built Cultural and Community Facilities' within the 1-5 year timescale envisaged. Given the size of the site and the character of adjacent properties, 9 units is considered a reasonable indicative yield.

## Full text:

Punch Partnerships (PML) supports the proposed housing site: HS05 Land at the Badger Public House. Punch's intention is to redevelop the site for housing in accordance with Policy HC12.3 'Built Cultural and Community Facilities' within the 1-5 year timescale envisaged. Given the size of the site and the character of adjacent properties, 9 units is considered a reasonable indicative yield.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

1917

Support

Respondent: Three Rivers District Council

## Summary:

The selected sites are supported with two exceptions, HS24 and HS33 are only for four units. The Government's planning guidance considers sites with a minimum of 5 dwellings appropriate for inclusion in the HELAA. Therefore site allocations ought to be for 5 dwellings or more and sites with fewer dwellings can come forward as windfall sites.

## Full text:

The selected sites are supported with two exceptions, HS24 and HS33 are only for four units. The Government's planning guidance considers sites with a minimum of 5 dwellings appropriate for inclusion in the HELAA. Therefore site allocations ought to be for 5 dwellings or more and sites with fewer dwellings can come forward as windfall sites.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1929

Object

Respondent: Cassiobury Residents' Association

## Summary:

Re HS11 - This proposed site is considered part of the amenity space for the flats above the parade of shops in Langley Way & Cassiobury Drive at the roundabout. It is private land, the owners have not given any indication they would wish to sell. We have been led to understand that the Trustees would not contemplate a sale, and nor would they give permission for such a development. Moreover, this site appears to be a form of back garden development & hence would be contrary to both the government's stated policy and the NPPF.

## Full text:

Re HS11 - This proposed site is considered part of the amenity space for the flats above the parade of shops in Langley Way & Cassiobury Drive at the roundabout. It is private land, the owners have not given any indication they would wish to sell. We have been led to understand that the Trustees would not contemplate a sale, and nor would they give permission for such a development. Moreover, this site appears to be a form of back garden development & hence would be contrary to both the government's stated policy and the NPPF.

## Change suggested by respondent:

The HS11 proposed site should be deleted and expunged from the final draft of the Local Plan.

Legally No  
compliant:

Sound: No

Comply with No

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: The HS11 proposed site should never have been included in the draft Local Plan in the first place.

Attachments: None

1930

Comment

Respondent: Cassiobury Residents' Association

## Summary:

Whilst broadly in favour of appropriate new development to meet residents' aspirations and demands, as a general comment, Watford is already densely populated for its relatively small size, as compared to other local authorities in the south of England; and we wish to reflect residents' general concerns regarding housing density, attendant traffic generation and infrastructural demands that every such new development brings (with perhaps the exception of a couple of genuine brownfield sites); most of which appear to have been forced on Watfords' planners, thus negating the very ethos of local decisions made via local democracy.

## Full text:

Whilst broadly in favour of appropriate new development to meet residents' aspirations and demands, as a general comment, Watford is already densely populated for its relatively small size, as compared to other local authorities in the south of England; and we wish to reflect residents' general concerns regarding housing density, attendant traffic generation and infrastructural demands that every such new development brings (with perhaps the exception of a couple of genuine brownfield sites); most of which appear to have been forced on Watfords' planners, thus negating the very ethos of local decisions made via local democracy.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1966

Support

Respondent: Transport for London Commercial Development

Agent: Transport for London Commercial Development

## Summary:

TfL are the leaseholders of Bushey Station Car Park where Network Rail own the freehold. TfL CD supports the allocation of land at Bushey station as suitable for residential led development. TfL CD are keen to work with the borough and Network Rail to bring forward development on site allocation HS31 Land at Bushey Station.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Not specified

Attachments: TfL Commercial Development reps\_Redacted - <https://watford.oc2.uk/a/nh>  
TfL Commercial Development site map - <https://watford.oc2.uk/a/nx>

2014

Comment

Respondent: Mr Murtaza Esmailji

## Summary:

Site: HS01 Land and garages at Lych Gate

The land allocated for development was originally partially off street parking for the flats I live in, the freeholder/ flat developer had decided some years ago to block access and the land became overgrown, only being cleared recently (still blocked by sleepers so cannot be used for parking). Furthermore some of the garages are privately owned via long leases. How are you able to allocate this land/property for development? The parking survey comment is a laughable, there is little parking available for residents – people from other streets come and park on Lych Gate. The parking space on your plan should be re-instated. Lastly it took Jack Green MRTPI Spatial Planning Manager over a month to reply to a simple email last time I had a query (to which he only replied when I sent a email to the Mayor of Watford as to why I was not getting a response). He did not answer all my queries.

## Full text:

Form received via email

## Change suggested by respondent:

A more suitable location should be found for your plan!

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Raise LPA: Yes

Raise LPA Why?: Email to Jack Green MRTPI Spatial Planning Manager

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Murtaza Esmailji\_Redacted - <https://watford.oc2.uk/a/nr>

2026

Object

Respondent: Mr Lawrence Farrelly

## Summary:

Site HS25:

I feel this development would put more pressure on the parking situation in the area which is already at breaking point. At the moment trying to find a parking space after 3pm in either Cardiff road, St James road or Liverpool road is virtually impossible, the adding of another 11 dwellings will only add to the problem

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: n/a

Appear exam: Not specified

Attachments: Lawrence Farrelly - <https://watford.oc2.uk/a/mh>

2051

Support

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

HS20 - Land at Lower Derby Road

Hertfordshire County Council (HCC) as joint landowner support the allocation of the site for housing.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
 HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
 HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
 HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
 HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

Respondent: Glyn Hopkin Holdings Ltd  
Agent: Glyn Hopkin Holdings Ltd

#### Summary:

HS22 Land and buildings at 252-272 Lower High Street

Our comments in relation to HS22 are directly related to the comments made above. 252-272 Lower High Street is identified under reference HS22 in the Regulation 19 Local Plan as a 0.5-hectare residential development site with an indicative yield of 110 units expected to be delivered within years 1-5 of the Plan period. To summarise our earlier comments, it considered that in order to be found sound, the Local Plan needs to lengthen the Plan period by at least one year to 2036/37; increase the minimum housing requirement / provision to 15,067 (and potentially more if the 20% buffer is applied); state that the density of development should seek to exceed 95 dwellings-per-hectare within the CDA where appropriate; and make various amendments to HO3.2 and HO3.3. To help strengthen the Local Plan and enable it to be found sound, it is recommended that the indicative yield at HS22 is increased. This is detailed in 6) below. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

#### Full text:

Letter and form received via email

#### Change suggested by respondent:

GHH support the allocation of the site for residential development, but recommend that the indicative yield is increased to 189 dwellings for the following reasons: 1) To achieve the minimum overall housing requirement of 15,067 over a 15-year plan period. Currently there is a shortfall of 79 dwellings; 2) To achieve the regeneration objectives of the Colne Valley Strategic Development Area and wider Core Development Area 3) To deliver sustainable patterns of development by utilising a previously-developed site in the High Sustainability Zone; 4) It would prevent the de-designation of Green Belt / greenfield land to meet objectively assessed needs; and 5) An increased yield would deliver a much greater quantum and variety of social, economic and environmental benefits. In the context of housing need (explained in further detail earlier in this representation form), GHH consider the site able to accommodate a greater quantum of development, and therefore make a compelling contribution to ensuring the shortfall is not just met in full but exceeded. GHH consider the site able to accommodate the entirety of this shortfall (79 dwellings) if necessary. Furthermore, with the site anticipated to be delivered within the first five years of the Local Plan period, this shortfall would be addressed immediately, rather than being directed towards the end of the Plan period. It is fundamentally important that the most sustainable locations for development are maximised. The Colne Valley Strategic Development Area ('CVSDA') – which forms the southern part of the CDA – is recognised as being one of high sustainability, with development able to benefit from excellent access to public transport and existing services and facilities. In the Housing and Economic Land Available Assessment ('HELAA') [2021], the site is considered to be "suitable, available and achievable" and "accordingly considered a deliverable site and recommended for inclusion in the Local Plan as a site allocation". The allocation of the site for residential development has already been ratified by the Council in the preparation of the evidence base. Chapter 11 of the NPPF underlines the importance of making effective use of land. Para. 117 states that "planning policies and decision should promote an effective use of land in meeting the need for homes and other uses" and that strategic policies "should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously-developed or 'brownfield' land". In addition to this, Para. 118 states that "planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes" and "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively". Strategic Policy HO3.2 – under 'housing density and optimising land' – states that "residential developments should seek to optimise the density of sites through a design-led approach, taking account of the context and sustainability of a site, focusing higher-density development within the Core Development Area. Within it, new residential developments should seek to deliver a minimum density of at least 95 dwellings-per-hectare". The draft strategic policy seeks to align with the aforementioned requirements of the NPPF to ensure land is utilised to the maximum extent. Significantly, the policy makes reference to new residential developments achieving a minimum density of 95 dwellings-per-hectare ('dph'). The use of the word minimum is important, and does not set a ceiling for residential density. Intensifying the allocation would align with the national and local planning policy directive to direct higher-density development to previously-developed land in the most sustainable locations. GHH therefore consider an uplift on the indicative yield of 110 units to be appropriate and still in accordance with the minimum density requirements under Strategic Policy HO3.2. Taking the above into consideration, GHH consider a minimum density of 378 to be appropriate. This would result in an uplift in the allocation to 189 dwellings, therefore ensuring that the shortfall of 79 dwellings is met in full. GHH recommend the inclusion of specific wording within the allocation that stipulates a minimum expected quantum of 189 dwellings. This is to provide the allocation with the necessary flexibility required under the NPPF, and encourage development to exceed this figure, provided compliance with other policies can be achieved and demonstrated. Focusing additional development within urban areas on previously-developed land would also prevent the loss of additional Green Belt / greenfield land. With a minimum shortfall of 79 dwellings, GHH consider it essential to direct this additional development towards already-allocated sites, such as 252-272 Lower High Street. As detailed above, the site is able to accommodate a greater quantum of development, and seeking to intensify the allocation would protect against potential further Green Belt / greenfield land release to meet objectively assessed needs. Enhancing the allocation would also deliver a greater range and quantum of social, economic and environmental benefits both in the short-term and long-term. An increased number of dwellings / residents would, as a minimum: 1) Generate a significant increase in annual convenience goods; comparison goods; and leisure expenditure; 2) Create direct and indirect employment opportunities during the construction phase; 3) Increase demand for, and use of, local services, facilities and businesses in the local area. This increased demand and spending would help to maintain and enhance the services available and improve their viability; 4) Provide the Council with a significant increase in potential New Homes Bonus and Council Tax Revenue receipts; 5) Provide improvements to infrastructure (either directly (i.e. on-site) or through planning obligations); 6) Introduce new areas of planting which would be of greater environmental / biodiversity benefit; and 7) Achieve a significant reduction in vehicle movements and contribute to the Council's green infrastructure and climate change objectives. It is therefore strongly recommended that the site allocation is increased to 189 to ensure minimum housing requirements are met and the most efficient use of an already allocated sustainable brownfield site. Please see submitted representations titled '2021 03 17\_252-272 Lower High Street Reps\_FINAL' for more detail.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Glyn Hopkin Holdings Ltd - Form\_Redacted - <https://watford.oc2.uk/a/zz>

Glyn Hopkin Holdings Ltd written reps\_Redacted - <https://watford.oc2.uk/a/zm>

2207

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: HS01 Land and garages at Lych Gate

5.198 Minerals and Waste Planning. This site is approximately 850m from the existing Waterdale Recycling Centre and Waste Transfer Station which is a safeguarded waste site under Policy 5: Safeguarding of Sites within the adopted Waste Core Strategy & Development Management Policies DPD, July 2012. Paragraph 182 of the NPPF states:

"Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

## Full text:

Form and document received via email

## Change suggested by respondent:

5.199 It is therefore requested that the following wording is added to the supporting text for this site, in order to ensure that the continued operation of both the recycling centre and waste transfer station at Waterdale are taken into account at the planning application stage:

- The Waterdale Recycling Centre and Waste Transfer is approximately 850m from this site and its operations should be taken into account.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2208

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

5.200 Children's Services (School Place Planning). It is requested that a site for a 3fe primary school within this housing allocation is allocated, in the light of the need to cater for a potential shortfall that has been identified in the county council's comments to the education section in Chapter 10 of the final draft local plan.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Table 13.2: Mixed use sites

1770

Comment

Respondent: Mr Brian Jackson

## Summary:

Please clarify MU13, would Sainsbury's stay open? This is VERY unclear. There are barely sufficient supermarkets in walking distance in Town Centre since Little Waitrose closed. I would have to drive to another supermarket, which is hardly likely to increase chances of meeting green objectives if others also have to do the same.

## Full text:

Please clarify MU13, would Sainsbury's stay open? This is VERY unclear. There are barely sufficient supermarkets in walking distance in Town Centre since Little Waitrose closed. I would have to drive to another supermarket, which is hardly likely to increase chances of meeting green objectives if others also have to do the same.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1897

Object

Respondent: West Hertfordshire Hospitals NHS Trust

Agent: Montagu Evans LLP

## Summary:

The proposed Riverwell allocation should be amended to include hospital use and the existing Watford General Hospital site in order to facilitate the re-provision of Watford General Hospital, part of which will be built on land covered by the proposed Riverwell allocation. It will also facilitate the delivery of development on surplus Trust land once the new hospital has been delivered.

## Full text:

These representations have been prepared by Montagu Evans LLP on behalf of West Hertfordshire Hospitals NHS Trust in relation to Watford Borough Council's 'Final Draft Local Plan' (i.e. the Regulation 19 Local Plan) and specifically in relation to the Watford General Hospital site and adjacent land known as the Riverwell site.

## Background

## The Trust

West Hertfordshire Hospitals NHS Trust ('the Trust') runs three National Health Service ('NHS') hospitals: Watford General Hospital, St Albans City Hospital and Hemel Hempstead Hospital.

It provides acute healthcare services to a core catchment population of approximately half a million people living in west Hertfordshire and the surrounding area.

The Trust also provides a range of more specialist services to a wider population, serving residents of north London, Bedfordshire, Buckinghamshire and east Hertfordshire.

As an employer of almost 5,000 people the Trust is one of the biggest employers in the area and sees nearly a million patients each year.

## Watford General Hospital

Watford General Hospital dates back to the formation of the NHS. It comprises buildings of a variety of ages, including buildings of the Victorian Watford Workhouse and of the Shrodells Public Assistance Institution which date from the interwar period. In 1965 the Peace Memorial Wing was opened and in the 1980s The Princess Michael of Kent Wing was built.

This collection of buildings is now outdated and inefficient and does not reflect the high-quality environment that the Trust wants to provide for its patients and staff. Furthermore there has been increasing pressure on capacity as demand for services has grown, and the inflexibility of the estate as it stands is an impediment to achieving a long-term, sustainable solution.

The Trust was delighted when, in late 2019, it learned that it had been one of the six successful first round Health Infrastructure Plan ('HIP1') parties. It subsequently undertook work to examine the potential of each of its sites and a number of green field locations to provide a large acute hospital to meet the catchment area's needs long into the future. This work culminated in a decision to develop a new emergency hospital at Watford which was made at a meeting between the Trust and Herts Valley Clinical Commissioning Group ('CCG') on 1 October 2020. It is the intention that the Trust will also continue to provide services from its other sites in Hemel Hempstead and St Albans.

Rather than redeveloping existing buildings, the new hospital will be built on land adjacent to the existing hospital so that the existing hospital can continue to provide services until the new hospital is ready. This will be a very significant development project that will take place over a number of years.

The hospital development will include land which forms part of what is referred to as the 'Riverwell' site in the draft Local Plan. Riverwell is being delivered by a local asset backed vehicle ('LABV') known as Watford Health Campus Partnership LLP which is a 50:50 limited partnership between Watford Borough Council and Kier Project Investment Limited. The aim of the LABV (as set out in its Business Plan) is:



“...to deliver an integrated and viable solution for Watford Riverwell which will support the regeneration of west Watford, introducing; high quality homes, market facing commercial and employment uses, improved public realm and local connectivity and facilitating the re-provision of Watford General Hospital.”

Thus the new hospital is wholly in line with well-established aims for this part of Watford.

The new hospital project is progressing apace – a design team is in place and discussions will continue to take place over the coming months to hopefully reach final agreement on the acquisition of the remaining land that is not under the Trust's control; whilst it has not ruled anything out at this stage, the Trust is hoping to be able to acquire land by agreement rather than by exercising its Compulsory Purchase powers.

The Trust has been working closely with Watford Borough Council to move the project forward and is grateful for Watford Borough Council's support thus far. To date six pre-application meetings have been held, together with a submission to the Design Review Panel. Submission of an outline planning application for the hospital development is currently planned for late May 2021. The Trust looks forward to a continued strong and collaborative relationship with the local authority to help deliver this critical piece of major infrastructure for the area.

These representations are intended to assist the delivery of the hospital by:

1. seeking express support in the Local Plan for the redevelopment of Watford General Hospital - an important consideration for the business case process;
2. confirming to Watford Borough Council that, in its capacity as landowner, the Trust is happy for the existing Hospital site to be included in the Local Plan as part of an allocation; and
3. enabling the Trust to be represented at the Examination in Public if needs be, hence why these representations are framed as an 'objection'.

#### Comments on the Draft Plan

The Trust welcomes the Council's general aims to regenerate areas of the borough such as west Watford / Riverwell. It is pleased to note that the Council recognises the importance of delivering supporting infrastructure alongside the significant growth that is being planned (paragraph 3.5). The Trust considers that Watford General Hospital is an essential part of the area's infrastructure (and should be recognised as such in the Local Plan) and that the effects of growth on the hospital should be fully considered and facilitated as part of the planning process.

The Trust particularly welcomes the Council's statement that it will support improvements to the hospital (paragraph 2.67).

However, the Trust objects to absence of clear provisions in the draft Local Plan in relation to improvements to the hospital. The Trust recognises the strong support of the Borough Council for a new hospital (as illustrated, for example, by the LABV's aims) and recognises that the omission of express provisions for the new hospital is likely a consequence of the different timescales of the Local Plan and HIP1 programmes.

Nevertheless, the Trust is keen to see this addressed in the final version of the Local Plan lest the Local Plan be found to be 'unsound'.

Such certainty will be particularly important when it comes to considering a planning application for the new hospital and in avoiding any undue delays to the determination of a planning application. Furthermore, having a clear development position is also a very important consideration when justifying and drawing down on Government funding for a major project such as this.

#### Draft Site Allocation

Draft Policy MU21 (Land at Riverwell) proposes the allocation of land upon which part of the new hospital will be built. It says that the site is considered suitable for mixed-use development, including residential, commercial uses and a primary school. It also seeks the provision of a 'public square' and estimates that the site has a capacity of 1,383 dwellings. The draft plan suggests that the timescale for development is "1-15 years".

The draft allocation presents three avoidable issues:

1. as it stands any planning application for new hospital floorspace on this land would be a departure from the development plan and would have to be justified against a loss of housing potential (which, given the pressing need for new homes, is likely to be given substantial weight in the planning balance). This is an avoidable hurdle if the site allocation is amended. It is also an unnecessary hurdle given the strong support that the Council has clearly expressed towards improvements to the hospital and given the strong local support for better facilities;
2. whilst there is a clear need for a new hospital, there is also a significant need for housing in the borough. As already tested by the Trust there are no reasonable alternative locations for the development a new hospital other than on land adjacent to the existing facility. However, such a development may alter the Council's assumptions relating to the housing capacity of the Riverwell site as currently defined; and
3. the assumed residential capacity of the draft allocation as currently drawn may not be achievable given that it could involve residential blocks that are immediately adjacent to the Trust's land and in a location where the Trust is proposing development. Such proximity of housing could give rise to 'agent of change' issues which in turn could prejudice the improvement of the healthcare estate as well as the longer-term operation of the hospital.

These issues then result in two potential concerns relating to the 'soundness' of the emerging Local Plan, specifically that:

1. the plan would not be 'positively-prepared' as it would not be providing a strategy which seeks to meet the area's objectively-assessed needs whether in terms of the new hospital or in terms of any decrease in housing capacity of the currently-proposed Riverwell allocation as a result of the hospital development; and
2. the plan would not be 'effective' as it would not be deliverable, specifically in terms of the assumed housing capacity of the currently-proposed Riverwell allocation.

#### Other Considerations - Developer Contributions

Returning to the Council's recognition that infrastructure must keep step with housing and other growth, we highlight that the new hospital will need to serve the occupants of new homes as well as the existing population. We note that, elsewhere in the draft Local Plan, the Council is seeking developer contributions for healthcare, for example:

"2.20 The Herts Valleys Clinical Commissioning Group has indicated that a new health facility, with a floorspace area of approximately 1,300 sq m, is required in the Watford Gateway Strategic Development Area."

Whilst the Trust supports the new healthcare facility at Watford Gateway, it also believes that developer contributions should be sought (whether by way

of the Community Infrastructure Levy or by way of section 106 obligations) from all development that will generate additional demand for NHS healthcare services. Although such contributions will represent but a small proportion of the overall expenditure on NHS facilities that will occur in the borough during the plan period, the collection of contributions – however modest – will help to address the common complaint amongst those raising issue with new development that additional housing only serves to add unwelcome pressure on healthcare facilities. The Trust would welcome the opportunity to engage further in relation to this matter.

#### Change suggested by respondent:

We are confident that these issues can be fully addressed by way of a modification to include the existing hospital site as part of the allocation. This is because whilst the new hospital will be in part built on the currently-proposed Riverwell allocation, parts of the existing hospital site will become available for development within the same 1-15 year timescale for Riverwell. Consequently the allocation of the existing hospital site in combination with the currently-proposed Riverwell allocation will ensure that the emerging Local Plan will both facilitate delivery of the new hospital and continue to provide for the significant housing delivery that is envisaged in the current draft local plan.

#### Requested Changes

To address the above matters we respectfully request that the Borough Council amends the draft Riverwell policy as follows:

1. allocate (see attached drawing) the existing Hospital site in combination with the Riverwell site as currently illustrated – as noted above we confirm that the landowner is content for its site to be allocated;
2. revise the text of draft Policy MU21 (Land at Riverwell) to read: “The site is considered suitable for mixed use development, including hospital, residential, commercial uses and a primary school”; and
3. note for the avoidance of doubt in the explanatory text that a new hospital will be built on land outside of the current hospital boundary and that parts of the existing hospital site will be released for development following the commissioning of the new Hospital. The Trust envisages that such land will be made available within the 15-year timeframe of the Riverwell allocation as currently drafted.

Legally Yes  
compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: Because the proposed Hospital is a matter of strategic importance for the area. It is very important that the Local Plan facilitates this.

Attachments: WBC Reps - WGH 180321 (submitted).pdf - <https://watford.oc2.uk/a/kg>

## 1902

## Comment

Respondent: La Salle Investment Management

Agent: Miss Rachel McGall

#### Summary:

La Salle support the designation of the Retail Park as a Mixed-Use Site for residential-led development, considering the Site an excellent opportunity to deliver new housing. La Salle suggests that if development proceeds in advance it would continue to conform to the Site Allocation.

La Salle is aware development options have been considered for the parcel of land to the north of the Retail Park, and land south. Both parcels of land are suggested to be included within the Allocation to help development come forward aligning with the Area's objectives, but acknowledge that they may come forward in phases.

#### Full text:

La Salle support the designation of the Retail Park as a Mixed-Use Site for residential-led development, considering the Site an excellent opportunity to deliver new housing. La Salle suggests that if development proceeds in advance it would continue to conform to the Site Allocation.

La Salle is aware development options have been considered for the parcel of land to the north of the Retail Park, and land south. Both parcels of land are suggested to be included within the Allocation to help development come forward aligning with the Area's objectives, but acknowledge that they may come forward in phases.

#### Change suggested by respondent:

.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Appendix 1- Colne Retail Park Plan 1 - Site Location Plan.JPG - <https://watford.oc2.uk/a/km>

Appendix 2- Colne Retail Park Plan 2- Tear-drop Site.JPG - <https://watford.oc2.uk/a/kn>

Appendix 3- Colne Retail Park Plan 3- Jaguar and Land Rover Car Dealership Site.JPG - <https://watford.oc2.uk/a/ky>

La Salle Investment Management\_Redacted - <https://watford.oc2.uk/a/y9>

1942

Comment

Respondent: Berkeley Homes

## Summary:

Berkeley Homes supports the site allocation MU05 for land and buildings at 94-98 St Albans Road for a mixed use development in accordance hybrid planning permission (ref. 19/00507/FULM) approved in November 2020.

## Full text:

-

## Change suggested by respondent:

To ensure accuracy and consistency with the policy the floorspace figures should be amended as follows: 2,050sqm GEA of commercial floorspace  
2,910sqm GEA of educational floorspace

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Berkeley Homes (North East London) Form 1 of 2\_Redacted - <https://watford.oc2.uk/a/z5>Berkeley Homes (North East London ) Reps - <https://watford.oc2.uk/a/z6>Berkeley Homes (North East London) Form 2 of 2\_Redacted - <https://watford.oc2.uk/a/z7>

1975

Comment

Respondent: Tesco

Agent: Tesco

## Summary:

In summary, Tesco supports the Council's intention to review its Local Plan, and the principle of the draft site allocation (MU16). Specifically, the principle of residential-led development at the site, with re-provision of Class E uses (including a replacement Tesco) is supported. In this way, an efficient and high density mixed use scheme would make a significant contribution to the delivery of new housing in a highly sustainable location, whilst also contributing to the vitality of this established retail area.

## Land Uses

The emerging proposals for the site incorporate retention/replacement of the Tesco store (E Class), residential development, and provision of space for a primary school.

Draft site allocation MU16 indicates that the subject site is considered suitable for 'mixed use development, including residential, E and F class uses and a primary school.'

It is unclear why the site allocation refers to both F class uses and a primary school, when a primary school would fall within the F Class. To avoid ambiguity, it is proposed that the allocation be amended to read:

'The site is considered suitable for mixed use development, including residential, E class, and potential for F class (primary school) use.'

## Retail Re-provision

Draft allocation MU16 currently states that development proposals for the subject site should 'Provide no additional retail floorspace above the existing on site provision.'

Tesco raise concern with this current wording. Whilst the current intention is to retain the existing store and fuel station, redevelopment of the current retail unit to provide a replacement superstore and fuel station is a potential option. It is unclear why such a restrictive approach is taken, given that the site is located within an established retail area, and that additional retail floorspace could provide significant local benefits. It is held that a degree of flexibility should be afforded, to allow for the dynamic nature and ever changing needs of the retail industry. Accordingly, it is proposed that the allocation wording be amended to read:

'Provide circa 100% retail floorspace re-provision, subject to operational requirements'.

## Indicative Residential Yield

It is Tesco's view that the indicative yield of 1,338 residential units is an appropriate indicative figure, given the sustainable nature of the site located within the Core Strategic Development Area, and ability to contribute to a sustainable new community in the centre of Watford.

## SUMMARY AND CLOSINGS

To summarise, the subject site represents a unique opportunity to deliver a range of benefits in an important and highly sustainable location. Tesco welcomes the provision of a mixed use allocation for the subject site, given the potential to both retain and enhance the retail offer on site, and assist with the delivery of a major new residential development. However, there is some concern in respect of the detailed wording of the site allocation as highlighted in this letter. We have made suggested alterations accordingly.

## Full text:

Form received via email

## Change suggested by respondent:

To avoid ambiguity, it is proposed that the allocation be amended to read:

'The site is considered suitable for mixed use development, including residential, E class, and potential for F class (primary school) use.'

It is held that a degree of flexibility should be afforded, to allow for the dynamic nature and ever changing needs of the retail industry. Accordingly, it is proposed that the allocation wording be amended to read:

'Provide circa 100% retail floorspace re-provision, subject to operational requirements'.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Not specified

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Tesco Response Form\_Redacted - <https://watford.oc2.uk/a/nf>Tesco Written Repls\_Redacted - <https://watford.oc2.uk/a/ng>

1976

Object

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

#### Summary:

A project team was engaged by Canada Life in July 2020 to review potential development options for Canada Life's site at Imperial Way known as Astral House (currently identified as site allocation MU07) and to advance discussions with Watford Borough Council. This was the first time that Canada Life had assessed the site in relation to the emerging local plan. No previous representations have been made to the Regulation 18 consultation stage or the Call for Sites.

At the time of engaging with the local authority in September 2020 we were informed that an infrastructure bid had been submitted to the Hertfordshire Growth Board to seek funding for various interventions in the Watford Gateway Strategic Development Area. Targeted projects identified included opening up cycle and pedestrian bridge links from the west of the Abbey Line to the east, thereby providing access to and potential redevelopment opportunities for a wider range of land uses to the east of the Abbey Line.

On the basis of the high level information provided, Canada Life expressed support, in principle, for the Watford Gateway Strategic Development Area and identified that the likely aspiration for the site would be to deliver a step change in scale and massing through the inclusion of tall buildings and mixed use development; although the final mix was yet to be determined but would likely include residential, office and other E Class Uses. However, this approach would necessarily require further investigation with surrounding landowners.

Since that date, significant research has been undertaken by the Canada Life advisory Team to review the strategy for the redevelopment of the site.

These

representations are therefore submitted with the benefit of now having undertaken discussions with the surrounding landowners and additional engagement with Watford Borough Council. These recent and ongoing

discussions are important and have clarified Canada Life's position in respect of the future redevelopment potential for land east of the Abbey Line.

In summary, discussions have raised the following key matters:

1. The London Cement Batching Plant is highly unlikely to be relocated due to the lack of alternative sites, the planning and logistical difficulties of doing so, and because there is likely to be little / no value in doing so to justify the significant cost to its owner.
2. The Coal Board Pensions Land (site allocation EM05) has not been put forward for allocation as a mixed-use development opportunity and we understand that the site is now being brought forward for modern industrial uses which will maintain Clive Way.
3. The Redrow Land (known as Balmoral Storage, Clive Way) has not been promoted for redevelopment and will therefore be subject to allocation for its existing industrial use.
4. Network Rail is supportive of the principle of delivering a MCSP on land to the east of the Abbey Line. This is seen as a key move and a catalyst to unlock land around the station for regeneration via their partnership with Kier Construction, known as Solum Regeneration ("Solum").
5. Regeneration around the station to the west of the Abbey Line is going to be the main focus for regeneration during the lifetime of the emerging Local Plan.

The above key matters are germane to the delivery of the Watford Gateway Masterplan SDA and, in particular, how land to the east of the Abbey Line is now

likely to be redeveloped during the lifetime of the emerging local plan. It is therefore necessary for MU07 to be amended so that the plan meets the necessary tests of soundness in respect of being justified and effective. What this means in relation to land to the east of the Abbey Line (including allocation MU07) is as follows:

- The policy must recognise that residential development and any associated infrastructure requirements such as a location for a primary school is very unlikely to happen during the lifetime of the emerging local plan. However, the wording of the policy should maintain flexibility to allow for these as part of a mix of uses if the cement batching plant relocates and adjacent landowners change their approach to the renewal of industrial units. This flexibility is required due to the clear environmental constraints that have been identified in respect of the cement batching plant remaining in-situ, proposals that are underway for the renewal of older industrial units and ongoing retention of industrial / storage uses i.e. land that has not been promoted for redevelopment.
- It should be clear in the emerging local plan that the uses identified as appropriate for Canada Life's site through allocation MU07 can come forward as solus or mixed uses i.e. it can be redeveloped for a single type or mix of employment uses and does not have to deliver a mixed-use scheme which includes residential use. The opportunity for a mixed residential and employment scheme will only be possible if the batching plant relocates and adjacent landowners also seek a compatible mix of uses. While this opportunity may arise longer term, it is now clear that if a residential led mixed-use scheme was to happen it would be towards the end of the new local plan period or, more likely, beyond. Development before then for beneficial solus or mixed employment uses cannot be fettered if the policy was interpreted as only allowing a development if it includes a mix of uses (including residential).
- Key principles / physical interventions for unlocking and putting in place infrastructure to pave the way for the longer term regeneration of the area can be set by policy now. However, these principles and in particular physical interventions, need to be refined to make best use of existing routes to avoid splitting development sites unnecessarily (making them unviable for redevelopment), losing existing employment land, and doubling up on infrastructure costs (see below for further discussion on this point).
- The construction of a MSCP with sustainable travel hub and pedestrian / cycle bridge to the station on land to the east of the Abbey Line and to the south of Clive Way is considered to be the main infrastructure and catalyst to further regeneration that will be deliverable during the lifetime of the emerging local plan.

At bullet point 3 we refer to the need to look again at what should constitute key infrastructure within the area to the east of the Abbey Line during the lifetime of

the plan, essentially putting in place key building blocks for longer term regeneration (or sooner if there is a substantial change in the current constraining factors identified through landowner discussions). Our conclusion, alongside that of Network Rail is as follows:

- Clive Way must be protected and extended through to Network Rail and Canada Life's land to the south of the east of the Abbey Line SDA area (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding as an extension to Clive Way). This is the most appropriate route to bring mixed vehicular traffic (alongside active travel options) through to a new MSCP and sustainable travel hub without unnecessarily sterilising substantial areas of developable land which would reduce the viability of projects seeking an uplift in employment densities.
- Canada Life will safeguard land at the end of a link from Clive Way for the construction of a MSCP / sustainable travel hub and linking bridge to the station and will continue to collaborate with Network Rail. As part of this approach the concrete batching plant traffic can be slightly re-routed, but still use the existing road through to Orphanage Road, without then needing costly re-routing to Imperial Way as suggested by Policy ST11.2. This is fundamental to cost effectively unlock land between the Main Line and the Abbey Line for high density redevelopment. Furthermore, it is fundamental to alleviating the severe congestion experienced in the town centre due to all existing station parking being located in one area.
- In the longer term, a pedestrian and cycle bridge from Penn Road to allow further east west permeability for pedestrians and cyclists may be delivered. With the batching plant retained, this new link could effectively be routed just to the north of the batching plant and linked to the existing pedestrian infrastructure along Imperial Park.

We do not support a safeguarding policy objective to create a further, segregated vehicular link through the Canada Life site to the Network Rail to the south / rerouting of batching plant traffic to Imperial Way via an extension of Imperial Way. This is not needed following further investigatory work with Network

Rail, would double up on routes to the same point, and the associated costs of doing so would leave the Canada Life site undevelopable for employment uses

(including industrial) during the emerging local plan period. This is not acceptable to Canada Life and would lead to their withdrawal of support for the Masterplan

Area if it was to be maintained as a policy requirement (see additional representation in response to Policy ST11.2 and P202 of the Local Plan document).

The above analysis demonstrates that the current strategy for the Watford Gateway SDA needs to be amended for land to the east of the Abbey Line. Without amendments to respond to the evidence that has emerged through recent and ongoing landowner discussions, the policy is not justified. This is

because it would not take into account the reasonable alternatives based on proportionate evidence that has been set out in these and other representations.

In addition, it would not be effective because Canada Life and Network Rail would not be in a position to safeguard land for an MCSP / sustainable travel hub on

land to the east of the Abbey Line. This is because the current strategy of extending Imperial Way / re-routing the batching plant traffic to Imperial Way would substantially and unnecessarily sterilise developable land within allocation MU07, where Class E(g), B2 and B8 employment uses are delivered, by splitting the site and putting active travel users in conflict with secure yard areas etc. As stated previously, it is now considered that employment uses will be the most

likely form of development on land to the east of the Abbey Line during this local plan period. These uses are required due to the very high, objectively assessed

levels of need for employment uses, including industrial development, within the borough.

The text of Site Allocation MU07 should be amended as follows: "Timescale: Windfall"

Full text:

-

Change suggested by respondent:

Development requirements and considerations

• This site is considered suitable for solus employment uses, mix of employment uses or mixed-use development, including residential and employment uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Result in no net loss of employment floorspace on site (unless the existing employment use is shown to be unviable);
- Seek to work collaboratively with the landowners of sites MU06 and EM05, which are located adjacent to the east and south of the site respectively, to maximise the benefits of development;
- Demonstrate that safe pedestrian and cyclist access to the site has been provided;
- Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land (in conjunction with MU06) required to help facilitate the delivery of a multi storey car park and sustainable travel hub (please refer to enclosed plan SK08 which identifies the indicative area for safeguarding);
- Take account of the potential risk of contamination on site;
- Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required ~~due to the scale of the~~ if new dwellings are to be provided as part of a mixed-use development; and
- In the case of residential development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of sensitive noise receptors."

In addition to the changes to allocation MU07 outlined above, it will be necessary to include amendments to site allocation EM05 to ensure Clive Way is maintained and any redevelopment proposals accommodate the retention of Clive Way for vehicular and active travel uses through to a new MSCP with sustainable transport hub.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

## 1984

## Comment

Respondent: Solum Regeneration

Agent: Daniel Watney

Summary:

7.1 During the consultation on the first draft of the Local Plan, Solum Regeneration submitted a representation to, in part, raise that the red line boundary for the allocation at 'Land at Watford Junction' did not correlate with the full extent of Network Rail's ownership. It was subsequently confirmed by the Council that the site boundary and area has been amended to reflect the ownership extent.

7.2 The Final Draft version of the Local Plan has not been correctly amended to reflect the updated red line boundary. It is requested that this error be corrected to reflect the correct ownership extent.

Full text:

Form received via email

Change suggested by respondent:

That the error be corrected to reflect the true ownership extent.

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: First Draft

Appear exam: Not specified

Attachments: Solum - document - <https://watford.oc2.uk/a/n9>

Solum - form\_Redacted - <https://watford.oc2.uk/a/nv>

1995

Object

Respondent: Telereal Trillium  
Agent: Newsteer

## Summary:

MU14 'Land at the car park, Wellstones'

Concerns regarding indicative yield in plan. See original letter. Relates to Policy HO3.2 & QD6.5 as well.

## Full text:

Form and letter received by email

## Change suggested by respondent:

With due consideration to the above, it is therefore recommended that the 'indicative yield' is either removed from the site allocation, changed to read 'baseline scenario' or a clearer explanation is provided to demonstrate that this is not considered to be the 'capacity' of the Site but is provided as a baseline figure to assist with WBC's wider assessment of housing supply.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: We submitted Reps to the First Draft Consultation which expressed similar concern around density restrictions.

Appear exam: Not specified

Attachments: Newsteer on behalf of Telereal Trillium\_Redacted - <https://watford.oc2.uk/a/n4>

2000

Comment

Respondent: JLL  
Agent: JLL

## Summary:

Cortland is pleased that the allocation of both Phase 2 parcels - Land to the west of and parallel to Ascot Road (MU19) and Land to the East of Ascot Road (MU20) remain as allocated mixed-use sites. It should be noted, the timescale of the MU20 allocation aligns more closely with 1-5 years rather than 6-15 years given both allocations are to come forward for planning this year. We consider the indicative residential yields (60 dph) on the allocated sites to be extremely low in relation to Ascot Road Phase 1 which was granted permission in 2017 with a density of 307 units per hectare, setting a precedent for the area. Our client promotes the Borough's desire to optimise sites through a design-led approach and the provision of a minimum dwellings per hectare requirement as set out in HO3.2. As such, we do not believe that the site allocation's density is justified and consistent with the rest of the Draft Local Plan's direction. Further to this, Policy QD6.1 notes the Council's support for a gentle uplift in the density of 'Established Areas'. Ascot Road is also designated as a Local Centre (Figure 5.1) within this Draft Local Plan which indicates the Council's awareness of the sustainability of the area. Therefore, it is considered that the density for both the allocations MU19 and MU20 should be increased significantly to appropriately reflect the Council's need for housing and Local Centres designation.

## Full text:

Form received via email

## Change suggested by respondent:

Therefore, it is considered that the density for both the allocations MU19 and MU20 should be increased significantly to appropriately reflect the Council's need for housing and Local Centres designation.

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Cortland - Document\_Redacted - <https://watford.oc2.uk/a/zy>  
Cortland - Form\_Redacted - <https://watford.oc2.uk/a/zb>

2001

Object

Respondent: Brasier Freeth LLP

## Summary:

As drafted MU 13 identifies an indicative yield for the site of 220 no. dwellings. It is not clear where the figure of 220 no. dwellings originates from. The Watford Tall Buildings Study (January 2021) identifies the potential for up to 8 storeys of development in this location alongside 10 storey elements and provides a broadbrush yield of 300 no. new dwellings and 3,388 sq m of commercial space. Analysis undertaken by Daejan Watford Limited indicates the potential for 400 no. dwellings and that has been discussed with both the local planning authority and their consultants Allies and Morrison. Against the background of the above the National Planning Policy Framework notes at paragraph 16 (d) that the plan should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Similarly, the National Planning Practice Guidance is explicit that “the local plan should make it clear what is intended to happen over the life of the plan, where and when this will occur and how it will be delivered” (Reference ID 12-002-20140306). For these reasons it is clear the Local Plan should identify a real life indicative yield in order to guide development and make the best use of previously developed land in line with the objectives of the Framework. Unless the Plan is modified to address this it is neither justified, nor effective, nor consistent with national policy as is required by paragraph 35 of the Framework and cannot therefore be considered to be sound.

## Full text:

-

## Change suggested by respondent:

The indicative yield should be identified as a minimum of 400 no. dwellings – See comments above. Daejan (Watford) Limited are otherwise supportive of the allocation for redevelopment.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Housing and Economic Land Availability Assessment (Letter to Tom Dobrashian dated 2 October 2020 and accompanying HELAA forms.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Daejan (Watford) Ltd\_Redacted - <https://watford.oc2.uk/a/zw>

2005

Object

Respondent: Asda

Agent: Newsteer

## Summary:

Concerns regarding indicative yield on site MU23 'Land at Asda, Dome Roundabout'. Also relates to policies HO2.3 & QD6.5. See full letter for details.

## Full text:

Form and letter received via email

## Change suggested by respondent:

It is therefore recommended that the 'indicative yield' is either removed from the site allocation, changed to read 'baseline scenario' or a clearer explanation is provided to demonstrate that this is not considered to be the 'capacity' of the Site but is provided as a baseline figure to assist with WBC's wider assessment of housing supply.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Newsteer on behalf of Asda\_Redacted - <https://watford.oc2.uk/a/n3>

Respondent: Mineral Products Association  
Agent: Mineral Products Association

#### Summary:

See also policies CDA2.1, CC8.5 and ST11.2

Aggregate Industries (AI) / London Concrete operates the rail depot and concrete batching plant at Orphanage Road. Around 60,000 tonnes of aggregate are imported to the rail depot each year, used in the manufacture of concrete on-site to supply the local market together with aggregates. The supply of rock by rail from the Mendips represents a low carbon means of supply. The operation of the rail depot by its nature can be noisy, and generates substantial HGV movements in the onward distribution of aggregates and concrete. Proximate development of sensitive uses such as residential could be incompatible with its ongoing operations and potentially lead to nuisance complaints. The site is safeguarded in the Hertfordshire Minerals Local Plan with a Minerals Consultation Area extending around the site, intended to ensure that the potential effects of non-minerals development on the site and the safeguarding that is applied to it, are considered. The introduction of residential development immediately adjacent and/or with direct views over the AI site could result in a potential conflict which would affect their existing and future operations. National policy (NPPF) and guidance (PPG) make it clear that existing sites for bulk transport and manufacture of concrete should be safeguarded from sensitive or inappropriate development that would conflict with the use of sites for these purposes. The NPPF also requires that the 'agent of change' principle is applied so that where an operation of an existing business could have a significant effect on new development in its vicinity, the applicant (agent of change) should be required to provide suitable mitigation before the development has been completed. The safeguarding of the site is also provided for in the adopted Hertfordshire Minerals Local Plan, with the Mineral Consultation Area (MCA) SPD identifying a 250m radius MCA around the site. The Watford Core Strategy also safeguards the site. The Policies Map does not adequately or accurately identify the safeguarded site. So in summary the Plan is considered to be not sound on the basis that: NOT JUSTIFIED due to failure to properly and accurately identify the safeguarded aggregates rail depot and concrete batching plant which is not the most appropriate strategy; NOT EFFECTIVE as policies do not set out clearly what is required to ensure that the aggregates rail depot and concrete batching plant are safeguarded as required by development plan and national policy; NOT CONSISTENT WITH NATIONAL POLICY as safeguarding is not applied properly to facilitate the sustainable supply of minerals (NPPF para 204e), agent of change is not applied properly (para 182), and by potentially prejudicing the operation of the rail depot the sustainable development objectives, especially enabling movement of materials by rail and associated benefits in terms of emissions and reducing road transport, may be conflicted (para 16).

#### Full text:

Form received by email

#### Change suggested by respondent:

The Plan should accurately identify the Orphanage Road site (rail depot and concrete batching plant) on the Policies Map so the area that is safeguarded and to which safeguarding policy applies is clear. It should ensure that any allocations or proposals for development in the Watford Junction area are required to ensure that the site and operations at the rail depot and concrete batching plant are safeguarded. This should clearly set out how this is to be achieved including through not permitting noise-sensitive development in close proximity to the site unless it can be demonstrated that sensitivity can be mitigated, and so potential adverse effects and prejudicing of the operation of the site is avoided. The supporting text for Site Allocations MU06 and MU07 should specifically include reference to safeguarding of the site, including the need to consult the Minerals Planning Authority on development within the MCA, the Agent of Change principle and that this may be applied through design, layout, orientation and fabric of new development to ensure that sensitivity to noise is mitigated and avoided. Policy ST11.2 and supporting text should also make clear that if the access to the rail depot and concrete batching plant is to be re-routed this must not result in any disruption to operations and exports from the site, which needs to be reflected in the text in Site Allocations MU06 and MU07. The boundaries of MU06 should be amended to exclude the sidings and access road that serve the facility, or the text is amended to ensure re-routing does not prejudice operations including export of material.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: Mineral Products Association\_Redacted - <https://watford.oc2.uk/a/mg>



2035

Comment

Respondent: IDA Plymouth Holdings  
Agent: Savills

## Summary:

We understand from the Final Draft Local Plan that the site has been included as an allocated site suitable for mixed use – reference TC019/MU11. The draft allocation has however only suggested an allocation for 72 residential units which considered to be extremely low for such a prominent and accessible site within the Core Town Centre area and a Highly Sustainable Area. This number of housing would be below the Council's average dwelling per hectare (dph) density for a site in the high sustainability areas which range from 95 – 350 dph. Based on the creation of 72 new homes in this location (given the land constraints of the borough outside the town centre) this would generate only 175 dph which is considered to be a sub-optimal approach to housing delivery in the most sustainable location and contrary to the aims and objectives of Paragraph 8 and Chapter 11 of the NPPF. Throughout our pre-application discussions with the LPA (ref 19/01468/PREAPP), it has been demonstrated that in principle, this site could accommodate a high density tall building scheme seeking to deliver between 200 – 300 new homes. It is noted from the Council's HELAA (2021) that only 14 sites were put forward during the call for sites. Our site was one of these and we are disappointed that given this low level of interest that our site was not considered to offer more potential and contribution towards the overall housing targets of the Borough. Section 3 of the HELAA sets out the methodology for the numbers that have been arrived at in each site allocation taking an average of the density ranges between each accessibility area and the site area. On the basis that our site has an area of 0.41 ha and lies in the highest suitability area within the town centre it would fall into the highest density range which has an average of 220 dph. Based on this calculation the site would generate a density average of 90 homes not 72 homes. Notwithstanding this, the Council have a significantly increased housing target of 793 units per annum compared to the existing 378 units per annum which has not been met over the last three years (or the last 12 years as admitted by the LPA in their HELAA) as confirmed by the 2020 Housing Delivery Test Results which means the NPPG paragraph 11 Presumption in Favour of Sustainable Development has been engaged. We note the Council's paragraph 4.4 of the HELAA which states, "This indicative housing numbers allocated for each site provided in Appendix A are not the required housing figures for an application that may come forward on these sites. The indicative yields are only to give a reasonable approximation of the capacity of the borough to meet the OAN, and is based on the density calculations described in Section 3." We recognise that the Council have only presented indicative density levels in order to meet their OAN however, where there is a clear case to increase the density of suitable and sustainable sites this should be recognised by the LPA.

## Full text:

Forms received via email

## Change suggested by respondent:

It is our strong opinion that further consideration is required by the Council to demonstrate they are able to achieve their new housing targets which may mean the consideration of further housing sites and increasing densities in key accessible and sustainable locations such as that at The Parade. As it stands we do not consider that the Final Draft Plan can be found to be positively prepared, justified or consistent with national policy on the basis of deliverability and with the NPPF. The intention is to create a taller building behind The Parade frontage to accommodate a high level of residential development alongside other suitable town centre uses and officers have confirmed within pre-application written responses that there is potential for a taller building on this site. We had previously requested that reference to the site being suitable for a taller building should be included within any future allocation for the site however this has not been put forward. We again request, based on officers pre-application advice, that specific reference is included within the draft allocation for a taller building subject to further design and townscape assessment.

Legally Not specified

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Issues and Options – 29 July 2019 and Preferred Options - 8 November 2019

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: IDA Plymouth Holdings Ltd - Watford Response Form 1\_Redacted - <https://watford.oc2.uk/a/mf>

IDA Plymouth Holdings Ltd - Watford Response Form 2\_Redacted - <https://watford.oc2.uk/a/mg>

2052

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

MU02 Land at 501 St Albans Road  
Hertfordshire County Council (HCC) as landowner supports the allocation of the site for mixed use including residential and community uses.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>

HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>

HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>

HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>

HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2054

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

MU19 Land to the west of and parallel to Ascot Road  
Hertfordshire County Council (HCC) as landowner supports the allocation of the site for residential led mixed use development.

## Full text:

Form received via email

## Change suggested by respondent:

-  
Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

#### Summary:

Site MU06 Land at Watford Junction

5.9 Given the importance of fully safeguarding the Orphanage Road facility, the requirements of the NPPF and the adopted and emerging Minerals Plan – appropriate and sufficiently detailed development requirements and considerations are required to ensure the WLP is 'sound'. It is acknowledged and welcomed that the final bullet point has been added to draft allocation MU06 – in response to representations previously made. This provides a good start and the retention of this text is supported.

5.10 The policy as currently drafted does helpfully include reference to needing to ensure that the layout of the scheme is designed to minimise any potential adverse impacts. The policy indicates that this may include 'locating non-residential floorspace at lower storeys'. Whilst this may be helpful along vehicular routes in particular not to have residential uses at ground floor level – it is important to note that higher level residential development if orientated toward the safeguarded facility could have uninterrupted views of the batching plant/rail unloading and aggregate storage areas and increased potential for noise disturbance. Changes are required to address this issue.

5.11 The proposed additions seek to additionally deal with the issue of the potential re-routing of the vehicle access to the safeguarded site on which the Site Allocation is entirely silent. This will require collaborative working with other surrounding landowners and the operator of the depot. Until that can be secured – appropriate access from Orphanage Road will need to be maintained which will by necessity traverse Site Allocation MU07.

#### Full text:

Form received via email

#### Change suggested by respondent:

The following changes are required with regard to the mapping of Site Allocation MU06:

- The boundary of Site Allocation MU06 should be amended to exclude the rail sidings which provide rail access to the safeguarded Orphanage Road rail aggregates depot.

- The boundary of the allocation site should be amended to exclude the current road access to the site - unless additional text is provided detailing what is required with regard to potential re-routing of the access which will require collaborative working with other land owners.

- Required changes to the 'Development requirements and considerations' are as follows:

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

Development proposals should:

- Support the wider objective....

- Facilitate the timely delivery of...

- Support the delivery of required...

- Demonstrate that safe access has been provided to the site

- Have regard to the safeguarded rail aggregates depot and concrete batching plant located in and adjacent to the north east

- boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;

- Ensure the layout of the scheme has been ~~planned, laid out and~~ designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot ~~and mitigation provided in line with the 'agent of change' principle.~~ This may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and/or providing buffer development between the sensitive uses and the safeguarded facility;

- Seek to work collaboratively with the landowners of sites MU07 and EM05, which are located adjacent and to the north east of the site, and the operator of the safeguarded rail aggregates depot and concrete batching plant to facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way. Until that is provided, appropriate vehicle access will be required to be maintained at all times from Orphanage Road;

- Seek to work collaboratively with the landowners of sites MU05 and MU07, which are located adjacent to the site, to maximise the benefits of development;

- Avoid significant harm to the setting of...

- Avoid significant adverse impacts on...

- Take account of potential impact on ...

- Take account of potential risk of....

- Be informed by a site specific Flood Risk Assessment...

- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant locate in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>

Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2077

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

Site MU07 Land and Buildings at Astral House

5.13 The changes required to the 'Development requirements and considerations' for Site Allocation MU07 mirror those required in respect of Site MU06. Similarly to Site Allocation MU06, it is acknowledged and welcomed that some reference has been made to the safeguarded facility and this text (final bullet point in the Draft Site Allocation) is supported. Other text provided for Site Allocation MU06 has not been reflected in MU07 and should be included both for consistency and to ensure a robust policy framework to support the safeguarding of the mineral infrastructure site.

## Full text:

Form received via email

## Change suggested by respondent:

Required changes to the 'Development requirements and considerations' are as follows:

The site is considered suitable for mixed-use development, including residential and employment uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Result in no net loss of employment...
- Have regard to the safeguarded rail aggregates depot and concrete batching plant located adjacent to the north west boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications.
- Ensure the scheme has been planned, laid out and designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the 'agent of change' principle. This may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and providing buffer development or screening between the sensitive uses and the safeguarded facility;
- Seek to work collaboratively with the landowners of sites MU06 and EM05, which are located adjacent to the south and east of the site, to maximise benefits of development. This should include working collaboratively with these landowners, and the operator of the safeguarded rail aggregates depot and concrete batching plant, to facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way;
- Demonstrate that...
- Facilitate the timely delivery....
- Take account of the potential impact...
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located ~~in~~ and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>  
Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

2209

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU05 Land and buildings at 94-98 St Albans Road

5.201 Children's Services (School Place Planning). Planning permission was granted on this site in November 2020 for 1,214 units, along with the signing of an associated Section 106 legal agreement that requires the developer to provide a 2fe primary school on land to the north of Penn Road. The primary school will cater for the pupil yield arising from the 1,214 units on this site. The county council has worked closely with the developer and the LPA to ensure the delivery of this primary school, along with an on-site multi-use games area and the use of a detached playing field, on land off Leavesden Road. Therefore, the requirement for a primary school to be located on this site, as stated within the supporting text, continues to be supported.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2210

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU06 Land at Watford Junction

5.202 Children's Services (School Place Planning). The requirement for a primary school to be located on this site, as stated within the supporting text, is supported. At Regulation 19 stage, the county council would expect to see a site identified for a new 3fe primary school within this allocation, in order to ensure deliverability. Although it is recognised that masterplanning has not progressed sufficiently to identify a site for a new primary school, the county council considers that subject to a masterplan being developed, the requirement for a new primary school is sufficiently covered within Strategic Policy CDA2.1: Watford Gateway Strategic Development Area, to deliver it (subject to the modifications that have been suggested to the policy).

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2211

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU16 Land at Tesco, Lower High Street

5.203 Children's Services (School Place Planning). The requirement for a primary school to be located on this site, as stated within the supporting text, is supported. At Regulation 19 stage, the county council would expect to see a site identified for a new 3fe primary school within this allocation, in order to ensure deliverability. Although it is recognised that masterplanning has not progressed sufficiently to identify a site for a new primary school, the county council considers that subject to a masterplan being developed, the requirement for a new primary school is sufficiently covered within Strategic Policy CDA2.3: Colne Valley Strategic Development Area, to deliver it (subject to the modifications that have been suggested to the policy).

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:

Sound: Yes

Comply with Yes  
duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2212

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU21 Land at Riverwell

5.204 Children's Services (School Place Planning). Outline planning permission was granted on this site in January 2015, along with the signing of an associated Section 106 legal agreement that set asides land within the site for a new 2fe primary school. Subsequent Section 106 agreements that have been signed, show the primary school site being within the south-eastern corner of Riverwell. As the site continues to be developed, with a number of units now constructed and occupied, the requirement for a primary school to be located on this site, as stated within the supporting text, is still required and continues to be supported.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2213

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: MU23: Land at ASDA, Dome Roundabout

5.205 Children's Services (School Place Planning). It is requested that a site is allocated for a 3fe primary school within this mixed use allocation, in the light of the need to cater for a potential shortfall that has been identified in the county council's comments to the education section in Chapter 10 of the final draft local plan.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Table 13.3: Employment sites 1928

## Comment

**Respondent:** GERALD EVE LLP

**Summary:**

Draft Site Allocation EM05

We have previously had correspondence with the place shaping team at the borough council in terms of the emerging Local Plan, which allocated this site for medium / high density employment led, mixed use development as part of the Watford Junction Strategic Development Area. The Site is also included within the Housing and Economic Land Availability Assessment (HELAA, September 2019) as a mixed-use site which has the ability to accommodate employment or housing growth.

LaSalle supports the principle of future growth in this sustainable location and considers that the Watford Gateway Strategic Development Area policy has been positively prepared. However, the railway line and nearby land uses act as a major physical barrier which currently prevents this land from being opened up to the nearby railway station and town centre without significant infrastructure investment, to which there are no known financial sources to meet these high capital strategic infrastructure costs.

Owing to the significant constraints faced in unlocking the bridge access across the railway line, it is considered unlikely that development at this side of the railway tracks will be achievable within the short term and that this is more realistic towards the end of the plan period (11-15 years +). LaSalle does support the aspirations of the Watford Gateway Strategic Development Area and the inclusion of its land within this, however, in the short term, it will likely need to redevelop the employment generating buildings to sustain its investment for the pension fund. Once it is clear how the new bridge crossing will be funded it could be considered suitable for larger scale mixed use development.

The draft allocation confirms that "this site is considered suitable for industrial uses". Given the wider industrial estate and the fact that the delivery of the wider regeneration area will take many years, LaSalle is currently progressing proposals for new, improved industrial buildings. It is therefore necessary for the policy to recognise this major infrastructure and funding constraint and to enable appropriate existing employment development to come forward within the next 1-5 years whilst it remains unclear how the infrastructure will be afforded to unlock the wider regeneration area.

The Watford Employment Land Review (2019) sets out that the wider industrial estate is the largest employment site in the borough and that vacancy rates are particularly low, at around 2%. Overall, the study found that there is scope across the borough for employment intensification at existing sites and the level of vacant floorspace across the borough is 5.22%, which is lower than the recommended market vacancy rates.

Based on the above we consider that in the short term there is a strong, identified need for the Site's continued allocation for employment use which supports the redevelopment of improved, energy-efficient industrial units that are suitable for modern occupiers but that this wouldn't prejudice the inclusion of the site for wider larger scale mixed use development in either the short or longer term.

Discussions have been held with the landowners of adjacent sites, including in relation to MU07 (Land and buildings at Astral House). We will continue to work with all local stakeholders to seek to deliver the longer-term development aspirations but this needs to be balanced against the needs of businesses now that make an important contribution to local employment opportunities and investment.

**Full text:**

Please see accompanying Covering Letter.

**Change suggested by respondent:**

On the basis of the above we would request the following amendments to the wording of draft policy allocation EM05:

- That the timescale provided for suitable industrial development is 1-5 years;
- That the second bullet point is supplemented to refer to wider redevelopment of the area later in the plan period (6-15 years) once the necessary infrastructure is in place which would enable this: "This site is considered suitable for mixed use development, including residential and employment uses..."

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Raise LPA:** Yes

**Raise LPA Why?:** We have made representations to both iterations of the plan preceding this version.

**Appear exam:** Not specified

**Attachments:** 210318 Watford BC Local Plan representation.pdf - <https://watford.oc2.uk/a/kq>

1977

Object

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

Summary:  
EM05

We have made representations to the following elements of the Local Plan:

- Para 2.14 - 2.22 and Policy CDA2.1
- Para 3.5 and Appendix B
- Para 11.15 and Policy ST11.2
- Allocation MU07
- Appendix C: transport Infrastructure Requirements, page 202

The comments made in respect of these elements of the plan provide evidence that justifies the requirement for the emerging local plan to safeguard a route via

Clive Way to facilitate access to a new Eastern Mobility Hub. The route for safeguarding is annotated on enclosed Plan SK08.

Full text:

-

Change suggested by respondent:

“Development requirements and considerations

This site is considered suitable for industrial uses.

Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Seek to work collaboratively with the landowner of site MU07, which is located adjacent to the west of the site, to maximise the benefits of development;
- ~~Not compromise Clive Way as a vehicle and active travel access route to a new eastern mobility hub which will include a multi-storey car park and bridge across the Abby Line to the station;~~
- Provide mitigation for any adverse impact resulting from the industrial uses on site in line with the 'agent of change' principle;
- Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required;
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations; and
- Take account of the potential risk of contamination on site.”

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>



2053

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

MU04 453 St Albans Road  
Hertfordshire County Council (HCC) as landowner supports the allocation of the site for mixed use including residential.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Not specified

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2078

Comment

Respondent: Aggregate Industries UK Ltd  
Agent: Firstplan Ltd

## Summary:

EM05 Land at Colonial / Clive Way  
5.15 The changes proposed to the 'Development requirements and considerations' mirror those required in respect for Site MU06 and MU07 with regard to road access re-routing.

## Full text:

Form received via email

## Change suggested by respondent:

Required changes to the 'Development requirements and considerations' are as follows:  
The site is considered suitable for mixed-use development, including residential and employment uses.  
Development proposals should:

- Support the wider objectives of the Watford Gateway Strategic Development Area;
- Seek to work collaboratively with the landowner of site MU07, which is located adjacent to the west of the site, to maximise the development benefits of development.
- Seek to work collaboratively with the landowners of sites MU07 and MU06, which are located to the south and south west of the site, and the operator of the safeguarded rail aggregates depot and concrete batching plant which is located the west of the site to facilitate re-routing of vehicle access to the safeguarded mineral site via Imperial Way.
- Demonstrate that safe pedestrian....
- Facilitate the timely delivery of ....
- Take account of.....
- Take account of....
- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant located ~~in and adjacent to the west of the site~~. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations.

Legally Yes  
compliant:  
Sound: No  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Representations were made by Firstplan on behalf of AI at Draft Watford Local Plan Issues and Options stage in October 2018 and First Draft Watford Local Plan Preferred Options stage in November 2019.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: Firstplan for Aggregate Industries UK Ltd - Form - <https://watford.oc2.uk/a/zj>  
Firstplan for AI\_Statement of Response\_ Watford Final Draft Local Plan\_12\_03\_21 - <https://watford.oc2.uk/a/zk>

## Table 13.4: Education facilities[10]

1819

Comment

Respondent: Sport England

## Summary:

No objection is made to this allocation on the basis of the development requirement that the loss of the disused playing fields on this former school site would be mitigated in accordance with the action plan in the Council's Playing Pitch Strategy.

## Full text:

No objection is made to this allocation on the basis of the development requirement that the loss of the disused playing fields on this former school site would be mitigated in accordance with the action plan in the Council's Playing Pitch Strategy.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: Yes

Raise LPA Why?: Preferred Options

Appear exam: Not specified

Attachments: None

2055

Object

Respondent: Hertfordshire County Council

Agent: Hertfordshire County Council

## Summary:

ED01 Former Meriden School

Hertfordshire County Council (HCC) as landowner does not support the allocation of the whole of this site for education. Only the land allocated for the detached playing field for Park Gate Junior School is available for this use. The 1.22 hectares shown on plan EM14096 is not available as it is being developed for a housing scheme with Herts Living Limited and Watford Community Housing Trust.

## Full text:

Form received via email

## Change suggested by respondent:

The removal of the land shown on plan EM14096 from the allocation. The policy wording should be amended as shown in Document 1 included with these representations:

ED01 Former Meriden School Site

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

Development proposals should:

- Provide appropriate mitigation for the ~~landed~~ detached playing field for Park Gate Junior School in line with the Playing Pitch Strategy (2020);
- Have regard to the Colne Way Waste Transfer Station, which is located directly west of the site. Mitigation for any negative impacts arising from the site's proximity to the waste site should be provided in line with the 'agent of change' principle;
- Complete a review of transport impact and safety as part of a full Transport Assessment which will include mitigation for pupils crossing the A41.

Pedestrian and cycle access should be taken from The Meadows to the north;

- Explore the potential for a pedestrian and cycle link across Meriden Park between the site and Garsmouth Way;

- Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network adjacent to the site; and

- Be accompanied by a Preliminary Ecological Appraisal.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2056

Support

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

ED02 Former Bill Everett Centre  
Hertfordshire County Council (HCC) as landowner supports the allocation of this site for education.

## Full text:

Form received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Not specified

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2057

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Land adjacent to Orchard Primary School  
Hertfordshire County Council (HCC) as landowner considers that the land adjacent to Orchard Primary School shown on Plan EM 14370 should be included for education use. This land was acquired by HCC to enable the school to expand from 2 to 3 forms of entry.

## Full text:

Form received via email

## Change suggested by respondent:

The site should be allocated for education use in Table 13.4 and on the Proposals Map.

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: No  
Appear exam: Appearance at the examination  
Oral exam why: n/a

Attachments: HCC Property Land at Harvest End map - <https://watford.oc2.uk/a/mt>  
HCC Property Land at Orchard Primary School map - <https://watford.oc2.uk/a/m3>  
HCC Property Proposed amended wording to Policy ED01 - <https://watford.oc2.uk/a/m4>  
HCC Property Response Form 1\_Redacted - <https://watford.oc2.uk/a/m5>  
HCC Property Response Form 2\_Redacted - <https://watford.oc2.uk/a/m6>

2214

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: ED01 Former Meriden School Site

5.206 Children's Services (School Place Planning). The allocation of this site for the development of an education facility is supported. The site is considered to be suitable for a new 3fe primary school, subject to detailed feasibility that will accommodate some of the additional pupil yield arising from the proposed site allocations that are contained within the final draft local plan. Prior to submission of the plan, additional dialogue is required with regard to the extent of the site.

5.207 Minerals and Waste Planning. Reference to the site's close proximity to the Colne Valley Waste Transfer Station is supported, including references to the 'agent of change principle' which is outlined in the NPPF.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

2215

Comment

Respondent: Hertfordshire County Council  
Agent: Hertfordshire County Council

## Summary:

Site: ED02 Former Bill Everett Centre

5.208 Children's Services (School Place Planning). The allocation of this site for the development of an education facility is supported. The site is considered to be suitable for a new 3fe primary school, subject to detailed feasibility that will accommodate some of the additional pupil yield arising from the proposed site allocations that are contained within the final draft local plan.

## Full text:

Form and document received via email

## Change suggested by respondent:

-

Legally Yes  
compliant:  
Sound: Yes  
Comply with Yes  
duty:  
Raise LPA: Yes

Raise LPA Why?: Hertfordshire County Council made representations to the consultation on the Regulation 18 First Draft Watford Local Plan in November 2019, where a number of comments were made against the draft policies, supporting text and sites contained within it. Additional comments were made as part of the duty to co-operate, prior to the publication of the Final Draft Local Plan in January 2021. Additional comments, including in relation to the IDP have been made to the Regulation 19 Final Draft Local Plan.

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: None

## Appendix A: Draft Monitoring Framework

1820

Object

Respondent: Mr Richard Foskett

## Summary:

The plan has "targets". Some need to be mandatory requirements. Especially those around environment and sustainability. Some may be mutually opposed. e.g more development in flood zones. Where is the sacrificial flood land zone ? Ownership of the target is not mentioned, nor sanctions for non achievement. Some of the targets are not quantified. Just say "reduce"  
A good plan needs a risk assessment. What are they, how will they be mitigated, etc.

## Full text:

The plan has "targets". Some need to be mandatory requirements. Especially those around environment and sustainability. Some may be mutually opposed. e.g more development in flood zones. Where is the sacrificial flood land zone ? Ownership of the target is not mentioned, nor sanctions for non achievement. Some of the targets are not quantified. Just say "reduce"  
A good plan needs a risk assessment. What are they, how will they be mitigated, etc.

## Change suggested by respondent:

Add columns for

- "stretch target" - useful where more is better e.g. building insulation standards.
- Requirements. move key targets into the requirement column
- ownership/ responsible for target achievement.
- sanctions available for missed target/requirement

Add a section on risk of frustration by developers/central government . e.g. where local plan is over-ruled to detriment of the targets. Please add.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: No

Appear exam: Written Representation

Attachments: None

## Appendix B: Housing Trajectory

1918

Support

Respondent: Three Rivers District Council

## Summary:

The housing trajectory is supported subject to the following comments:

A separate table clearly setting out the 5 Year Housing Supply from adoption would be useful, as the Plan needs to be able to demonstrate a 5 year supply of deliverable housing to be found sound. The figures demonstrate that this would be achieved, however a separate table would add clarification.

A windfall allowance has been included in the trajectory from year 4 of the plan period where as planning practice guidance indicates that windfall should only be included for years 6-15 of the plan period.

## Full text:

The housing trajectory is supported subject to the following comments:

A separate table clearly setting out the 5 Year Housing Supply from adoption would be useful, as the Plan needs to be able to demonstrate a 5 year supply of deliverable housing to be found sound. The figures demonstrate that this would be achieved, however a separate table would add clarification.

A windfall allowance has been included in the trajectory from year 4 of the plan period where as planning practice guidance indicates that windfall should only be included for years 6-15 of the plan period.

## Change suggested by respondent:

-

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

Raise LPA: No

Appear exam: Not specified

Attachments: None

1973

Object

Respondent: Canada Life Asset Management  
Agent: Williams Gallagher

## Summary:

Paragraph 3.5 identifies that the delivery of new homes over the plan period is set out in the housing trajectory (Appendix B) which forecasts the anticipated delivery of new homes each year to 2036. Further to our response to paragraphs 2.14 – 2.22 and Policy CDA2.1, which explains the need for an alternative and more flexible approach to redevelopment of land to the east of the Abbey Line within the SDA, it will be necessary for the trajectory to be amended. The amendment to the trajectory should only count residential development for MU07 under potential windfalls. This is because following landowner discussions, we no longer consider that MU07 will be in a position to guarantee housing delivery at a point in the plan period which can be defined. That is not to say that the opportunity for housing should be excluded from the site allocation, but it can only be capable of consideration if the batching plant is relocated or subject to significant environmental improvements and there is a wider mixed-use development forthcoming with adjacent landowners. In advance of these circumstances aligning, redevelopment for solus employment uses, while safeguarding space to the south of allocation MU07 (in conjunction with MOU6) for a MSCP and sustainable transport hub, is now the most appropriate approach to defining development for MU07.

## Full text:

-

## Change suggested by respondent:

The alterations to the site allocation for MU07 are set out as a separate representation.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: These responses were raised in advance of the representations being submitted with Julian Hart (Interim Senior Regeneration Consultant) during ongoing dialogue between Canada Life, Watford Borough Council and landowners within the Strategic Development Area.

Appear exam: Appearance at the examination

Oral exam why: N/A

Attachments: Canada Life\_Redacted - <https://watford.oc2.uk/a/z8>

2093

Object

Respondent: North Western Avenue Watford Ltd  
Agent: Woolf Bond Planning

## Summary:

See letter for details

The Plan therefore as currently prepared in not sound with respect of:

- a) It is not consistent with NPPF paragraph 22 regarding the requirement for strategic policies to look ahead over a minimum 15 year period from adoption; and
- b) It is not justified as the evidence does not support the Council's expectations of housing delivery in respect of windfalls;

## Full text:

Form and letter received via email

## Change suggested by respondent:

See letter for details

The housing trajectory in appendix B would need to be revised taking on board the 116 dpa windfall allowance

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Raise LPA: Yes

Raise LPA Why?: Through responses at each of the earlier stages

Appear exam: Appearance at the examination

Oral exam why: n/a

Attachments: North Western Avenue Watford Ltd Planning Reps - <https://watford.oc2.uk/a/nz>

North Western Avenue Watford Ltd Supporting Appendices (A to N) - <https://watford.oc2.uk/a/nm>

North Western Avenue Watford Ltd Response Form\_Redacted - <https://watford.oc2.uk/a/nn>

## Appendix C: Transport Infrastructure Requirements

1934

Comment

Respondent: Cassiobury Residents' Association

## Summary:

The proposed crossing improvements at the Hempstead Road / Stratford Way junction to improve connectivity for cyclists should not be at the expense of pedestrian convenience or safety; there are potential blind corners in this proposal and pedestrian amenity and safety should be given the first priority.

## Full text:

The proposed crossing improvements at the Hempstead Road / Stratford Way junction to improve connectivity for cyclists should not be at the expense of pedestrian convenience or safety; there are potential blind corners in this proposal and pedestrian amenity and safety should be given the first priority.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1935

Comment

Respondent: Cassiobury Residents' Association

## Summary:

re proposed: Enhanced cycle infrastructure along Hempstead Road: such should not be to the detriment of residents' amenity or safety. This is a tree-lined road, with several blind corners at intersections, and the introduction of any cycle infrastructure must not compromise either pedestrians' safety and well-being, or that of residents using their driveways from their homes to access the main road.

## Full text:

re proposed: Enhanced cycle infrastructure along Hempstead Road: such should not be to the detriment of residents' amenity or safety. This is a tree-lined road, with several blind corners at intersections, and the introduction of any cycle infrastructure must not compromise either pedestrians' safety and well-being, or that of residents using their driveways from their homes to access the main road.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

## Appendix F: Marketing Requirements

1856

Comment

Respondent: CAMRA (Watford &amp; District Branch)

## Summary:

This sentence is ambiguous:

"Where the premises are in poor condition or have been partially demolished, the exercise should be limited to marketing of the site as a potential redevelopment site to reflect the existing use."

Does it mean that, for example, a pub that is in poor condition or partially demolished must nevertheless be marketed for redevelopment as a pub ("to reflect the existing use")? CAMRA would applaud that because our concern is that pubs could be 'run down' deliberately to make them seem unviable in the eyes of the planning authorities and therefore more suitable for redevelopment.

## Full text:

This sentence is ambiguous:

"Where the premises are in poor condition or have been partially demolished, the exercise should be limited to marketing of the site as a potential redevelopment site to reflect the existing use."

Does it mean that, for example, a pub that is in poor condition or partially demolished must nevertheless be marketed for redevelopment as a pub ("to reflect the existing use")? CAMRA would applaud that because our concern is that pubs could be 'run down' deliberately to make them seem unviable in the eyes of the planning authorities and therefore more suitable for redevelopment.

## Change suggested by respondent:

-

Legally Not specified  
compliant:  
Sound: Not specified  
Comply with Not specified  
duty:  
Raise LPA: No  
Appear exam: Not specified  
Attachments: None

1857

Comment

Respondent: CAMRA (Watford &amp; District Branch)

## Summary:

In the Press Advertisement section, the draft plan states that adverts for small community facilities should be placed and maintained in the local newspaper. Public houses of all sizes are normally advertised for sale in specialist publications (e.g., the Morning Advertiser) and through specialist agents. The advert would risk not being seen by relevant potential buyers if it were only advertised in the local newspaper. Therefore, we recommend that this bullet point is modified so it's clear that public houses of all sizes should be advertised in the relevant specialist media.

## Full text:

In the Press Advertisement section, the draft plan states that adverts for small community facilities should be placed and maintained in the local newspaper. Public houses of all sizes are normally advertised for sale in specialist publications (e.g., the Morning Advertiser) and through specialist agents. The advert would risk not being seen by relevant potential buyers if it were only advertised in the local newspaper. Therefore, we recommend that this bullet point is modified so it's clear that public houses of all sizes should be advertised in the relevant specialist media.

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: It was raised in our representation to the draft Watford Plan in November 2019.

Appear exam: Not specified

Attachments: None

1858

Comment

Respondent: CAMRA (Watford &amp; District Branch)

## Summary:

The appendix in the draft states that properties should be marketed for 12 months, but we would like properties to be marketed for 24 months, as CAMRA's Model Planning Policy recommends.

The value of the property should result from independent professional valuation. We recommend that the wording is changed as follows:

- Guide Price - this should be commensurate with the current market price for comparable premises. It is expected that the value of the property will be derived from an independent expert RICS registered value or independent accredited member of RICS (Royal Institute of Chartered Surveyors).

## Full text:

The appendix in the draft states that properties should be marketed for 12 months, but we would like properties to be marketed for 24 months, as CAMRA's Model Planning Policy recommends.

The value of the property should result from independent professional valuation. We recommend that the wording is changed as follows:

- Guide Price - this should be commensurate with the current market price for comparable premises. It is expected that the value of the property will be derived from an independent expert RICS registered value or independent accredited member of RICS (Royal Institute of Chartered Surveyors).

## Change suggested by respondent:

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Raise LPA: Yes

Raise LPA Why?: We raised it in our representation to the draft plan in November 2019.

Appear exam: Not specified

Attachments: None



## **Appendix A:**

**Representations received after 18 March 2021**

2219

Comment

**Table 13.2: Mixed use sites****Respondent:** National Grid [470]**Agent:** National Grid (Matt Verlander) [3866]**Date received:** 29/03/2021 via Email**Summary:**

Proposed development sites crossed or in close proximity to National Grid assets:

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.

Details of the sites affecting National Grid assets are provided below.

Strategic Development Site MU18

Asset Description: ZC ROUTE (TWR 116A - 142): 275Kv Overhead Transmission Line route: ELSTREE - WATFORD SOUTH 1 33Kv Underground Cable route: ELSTREE 400KV S/S Electrical Substation: BUSHEY TRACKSIDE 25KV

ZC ROUTE (TWR 116A - 142): 275Kv Overhead Transmission Line route: ELSTREE - WATFORD SOUTH 1

A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

**Full text:**

Submission received after close of consultation

**Change suggested by respondent:**

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

<https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Raise LPA:** Not specified**Appear exam:** Appearance at the examination**Oral exam why:** n/a**Attachments:** National Grid\_Redacted - <https://watford.oc2.uk/a/yc>National Grid Plan\_Redacted - <https://watford.oc2.uk/a/yd>

2220

Object

**Policy VT5.3: Local Centres****Respondent:** Kentucky Fried Chicken (Great Britain) Limited [4140]**Agent:** Kentucky Fried Chicken (Great Britain) Limited (Mr Steve Simms, Director) [4139]**Date received:** 24/03/2021 via Paper

**Summary:****POSITIVELY PREPARED**

1. The draft policy is not based on any objectively assessed development requirement, but instead implies that no hot food takeaways (HFTs) will be required in locations that happen to be within 400 metres of the entrance of primary schools over the Plan Period. It does this without evidence of: (a) existing numbers of HFTs in such areas or the wider district, (b) the effect of the policy on numbers such areas or the district, (c) any link between obesity incidence and proximity of HFTs to primary schools or (d) any particular distance at which incidence increases or is harmful.
2. No mapping is provided or other assessment made to establish the areas or population affected the distance chosen has the effect of banning HFTs from a large majority of the district. Because no assessment has been made of the number of HFTs that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts.
3. The policy is an area-based blanket ban and is negative in its assumption that all HFTs offer little choice and serve food of the same nutritional value. This is unfair to those that engage positively to offer healthy choices and therefore acts as a disincentive to do so where established businesses compete negatively.
4. Increasingly, district and local centres depend upon the presence of experiential (that is, difficult or impossible to replace online) or 'serendipitous' uses (that is, unlikely to generate a specific trip) to draw in and maintain the footfall to support remaining non-experiential uses.
5. An inability to operate such uses will result in not only their loss and resulting additional and longer trips by car, but also the loss of the remaining convenience stores and other non-experiential uses close by.

Each zone covers 50 hectares, containing typically around 1,000 households. This amounts to a significant spend lost and car journeys caused.

**JUSTIFIED**

1. Neither the supporting text nor the evidence base provide any information to show that the incidence of overweight or obesity in the district is above average or increasing.
2. Consequently, it is difficult to draw any conclusions from the evidence as to the effect of particular land uses or their proximity to others on the attainment of healthy diet and weight. Clearly, diet is a key determinant both of general health and obesity levels, but its predictors are far more complex than the environment around schools.
3. Whilst some HFTs, together with restaurants, pubs and shops are a source of cheap, energy dense and nutrient poor foods, not all of them are, and the planning system is ineffective in distinguishing between those that are and those that are not. Indeed, in some respects, pubs and restaurants can often be worse (Robinson et al, 2018).
4. Planning Inspectors at appeal (APP/P4415/A/11/2159082) have found that refusing HFTs within 400 metres of primary schools cannot be justified. This is because such policies tend to be justified as countering the vulnerability of unaccompanied children to making poor diet choices. However, primary school children are rarely unaccompanied.
5. Sometimes, local evidence can demonstrate a correlation between the density of food and drink uses in a given geography and incidence of overweight or obesity. Policies related to limiting over-concentration of these uses within a specified area might be justified, but the evidence on proximity specifically as a factor is weak and conflicting.
6. Typically, where similar policies have been adopted elsewhere in the United Kingdom, it has been as a result of very high and increasing incidence coupled with proliferation of the use controlled, together outweighing limited evidence of effectiveness. It is also often the case that, where adopted, no objections have been made.

**EFFECTIVE**

1. In the past, systematic reviews (Williams et al, 2014) have found very little evidence for an effect of the retail food environment surrounding schools on food purchases and consumption, so it is at best unclear whether an effort to attain healthy diets and weights based on refusing HFTs within 400 m of primary schools could ever work.
2. As discussed in Williams et al (2004), the methods for defining and measuring the food environment vary widely between studies and few consistent findings emerge. The premises studied rarely, if ever, map across to actual use classes or specific land uses, making it near-impossible to conclude whether HFTs

are a particular problem.

3. The specific focus on primary schools is very unlikely to be effective, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are properly the responsibility their parents or guardians.

4. In such a relatively small district with numerous primary schools, the area affected is a significant proportion of the Borough, so it is hard to see how the effectiveness of its extent could be monitored.

Would poor or negative achievement against the objective result in reduction or expansion of the zones?

What other corrective action might be taken short of their withdrawal?

5. Exercise is also a key determinant that must be considered for a complete picture. Access to open space, sport and recreation facilities is a longstanding and achievable output of the planning system.

Directing resources to this and targeted lifestyle interventions would likely be a far more effective strategy for reducing childhood obesity.

**CONSISTENT WITH NATIONAL POLICY**

1. The National Planning Policy Framework (NPPF) recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to open space, sport and recreation facilities and health services, and ensuring developments are within walkable distance.

2. The NPPF requires policies to be sound, assessed against tests, including justification (which requires evidence that there is problem that can be solved by planning policy) and effectiveness (which requires at least reasonable correlation and a potential mechanism of action between the thing controlled and outcome sought).

3. The NPPF requirements are not overridden by Planning Practice Guidance (PPG) paragraph 4 of part 53, which suggests consideration of a list of issues, including high incidence of obesity and overconcentration of certain uses (implicitly food and drink, not necessarily HFTs) in proximity to locations where children and young people gather.

**REFERENCES**

Robinson E, Jones A, Whitelock V, Mead BR, Haynes A, (Over)eating out at major UK restaurantchains: observational study of energy content of main meals. BMJ 2018; 363: 4982

Williams J, Scarborough P, Matthews A, Cowburn G, Foster C, Roberts N and Rayner M, A systematic review of the influence of the retail food environment around schools on obesity-related outcomes. Obes Rev 2014; 15: 359-374

**Full text:**

Form received via post after close of consultation

**Change suggested by respondent:**

Delete part (f) of the policy and amend or provide evidence for part (g).

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Raise LPA:** No

**Appear exam:** Appearance at the examination

**Oral exam why:** n/a

**Attachments:** KFC\_Redacted - <https://watford.oc2.uk/a/yw>