

# **Report to Watford Borough Council**

**by William Fieldhouse BA (Hons) MA MRTPI**

an Inspector appointed by the Secretary of State

Date: 20 September 2022

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

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

The Plan was submitted for examination on 6 August 2021

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

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## **Abbreviations used in this report**

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

## **Evidence and Examination Documents**

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

## Non-Technical Summary

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

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

The main modifications can be summarised as follows:

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

## Introduction

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

## Main Modifications

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

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<sup>1</sup> SUB1.

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

## **Policies Map**

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted plan. In this case, the relevant document is the Final Draft Policies Map A0 Consultation Version that was submitted in August 2021<sup>2</sup>.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published main modifications to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
7. These further changes to the policies map were published for consultation alongside the main modifications: Policies Map: Suggested Modifications to Support the Schedule A Proposed Main Modifications (Fourth iteration)<sup>3</sup>.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Final Draft Policies Map A0 Consultation Version and the further changes published alongside the main modifications.

## **Context**

### **The Borough and its surroundings**

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

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<sup>2</sup> SUB2.

<sup>3</sup> ED54A.

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

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

## **The statutory development plan**

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

## **Public Sector Equality Duty**

12. The Council carried out an Equalities Impact Analysis to inform the preparation of the Plan<sup>4</sup>.
13. I have had due regard to the three aims expressed in section 149(1) of the Equality Act 2010 and in particular considered how the Plan's policies and proposals are likely to affect people from groups with "protected characteristics"<sup>5</sup>. This has involved my consideration of several matters during the examination including those relating to different types of housing need, including for people with disabilities, the elderly, and travellers; achieving sustainable design; improving accessibility and infrastructure for public transport, walking and cycling; and protecting and providing education, health and other

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<sup>4</sup> SUB11.

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



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

## **Assessment of the Duty to Cooperate**

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
15. The Council's Duty to Cooperate Statement of Compliance and statements of common ground<sup>6</sup> set out the cross boundary strategic matters that the Council considered during the preparation of the Plan and how it addressed them through working with other local authorities and relevant prescribed bodies. The strategic matters included housing, employment, transport, education, health, waste, minerals, and waste water infrastructure. The activities undertaken aimed at achieving effective cooperation included joint studies, working groups, ongoing liaison with statutory consultation bodies, and specific duty to cooperate meetings.
16. The policies and proposals in the Plan reflect the outcome of the joint-working on the strategic matters, and none of the prescribed bodies or other relevant organisations have indicated that they are dissatisfied with their liaison with the Council. Thus, whilst there are a number of soundness issues related to some strategic matters that I consider in subsequent parts of this report, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and complied with the duty to cooperate.

## **Assessment of Other Aspects of Legal Compliance**

17. The Plan has been prepared in accordance with the Council's Local Development Scheme<sup>7</sup>.
18. The Council published a Statement of Community Involvement in July 2017 and updates in November 2019 and October 2020<sup>8</sup>. The Council's Regulation 22(1)(C) Statement and Consultation Summary<sup>9</sup> set out how it has involved residents and other stakeholders in preparing the Plan, including through three consultation exercises

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<sup>6</sup> ED3 to ED8.

<sup>7</sup> SUB13.

<sup>8</sup> SUP2, SUP4 and SUP5.

<sup>9</sup> SUB12 and SUB14.

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

19. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under regulation 19<sup>10</sup>. The appraisal used a systematic framework and proportionate available data to assess emerging policies and potential allocations, along with reasonable alternatives, throughout the preparation of the Plan. Potential impacts, including cumulative impacts, on defined sustainability objectives and, where necessary, mitigation measures were identified. The findings of the appraisal were used by the Council to inform decisions about the content of the Plan. The appraisal was updated to assess the main modifications and a report was published for consultation<sup>11</sup>.
20. The Council's Habitat Regulations Assessment Screening Reports<sup>12</sup> demonstrate that the Plan would not result in an adverse impact on the integrity of any relevant protected sites (the nearest of which is at least 19.5 km from the Borough) and therefore an appropriate assessment is not necessary.
21. The development plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the Borough. Those priorities are meeting housing needs within the Borough; retaining the town's pre-eminent economic role in the sub-region, both in terms of providing employment and main town centre uses; and delivering infrastructure to support high levels of household and employment growth.
22. The Plan's overall spatial strategy (policy SS1.1) and various specific requirements, including in policies CC8.1 to CC8.5, NE9.1 to NE9.8 and ST11.1 to ST11.6, ensure that the development plan, as a whole, includes policies designed to secure that the development and use of land in the Borough contribute to the mitigation of, and adaptation to, climate change.
23. Appendix H in the Plan identifies the policies in the Watford District Plan 2000 and the Core Strategy 2006-2031 that will be superseded

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<sup>10</sup> SUB3 to SUB9.

<sup>11</sup> ED58, ED58/1 and ED58A to ED58F.

<sup>12</sup> SUB10 and ED59.

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

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

## **Assessment of Soundness**

### **Main Issues**

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

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

#### **Plan period**

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

#### **Household growth and housing requirement**

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

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

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

### **Additional industrial, warehouse and office floorspace**

29. Proportionate and up-to-date evidence<sup>13</sup> indicates a need for a total of 188,000 sqm of additional office floorspace and 481,500 sqm of additional industrial and warehouse floorspace in South West Hertfordshire. Of that need, 37,600 sqm of office floorspace and 98,400 sqm of industrial and warehouse floorspace are required in Watford. In order to ensure that the Plan is justified, the reasoned justification to policy EM4.1 needs to be modified to refer to the floorspace requirements in Watford [**MM83**].
30. The Plan refers to the creation of 11,500 new jobs. However, the basis for that figure, the time period to which it relates, and its relationship with the identified need for additional office, industrial and warehouse floorspace are not clear. Furthermore, specifying a potential number of new jobs does not make clear how a decision maker should react to a development proposal. Policies SS1.1 and EM4.1 and Appendix A therefore need to be modified to delete reference to 11,500 jobs to ensure the Plan is effective and justified [**MM13, MM85** and **MM245**].

### **Conclusion**

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

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

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

32. The Council's Local Plan Viability Assessment 2021<sup>14</sup> provides up-to-date and proportionate evidence about the economic viability of development that is consistent with national policy and guidance. The types of development tested reflect the allocations in the Plan and windfall proposals that are likely to come forward. Reasonable assumptions are made about development values and costs, including those associated with policy requirements in the Plan. Whilst an additional cost for providing electric vehicle charging points in residential developments was not factored in, this would not make a significant difference to the overall findings of the assessment that I describe below<sup>15</sup>.
33. The evidence shows that the majority of housing and mixed use allocations are likely to be viable assuming that all relevant policy requirements are met<sup>16</sup>. However, despite that, nearly 4,000 of the new homes proposed in the Plan are on allocations that the evidence indicates may not be viable unless fewer affordable homes are provided than required by policy HO3.3. I consider whether that policy is sound later in this report, but in summary I conclude that subject to a main modification it will be effective in securing the maximum amount of affordable housing whilst being flexible enough to avoid preventing schemes coming forward due to poor viability.

### **Conclusion**

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

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<sup>14</sup> VIA1.

<sup>15</sup> Oral evidence by the Council at the hearing session on 9 February 2022.

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

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

#### **The spatial strategy**

35. The identified need for 784 additional homes per year compares with an historic average completion rate of under 380 homes per year. A number of spatial options to accommodate these homes, and economic development, were considered and assessed during the preparation of the Plan. However, the built-up nature of the Borough means that realistic opportunities for accommodating such a scale of development are extremely limited. This is exemplified by the fact that every site that was identified as being available and suitable is allocated in the Plan following a thorough process that involved consideration of all undeveloped land, including Green Belt, as well as opportunities on currently and previously developed land.
36. The spatial strategy is described as transformational in policy SS1.1 and illustrated on the Key Diagram (Figure 1.2). It aims to make efficient use of the limited sites that are available and maximise opportunities to use sustainable forms of transport by focussing 80% of development in the Core Development Area based on and around the town centre. Detailed proposals for the implementation of the strategy in the Watford Gateway, Town Centre, and Colne Valley Strategic Development Areas, that collectively make up the Core Development Area, are set out in policies CDA2.1 to CDA2.3 and the development requirements for allocated sites.
37. All of the allocated sites in the Core Development Area are brownfield, most being in active use comprising buildings of varying quality and/or surface car parks. The strategy requires high density development, including through new buildings that will be significantly taller than existing prevailing heights. Heritage Impact Assessments<sup>17</sup> conclude that development of this nature can be designed such that there would be no, or less than substantial, harm to heritage assets. However, a number of modifications are needed to the policies relating to the three Strategic Development Areas and the development requirements for the relevant allocations so that the

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<sup>17</sup> ED32A to ED32K.

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

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

## **Green Belt**

41. The detailed wording of policy SS1.1 needs to be modified so that it is consistent with national policy relating to inappropriate development in the Green Belt only being approved in very special circumstances [**MM15**].
42. The Council carried out a systematic two-stage Green Belt assessment during the preparation of the Plan to inform decisions about whether changes needed to be made to help meet development needs or for other reasons<sup>18</sup>. Based on that, and other site specific information, the Plan removes a limited amount of land from the Green Belt in five locations.

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<sup>18</sup> ENV4 and ENV5.

43. In three of those cases, the physical character of the land has changed significantly due to development that has taken place such that it no longer serves any Green Belt purpose. Furthermore, retaining the designation would not provide an effective policy approach for considering any proposals for further development that may come forward in those locations during the plan period.
  
44. Land at Tolpits Lane is now an established gypsy and traveller site. An adjoining area will form an extension to that site to ensure that the identified need for an additional two pitches can be met in a suitable location. National policy allows for limited alterations to the Green Belt to meet specific identified needs for traveller accommodation<sup>19</sup>.
  
45. Land to the north of the A41 on the Borough boundary now forms part of a large film studio complex. It no longer serves any Green Belt purpose. To the south of this is a small field that is essentially contained by the A41, Hempstead Road, and the existing urban area. It is available now and suitable for the development of around 90 dwellings and included in the Plan as housing allocation HS06 Russell Lane. Significantly, the site provides a rare opportunity for the development of new family homes with gardens, rather than high density flats. The proposal would be likely to have an overall low to moderate effect on Green Belt purposes. Subject to a modification, the development requirements for the site in chapter 13 would be effective and consistent with national policy with regard to securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt [**MM180**]. The harm that the development would cause would clearly be outweighed by the significant benefits that the proposal would bring in helping to meet housing needs. That is particularly so in light of my findings later in this report about the difficulties in fully meeting those needs due to land constraints.
  
46. To the south and south east of housing allocation HS06 Russell Lane is a school, woodland and recreation ground that are enclosed by the existing urban area and that allocation. None of that land would continue to serve a Green Belt purpose once the allocation is developed.

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<sup>19</sup> Planning Policy for Traveller Sites (2015) policy E.



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

## **Conclusion**

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

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

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

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

53. Development of allocation MU05 St Albans Road, in the north west corner of the Area, is now underway following the granting of planning permission for 1,214 dwellings, a primary school, and nearly 2,500 sqm of commercial and office floorspace. Allocations MU08 Station Road and EM01 Cassiobury House also now have planning permission, and a scheme is being progressed for allocation MU09 Watford Police Station on Clarendon Road which is likely to be redeveloped in the next few years.
54. Allocations MU07 Astral House and EM05 Colonial Way/Clive Way, which are to the east of the two railway lines, are expected to remain in industrial use for the much of the plan period. Indeed, both sites are likely to be redeveloped with new industrial units in the short term. Whilst there is a possibility of these sites becoming available for mixed use redevelopment towards the end of the plan period, this would be dependent on various factors, not least the development of allocation MU06 Watford Junction immediately to the west.
55. Allocation MU06 Watford Junction comprises the railway station, a multi-storey car park, extensive surface level car parks, and the rail aggregates depot and concrete batching plant. The aggregates depot and concrete plant is an important facility of at least sub-regional significance which is safeguarded in the Hertfordshire Minerals Local Plan and expected to remain in situ throughout the plan period and beyond. Residential and commercial development nearby would be required to provide suitable mitigation through the agent of change principle in accordance with policy CC8.5 and national policy<sup>20</sup>.
56. There are currently no specific proposals for developing allocation MU06 but it is supported by the landowners and they, the Council, and other relevant parties are working to deliver a scheme in the medium to longer term. Key will be the provision of a new multi-storey car park as part of a new "mobility hub" to the east of the railway lines with road access from the east and a new pedestrian and cycle bridge over the railways. This would allow high density residential and commercial development on the existing surface car

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<sup>20</sup> NPPF 187.

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

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

## **Conclusion**

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

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

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

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

## **Conclusion**

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

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

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

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

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

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

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

73. The Council carried out initial work in 2021 as a first step in the preparation of a masterplan for the Lower High Street area<sup>21</sup>. In order for policy CDA2.3 to be effective in helping to deliver the transformation of that area over the plan period and beyond, a modification is needed to refer to the Council preparing a Masterplan Supplementary Planning Document for the Lower High Street area. Proposals would be required to have regard to the masterplan and demonstrate how they contribute to the coordinated delivery of development, do not inhibit the delivery of other sites, and do not compromise future development opportunities that could make a positive contribution towards the objectives set out in policy CDA2.3 [**MM49, MM51 and MM53**]. The weight to be attached to the Masterplan Supplementary Planning Document would depend on its status in accordance with national policy; this does not need to be repeated in the Plan.
74. The Council advised during the examination that the preparation of a masterplan is a priority, and that it is likely to be adopted within two years. Given that the large allocations around Lower High Street, and potentially windfall sites, are expected to come forward in the medium and longer term the masterplan should be in place to effectively coordinate development along with the significant improvements to the built environment, public realm and connectivity for pedestrians, cyclists and public transport that will be required.
75. A number of other changes to policy CDA2.3, the reasoned justification, and the development requirements for the relevant allocations are needed. Those modifications relate to various matters including the protection of heritage assets and improvements to transport infrastructure [**MM47, MM48, MM52, MM55, MM185 to MM188, MM190, MM219 to MM221, MM223 to MM225, MM231, MM232 and MM237**]. This will ensure those policies are effective and justified.
76. Whilst, for commercial reasons, there may be no intention to redevelop the Tesco building in the foreseeable future, it is not necessary to amend the policies map to exclude that part of the site from allocation MU16. This is because circumstances may change in the medium or longer term and, irrespective of whether the building remains or is redeveloped, it would need to be taken into account in the design and layout of any schemes on other parts of the allocation and in the wider area. Nor does the indicative yield for the site need

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

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

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

## **Conclusion**

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

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

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



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

## **Housing and mixed use allocations**

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

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

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

## **Commitments**

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

## **Windfalls**

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

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

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

### **Overall housing land supply for the plan period**

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

### **Five year housing land supply**

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

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

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

## **Conclusion**

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

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

### **Affordable housing**

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

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

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

102. Policy HO3.3 expresses the 35% affordable housing requirement in terms of the number of habitable rooms. This provides flexibility and has the potential to increase the supply of affordable homes with three or more bedrooms to address the growing need amongst families with dependent children. However, for effectiveness, a modification is required to the reasoned justification to explain this element of the policy [**MM65**].
103. The requirement in policy HO3.3 for 60% of affordable homes to be for social rent reflects the identified need for that tenure of affordable housing whilst ensuring consistency with national policy relating to affordable home ownership<sup>23</sup>. However, a main modification is required to the reasoned justification to clarify the approach [**MM66**]. Whilst the Plan was prepared prior to the introduction of national policy relating to First Homes, the tenure split in policy HO3.3 would allow such products to be brought forward along with other forms of affordable home ownership as appropriate.
104. Subject to the main modifications I have described, the Plan should be effective in securing the maximum amount of affordable housing to help meet identified needs in a way that is consistent with national policy whilst maintaining the viability of development.

## **Dwelling size**

105. Around one third of households in the Borough have one or more dependent children and that proportion is expected to increase over the plan period<sup>24</sup>. National policy expects the needs of families with children to be reflected in local plans, and the Plan should seek to achieve balanced communities in all parts of the Borough. There is

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<sup>23</sup> NPPF 65.

<sup>24</sup> Council response to PQ21.

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

106. Policy HO3.10 requires all new homes to meet or exceed the nationally described space standards. This carries forward a requirement previously set out in a supplementary planning document<sup>25</sup> that has been implemented successfully for a number of years. Given the Plan's reliance on high density development, much of which is expected to be in the form of apartment blocks with less outside space than detached and semi-detached houses, it is particularly important for the minimum internal space standards to be achieved to ensure satisfactory living conditions.

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

107. Policy HO3.11 requires the provision of private outdoor amenity space for all dwellings, ranging from a minimum of 5 sqm for one bedroom apartments to 25-40 sqm for four bedroom houses. The detailed wording and structure of this part of the policy need to be modified to ensure clarity and therefore effectiveness [**MM81**].

108. The last part of policy HO3.11 supports the provision of communal outdoor amenity space, including roof and terrace space. Such spaces provide important opportunities for socialising and recreation, including children's play, that private balconies do not. As the vast majority of residential development is expected to be in the form of apartment blocks, it is important that the Plan is effective in securing private shared outdoor amenity space that is high quality and accessible to all residents. To ensure this, policy HO3.11 and the reasoned justification need to be modified to set out a clear requirement in this regard [**MM80** and **MM81**].

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

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<sup>25</sup> Residential Design Guide 2016 [LDD10].

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

## **Build to rent**

110. Policy HO3.4 is supportive of build to rent homes provided that a number of criteria are met. In most respects the approach is consistent with national policy and associated guidance<sup>26</sup>, although a number of changes need to be made to the policy and reasoned justification to ensure this is so. Those changes relate to the provision of affordable housing, including through discounted rents that are at least 20% below market rents having regard to the latest relevant evidence, and the use of site specific viability assessments in particular circumstances [MM70 to MM72]. The references to break clauses and covenants in the reasoned justification are not policy requirements and do not need to be modified to ensure soundness.

## **Custom and self build housing**

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

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

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<sup>26</sup> [www.gov.uk/guidance/build-to-rent](http://www.gov.uk/guidance/build-to-rent)



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

### **Housing for the elderly and those with special needs**

113. The evidence indicates that there will be a large rise in the number of households that include people with health issues including impaired mobility and dementia. The Council received over 300 applications to adapt existing homes in the last year or so. It is likely that there will be a significant increase over the plan period in the number of households that would benefit from having accessible and adaptable homes that meet the building regulation standard M4(2). The cost of meeting that standard was included in the viability assessment. The requirement in policy HO3.10 for all new homes to be designed and built to comply with the M4(2) standard unless they are built to comply with M4(3) (wheelchair user) is, therefore, justified by evidence relating to need and viability.
114. Policy HO3.10 requires developments of 10 or more homes to provide at least 10% to M4(3) standard. However, the evidence indicates a need for around 500 additional wheelchair user homes. This represents around 4% of the housing requirement. Policy HO3.10 needs to be modified accordingly so that it is justified by proportionate evidence [**MM78**].
115. The last part of policy HO3.10 requires 2% of homes on developments of 50 or dwellings to be designed to support someone living with dementia. In order to be effective and justified, the policy and reasoned justification need to refer to the design principles set out in Figure 3.3 and to clarify that wheelchair user homes can contribute to the requirement if appropriately designed [**MM79**].
116. Policy HO3.5 relates to specialist housing and care homes, and includes requirements relating to the protection of existing facilities and the provision of new facilities. Various changes need to be made to the policy and reasoned justification to ensure the policy is sound in all four respects.
117. Firstly, clarification is needed of the types of development that it applies to, consistent with national policy<sup>27</sup>, including age-restricted market housing, retirement living or sheltered housing, housing with

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<sup>27</sup> PPG ID:63-010-20190626.

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

### **Gypsy and traveller accommodation**

118. Paragraph 3.35 in the Plan refers to a need for two additional pitches for gypsies and travellers up to 2036. This is based on an up-to-date and proportionate assessment<sup>28</sup>. Paragraph 3.37 refers to a site being allocated adjacent to the existing site at Tolpits Lane to meet this need.

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

### **Conclusion**

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

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<sup>28</sup> Gypsy and Traveller Accommodation Assessment 2019 (ORS) [HOU5].

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

121. I have already found that there is an identified need for a total of 37,600 sqm of additional office floorspace and 98,400 sqm of additional industrial and warehouse floorspace in Watford. However, the evidence clearly shows that, whilst there are opportunities for a significant amount of additional office floorspace in and close to the town centre, the amount of land in the Borough suitable and available for industrial and warehouse development is extremely limited<sup>29</sup>. The Plan aims to build on its sub-regional role in office provision, whilst protecting existing industrial areas and supporting the limited opportunities to provide new industrial and warehouse floorspace.

### **Designated industrial areas**

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

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

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<sup>29</sup> EMP1 to EMP5.

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

### **Additional industrial and warehouse floorspace**

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

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

### **Office development and allocations**

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

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

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

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

## **Conclusion**

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

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

130. Managing transport in the Borough is a key challenge, not least because of the high levels of greenhouse gas emissions from the sector, poor health associated with air pollution, and the social and economic impacts of congested roads. The spatial strategy concentrates the majority of future development in the most accessible parts of the town<sup>30</sup> in order to minimise the need to travel and maximise opportunities to walk, cycle and use public transport. Chapter 11 in the Plan includes a number of policies and proposals aimed at creating a “sustainable travel town” and ensuring that development mitigates the impacts on the transport network. In most respects those policies and proposals are sound, although a

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<sup>30</sup> As illustrated in Figure 1.1 in the Plan.

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

## **Development and improvements to transport infrastructure**

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

## **Cycle and car parking**

134. Policy ST11.4 requires all development to provide secure on-site cycle parking facilities in line with the standards set out in Appendix D of the Plan. Modifications are required to the policy, and the cycle standards for larger dwellings, to ensure that they are justified and effective [**MM167**, **MM168** and **MM252**].
135. Policy ST11.5 sets out requirements for car parking provision including maximum standards for different types of development in the Core Development Area and other parts of the Borough (Appendix E); the provision of spaces for disabled persons, car club use, and powered two wheelers; and the installation of active and passive charging infrastructure for electric vehicles. A modification is required to the car parking standards for industrial and warehouse developments in Appendix E to ensure that they are justified and effective [**MM253** and **MM254**].
136. The Council's viability assessment did not include an additional cost for meeting the requirement in policy ST11.5 to provide 20% of parking spaces with active charging infrastructure and for all other spaces to have passive provision. However, an additional cost of £3,600 per dwelling would not make a significant difference to the findings of the viability assessment<sup>31</sup>. Furthermore, incorporating such infrastructure into development at the outset will be cost effective and is necessary to encourage the shift to more sustainable forms of transport.

## **Strategic road network**

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

## **Conclusion**

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

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<sup>31</sup> Council oral evidence to the hearing session on 9 February 2022.

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

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

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

### **Conclusion**

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



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

143. Policy QD6.1 sets out different approaches to the design of development in the Core Development Area, Established Areas, and Protected Areas. These reflect the different characters of those areas, and the type and amount of development proposed in them. To ensure effectiveness, a modification is required to clarify that the three areas are defined on the policies map [**MM105**].
144. Policy QD6.2 requires all development to demonstrate how it responds to a number of design principles relating to character and identity, built form, active and passive frontages, movement and connectivity, and views. Modifications are required to refer to the Council's Skyline Supplementary Planning Document and to include an additional principle relating to sustainability [**MM106** to **MM108**]. This will ensure consistency with national policy and effectiveness.
145. Policy QD6.4 sets out detailed design requirements for new buildings. Modifications are required to clarify those relating to primary access for ground floor units and internal cores, and to include an additional requirement for buildings to promote the use of stairs and provide secure cycle parking in easily accessible locations [**MM109** to **MM111**]. These changes are necessary to ensure effectiveness given the number of new homes that will be provided in apartment blocks.
146. Policy QD6.5 sets out additional design requirements for buildings that exceed the base building heights defined in Figure 6.3. Those base heights range from four storeys outside the Core Development Area to ten storeys in parts of the Watford Gateway Strategic Development Area. The approach is justified by the Watford Tall Buildings Study<sup>32</sup> and is, in most respects, sound. However, to ensure effectiveness and consistency with national policy, modifications are required relating to design quality and the types of significant public benefits that such development is expected to deliver, and to include reference to the Skyline Supplementary Planning Document [**MM112** to **MM117**].

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<sup>32</sup> HER19 [2021]

## Conclusion

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

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

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

149. Policy HE7.1 seeks to ensure that development embraces opportunities to use the historic environment to support good design and enhance the setting and understanding of the historic environment and improve Watford's historic character. Modifications are required to the reasoned justification [**MM118** and **MM119**].

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

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

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

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

## **Conclusion**

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

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

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

157. Policy NE9.6 states that open space and ancillary facilities will be protected, unless an up to date assessment demonstrates they are surplus. A modification is required to clarify that the open space and ancillary facilities to be protected are defined on the policies map, and to refer to adverse impacts on the community and environment being taken into account in the needs assessment [**MM148**]. To ensure the policy is justified and can be effectively implemented, changes are required to the open space and green infrastructure designations on the policies map relating to land at Blackwell Drive; Kytes Drive; Alban Wood school; and Callowland allotments.
158. I have considered policy NE9.7, relating to the provision of public open space in residential development, under main issue 8.
159. A modification is required to policy NE9.8 to ensure consistency with national policy and to clarify the approach to achieving an overall net gain in biodiversity including through additional requirements relating to long term monitoring and maintenance plans, and ecological surveys and assessment reports [**MM151**]. The approach to biodiversity net gain provides an interim policy, consistent with national policy, until the relevant parts of the Environment Act 2021 come into effect.

## **Conclusion**

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

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

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

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

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

## **Conclusion**

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

## **Other soundness matters**

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

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

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

## **Documents referred to in Plan policies**

169. Legislation and national guidance<sup>33</sup> set out information requirements for planning applications. National policy states that local planning authorities should publish a list of their local information requirements, that these should be kept to a minimum and be reviewed at least every two years. The requirements for "sustainability statements", "air quality assessments" and "BREEAM pre-assessments" in policies CC8.1, CC8.2, CC8.3, CC8.4 and IN9.5 are not consistent with national policy or justified and should therefore be deleted [**MM126**, **MM130**, **MM133** and **MM146**].
170. Various policies in the Plan refer to supplementary planning documents and other local guidance. Modifications are required to ensure that these are given appropriate weight in decision making [**MM39**, **MM42**, **MM49**, **MM107**, **MM155** and **MM177**].

## **Sites and areas referred to in Plan policies**

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<sup>33</sup> PPG ID:14.

171. To ensure effectiveness and consistency with national policy, modifications are required to various policies to clarify that they relate to specific sites or areas in the Borough as defined on the policies map [**MM35, MM46, MM55, MM87, MM97, MM104, MM105, MM173** and **MM176**].
172. Changes are required to the titles of various maps in the Plan and the reasoned justification to ensure that their purpose and relationship with policies and the policies map is clear [**MM17, MM18, MM20, MM36, MM37, MM47, MM48, MM56, MM82, MM97, MM102, MM104, MM118, MM138** and **MM162**]. Figure 8.1 "energy opportunity areas" and associated reasoned justification need to be deleted to avoid ambiguity with national policy<sup>34</sup> and because it does not provide reasoned justification for the Plan [**MM124** and **MM125**].

### Other issues

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

## Overall Conclusion and Recommendation

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

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<sup>34</sup> NPPF 155(b), 158(b) and footnote 54.

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

*William Fieldhouse*

Inspector

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This report is accompanied by an appendix containing the  
main modifications

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## **Appendix – Main Modifications**


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

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

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

MM Ref	Local Plan Ref	Modification (deleted text shown as red <del>strike through</del> and additional text shown green <u>underlined</u> ). Unchanged text is in black font
<b>How to use this document (introduction)</b>		
M1	Page 6, after Table 'The Local Plan and the Spatial Strategy'	<u>The diagrams covering the borough at the beginning of the majority of chapters are included to provide context to the strategic objectives of the Local Plan and opportunities to consider when development comes forward. This also applies to the schematic diagrams for each of the three Strategic Development Areas. The strategic maps are not intended to demonstrate policy requirements and are indicative only. Where specific areas and sites within the borough are covered by particular policies, these are defined on the Policies Map.</u>
<b>CHAPTER 1: A SPATIAL STRATEGY FOR WATFORD</b>		
M2	Front cover	<del>2018</del> <u>2021-2036</u> <u>2038</u>
M3	Page 8 paragraph 1.2 Second sentence	It covers the period from <del>2018 to 2036</del> <u>2021 to 2038</u> and will guide new development so that it goes ahead in a co-ordinated manner, making the best and most appropriate use of land to meet the needs of the community.
M4	Page 11, paragraph 1.21	Watford will see a lot of change in the <del>18-17</del> years covered by the plan period, as it grows and makes a transition towards being a more sustainable town, actively tackling climate change, with the aim of becoming carbon neutral.
M5	Page 11 paragraph 1.22 first sentence	This will be achieved by promoting the three overarching objectives of the National Planning Policy Framework at a local level, thereby creating a different and better place in <del>2036</del> <u>2038</u> .
M6	Page 11 paragraph 1.23 Second sentence	The following highlights the key Economic, Social and Environmental characteristics of Watford now, and where the Council wants it to be in <del>2036</del> <u>2038</u> .
M7	Page 12, green text box, title	Watford's economy in <del>2036</del> <u>2038</u>

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

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

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

<p>M20</p>	<p>Page 24, Figure 2.2, Diagram, revised title and added features including Conservation Areas, Eastern Mobility Hub area of search, sidings to the concrete batching plant, infilled active frontages</p>	<p><b>Figure 2.2 Watford Gateway Strategic Development Area, Illustrative Concept Diagram</b></p> <p><b>Key</b></p> <ul style="list-style-type: none"> <li>SDA Boundary</li> <li>Public Transport Priority</li> <li>Walking and Cycling</li> <li>Mixed-Use Development</li> <li>Active and Positive Frontages</li> <li>Primary Office Location</li> <li>Indicative New Pedestrian/Cycle Crossing</li> <li>Concrete Batching Plant and Rail Aggregates Depot</li> <li>West Coast Main Line</li> <li>Abbey Line</li> <li>Watford Junction Railway Station</li> <li>Major Bus Interchange</li> <li>Conservation Areas</li> <li>Eastern Mobility Hub area of search</li> </ul>
<p>M21</p>	<p>Page 25, after paragraph 2.14, new paragraph, delete last sentence of preceding paragraph. Revise paragraph 2.15</p>	<p><del>However, the compatibility of new uses will need to be carefully considered, particularly where residential uses are proposed.</del></p> <p><u>The transformation of the area from an under-utilised employment area to a mixed-use area inclusive of new homes, employment space and community facilities will take place throughout the plan period. It will encompass a new Eastern Mobility Hub east of the railway lines connecting to the Sustainable Transport Hub located west of the railway lines at Watford Junction Station. This will likely come forward in phases as infrastructure is delivered and development opportunities present themselves.</u></p>

		<p><u>In the first part of the plan period, proposals for the redevelopment of employment floorspace with either replacement or alternative forms of employment uses will be supported. Mixed-use development that may include residential uses that contribute towards the long-term vision of the area will be supported and in such circumstances the loss of employment floorspace may be acceptable. The compatibility of new and existing uses will need to be carefully considered, particularly where when residential uses are proposed in the area as the ‘agent of change’ principle will need to be addressed.</u></p> <p><u>The concrete batching plant and rail aggregates depot (including road access from Orphanage Road and rail sidings running parallel to the Abbey Line) is safeguarded by the Hertfordshire Minerals Local Plan and subject to a 250m Minerals Infrastructure Consultation Area. <del>Its relocation</del>Relocation of the facility will be challenging to achieve and will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria. New development coming forward in the surrounding area should assume that the facility will remain for the long-term. New development will be required to be designed and mitigated to ensure that it will not prejudice existing or future use of the safeguarded site and associated operations in accordance with the ‘agent of change’ principle. Appropriate mitigation provided by new development may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and providing buffer development or screening between the sensitive uses and the safeguarded facility.</u></p>
M22	Page 25, paragraph 2.16,	<p>Reprovision of car parking, including access, will need to be considered at a strategic level across the area to avoid fragmentation and inefficient use of land. Large areas of scattered car parking throughout the Strategic Development Area should be avoided. Proposals for car parking that come forward <del>independently of a car parking strategy for the area, or a future masterplan,</del> will not be supported where they could compromise the road network or infrastructure for alternative forms of active travel, such as cycling and walking. <u>A new multi-storey car park will be provided as part of the Eastern Mobility Hub east of the Abbey Line. Any proposals that come forward which include the loss of the existing multi-storey car park and surface parking will need to demonstrate how the replacement facility will be delivered.</u></p>
M23	Page 25, paragraph 2.17, after fifth sentence	<p><u>When the area comes forward with more comprehensive mixed-use development in the second part of the plan period and longer-term, a</u> A route for a second bridge that connects Penn Road with Watford Junction is to be protected so that new development does not compromise potential access to the area in the future.</p>
M24	Page 26, after paragraph 2.22	<p><b><u>Delivery and managing development</u></b></p> <p><u>The Watford Gateway Strategic Development Area consists of two constituent parts; land around Watford Junction Station and the area of Clarendon Road.</u></p>

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



M27	Page 27, Strategic Policy CDA2.1, Part g)	<u>Prior to the implementation of a planning permission which includes residential uses on land east of the railway line West Coast Main Line, a pedestrian and cycle bridge for commuters and residents across from the east side of the Abbey Line to Watford Junction Station must be agreed before planning permission is granted. Development proposals will need to be designed to ensure they do not compromise delivery of the bridge;</u>
M28	Page 27, Strategic Policy CDA2.1, revised text for Part h)	<u>A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded;</u> <u>As part of a comprehensive mixed-use redevelopment of the area in the second part of the plan period, a route for a pedestrian and cycle bridge that will enable access to Watford Junction station via Penn Road must be shown to be feasible and achievable when redevelopment proposals are submitted;</u>
M29	Page 27, Strategic Policy CDA2.1, Part j)	<u>On land east of the West Coast Main Line and within the Strategic Development Area, redevelopment of existing employment floorspace for replacement or other employment uses will be supported in the first part of the plan period. Where it is demonstrated that proposals for residential-led mixed-use development will contribute towards the delivery of the wider objectives of the Watford Gateway Strategic Development Area, and the proposed use will not undermine existing uses through the 'Agent of Change' Principle, the loss of employment floorspace may be acceptable;</u>  <u>Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace and the proposed use will not undermine existing uses through the 'Agent of Change' Principle. As part of the commercial floorspace a replacement childcare facility should be provided."</u>  <u>If a proposal is to include the loss of the child care facility, a replacement facility should be reprovided as part of the commercial floorspace. As part of the commercial floorspace a replacement childcare facility should be provided."</u>
M30	Page 27, Strategic Policy CDA2.1, new bullet after Part j)	<u>In the first part of the plan period, employment redevelopment proposals will be supported, as will further redevelopment that will enable a transition towards increased mixed-use schemes and supporting infrastructure in the second part of the plan period.</u>
M31	Page 27, Policy CDA2.1, part k)	<u>Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line. Applicants will be required to demonstrate this has been achieved as part of any proposal. A new multi-storey car park as part of the Eastern Mobility Hub will be provided on land to the east of the Abbey Line. Proposals that include the loss of the existing multi-storey car park will be required to set out how the replacement facility will be delivered, including delivery phases, as part of the planning application;</u>

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

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

M44	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, part i)	i) Proposals <del>must should</del> demonstrate the provision of innovative waste management and recycling storage and collection systems, to reduce the need for service vehicles along the High Street.
M45	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, three new bullets after Part h)	<p><del>h) Heritage assets, in particular St Mary's Church and the surrounding conservation areas, are key to the character of the Strategic Development Area and proposals should be sensitive to these heritage assets, enhancing their character and setting; Heritage assets are located in key parts of the Strategic Development Area such as the High Street and the areas around St Mary's Church and the Town Hall. They are a key component of the character of this area and proposals for new development should respond to these assets, enhancing their character and setting;</del></p> <p><u>i) Future development in the Strategic Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area and where prepared for individual sites;</u></p> <p><u>j) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessments for all sites which are to be submitted prior to the determination of any application;</u></p> <p><u>k) A site for a new 3 form entry primary school should be located within the strategic development area that is BB103 compliant, including external areas. Applicants are encouraged to identify where a new primary school can be provided.</u></p>
M46	Page 33, Strategic Policy CDA2.2, after final paragraph	<u>The Town Centre Strategic Development Area is defined on the Policies Map.</u>
M47	Page 34, Paragraph 2.23, New sentence after final sentence	<u>Figure 2.4 is a schematic diagram to provide context for the area and is not to be interpreted as policy.</u>
M48	Page 34, Figure 2.3 Diagram title	<u>Figure 2.4 Colne Valley Strategic Development Area, Illustrative Context Plan</u>

M49	Page 35, paragraph 2.59,	<p>Major development proposals should <u>have regard to Supplementary Planning Documents, masterplans and strategies related to the Strategic Development Area. Applicants will be expected to demonstrate use a masterplan-led approach that demonstrates how they have maximised local opportunities for development of appropriate densities, to improve the public realm and increase access to services and facilities. Applicants will also be expected to demonstrate that proposals would contribute to the co-ordinated delivery of development and that it would not compromise future development opportunities within the Strategic Development Area.'</u></p>
M50	Page 36, after paragraph 2.67, two new paragraphs	<p><u>Redevelopment of the hospital is likely to consist of multiple phases; delivery of the multi-storey car park, redevelopment of the hospital and land between the new hospital and Vicarage Road. Development of the Riverwell and the Watford General Hospital/stadium areas should be considered in the context of the wider Strategic Development Area and existing built-up area adjacent and ensure opportunities to connect people with local destinations are optimised, such as creating easily legible routes through the site that are enhanced through each phase. The layout of buildings and their access points should ensure there is good accessibility for people using sustainable transport such as walking, cycling, public bus services and those with mobility issues.</u></p> <p><u>The existing hospital located in the north part of the site is adjacent to the existing residential area of Vicarage. Redevelopment schemes will need to take into account how new development may affect these residents and implement design measures to mitigate any possible negative impacts. The area is capable of supporting a base building height of up to six storeys, however, buildings of significant scale are likely to have an impact on the character of the residential area and listed buildings in the vicinity. If proposed, an approach to taller buildings that demonstrates a transition from higher elements in more central parts of the site transitioning to lower lying buildings closer to the boundary of the Strategic Development Area, such as Vicarage Road, will need to be set out.</u></p>
M51	Page 36, after 2.68, additional paragraph	<p><b><u>Delivery and managing development</u></b></p> <p><u>The constituent parts of the Colne Valley Strategic Development Area including the Lower High Street, Riverwell and the hospital/stadium areas, will together contribute towards the wider regeneration of the Colne Valley. To support the coordinated delivery of development and achieving the objectives for the area, the following mechanisms are either in place or will be prepared in the future:</u></p> <ul style="list-style-type: none"> <li><u>Riverwell will continue to deliver new homes and community facilities guided by an existing masterplan for the area developed by the Council in partnership with the private sector.</u></li> </ul>

		<ul style="list-style-type: none"> <li>• <u>The Lower High Street area extending from Watford High Street Overground Station to Bushey Overland Station consists of a mix of allocated sites and land that remains unallocated. A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Adoption is anticipated in 2024.</u></li> <li>• <u>The proposed new hospital is a distinct area within the Strategic Development Area that has outline planning permission. Once delivered, the existing hospital site will be able to support the delivery of new homes in the later part of the plan period. The Council will prepare appropriate guidance for the redevelopment of the surplus land.</u></li> </ul>
M52	Page 37, paragraph 2.72, first sentence	Informed by the Taller Buildings Study, the base future building height in the area is <u>up to five or six</u> storeys.
M53	Page 38, Strategic Policy CDA2.3, first paragraph	<p>The Colne Valley Strategic Development Area is designated to facilitate transformative and co-ordinated change around the River Colne, <del>and</del> Lower High Street <u>and the area of Watford General Hospital area</u>, producing a sustainable and mixed-use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses.</p> <p><u>A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Once adopted, development proposals will need to have regard to the masterplan. Applicants will be expected to demonstrate that their proposals contribute towards the coordinated delivery of development, infrastructure and improvements to the public realm. Proposals should be designed so not inhibit the delivery of other sites or compromise future development opportunities that could make a positive contribution towards the objectives for the area.</u></p>
M54	Page 38, Strategic Policy CDA2.3, new bullets after parts a) and j) amend part f),	<p>b) <u>Redevelopment of the existing Watford General Hospital will provide modern facilities that are well integrated and co-ordinated with other developments, designed to minimise impacts on nearby residential areas and are well connected to support sustainable transport options including walking, cycling and bus services;</u></p> <p>c) <u>A multi-storey car park with a capacity of approximately 1,450 car parking spaces located east of the existing Watford General Hospital car park;</u></p> <p>f) <u>A site for a new primary school within Site MU21 'Land at Riverwell', and a site for a new 3 form entry primary school within Site MU16 'Land at Tesco', Lower High Street, <del>New primary school sites</del> to meet the demands generated by new development.</u></p>

		<p>j) <u>Future development in the Core Development Area will take into account the findings and recommendations of the Council’s Heritage Impact Assessment Screening Report for this area, and where prepared, for individual sites.</u></p> <p>k) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for all sites to be submitted prior to the determination of any application.</u></p>
M55	Page 38, Strategic Policy CDA2.3, after final paragraph	<u>The Colne Valley Strategic Development Area is defined on the Policies Map.</u>
<b>CHAPTER 3: HOMES FOR A GROWING COMMUNITY</b>		
M56	Page 40, paragraph 3.1	<u>The Spatial Strategy to 2036 seeks to deliver at least 14,988 new homes. The Spatial Strategy seeks to deliver at least 13,328 net additional new homes between 2021 and 2038. This is equivalent to the delivery of at least 784 new homes each year and forms the baseline figure to calculate the five year housing supply. This figure includes the amount of housing required to meet local need as determined using the government’s standard method (14,274 homes) and an additional 5% allowance (714 homes) to reduce the risk of sites identified in the plan not coming forward as anticipate. The figures that make up this the housing supply in the Local Plan target are set out in Figure 3.1. Figure 3.2 provides an overview of site allocations for residential use and their distribution across the borough. For more detailed information about these sites, refer to Table 13.1 and for site boundaries refer to the Policies Map.</u>
M57	Page 40, additional paragraph after paragraph 3.2	<u>The number of homes to be delivered on site allocations during the plan period is 8,604 units. This figure is the sum total of the indicative yields for all of the allocations as listed in Chapter 13 which are derived from the size of each site and standard density assumptions depending on its location. As of 1 April 2021, a total of 1,218 units on site allocations have been granted planning consent. These units are not included in the maximum of 2,507 units that could come forward on sites with extant planning permission as represented in Figure 3.1</u>

<p>M58</p> <p>Page 40, figure 3.1</p> <p>Revised housing figures in diagram. Commitments revised to reflect removal of completions from 2018 to 2021 and remove duplication of planning consents on sites put forward as site allocations.</p>	<p>Figure 3.1 Housing figures in the Local Plan</p> <p>8,748 + 4,145 + 2,095 = 14,988</p> <p>Homes on allocated sites + Commitments (completions and extant planning permissions) + Windfall (inclusive of a 5% buffer of the total housing requirement) = Total number of homes</p> <p>Figure 3.1: Summary of housing supply identified in the Local Plan</p> <p>8,604 + 2,507 + 2,217 = 13,328</p> <p>Homes on allocated sites + Commitments (maximum number of homes delivered through extant planning permissions) + Windfall = Total number of homes</p>
<p>M59</p> <p>Page 41, paragraph 3.3</p>	<p>As part of the housing to be provided to 2036-2038, a total of 2,217 homes are included in the housing supply as windfall. <del>windfall allowance of 2,132 units is included.</del> This is based on a combination of three factors including the historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall</p>



		development will contribute, on average, <u>116 158</u> new homes per year <u>over the plan period with the windfall contribution as part of the housing trajectory from 2024/25.</u>
M60	Page 41, paragraph 3.5	<u>2036 2038</u>
M61	Page 41, additional paragraph after paragraph 3.5	<u>The commitments figure of 2,507, as quoted in Figure 3.1, assumes that all sites with planning permission on 1 April 2021, which are not site allocations in the Local Plan, will be developed. This means that any permissions which are not implemented will lead to a reduction in this source of supply. Since the adoption of the Core Strategy in 2013, the Council has seen an average annual lapse rate of 15%. If this rate was to be replicated across all permissions as of 1 April 2021, this supply of 2,507 dwellings would be reduced by 376 dwellings to 2,131 dwellings.</u>
M62	Page 41, Strategic Policy HO3.1	<u>To meet housing need, at least 13,328 net additional homes, equivalent to at least 784 new homes per year, Provision will be delivered made for 14,988 new homes, inclusive of a 5% buffer of 714 homes, in Watford Borough between 2021 and 2038. for the period 2018 to 2036</u> Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development.
M63	Page 41, Strategic Policy HO3.1, after last paragraph add new sentence	<u>Site allocations for housing and mixed-use, where residential use would be supported, are defined on the Policies Map.</u>
M64	Page 43, Policy HO3.2, 1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence	Proposals for new residential development <u>of five dwellings or more</u> will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms).
M65	Page 43, new paragraph after paragraph 3.13	Affordable housing can refer to rented or sales properties and is defined by the National Planning Policy Framework (Annex 2). <del>Definitions of affordable housing are set out in Annex 2 of the National Planning Policy Framework.</del> To best reflect affordable housing as a proportion of the total number of homes completed on a site, the requirement will be <del>based on measured by</del> <u>measured by</u> habitable rooms, <del>with supporting information to be provided by an applicant including the number of units, floorspace and bed spaces as part of the housing schedule.</del>  <u>The number of affordable housing units provided does not have to be equivalent to 35% of the total number of housing units proposed. The housing mix, in terms of size of units of the market and affordable elements of the scheme, can be</u>

		<p><u>varied so long as the number of habitable rooms provided as affordable accommodation is equivalent to 35% of the total number of habitable rooms in the proposed development.</u></p> <p><u>Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. Applicants should present affordable housing figures as a percentage of total residential provision by habitable rooms and units to enable comparison as part of the housing schedule.</u></p> <p><u>The distribution of habitable rooms can help deliver the type of affordable homes needed in the borough more effectively and contribute towards providing 20% family sized homes across the scheme as set out in Policy HO3.2 'Housing Mix, and Optimising Use of Land'. Applicants are encouraged to engage with the Local Authority at an early stage to determine the housing mix of the affordable housing element of the scheme.</u></p>
M66	Page 43, new paragraph after paragraph 3.14	<u>The National Planning Policy Framework requires a proportion of the total number of residential units to be provided for affordable home ownership. Therefore, the delivery of other types of affordable housing, including social rent, are to be applied once this threshold has been achieved.</u>
M67	Page 44, Policy HO3.3, first paragraph	Residential developments, <del>including residential institutions of 10 ten</del> homes or more will be supported where they provide at least 35% affordable housing (by habitable room).
M68	Page 44, Policy HO3.7, third paragraph	<del>If the a plot has been offered to people registered on the Council's Self Build Register and the open market and marketed for a minimum of 12 months from the commencement of development on the site and has not been sold, then the plot will be returned to the developer. and has not been sold within 12 months of completion of the overall scheme, the property will return to the developer to be built out.</del>
M69	Page 44, Policy HO3.3, last paragraph	<del>In exceptional circumstances, Where a viability assessment, undertaken in accordance with national planning policy and guidance, demonstrates particular circumstances it is demonstrated that mean the it would not be viable to meet the affordable housing requirements set out in this policy cannot be met,</del> 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 <del>that a higher the</del> number of affordable units <del>can be achieved</del> on site <del>is higher than agreed,</del> up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development.
M70	Page 44, Paragraph 3.19	Build to Rent schemes will be required to provide affordable housing based on the criteria set out in Policy HO3.3 'Affordable Housing'. Where a developer is proposing a Build to Rent scheme that requires affordable housing to be

	and 3.20, new sentence and amended structure	<p>provided, the affordable housing offer may be entirely Discounted Market Rent, if agreed with the Local Planning Authority. <u>To meet housing need, the proportion of affordable housing to be provided as Discounted Market Rent should be the same as required in Policy HO3.3 'Affordable Housing' (by habitable rooms). The minimum discount on the market rent units should be at least 20%, as required by Planning Practice Guidance. A discount greater than 20% will only be applied if demonstrated to be deliverable through an update to the Local Housing Needs Assessment.</u></p> <p><u>In particular circumstances, a viability assessment may be acceptable to demonstrate that the Discounted Market Rent requirement is not achievable. Viability assessments submitted as part of a planning application will be made publically available and robustly scrutinised by the Local Planning Authority.</u></p> <p><del>The discount on the market rent should be provided in line with the findings of the Local Housing Needs Assessment.</del> Discounted Market Rent units should be fully integrated into the development, with no differences between these units and the market units, tenure blind.</p> <p><del>It identified that for a person or family to afford a home in Watford, a discount of between 26-34% would need to be applied to market rents, with the variation reflecting different sizes of homes. This level of discount reflects a local approach to meeting the needs of local residents who cannot afford market rents.</del></p>
M71	Page 45, paragraph 3.22, second sentence	<p><del>The allocation of the Discounted Market Rent properties that are not offered as affordable housing should be allocated in a manner agreed between the operator and to people in a manner agreed with the Local Authority.</del></p>
M72	Page 46, Policy HO3.4, first paragraph	<p>Proposals for Build to Rent homes will be supported in locations appropriate for residential development. Affordable housing should be provided in accordance with Policy HO3.3 Affordable Housing, although Discounted Market Rent, at a genuinely affordable rent, will be accepted in place of other affordable housing tenures. <del>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.</del> <u>The discount on the market rent should be at least 20% having regard to the most up-to-date Local Housing Market Needs Assessment or other relevant evidence.</u></p>
M73	Page 47, Policy HO3.5	<p><b>Policy HO3.5: <u>Specialist Care and Supported Living Specialist Housing and Care Homes</u></b></p> <p><del>Existing specialist and supported housing will be protected where it is up to the standards set out in Hertfordshire County Council guidance.</del></p>

		<p>The redevelopment of any site that includes housing for vulnerable people will only be acceptable where it meets the standards set out in Hertfordshire County Council guidance and when it meets the following criteria:</p> <p><u>Proposals for new specialist care and supported living accommodation, as defined in the Glossary, will be supported.</u></p> <p><u>Proposals that result in the loss of existing residential accommodation that provides specialist care and supported living will be resisted unless:</u></p> <ul style="list-style-type: none"> <li>a) There is no longer an identified need for the existing facility;</li> <li>b) The needs will be met elsewhere in the Borough, preferably close to the existing building or in a preferential location for specialist housing; <u>or</u></li> <li>c) <del>Reprovision</del> <u>Redevelopment</u> would <u>provide</u> <del>result in</del> improved quality of specialist housing <u>and facilities.</u></li> </ul> <p><del>Proposals for new specialist housing should be located within 400m of a district or local centre and public transport,</del> <u>Proposals should be</u> designed to include pick-up and drop-off facilities close to the <del>principal</del> <u>principle</u> entrance that are able to accommodate specialist transport vehicles. To aid mobility, development should provide space for the storage of mobility scooters.</p> <p><del>New specialist housing and care homes that are provided at market value will be required to comply with the affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.</del></p> <p><u>Should a proposal for new specialist care and supported living accommodation fall within Use Class C3, the proposals will be required to provide affordable housing consistent with Policy HO3.3 for that proportion of the scheme. This requirement will not be applied to proposals for new specialist care and supported living accommodation classified as being within Use Class C2.</u></p>
M74	Page 48, paragraph 3.32	<p>However, self-build and custom housebuilding will be supported <del>on windfall sites where proposals are for 50 new houses or more</del> <u>on allocations and windfall sites, and proposals that include 50 or more non-flatted homes (excluding affordable housing) will be required to provide 10% of plots for such development.</u></p>
M75	Page 48, paragraph 3.33,	<p>Marketing of the site should be demonstrated to have been undertaken proactively to gauge potential interest in a self-build plot <del>by</del> <u>on the open market, including those registered on the Council's Self-build Register.</u></p>

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

		<p><del>Where communal amenity space is provided this should be of a minimum size of 50sqm for two units, plus 15sqm per additional two units. Apartment schemes should provide high quality shared private amenity space on-site that is accessible to all residents unless it would not be possible or appropriate to do so. The use of roof areas, including podiums and courtyards for additional private or shared amenity or garden space is supported and should be encouraged. While the standard is set out this will need to be considered in the wider context of the scheme, in terms of the opportunities and constraints of a site.</del></p> <p><del>Family housing on upper floors should have access to shared amenity space, informal play space and equipped play space (if no facilities are located nearby) and / or a balcony or terrace, subject to acceptable amenity and design considerations. This should be considered in conjunction with Policy NE9.7 ‘Providing New Open Space’.</del></p> <p><del>Where shared private communal amenity space is provided, it should be designed to be accessible to all residents and provide places to sit, play and the exercise. Where provision is catering for families in the development, informal play space, and as appropriate, equipped play space should be integrated into the shared space. It should be adaptable to accommodate the changing needs of residents and be easy to maintain, whilst not compromising its contribution towards creating a quality public realm. Importantly, shared private amenity communal open space should be designed into the scheme so as not to be overshadowed or suffer low levels of daylight.</del></p>															
M81	Page 54 Policy HO3.11	<p><b>Policy HO3.11: Private and <del>Communal Outdoor</del> shared private amenity space</b></p> <p><b><u>Private amenity space</u></b></p> <p><del>A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and at least one additional square metre should be provided for each additional occupant.</del></p> <p><del>Provision of private amenity space is to meet the following standards: All new homes should be provided with private outdoor amenity space that meets the following minimum standards:</del></p> <table border="1" data-bbox="573 1166 1469 1390"> <thead> <tr> <th>Size of dwelling</th> <th>Apartment</th> <th>House/Duplex/Maisonette</th> </tr> </thead> <tbody> <tr> <td>1-bed</td> <td>5sqm</td> <td>12sqm</td> </tr> <tr> <td>2-bed</td> <td>7sqm</td> <td>24sqm</td> </tr> <tr> <td>3-bed</td> <td>8sqm</td> <td>25-40sqm</td> </tr> <tr> <td>4-bed</td> <td>9sqm</td> <td>25-40sqm</td> </tr> </tbody> </table>	Size of dwelling	Apartment	House/Duplex/Maisonette	1-bed	5sqm	12sqm	2-bed	7sqm	24sqm	3-bed	8sqm	25-40sqm	4-bed	9sqm	25-40sqm
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		<p>The minimum depth and width for all balconies and other private external spaces should be 1.5m. This does not contribute towards the minimum internal space standards.</p> <p><b><u>Shared private amenity space</u></b></p> <p>The provision of <del>communal</del> <u>shared private</u> outdoor amenity space, including roof and terrace space, will be supported. <u>Residential development comprising 10 or more flats should provide shared private outdoor amenity space that is high quality and accessible to all residents unless it would not be possible or appropriate to do so.</u> <del>Communal outdoor amenity space will need to be designed to be usable by all residents.</del></p>
<b>CHAPTER 4: A STRONG ECONOMY</b>		
M82	Page, 56, paragraph 4.2, new sentence after final sentence	<u>Figure 4.1 reflects designated employment areas as defined on the Policies Map. For information about site allocations for employment uses, or have an element of employment use, refer to Tables 13.2 and 13.3 in Chapter 13.</u>
M83	Page 56, paragraph 4.4, third sentence	<u>For Watford, the study suggested there was a need for 37,600sqm of office floorspace and 98,400sqm of industrial floorspace. Reflecting the strengths and opportunities across SW Herts and Watford, To contribute towards this requirement, Watford has planned for <del>111,175</del> <u>85,488</u>sqm of office floorspace and <del>40,759</del> <u>25,206</u>sqm of industrial floorspace.</u>
M84	Page 56, after paragraph 4.4	<u>The Council will continue to work with neighbouring authorities in the South West Hertfordshire Functional Economic Market Area to deliver the shortfall of industrial floorspace that cannot be provided in Watford over the plan period.</u>
M85	Page 57, Strategic Policy EM4.1, second paragraph	<u>To meet the employment needs in Watford and contribute towards the strategic employment requirements of South West Hertfordshire, the Local Plan makes provision for 25,206sqm net additional industrial floorspace (Use Classes B2, B8, E(g)(ii) and E(g)(iii)) and 85,488sqm net additional office floorspace (Use Class E(g)(i)). To meet these <del>challenging</del> targets, the Local Plan will seek to prevent the net loss of <del>both</del> office and industrial floorspace across the Borough. New office growth will be prioritised at the Clarendon Road Primary Office Location, while new industrial growth will be prioritised in</u>

		the five Designated Industrial Areas. <del>Over the plan period, the Council will seek to plan for the creation of 11,500 new jobs.</del>																				
M86	Page 57, Strategic Policy EM4.1, third paragraph	<del>The Council will continue to work with neighbouring authorities in the South West Hertfordshire Functional Economic Market Area to deliver the shortfall of industrial floorspace that cannot be provided in Watford over the plan period.</del>																				
M87	Page 57, Strategic Policy EM4.1, new sentence after last paragraph	<u>Site allocations for employment and mixed-use development, where employment uses would be supported, are defined on the Policies Map.</u>																				
M88	Page 58, paragraph 4.8, last sentence	The South West Herts Economic Study Update has shown there to be a large demand for industrial floorspace within the plan period, although the borough's Housing and Economic Land Availability Assessment (HELAA) (2021) has identified a shortfall of land for industrial uses up to <del>2036</del> <u>2038</u> .																				
M89	Page 58, Table 4.1, heading and floorspace figures	<p>Revised Table 4.1 (below paragraph 4.13, p58)</p> <table border="1"> <thead> <tr> <th><b>Industrial potential supply 2018-2036</b></th> <th><b>Floorspace (sqm)</b></th> </tr> </thead> <tbody> <tr> <td>Site allocations</td> <td>17,035</td> </tr> <tr> <td>Sites with planning permission</td> <td>23,724</td> </tr> <tr> <td><b>Total</b></td> <td><b>40,759</b></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th><b>Summary of industrial floorspace provision 2021-2038</b></th> <th><b>Floorspace provision (sqm)</b></th> </tr> </thead> <tbody> <tr> <td><u>South West Hertfordshire requirement</u></td> <td><u>481,500</u></td> </tr> <tr> <td><u>Watford requirement</u></td> <td><u>98,400</u></td> </tr> <tr> <td><u>Provision through site allocations</u></td> <td><u>12,799</u></td> </tr> <tr> <td><u>Provision on sites with planning permission</u></td> <td><u>12,407</u></td> </tr> <tr> <td><u>Total industrial floorspace provision in the Local Plan</u></td> <td><u>25,206</u></td> </tr> </tbody> </table>	<b>Industrial potential supply 2018-2036</b>	<b>Floorspace (sqm)</b>	Site allocations	17,035	Sites with planning permission	23,724	<b>Total</b>	<b>40,759</b>	<b>Summary of industrial floorspace provision 2021-2038</b>	<b>Floorspace provision (sqm)</b>	<u>South West Hertfordshire requirement</u>	<u>481,500</u>	<u>Watford requirement</u>	<u>98,400</u>	<u>Provision through site allocations</u>	<u>12,799</u>	<u>Provision on sites with planning permission</u>	<u>12,407</u>	<u>Total industrial floorspace provision in the Local Plan</u>	<u>25,206</u>
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M90	Page 58, Table 4.2, heading and floorspace figures	<p>Revised Table 4.2 (below paragraph 4.15, p59)</p> <table border="1" data-bbox="589 279 2042 448"> <thead> <tr> <th><b>Office potential supply 2018-2036</b></th> <th><b>Floorspace (sqm)</b></th> </tr> </thead> <tbody> <tr> <td>Site allocations</td> <td>38,672</td> </tr> <tr> <td>Sites with planning permission</td> <td>72,503</td> </tr> <tr> <td><b>Total</b></td> <td><b>111,175</b></td> </tr> </tbody> </table> <table border="1" data-bbox="589 470 2042 719"> <thead> <tr> <th><b>Summary of office floorspace provision 2021-2038</b></th> <th><b>Floorspace provision (sqm)</b></th> </tr> </thead> <tbody> <tr> <td><u>South West Hertfordshire requirement</u></td> <td><u>188,000</u></td> </tr> <tr> <td><u>Watford requirement</u></td> <td><u>37,600</u></td> </tr> <tr> <td><u>Provision through site allocations</u></td> <td><u>19,428</u></td> </tr> <tr> <td><u>Provision on sites with planning permission</u></td> <td><u>66,060</u></td> </tr> <tr> <td><u>Total office floorspace provision in the Local Plan</u></td> <td><u>85,488</u></td> </tr> </tbody> </table>	<b>Office potential supply 2018-2036</b>	<b>Floorspace (sqm)</b>	Site allocations	38,672	Sites with planning permission	72,503	<b>Total</b>	<b>111,175</b>	<b>Summary of office floorspace provision 2021-2038</b>	<b>Floorspace provision (sqm)</b>	<u>South West Hertfordshire requirement</u>	<u>188,000</u>	<u>Watford requirement</u>	<u>37,600</u>	<u>Provision through site allocations</u>	<u>19,428</u>	<u>Provision on sites with planning permission</u>	<u>66,060</u>	<u>Total office floorspace provision in the Local Plan</u>	<u>85,488</u>
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M91	Page 59, Policy EM4.2 2 <sup>nd</sup> paragraph	<p>Proposals for new industrial employment uses will be supported where they contribute to the identified need for industrial land set out in the South West Herts Economic Study Update. <del>To achieve this, proposals will be supported that incur no net loss of industrial floorspace unless</del> <u>Proposals that would incur a net loss of industrial floorspace will be resisted unless the new use would avoid compromising the industrial activities in the area, and:</u></p> <ul style="list-style-type: none"> <li>a) An up-to-date evidence base demonstrates that the site is no longer required for industrial use; or</li> <li>b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for industrial use in the medium-term.</li> </ul>																				
M92	Page 60, paragraph 4.19	<p>To preserve the strong sub-regional role that Clarendon Road plays in supporting growth in the office sector, the area will be the preferred location for future office growth. It is important to protect existing office use at this location, in line with the findings of the South West Herts Economic Study Update. For proposals for new office floorspace, the office development hierarchy should be followed (Figure 4.3). The approach aims to direct new office development to the Clarendon Road Primary Office Location <u>and the Town Centre, followed by</u> <del>if it is not possible for the new office to be located within the Clarendon Road Primary Office Location, the sequential test should be used to direct the office use to</del> the wider Core Development Area, <del>in line with the office hierarchy</del>. This ensures that <del>new office use outside of Clarendon Road contributes to small clusters first, to minimise any potential negative impacts on residential or industrial areas elsewhere.</del></p>																				

<p>M93</p>	<p>Page 60, Figure 4.3</p>	<p>The diagram illustrates a hierarchy of office development. At the top, two boxes represent specific locations: 'Clarendon Road Primary Office Location' and 'Watford Town Centre'. Below these, a large blue arrow points to a box for 'Wider Core Development Area'. A second large blue arrow points from the 'Wider Core Development Area' to a final box for 'Elsewhere in the Borough'.</p> <pre> graph TD     A["<b>Clarendon Road Primary Office Location</b> Performs a strategic function in South West Hertfordshire as a regional office hub, It is expected that the office floorspace requirements up to 2038 can be met within this location through intensification."]     B["<b>Watford Town Centre</b> Office development appropriate as part of a mix of main town centre uses."]     C["<b>Wider Core Development Area</b> Small clusters of office."]     D["<b>Elsewhere in the Borough</b> Small offices dispersed throughout the Borough."]     A --&gt; C     B --&gt; C     C --&gt; D   </pre>
<p>M94</p>	<p>Page 60, Policy EM4.3, second paragraph</p>	<p>Proposals for new office development, <u>defined within the office Use Class E(g)(i)</u>, that result in no net loss of office floorspace in the Clarendon Road Primary Office Location will be supported. Proposals that would incur a net loss of office floorspace will be resisted unless <u>they safeguard the commercial role and character of the Clarendon Road Primary Office Location, and:</u></p> <ul style="list-style-type: none"> <li>a) An up-to-date evidence base demonstrates that the site is no longer required for office use; or</li> <li>b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for office use in the medium-term.</li> </ul> <p>Mixed-use development, including residential, will be supported where there is no net loss of office floorspace and a predominantly commercial frontage is maintained on to Clarendon Road <u>that reinforces the commercial character of the area.</u></p>

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

M102	Page 71, Policy VT5.3, at the end of the policy	<u>The Town Centre, District Centre and Local Centres are defined on the Policies Map.</u>
M103	Page 71, Policy VT5.3: Local Centres, bullet f)	<del>Are located more than 400m walking distance from the entrance of an existing or permitted primary school.</del>
<b>CHAPTER 6: AN ATTRACTIVE TOWN</b>		
M104	Page 74, Paragraph 6.4, new sentence after final sentence	Protected areas include all parks and open spaces (detailed map at Figure 9.1) and all conservation areas (detailed map at Figure 7.2). <u>These maps are to provide context about Policy QD6.1, however, they are not intended to set out policy requirements. Areas identified are defined on the Policies Map and this should be referred to as part of the decision-making process.</u>
M105	Page 75, Strategic Policy QD6.1, after last paragraph	<u>The Core Development Area, Established Areas and Protected Areas are defined on the Policies Map.</u>
M106	Page 76, paragraph 6.8	Local and town wide views are important to residents and those arriving in the town, and are an important aid to finding key locations. Key views are identified in <u>the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document. supporting planning documents.</u>
M107	Page 77, Policy QD6.2, final paragraph, last sentence	New development will need to make a positive contribution towards important views in the borough, <u>having regard to the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document or equivalent future guidance.</u> This includes views from high vantage points, ground level and long distance views. New development should enhance the setting of local landmarks where appropriate. New developments that have an impact on the local skyline will need to be designed to an exceptional standard that will improve the distinctiveness of Watford in a positive way.

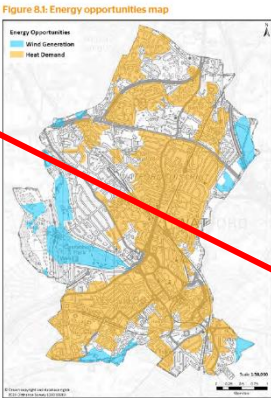
M108	Page 77, Policy QD6.2: Design Principles, new paragraph	<u>Sustainable design</u> New developments will need to be designed to minimise their impact on the environment and embrace sustainability principles. This should include measures to reduce the use of resources including energy, water and waste and incorporate soft measures to improve the environment such as green roofs, green walls and multifunctional green spaces.
M109	Page 81 QD6.4 Building Design, bullet e)	e) All ground floor units <u>facing the street or public realm should</u> <del>to</del> be designed so that the primary access for each individual unit is directly onto <del>that the</del> <u>street or public realm</u> ; deviation from this (by exception) will need to demonstrate <u>that individual ground floor access is not feasible due to the constraints of the site.</u>
M110	Page 81 QD6.4 Building Design, bullet h)	h) internal cores are to serve no more than eight units per floor; deviation from this (by exception) will need to be justified and mitigated through design measures that demonstrate internal living standards will not be adversely affected.
M111	Page 81, Policy QD6.4: Building Design, new bullets after Part h)	i) <u>Buildings should be designed to promote the use of stairs through locating the stairwell in a prominent and easily accessible location within the entrance core of the building, providing a well-lit and spacious internal space which allows social interaction as well as being comfortable for residents to walk up and down and to pass one another;</u> j) <u>Secure cycle parking should be provided in easily accessible and convenient locations;</u>
M112	Page 83, paragraph 6.28	Where consideration of the suitability and sensitivity of a site suggests that a taller building, or built element, may be justified proposals will need to demonstrate how they will deliver <del>exceptional</del> <u>outstanding</u> design quality, high quality living environments and public benefits for the town and community.
M113	Page 83, paragraph 6.29, second sentence	To ensure taller buildings are of <del>exceptional</del> <u>outstanding</u> design, applicants should make appropriate use of tools and processes for assessing and improving the design of their proposals, including making use of design review.
M114	Page 84, paragraph 6.30	Buildings that would be taller than the base building height for their area will also be required to demonstrate their positive contribution in terms of public benefits to the town and the community. <u>Proposals should be able to demonstrate that t</u> <del>These benefits should</del> <u>hese benefits should</u> clearly exceed the benefits that could be achieved for a building that would be lower than the base height for the appropriate area. These benefits should include, but may not be limited to: a) <u>Enhanced p</u> provision of affordable housing and a good mix of dwelling sizes <u>which reflects the identified housing needs;</u> b) <u>Enhanced p</u> Provision of infrastructure, including public transport, cycling and walking infrastructure and social infrastructure to support communities' health and wellbeing, including public open space and access to services and facilities;

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

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

		<u>will be given to the conservation of the asset. Any harm to, or loss of, significance will require clear and convincing justification in accordance with national policy.</u>
M122	Policy HE7.3, final paragraph additional policy requirements provided	<p>To preserve and enhance the character, appearance and setting of <del>non-designated heritage assets</del> <del>Locally Listed Buildings</del> all planning applications that affect <del>non-designated assets</del> <del>Locally Listed Buildings</del> will be determined in accordance with the following:</p> <p>a) Where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building;</p> <p>b) All alterations and extensions should enhance the building’s character, setting and features and must not adversely affect the significance of the building;</p> <p>c) <u>Monuments with heritage value will be protected and proposals should consider how they will respond to the retention and enhancement of the structure and its setting in situ or as appropriate.</u></p> <p>d) <u>Identified sites with places and landscapes with heritage value will be protected and proposals will be required to demonstrate how they are positively contributing towards the heritage value to enhance local distinctiveness. Assets which come to light during the course of an application will need to be properly assessed and recommendations reflected in the details of the proposal.</u></p>
M123	Page 92, Paragraph 7.20, add to end of paragraph.	<u>Arrangements should be made to store a copy of any reports and other materials which arise from archaeological investigations in relation to development proposals in a location agreed with Local Planning Authority which is publicly available.</u>
<b>CHAPTER 8: A CLIMATE EMERGENCY</b>		



M124	Page 94, delete Figure 8.1	
M125	Page 94, paragraph 8.3	<p>Major developments in the Core Development Area should consider how they can reduce carbon emissions through the use of large-scale renewable energy schemes, such as community energy networks. Areas with potential for community energy schemes are identified on the Watford Energy opportunities map (Figure 8.1).</p> <p><u>Major developments, particularly those located within the Core Development Area, that could benefit from the scale and density of development anticipated to take place during the plan period, should maximise opportunities to do so. This may include low-carbon and renewable energy schemes that could be integrated into a development and consideration of how the design and management of a scheme could make effective use of materials and reduce waste.</u></p>
M126	Page 95, paragraph 8.6, fourth sentence	Therefore, major non-residential developments <u>should aim</u> <del>are to</del> meet the BREEAM 'excellent' standard, or equivalent.
M127	Page 95, paragraph 8.7, first sentence	To be effective and reduce costs of retrofitting buildings, applicants <u>should</u> <del>are to</del> provide a pre-assessment certificate to the Local Planning Authority which will set out how sustainability measures can be achieved as part of the development early in the process. Submission of a certificate by an accredited assessor will be required upon completion.
M128	Page 96, Policy CC8.2, Second paragraph, first sentence	Proposals should be designed to reduce their impact on the environment and create high quality internal and external space for people to use. Proposals will be supported where it is demonstrated that resources will be used efficiently as part of the construction and operation of a building. This includes appropriate use of technologies, building design and layout, while taking into consideration the effects of climate change. To achieve this, non-residential major developments should <u>aim to</u> achieve BREEAM excellent standard.

		<p><del>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.</del></p>
M129	Page 94, paragraph 8.4	<p>To be most effective, minimise costs and avoid time delays, applicants should consider sustainable principles from the start of the design process. <del>A Sustainability Statement should be used to set out how proposals will mitigate the impact of climate change and contribute towards sustainable development.</del></p>
M130	Page 95, Policy CC8.1, first paragraph	<p>The Council will support proposals that help combat climate change and ensure the borough becomes more resilient, sustainable and adaptable to climate change. <del>Developments should provide a sustainability statement with their application.</del> New development will need to demonstrate how it is contributing positively towards:</p>
M131	Page 98, Policy CC8.3, Energy Efficiency	<p><b>Energy efficiency</b>  <del>To minimise the impact of new homes on the environment, and achieve Net Zero Carbon, a phased approach to improve the energy efficiency of new homes is set out. To achieve this residential developments should:</del></p> <ul style="list-style-type: none"> <li>a) Be designed so they can be adapted to be <u>carbon neutral</u> <del>Net Zero Carbon</del>;</li> <li>b) Avoid overheating and use passive ventilation when possible;</li> <li>c) Achieve <del>the minimum applicable percentage, as set out below,</del> <u>a 19%</u> improvement for carbon emissions over the target emission rate (TER) as <u>set out</u> <del>outlined</del> in National Building Regulations Part L (2013), or any updated government standards, whichever results in a higher target.</li> </ul> <p>Proposals that do not meet these energy efficiency targets will only be supported if it is unfeasible <del>due to exceptional circumstances</del> and a financial contribution is made towards the Carbon Offset Fund to provide equivalent carbon savings off-site.</p>
M132	Page 98, Policy CC8.3, Water Efficiency, second paragraph	<p>In new, non-residential developments, <u>that are unable to achieve BREEAM 'excellent' standard</u>, water conservation measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM 'very good' for the appropriate building typology.</p>
M133	Page 98, Policy CC8.3,	<p><del>Sustainability Statements</del></p>

	Sustainability Statements, delete section	<del>A Sustainability Statement will be submitted to the Local Planning Authority to demonstrate compliance with this policy for new build residential developments (other than householder applications). The Sustainability Statement will include details as to how energy, water and waste requirements will be complied with and monitored.</del>
M134	Page 100, Policy CC8.4	<p>Development will be supported where it <u>minimises emissions that would</u> <del>does not</del> contribute towards a worsening of existing air quality and, <del>where possible,</del> seeks to improve existing air quality. Appropriate mitigation measures will be required to address any potential impact on air quality.</p> <p><del>An Air Quality Assessment will be required for</del> All major developments and other forms of development that are considered to be at risk of impacts <u>resulting</u> from significant emissions or pollutants <u>will need to consider air quality</u>. This includes, but is not limited to, development where the occupiers/users may be sensitive to poor air quality and development in close proximity to an Air Quality Management Area. <u>Assessments Proposals</u> will be required to consider the cumulative impacts in conjunction with other developments in the vicinity and include mitigation measures where necessary.</p> <p>Where <del>the Air Quality Assessment indicates that</del> a development would cause harm to air quality, planning permission will not be granted unless appropriate mitigation measures are proposed, which demonstrate that:</p> <ol style="list-style-type: none"> <li>a) Public exposure to the pollution source has been minimised;</li> <li>b) Sensitive development has been located an appropriate distance away from the source of exposure; and</li> <li>c) The development would not lead to the creation of a new street canyon or a building configuration that inhibits effective pollution dispersion.</li> </ol>
M135	Page 101, Policy CC8.5, first paragraph, second sentence	In accordance with the <del>'Agent of Change' Principle'</del> , new development <u>must ensure it does not cause existing uses in the vicinity to curtail their activities</u> . New development will be required to assess its potential impacts on neighbouring land uses, including the cumulative effects, and set out mitigation measures where appropriate.
M136	Page 101, Policy CC8.5, Noise pollution and vibration, first sentence	Where development is <u>noise sensitive</u> , noise-generating, or the surrounding area is sensitive to noise and vibration, applicants must undertake a noise assessment to identify potential issues and the required attenuation measures to achieve acceptable noise levels, as defined in national guidance.

M137	Page 101, Policy CC8.5, Contamination, including contamination of groundwater, after second paragraph	<u>Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), infiltration via deep borehole soakaways will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated. Certain discharges into the ground may require an Environmental Permit.</u>
<b>CHAPTER 9: CONSERVING AND ENHANCING THE ENVIRONMENT</b>		
M138	Page 103, new paragraph after paragraph 9.2	<u>The content of Figure 9.1 reflects the green infrastructure and open space network as defined on the Policies Map. The opportunity areas and strategic/local links demonstrate how important elements of the green infrastructure network are connected and help to show where improvements could be made. This information is set out to provide context and aid policy implementation and applicants are encouraged to consider how their proposals can contribute towards enhancing the green infrastructure network.</u>
M139	Page 104, Strategic Policy NE9.1, Part c) onwards	<p>Ensuring all <del>new</del> development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, <u>following the ‘mitigation hierarchy’ of avoidance, mitigation or compensation locally where possible;</u></p> <p><del>Following the ‘mitigation hierarchy’ of avoidance, mitigation or compensation as appropriate;</del></p> <p><u>d) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, as required under the Water Framework Directive;</u></p> <p><del>e) Minimising</del> <u>Reducing</u> the risk of flooding, including surface water flood risk;</p> <p>f) Bettering access to open space across the borough where there is an identified need and delivering new green spaces as part of new development;</p> <p>g) Delivering non-traditional forms of urban greening as part of high density development, as well as traditional open space, including green roofs and walls;</p> <p>h) Improving the quality of Watford’s existing open spaces through development contributions;</p> <p><del>i) Where necessary,</del> Ensuring that protected species and their habitats are a material consideration when determining planning applications;</p>

		<p>j) Protecting trees and encouraging native planting on new development; and</p> <p>k) <u>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.</u></p>
M140	Page 106, Policy NE9.2, second paragraph	<p><del>A proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. Native planting should be prioritised.</del> <u>Existing trees, woodlands and hedgerows should be retained wherever possible. If loss is demonstrated as being unavoidable, appropriate replacement or compensation will be required with native species being prioritised.</u></p>
M141	Page 106, Policy NE9.2, after final paragraph	<p><u>Green infrastructure as defined on the Policies Map will be protected.</u></p>
M142	Page 108, Policy NE9.3, paragraph 1 onwards	<p>Development proposals in close proximity to watercourses must support the strategic importance of Watford’s blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits. <u>Where development is adjacent to a watercourse, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving ‘good’ ecological status as defined by the Water Framework Directive (WFD) objectives.</u></p> <p>Development proposals in close proximity to, or that include a watercourse must:</p> <p>a) <u>Maintain an undeveloped and unobstructed buffer strip of eight metres from the top of the bank of all watercourses of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). 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;</u></p> <p>b) <u>Conserve and enhance the biodiversity value of the watercourse and its corridor by including Water Framework Directive action measures within the proposal. Action measures could include but are not limited to through the inclusion of in-channel enhancements, the creation of priority wetland habitats, prioritising native planting schemes and by addressing misconnections and the eradication and management of Invasive Non-Native Species;</u></p> <p>c) <del>Enhance the role of the watercourse corridors</del> <u>as an accessible active travel and leisure route for pedestrians, cyclists and boaters, and increase connectivity along the length of the watercourse. This includes connectivity and access, where appropriate, to the green infrastructure network;</u></p>

		<p>d) Integrate the watercourse into the scheme as a vital part of the public realm; and</p> <p>e) Open and re-naturalise modified watercourses, including culverted and piped waterways. <u>New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A Water Framework Directive assessment should be submitted as part of proposals and should include an assessment of the works to preventing future improvement, in addition to how the proposal will impact Water Framework Directive status.</u></p> <p>The provision of crossings and bridges will be supported where they improve connectivity for pedestrians and cyclists, are in keeping with the setting of the area, and are designed to avoid obstructing flood flows <u>and damage to a watercourse.</u></p> <p><u>Flood Zones 2 and 3 are defined on the Policies Map.</u></p>
M143	Page 109, paragraph 9.16	<p>The River Colne basin is designated as Groundwater Source Protection Zone 1, most sensitive with an area buffering the waterway covering much of east Watford identified as Groundwater Source Protection Zone 2 and sensitive to contamination. This means several land uses including industrial, petrol stations and waste management may not be suitable in certain areas of Watford due to the high risk of contamination to the aquifer and drinking water. Developers are expected to implement measures to <u>'minimise avoid</u> these potential negative impacts on the ground source'. Where these are required these should be prepared in collaboration with the Environment Agency and the Lead Local Flood Authority.</p>
M144	Page 110, Policy NE9.4, Fluvial Flooding, second paragraph onwards	<p>Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. <u>Only water compatible and essential infrastructure will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within Flood Zone 3b. Developers should seek to increase the extent of Flood Zone 3b where possible and appropriate.</u> To demonstrate compliance with the Exception Test, a flood resilient design and emergency planning considerations will need to be accounted for, over the lifetime of the development including:</p> <ul style="list-style-type: none"> <li>a) The development to remain safe and operational under flood events;</li> <li>b) Safe evacuation and/or safely remaining in the building under flood conditions;</li> <li>c) Key services must continue to be provided under flood conditions; and</li> <li>d) Buildings are to be designed for quick recovery following a flood.</li> </ul> <p>Any development within Flood Zones 2 and 3, and those over one hectare in Flood Zone 1, should use a Flood Risk Assessment to show how they have considered flood risk beyond the site boundaries, including cumulative impacts arising from other developments. <u>It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the Strategic Flood Risk Assessment) and that where possible, development will reduce flood risk overall.</u> Proposals <u>for development in the floodplain must <del>should</del></u></p>

		<p>demonstrate that suitable flood compensation storage <u>will be provided is available</u> to avoid any net loss in floodplain. <u>Additionally, all new development within flood zones require an assessment of the impact of climate change on flood risk on site and elsewhere.</u></p> <p><u>Developers should seek to provide an undeveloped buffer zone of eight metres between the top of the bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing).</u> Proposals located in areas where waterways have been culverted or altered should seek to re-naturalise the river and surroundings, improve water storage and enhance riparian habitats, in line with requirements to meet Water Framework Directive objectives and the Thames River Basin Management Plan. <u>There is a presumption against the use of hard engineering, including gabions. For any development within eight metres of a culvert, the developer must demonstrate that they have sought to de-culvert, as well as undertake a survey of the culvert to assess its exact location, condition and whether it is commensurate with the lifetime of the development or demonstrate how it will be repaired/upgraded.</u> Flood defences <u>and Main Rivers within the site boundary adjacent to development sites</u> must be maintained, repaired or replaced by the developer for the lifetime of the development. <u>For any development within eight metres of a main river, the developer must demonstrate that access to the river and banks will still be possible for maintenance and emergency works.</u></p>
M145	Page 110, Policy NE9.4, Groundwater, fifth paragraph	<p>Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts <u>or risks to controlled waters</u>. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), <u>deep-infiltration via deep borehole soakaways should be the last resort will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated.</u> Certain discharges into the ground may require an Environmental Permit.</p>
M146	Page 112, Policy NE9.5, second paragraph, delete last sentence	<p>Sustainable Drainage Systems should make effective use of land by being multifunctional, to maximise ecological benefits such as biodiversity, provide open space or incorporate tree planting and landscaping. Developments will need to ensure the implementation of Sustainable Drainage Systems does not worsen contamination effects, and soakaways should not be located within land affected by land contamination. <del>Details of the Sustainable Drainage System should be submitted to the Council as part of the Sustainability Statement.</del></p>
M147	Page 112, Policy NE9.5, fourth paragraph	<p>Sustainable Drainage Systems should be designed and integrated into the proposal to effectively manage the existing surface water flow paths on the site, <u>protect and enhance water quality</u>, and help to mitigate other flood risks.</p>

M148	Page 113, Policy NE9.6, first, second and third paragraphs, replace final paragraph	<p>Open space and ancillary facilities used for leisure and recreation will be protected, unless an up to date assessment <u>of needs</u> demonstrates the space is surplus to need. For an open space or an ancillary facility to be considered surplus to requirements, the following must be demonstrated:</p> <ol style="list-style-type: none"> <li>a) An assessment <u>of needs</u> has been undertaken that has clearly shown the open space, buildings or land to be surplus to requirements, having regard to the Council’s most recent evidence base; and</li> <li>b) The open space is not needed for alternative open space uses; or</li> <li>c) An equivalent or better facility in terms of quality and quantity is to be provided in a more suitable location that meets the needs of the local community.</li> </ol> <p>Development proposals for alternative open space uses will be supported where an up-to-date assessment <u>of needs</u> clearly shows the benefits outweigh <del>the loss</del> <u>any adverse impacts on the community and the environment</u>.</p> <p><del>The absence of identification of an open space on the Policies Map does not imply that development is appropriate. Open space and ancillary facilities used for leisure and recreation, as defined on the Polices Map, will be protected.</del></p>
M149	Page 113, paragraph 9.28	<p>As new development comes forward, there <del>may</del> <u>will</u> be opportunities to <del>provide</del> <u>create</u> new <u>publicly accessible communal</u> open space on site. <del>While some level of private amenity space will be expected (Policy HO3.11 Private and Communal Outdoor Amenity Space’), larger developments can also help to provide communal sports and recreational facilities such as,</del> <u>The different types of publically accessible open space have been defined in the Watford Green Spaces Strategy and include the following:</u></p> <ul style="list-style-type: none"> <li>• Parks, public gardens and recreational grounds;</li> <li>• Amenity green spaces;</li> <li>• Equipped play space;</li> <li>• Natural and semi-natural green spaces;</li> <li>• Outdoor sports facilities;</li> <li>• Churchyards and cemeteries; and</li> <li>• Allotments.</li> </ul> <p><del>The different types of open space have been defined in the Green Spaces Strategy.</del> <u>The Green Space Strategy sets out where these different facilities are located in the borough and appropriate catchment distances for each type of open space. Where a development does not lie within the catchment distance of a type of open space, it will be imperative that this is provided on site to reverse the deficiency.</u></p>

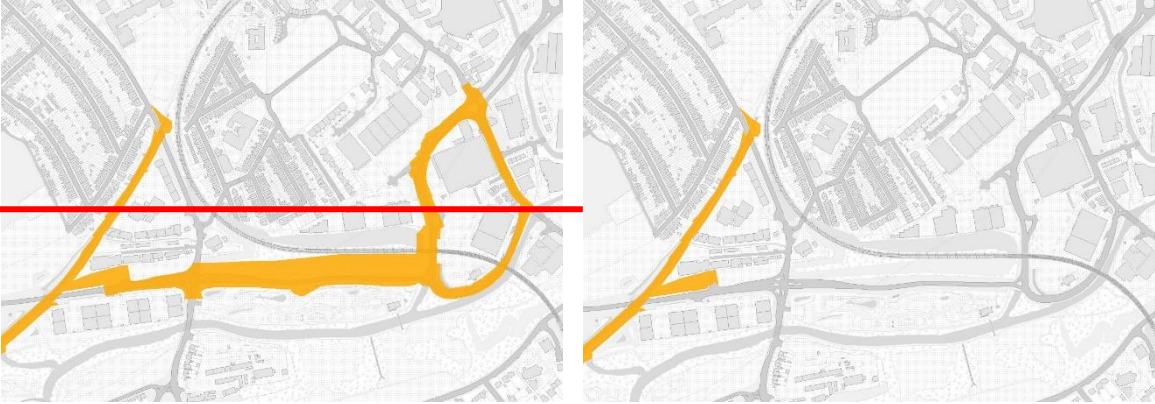


M150	Page 114, Policy NE9.7, first paragraph	New <u>major</u> residential developments proposals will be supported where they contribute to the provision, enhancement and maintenance of open space, either by means of on-site provision or through developer <del>contributions</del> <u>obligations</u> .
M151	Page 115, Policy NE9.8	<p><del>Development proposals should apply the mitigation hierarchy to avoid or mitigate harmful effects on biodiversity. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.</del></p> <p>New development should seek to achieve an overall net gain in biodiversity. This must be measured through the use of the latest <del>Natural England biodiversity</del> <u>Defra Biodiversity</u> metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site.</p> <p>Development should apply the mitigation hierarchy to <del>avoid</del> <u>minimise</u> or mitigate harmful effects on biodiversity. Mitigation and compensation measures must offset any losses to achieve a measurable net gain for biodiversity. Where it is not possible to avoid or mitigate all impacts on site, an offsite Biodiversity Offset Agreement should be submitted <u>to demonstrate that any off-site measures proposed seek to enhance locally and nationally important priorities.</u></p> <p><u>To ensure the long-term net gain, all development proposals should prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on-and off-site measures.</u></p> <p><u>All development proposals will be required to prepare a proportionate ecological survey and assessment report. Where there is a reasonable likelihood of the presence of a protected species or its-habitat is found to be present, applications must be supported by an ecological survey. If present, the proposal must mitigate or compensate appropriately in accordance with the legislation that protects them. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.</u></p>
<b>CHAPTER 10: INFRASTRUCTURE</b>		
M152	Page 118, Policy 10.1	<p>Proposals should demonstrate a comprehensive, integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and:</p> <ul style="list-style-type: none"> <li>a) Contributes appropriately and proportionately towards required infrastructure, <u>having regard to the latest identified in</u> <del>in</del> <u>Watford's Infrastructure Delivery Plan</u>, at a rate and scale sufficient to support the growth identified in this Local Plan;</li> <li>b) Where applicable, connects to area-wide infrastructure and enables future connections;</li> </ul>

		<p>c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the <del>Watford's Infrastructure Delivery Plan, Site Allocations</del> <u>site allocations</u> and / or other policies in the Local Plan;</p> <p>d) <del>Where development is dependent upon, or creates a specific need for, new or improved infrastructure; this will be delivered on site;</del></p> <p>e) Is appropriately designed so that it complements and does not unduly restrict development on adjacent or connected sites.</p> <p>Developers will be expected to <del>engage</del> <u>participate in early pre-application engagement</u> with the Council and infrastructure service providers to discuss their requirements.</p> <p>Developer contributions will be sought where needs arise, in line with the policy requirements of this plan; where provision is made on site, this will be considered in the context of other developer contributions.</p>
M153	Page 120, Paragraph 10.17, first sentence	Future-proofed, high quality digital infrastructure, <u>such as fibre optic cables for high speed internet</u> is considered vital to support well-functioning <u>residential and</u> employment areas.
M154	Page 120, Policy IN10.2	<p><del>Planning permission, except for householders, will be granted where it is demonstrated</del> <u>All non-householder development will be expected to demonstrate</u> that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from <u>the proposed development. Where necessary, planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades.</u> Infrastructure provision <u>should be made in accordance with relevant requirements set out in this Local Plan; have regard to the latest Watford</u> <del>will reflect the Infrastructure Delivery Plan and its successor documents to</del>; meet the needs arising from development, and mitigate adverse social, economic or environmental impacts arising from development.</p> <p>Developers must demonstrate they have explored existing infrastructure capacity <u>with appropriate providers</u>, and how this could be future-proofed, <del>with appropriate providers</del> and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the borough, opportunities should be taken to maximise infrastructure provision on suitable sites.</p> <p>Proposals for <u>residential and</u> employment uses should demonstrate that provision is made for <del>high quality digital facilities</del> <u>high speed internet infrastructure</u> as part of the application.</p>
M155	Page 122, Policy IN10.3	There will be a need to balance the priorities for infrastructure delivery with those for affordable housing, other non-infrastructure related planning obligations and sustainability standards.

		<p>The Council will secure the infrastructure necessary to support the growth outlined in this plan, ensure sustainable development, meet the needs of development and, where necessary, mitigate the impacts of development by:</p> <p>a) Securing appropriate on-site enabling and development works;</p> <p>b) Charging the Community Infrastructure Levy on developments as required by any charging schedules in operation for the area within which the development is located;</p> <p>c) Securing <del>Section 106 Agreements</del> <u>planning obligations</u> to provide affordable housing and <del>make provision to</del> mitigate the impacts of the development, <u>in accordance with national policy and where necessary, or appropriate</u> having regard to any relevant <u>Supplementary Planning Documents</u> or <u>other local</u> guidance;</p> <p>d) Securing off-site highway works, <u>including provision for cycling and walking</u>, where necessary;</p> <p>e) Working with relevant service providers to identify and secure infrastructure funding or financing mechanisms.</p>
<b>CHAPTER 11: A SUSTAINABLE TRAVEL TOWN</b>		
M156	Page 125, paragraph 11.7, third sentence	<del>2036</del> <u>2038</u>
M157	Page 124, Paragraph 11.15, last sentence	Improvements to the road network <del>through an extension of Imperial Way, to provide a connection with the new proposed mobility hub and access from Colonial Way via Clive Way with upgrades to the necessary road junction and road extension to provide a connection with the proposed Watford Junction Sustainable Transport Hub.</del> <u>The potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot via Imperial Way, should also be facilitated.</u>
M158	Page 126, Policy ST11.1, Part g)	g) Supporting a <del>Sustainable Transport Hub</del> <u>mobility hub</u> within the town centre that serves as a focal point for multiple modes <u>and links to the High Street Station.</u>
M159	Page 126, Policy ST11.1, new bullet after Part g)	<u>h) Enhancing pedestrian and cycle facilities at key junctions with the ring road</u>
M160	Page 127, Paragraph 11.14	Watford Junction is the busiest railway station in Hertfordshire. The adjacent bus station, along with taxi rank provision, cycle and walking links and car parking mean that it serves as a multi-modal transport hub for both the town and the wider region. Growth around the station is unlikely to be possible without alterations to the built environment to unlock sites and improve accessibility to sustainable travel. The ability to deliver key transport infrastructure must therefore be preserved. This should include the provision of two new pedestrian / cycle bridges to overcome severance caused by the rail lines <u>as part of the comprehensive redevelopment of the area.</u> One of <u>these bridges</u> <del>which</del> should cross both the West

		<p>Coast Main Line and Abbey Line, preferably as part of, or within the vicinity of, Watford Junction Station, and the second <del>being</del> <u>should be</u> between Penn Road and Colonial Way. Links to these should accommodate both pedestrians and cyclists, <del>and</del> be accessible to non-station users 24 hours a day, <del>to</del> maximise the permeability of the area, <u>provide a connection to the Eastern Mobility Hub and not compromise any future re-routing of vehicle access to the concrete batching plant and rail aggregates depot.</u></p>
M161	Page 128, Policy ST11.2	<p>Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a <u>Sustainable</u> Transport Hub.</p> <p>To prevent development that would compromise future mass transit, bus prioritisation, walking, and cycling infrastructure, set out in either the South West Hertfordshire Growth and Transport Plan, the Local Cycling and Walking Infrastructure Plan or Watford’s Sustainable Transport Strategy, <u>developers will need to have regard to the following Safeguarded Transport Routes</u> <del>the following routes will be protected from development whose</del> <u>to ensure</u> designs would <u>not</u> compromise their ability to prioritise public transport and active travel routes:</p> <ul style="list-style-type: none"> <li>a) The disused former Croxley Rail Line, including access points <u>and routes on the existing road network</u>, as set out in the <del>Watford MRT Safeguarding Technical Report</del> <u>Croxley Line – Safeguarding for Mass Rapid Transit Technical Report</u>;</li> <li>b) The current Ebury Way cycle path and access to it; and</li> <li>c) The Abbey Line.</li> </ul> <p><u>Additionally, proposals should have regard to:</u></p> <ul style="list-style-type: none"> <li>d) <u>Existing</u> <del>Current</del> and planned cycle routes identified in the Local Cycling and Walking Infrastructure Plan; and</li> <li>e) <u>Any future p</u>Planned mass rapid transit routes identified by Hertfordshire County Council.</li> </ul> <p><del>All routes are</del> <u>The Safeguarded Transport Routes are identified on the Policies Map and</u> represented in Figure 11.3.</p> <p>The role of Watford Junction as a multi-modal <u>Sustainable Transport Hub</u> <del>hub</del> should be preserved, meaning that development must not hinder the provision of the following on-site and cross-boundary infrastructure;</p> <ul style="list-style-type: none"> <li>f) New pedestrian / cycle bridges over the West Coast Main Line and Abbey Line and connecting Penn Road with Colonial Way, plus access to these <u>from the existing and new road networks</u>;</li> <li>g) Bus and rail access that also provides for <u>the use of</u> cycles, electric vehicles, drop-off movements, taxis, coaches and <u>any</u> future mass rapid transit access;</li> <li>h) <del>Extension of Imperial Way to</del> <u>Pedestrian and cycling access from Colonial Way (or Imperial Way as part of a comprehensive redevelopment of the area) that will</u> provide a connection <u>to the Eastern Mobility Hub and access to</u></li> </ul>

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

M167	Page 133, paragraph 11.33	Cycle parking standards are set out in Appendix D and parking should be laid out <del>in accordance to</del> <u>with regard to</u> the Watford Cycle Parking Supplementary Planning Document.
M168	Page 135, Policy ST11.4, Cycle parking, second sentence	Secure <u>and convenient</u> cycle parking facilities should be designed at the outset of the scheme.
<b>CHAPTER 12: A HEALTHY COMMUNITY</b>		
M169	Page 146, Policy HC12.1, third paragraph, fifth sentence	<del>Major developments are expected to promote active design by adhering to the 10 Principles of Active Design set out by Sport England. Non-householder developments should promote active design having regard to relevant guidance, including that from Sport England.</del>
M170	Page 147, Paragraphs 12.4, 12.5, 12.6	<p><del>12.4 A Health Impact Assessment seeks to inform and influence decision making, ensuring that health impacts, and the distribution of those impacts, are considered as part of the planning policy process. They provide a mechanism to understand more broadly how a wider range of economic, environmental and social factors can combine to affect a development.</del></p> <p><del>12.5 The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher quality development of schemes of 100 or more residential units. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:</del></p> <ul style="list-style-type: none"> <li><del>• Rapid Assessment for simpler proposals;</del></li> <li><del>• In-depth Health Impact Assessment for more complicated or larger proposals.</del></li> </ul> <p><del>12.6 Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth Health Impact Assessments will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment, as a minimum, to support their planning application.</del></p>

		<p><u>The Watford Local Plan seeks to ensure that positive opportunities from development are optimised and that any unintended consequences do not have a disproportionate impact upon the population, especially those more at risk from health inequalities. A Health Impact Assessment (HIA) is an essential assessment for any development proposal to demonstrate that it will not have negative implications for the physical health and mental wellbeing of both existing communities in the vicinity, as well as the future residents of the new development. Health Impact Assessments are a tool through which development can:</u></p> <ul style="list-style-type: none"> <li><u>• Understand the local community health needs and demonstrate how it can support these;</u></li> <li><u>• Demonstrate how it has considered health inequalities;</u></li> <li><u>• Meet the requirements of the Environmental Impact Assessment (EIA) Regulations for human health;</u></li> <li><u>• Meets the policy requirements of the Watford Local Plan that major development proposals undertake a Health Impact Assessment;</u></li> <li><u>• Demonstrate the opportunities of a proposal and how a development has been positively planned.</u></li> </ul> <p><u>Hertfordshire County Council has adopted a Health Impact Assessment Position Statement which sets out when a Health Impact Assessment should be undertaken and frameworks to use for each stage of the Health Impact Assessment process. The Health Impact Assessment Position Statement sets out a threshold for different types of development, including a threshold for the development of 100 residential units or more to be subject to a Health Impact Assessment. <del>This can be applied flexibly depending on the nature of a development proposal.</del> Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:</u></p> <ul style="list-style-type: none"> <li><u>• Rapid Assessment for simpler proposals;</u></li> <li><u>• In-depth (comprehensive) assessment for more complicated or larger proposals</u></li> </ul> <p>Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth, or comprehensive Health Impact Assessments will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment to support their planning application.</p>
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M171	Page 148, Policy HC12.3	<p>Proposals for new, extended or improved cultural and community uses that address a demonstrated demand from the local community will be supported. Such uses should be located within sustainable, accessible locations close to the identified need and as a complementary use within, or close to, an identified Local Centre. Facilities <del>that are proposed in isolated locations or</del> that conflict with existing uses nearby will not be permitted.</p> <p>The loss of existing community and cultural venues will only be permitted where it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>The facility is no longer needed and there is no need for an alternative community or cultural use on that site; or</li> <li>The community or cultural uses can be reprovided of a higher quality in an alternative location or manner that is equally accessible to the community.</li> <li><u>In accordance with Appendix F, the property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for community uses.</u></li> </ol> <p>Development within the curtilage of existing community facilities should demonstrate that the continued operation of these facilities is not compromised.</p>
<b>CHAPTER 13: SITE ALLOCATIONS AND NEW DEVELOPMENT</b>		
M172	Page 150, paragraph 13.2, second sentence	The administrative area of Watford has a capacity for providing <del>14,988</del> <u>13,328</u> units over the plan period, with current estimates indicating a <del>793</del> <u>784</u> units per annum requirement.
M173	Page 150, Paragraph 13.3, first sentence	These sites are <del>identified</del> defined on the Policies Map and set out in Figure 13.1. The policy is applicable to those sites identified in <del>Tables 13.1, 13.2, 13.3 and 13.4</del> <u>Tables 13.1 (housing), 13.2 (Gypsies and Travellers), 13.3 (mixed-use), 13.4 (employment) and 13.5 (education)</u> which include the following information:
M174	Page 151, Paragraph 13.4	The process for calculating the indicative yields of the site has been set out in the <del>HELAA</del> <u>Housing and Economic Land Availability Assessment</u> , as has the wider process for site selection. <u>It is important to emphasise that the indicative yields set out are purely baseline scenarios used to estimate the number of units to be provided within the plan period, based on site size and the sustainability of the surrounding area. Ultimately, the scale of development should be guided by design quality, character and any heritage sensitivities which may affect the site, having regard to the full suite of policies in the Plan including Policies HO3.2: Housing Mix, Density and Optimising Use of Land and QD6.5: Building Height.</u>
M175	Page 151, new paragraphs	<u>For each site allocation, the types of uses that are considered appropriate have been set out. Proposals for uses classified as sui generis will be supported where these are consistent with the uses set out in Tables 13.1 – 13.5, support the wider</u>



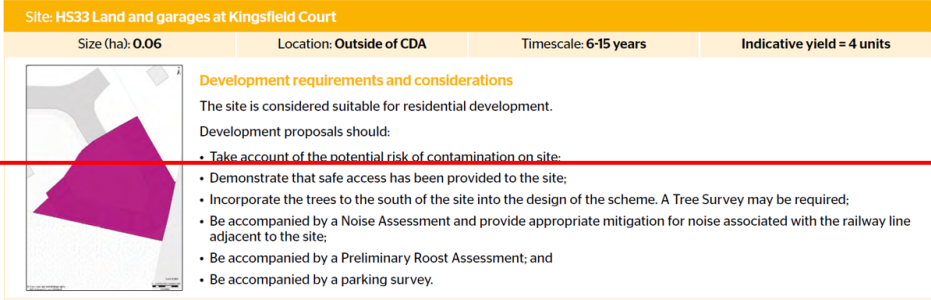
	after paragraph 13.4	<p><u>objectives for the area, particularly on sites that are located within a Strategic Development Area, and will make a positive contribution towards achieving these. Where proposals include an ancillary use that is not within a use-class set out in a site allocation, applicants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

M178	Site allocations for residential use where these are the only proposed uses.	<i>Residential allocations have been clarified to state these are classified as C3 use. These proposed amendments will be included in the Schedule of Minor Modifications.</i>
M179	Page 152, Table 13.1: Housing sites HS01 Land and garages at Lych Gate, add new requirement after second bullet	<u>b) Have regard to the Waterdale Recycling Centre and Waste Transfer, which is located approximately 850m from this site. Its operations should be taken into account;</u>
M180	Page 154, Table 13.1: Housing sites HS06 Land at Russell Lane, amend third bullet	<del>Incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy; and</del> <u>c) A proportionate contribution for compensatory improvements to the environmental quality and accessibility of remaining parts Watford's Green Belt which include areas of existing open space and green infrastructure via a Section 106 agreement;</u>
M181	Page 157, Table 13.1: Housing Sites HS12 Land and garages between 139 and 149 Queens Road	Timescale <del>4-5</del> <u>6-15</u> years
M182	Page 158, Table 13.1, Site HS14, first bullet	<del>Avoid any significant adverse impacts on the locally listed building, Exchange House, located opposite the site;</del> <u>a) Future development proposals for HS14 will take account of the findings and recommendations of the Council's Heritage Impact Assessment ;</u>

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

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

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

M191	Page 167, Table 13.1 Housing sites HS31 Land at Bushey Station	Timescale: <del>4-5</del> <u>6-15</u> years				
M192	Page 167, Table 13.1 Housing sites HS31 Land at Bushey Station, replace fourth bullet	<p><del>Avoid any adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</del></p> <p><u>d) Future development at HS31 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p><u>e) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>f) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for the site to be submitted prior to the determination of any application;</u></p>				
M193	Page 168, Table 13.1: Site HS33, delete	 <p>Site: HS33 Land and garages at Kingsfield Court</p> <table border="1"> <tr> <td>Size (ha): 0.06</td> <td>Location: Outside of CDA</td> <td>Timescale: 6-15 years</td> <td>Indicative yield = 4 units</td> </tr> </table> <p><b>Development requirements and considerations</b></p> <p>The site is considered suitable for residential development.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• <del>Take account of the potential risk of contamination on site;</del></li> <li>• Demonstrate that safe access has been provided to the site;</li> <li>• Incorporate the trees to the south of the site into the design of the scheme. A Tree Survey may be required;</li> <li>• Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site;</li> <li>• Be accompanied by a Preliminary Roost Assessment; and</li> <li>• Be accompanied by a parking survey.</li> </ul>	Size (ha): 0.06	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 4 units
Size (ha): 0.06	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 4 units			
M194	Page 169, New Table 13.2- Addition of Gypsy and Traveller Site Tolpits Lane	<u>Table 13.2: Gypsy and Traveller Site</u>				

**Site: GT01 Land at Tolpits Lane, south of Epsom Road**

**Size (ha): 0.31**

**Location: Outside of CDA**

**Timescale: 1-5 years**

**Indicative Yield = 2 Gypsy and Traveller Pitches**



**Development requirements and considerations**

**The site is considered suitable for the provision of Gypsy and Traveller pitches.**

**Development proposals should:**

Have regard to criteria a-f of Policy H03.8: Gypsies and Travellers.

Ensure that the plots are protected for Gypsy and Traveller use exclusively unless it can be demonstrated that they are no longer required in accordance with Policy H03.8.


Retain and enhance the walking and cycle route immediately adjacent to the eastern boundary of the site.

Provide quality landscaping along the frontage with Tolpits Lane and the path along the eastern boundary of the site

Be accompanied by a Preliminary Ecological Assessment

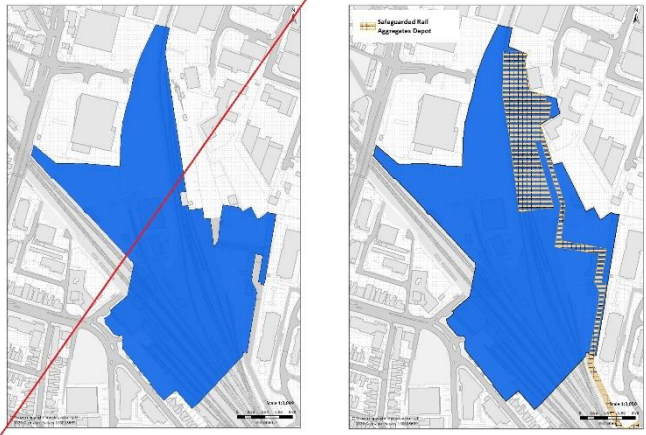
Incorporate compensatory measures for the loss of Green Belt into the scheme.

M195	Page 169, Table 13.2, Site MU01, amend first sentence	This site is considered suitable for mixed-use development including <u>one or more of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community uses.</u> Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.
M196	Page 169, Table 13.2, Site MU02, amend first sentence	This site is considered suitable for mixed-use development including <u>one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential, and E(e) medical facilities and F2(b) meeting places for community use.</u> Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.
M197	Page 170, Table 13.2, Site	This site is considered suitable for mixed-use development including <u>one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community uses.</u> Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.

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




		<p>c) <u>Provide a new primary school;</u></p> <p>d) <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></p> <p>e) <u>Seek to work collaboratively with the landowner of site MU06, which is located adjacent to the east of the site, to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage;</u></p> <p>f) <u>Future development at MU05 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p>g) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p>h) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u>  <del>Avoid significant harm to the Nascot Conservation Area, located directly to the west of the site;</del>  <del>Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</del></p> <p>i) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</p> <p>j) Facilitate appropriately and proportionately towards the timely provision of required infrastructure identified in Watford’s Infrastructure Delivery Plan, including measures to improve access to the station for cyclist, pedestrians and vulnerable users; and</p> <p>k) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.</p>
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<p>M201</p>	<p>Page 172, Table 13.2: Mixed-use sites          MU06 Land at Watford Junction, site allocation map</p> <p><u>Site extended to include land to the east and the area safeguarded to protect the concrete batching plant and rail aggregates depot, rail sidings and access road have been added as Safeguarded Rail Aggregates Depot layer.</u></p>	
<p>M202</p>	<p>Page 172, Table 13.2: Mixed-use sites          MU06 Land at Watford Junction,</p>	<p>Indicative yield = 1,232 units <u>C3 residential</u>, 20,998 sqm of <u>E(g)(i) office floorspace</u>.</p> <p>This site is considered suitable for mixed-use development <del>including residential-C3 residential, employment and commercial uses</del> <u>E(g)(i) office floorspace</u>, a replacement <u>E(f) childcare facility</u> and a <u>F1(a) primary school</u>. <del>is required on site.</del></p> <p>Development proposals should:</p>

	revised requirements	<ul style="list-style-type: none"> <li>a) Support the wider objectives of the Watford Gateway Strategic Development Area, including the necessary improvements to the station and its <u>operation functionality</u>;</li> <li>b) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including measures to improve bus priority around the station;</li> <li>c) <del>A-Provide a new 3 form entry primary school;</del></li> <li>d) <del>A-Provide a replacement child care facility;</del></li> <li>e) Seek to work collaboratively with the landowners of sites MU05 and MU07 <del>which are</del> located adjacent to the site, <u>MU24 located north east of the site and the operator of the concrete batching plant and rail aggregates depot located almost entirely within the site to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage</u>;</li> <li>f) <u>Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided</u>;</li> <li>g) <u>Development will not compromise Clive Way as a safe, high quality active travel route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub</u>;</li> <li>h) <u>In collaboration with the landowners of sites MU05, MU07 and MU24 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides access to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub</u>;</li> <li>i) <del>Support the delivery of a new pedestrian and cycle bridge and the protection of a second crossing route from Penn Road across the railway line</del>; <u>Support the delivery of a second crossing point from Penn Road across the railway lines in the latter part of the plan period when comprehensive mixed-use redevelopment is proposed</u>;</li> <li>j) <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network</u>;</li> <li>k) <del>Demonstrate that safe access has been provided to the site</del>;</li> <li>l) <u>Have regard to the safeguarded concrete batching plant and rail aggregates depot located largely within the north east boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any</u></li> </ul>
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		<p><u>applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</u></p> <p>m) <del>Ensure the layout of the scheme has been planned, laid out and</del> <u>designed to minimise any potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the ‘agent of change’ principle; and This may include locating non-residential floorspace in the lower storeys;</u></p> <p>n) <u>Future development at MU06 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</u></p> <p>o) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p> <p><del>Avoid significant harm to the setting of the Nascot Conservation Area, located directly to the west of the site;</del></p> <p><del>Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;</del></p> <p>p) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided;</p> <p>q) Take account of the potential risk of contamination on site;</p> <p>r) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and</p> <p>s) <u>For all noise sensitive development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, rail aggregates depot and associated concrete batching plant and rail aggregates depot located largely within in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of sensitive noise receptors.</u></p>
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<p>M203</p>	<p>Page 173, Table 13.2: Mixed-use sites – Site MU07</p> <p><u>Safeguarded Rail Aggregates Depot layer added</u></p>	
<p>M204</p>	<p>Page 173, Table 13.2: Mixed-use sites MU07 Land at Astral House, revised requirements</p>	<p>Timescale: 1-5 years (<u>industrial development</u>)          6-15 years (<u>long-term transitional mixed-use development</u>)          Indicative yield = <u>6,600sqm of B2, B8 industrial floorspace</u> <del>131 residential units</del></p> <p><del>This site is considered suitable for mixed-use development, including residential and employment uses.</del>  <u>This site is considered suitable for mixed-use development including one or more of the uses, or a mix thereof, defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development and E(g)(iii) industrial processes.</u></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: E(e) health facilities, E(f) crèche/nursery, E(g)(ii) research and development, E(g)(iii) industrial processes, C2 residential institutions, C3 residential, and C4 houses in multiple occupation.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>a) Support the wider objectives of the Watford Gateway Strategic Development Area;</li> <li>b) Result in no net loss of employment floorspace on site <u>unless the office use is replaced with industrial uses;</u></li> </ul>

		<p>c) <u>Seek to work collaboratively with the landowners of sites MU06, and MU24 EM05 and the operator of the concrete batching plant and rail aggregates depot, which are located adjacent to the east of to the site, to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage;</u></p> <p>d) <u>Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided;</u></p> <p>e) <u>Demonstrate that safe pedestrian and cyclist access to the site has been provided; Development will not compromise Clive Way as a safe, high quality active travel route to the Watford Junction Sustainable Transport Hub;</u></p> <p>f) <u>In collaboration with the landowners of sites MU05, MU06 and MU24 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;</u></p> <p>g) <u>Future development at MU07 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p>h) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p> <p>i) <u>Support the delivery of a second crossing point from Penn Road across the railway lines in the latter part of the plan period when comprehensive mixed-use redevelopment is proposed;</u></p> <p><del>j) <u>Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land required for bridge;</u></del></p> <p>k) <u>Take account of the potential risk of contamination on site;</u></p> <p>l) <u>Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required if <u>new residential dwellings come forward; due to the scale of the new dwellings to be provided; and</u></u></p> <p>m) <u>Have regard to the safeguarded concrete batching plant and rail aggregates depot adjacent to the western boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward</u></p>
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		<p><u>on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</u></p> <p>n) <u>Ensure the scheme has been planned, laid out and designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the ‘agent of change’ principle; and</u></p> <p>o) <u>For all noise sensitive development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, concrete batching plant and rail aggregates depot and associated concrete batching plant located in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of sensitive noise receptors.</u></p>
M205	Page 174, Table 13.2, Site MU08, amend first sentence	<p>Indicative yield = 21 units <u>C3 residential</u>, 480sqm of <u>E(g)(i) office floorspace</u></p> <p>This site is considered suitable for mixed-use development of <u>C3 residential and/or E(g)(i) office floorspace</u>, <del>including residential and office uses.</del></p>
M206	Page 174, Table 13.2, Site MU08, amend last bullet. Two new bullets added	<p><del>Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site. Future development at MU08 will take into account the findings and recommendations of the Council’s Heritage Impact Assessment;</del></p> <p>d) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design.</u></p> <p>e) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.</u></p>
M207	Page 175, Table 13.2, Site MU09, amend first sentence	<p>Indicative yield = 120 units <u>C3 residential</u>, 2,770sqm of <u>E(g)(i) office floorspace</u></p> <p>This site is considered suitable for mixed-use development of <u>C3 residential and/or E(g)(i) offices</u>, <del>including residential and office uses.</del></p>

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

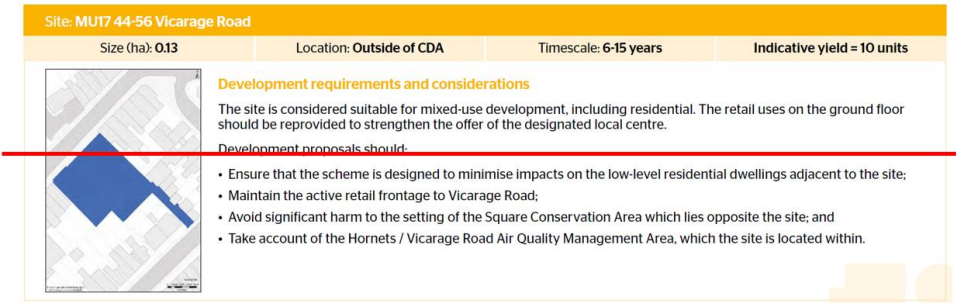


	MU11, amend first sentence, amend last two bullet, two new bullet after last bullet	The site is considered suitable for mixed-use development <u>including C3 residential, including residential uses and active commercial uses on the ground floor. One or more, or a mix thereof, of the uses defined within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

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

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

<p>paragraphs and c)</p>	<p>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: C2 residential institutions, E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation.</p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>a) Support the wider objectives of the Colne Valley Strategic Development Area, including the linear park;</li> <li>b) Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as part of the linear park proposal. Re-naturalisation of the culverted River Colne will also be supported;</li> <li>c) <u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u></li> <li>d) Seek to engage with landowners of site HS21, located adjacent to the west, and HS23, located adjacent to the south, to maximise the benefits of development;</li> <li>e) Provide no additional retail floorspace above the existing on site provision;</li> <li>f) Enhance the strategic view from the railway line to the town centre. Proposals should be supported with images that demonstrate how a proposal will contribute towards the Watford skyline;</li> <li>g) Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway;</li> </ul> <p><del>Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site, including the locally listed coal duty marker on site. If it is demonstrated to be unfeasible to retain the listed monument on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the monument. A Heritage Impact Assessment may be required;</del></p> <ul style="list-style-type: none"> <li>h) <u>Future development at MU16 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></li> <li>i) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></li> <li>j) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></li> </ul>
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		<p>k) <u>New proposals should seek to incorporate the locally listed coal duty marker into the new scheme; proposals which seek to relocate the monument will need to justify why this is appropriate and that the new location provides an enhanced setting and interpretation of the monument;</u></p> <p>l) Adequately address the level changes on site;</p> <p>m) Have regard to the high pressure pipeline that traverses the site;</p> <p>n) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</p> <p>o) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;</p> <p>p) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided;</p> <p>q) Take account of the potential risk of contamination on site;</p> <p>r) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including a revised junction layout, crossing improvements and provision of a cycle path along Lower High Street; and</p> <p>s) Retain significant trees on site wherever possible, including those with a Tree Protection Order.</p>				
M222	Page 182, Table 13.2, Site MU17, delete	 <p>Site: MU17 44-56 Vicarage Road</p> <table border="1"> <tr> <td>Size (ha): 0.13</td> <td>Location: Outside of CDA</td> <td>Timescale: 6-15 years</td> <td>Indicative yield = 10 units</td> </tr> </table> <p><b>Development requirements and considerations</b></p> <p>The site is considered suitable for mixed-use development, including residential. The retail uses on the ground floor should be reprovided to strengthen the offer of the designated local centre.</p> <p><b>Development proposals should:</b></p> <ul style="list-style-type: none"> <li>• Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site;</li> <li>• Maintain the active retail frontage to Vicarage Road;</li> <li>• Avoid significant harm to the setting of the Square Conservation Area which lies opposite the site; and</li> <li>• Take account of the Hornets / Vicarage Road Air Quality Management Area, which the site is located within.</li> </ul>	Size (ha): 0.13	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 10 units
Size (ha): 0.13	Location: Outside of CDA	Timescale: 6-15 years	Indicative yield = 10 units			
M223	Page 183, Table 13.2, Site MU18, amend first sentence	<p>Indicative yield = 466 units <u>C3 residential</u></p> <p>The site is considered suitable for <del>residential-led</del>, mixed-use development, <u>including C3 residential. In addition one or more of, or a mix thereof, the uses defined within the following Use Classes would be supported to provide active ground</u></p>				

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

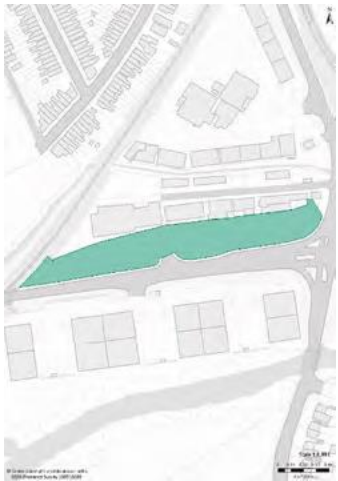
	MU19, amend first sentence	<p>The site is considered suitable for <del>residential-led</del>, mixed-use development, <u>including C3 residential and transport improvements.</u></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: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


M230	Page 185, Site allocation MU21, revised development requirements and considerations with hospital added to the allocation	<p>Indicative yield = 1,383 units <u>C3 residential</u></p> <p>This site is considered suitable for mixed-use development <del>including for residential, C3 residential, commercial uses and a F1(a) primary school, a new hospital and associated car park.</del></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: C1 Hotels, C2 residential institutions, E(e) medical or health facilities, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>a) Support the wider objectives of the Colne Valley Strategic Development Area;</li> <li>b) <u>Complete a review of transport impact and safety as part of a full Transport Assessment;</u></li> <li>c) <u>A clearly legible, continuous pedestrian route, suitable for all users including those with mobility issues, should be provided from Vicarage Road to Thomas Sawyer Way along the west side of the existing hospital;</u></li> <li>d) <u>Cycle infrastructure to be provided along Thomas Sawyer Way and Willow Lane;</u></li> <li>e) <u>Pedestrian and cycle connections to the disused former Croxley Rail Line adjacent to the southern boundary of the site should be provided;</u></li> <li>f) Enhance the public realm through the provision of a new public square;</li> <li>g) <u>Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan;</u></li> <li>h) <u>Future development at MU21 will take into account the findings and recommendations of the Council's Heritage Impact Assessment, recognising the former workhouse within the site boundary is a nationally listed building;</u></li> <li>i) <u>Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></li> <li>j) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application. Any taller elements of a proposed scheme should be located on the sections of the site farthest away from the heritage assets and buildings heights should step down towards the heritage assets to reflect the heights of the assets;</u></li> <li>k) Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> <li>l) Take account of the potential risk of contamination on site; <u>and</u></li> </ul>
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		<p>m) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided, <u>including the sewerage pipe traversing the site near the existing hospital.</u></p>
M231	Page 186, Table 13.2, Site MU22, new first sentence	<p>Indicative yield = 141 units <u>C3 residential</u></p> <p>The site is considered suitable for <del>residential-led</del>, mixed-use development, <u>including C3 residential.</u></p> <p><u>In addition one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c) commercial floorspace and F2(b) meeting places for community use would be supported. <del>Reprovision of the retail uses is possible on the ground floor.</del></u></p>
M232	Page 186, Table 13.2, Site MU22, replace fifth bullet	<p><del>Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.</del></p> <p><u>e) Future development at MU22 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u></p> <p><u>f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;</u></p> <p><u>g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></p>
M233	Page 187, Table 13.2, Site MU23, add first sentence	<p>Indicative yield = 422 units <u>C3 residential</u></p> <p><u>The site is considered suitable for mixed-use development including C3 residential.</u></p> <p><u>In addition, one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: E(a) retail sale of good other than hot food, E(b) food and drink for consumption (mostly) on the premises, E(d) indoor sport, recreation or fitness F1(a) education and F2(b) meeting places for community use.</u></p>

M234	Page 187, Table 3.2: Mixed-Use Site Allocations, MU23, Land at Asda, Dome Roundabout, added requirement after second bullet	<u>Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;</u>
M235	Page 188, Table 13.3, Employment Site Allocations, EM01 Cassiobury House 11-19 Station Road Amend first sentence	Indicative yield = <del>2,530</del> <u>5,153</u> sqm of office <u>and commercial</u> floorspace <u>6,165</u> sqm of hotel floorspace  <u>This site is considered suitable for office-led development including one or more, or a mix thereof, the uses defined within the following Use Classes: E(g)(i) offices and C1 hotels.</u>
M236	Page 188, Table 13.3, Employment Site Allocations, EM01 Cassiobury House 11-19 Station Road Amend third bullet.	c) <del>Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.</del> ; <u>-Future development at EM01 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;</u> and  d) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.</u>

	After fourth bullet, new bullet	
M237	Page 188, Table 13.3, Site EM02, amend first sentence	<i>[See the proposed amended allocation in the row below]</i>
<b>Site: EM02 Land to the south of Wiggshall Industrial Estate</b>		
<b>Size (ha): 0.58</b>	<b>Location: CDA</b>	<b>Timescale: 1-5 years 6-15</b>
<b>Indicative Yield = 11,600 5,800sqm of B2, B8, E(g)(ii), E(g)(iii) industrial office floorspace</b>		
	<p>This site is considered suitable for <del>office</del> <u>industrial uses development</u> and may include one or more of the uses defined within the following <b>Use Classes</b>: <u>B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.</u></p> <p>Development proposals should:</p> <ul style="list-style-type: none"> <li>Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;</li> <li>Ensure that a safe access to the site has been provided; <del>and</del></li> <li><u>Be designed to enable access from the disused former Croxley Rail Line to Thomas Sawyer Way; and</u></li> <li>Take account of the potential risk of contamination on site.</li> </ul>	
M238	Page 189, Table 13.3, Site EM03, amend first sentence	This site is considered suitable for industrial uses <u>and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.</u>
M239	Page 189, Table 13.3, Site EM04,	This site is considered suitable for industrial uses <u>and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.</u>

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

		<ul style="list-style-type: none"> <li>b) <u>Seek to work collaboratively with the landowners of sites MU06 and MU07 and the operator of the concrete batching plant and aggregates facility which is located adjacent to the west of the site to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage;</u></li> <li>c) <u>Have regard to the safeguarded concrete batching plant and rail aggregates depot located west of the boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications;</u></li> <li>d) <u>Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided;</u></li> <li>e) <u>New development will not compromise Clive Way as a safe, high quality active travel route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;</u></li> <li>f) <u>In collaboration with the landowners of sites MU05, MU06 and MU07 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;</u></li> <li>g) <u>In the case of residential development, provide mitigation for any adverse impact resulting from the industrial uses on site in line with the 'agent of change' principle;</u></li> <li>h) <u>Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required; Future development at MU24 will take into account the results and recommendations of the Council's Heritage Impact Assessment;</u></li> <li>i) <u>Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;</u></li> <li>j) <u>Take account of the potential risk of contamination on site;</u></li> <li>k) <u>Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required if new dwellings come forward; and</u></li> </ul>
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		<p>l) <u>For all noise sensitive development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, concrete batching plant and rail aggregates depot located west of in and adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operation due to the introduction of noise receptors.</u></p>
M242	<p>Site allocations for residential use where these are the only proposed uses.</p>	<p><i>Residential allocations have been clarified to state these are classified as C3 use. These proposed amendments will be included in the Schedule of Minor Modifications.</i></p>
M243	<p>Page 191, Table 13.4: Education facilities – Site ED01</p> <p><u>Allocated Sites For Delivery Layer site ED01 boundary amended</u></p>	
M244	<p>Page 191, Table 13.4: Education facilities, Site: ED01 Former Meriden School Site, first bullet.</p>	<p>Development proposals should:</p> <ul style="list-style-type: none"> <li>• Provide appropriate mitigation for the lapsed <u>detached playing field for Park Gate Junior School</u> in line with the Playing Pitch Strategy (2020);</li> </ul>

**Appendix A: ~~Draft~~ Monitoring Framework**

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

**Appendix B: Housing Trajectory**

M247

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

**Appendix B: Housing Trajectory**

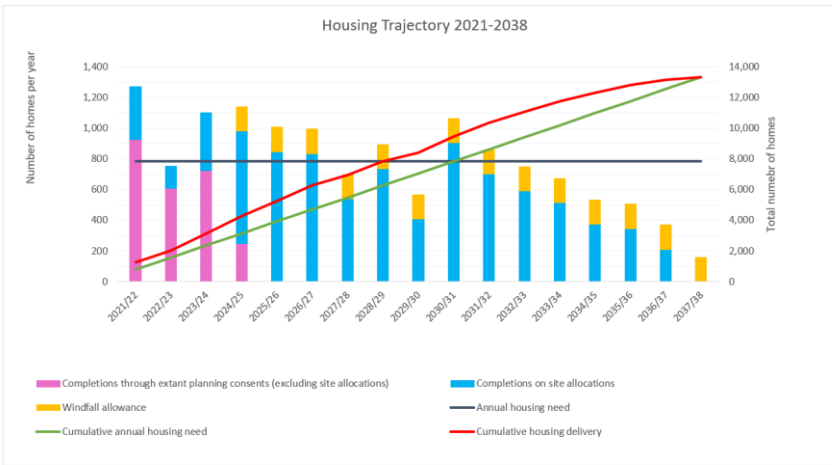
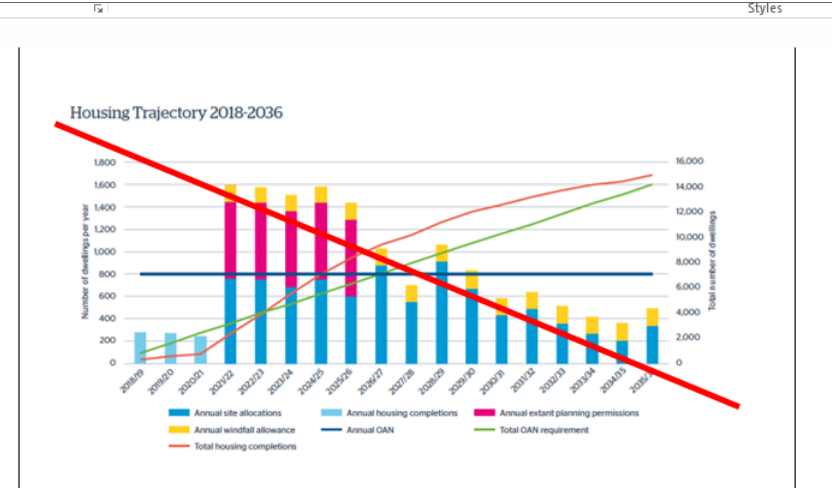
Year	Commitments (completions and extant permissions)	Housing Completions from site allocations	Windfall allowance	Annual housing completions	Cumulative housing completions
2018/19	268	0	0	268	268
2019/20	262	0	0	262	530
2020/21	235	0	0	235	765
2021/22	676	771	139	1,586	2,351
2022/23	676	795	139	1,574	3,925
2023/24	676	684	139	1,499	5,424
2024/25	676	757	139	1,572	6,996
2025/26	676	611	140	1,426	8,422
2026/27	0	881	140	1,021	9,443
2027/28	0	553	140	693	10,136
2028/29	0	916	140	1,056	11,192
2029/30	0	687	140	827	12,019
2030/31	0	444	140	584	12,603
2031/32	0	493	140	633	13,236
2032/33	0	365	140	505	13,741
2033/34	0	275	140	415	14,156
2034/35	0	212	140	352	14,508
2035/36	0	340	140	480	14,988
<b>Total</b>	<b>4,145</b>	<b>8,345</b>	<b>2,095</b>	<b>14,988</b>	<b>14,988</b>



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

M249

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



**Appendix C: TRANSPORT INFRASTRUCTURE REQUIREMENTS**

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

**Appendix D: Cycle Parking Standards**

M252	Residential cycle parking standards, lines 1-6	Use Class	High Sustainability Area		Other Areas	
			Minimums			
		Residential	Long-Term (employee / resident)	Short-Term (visitor)	Long-term (employee / resident)	Long-Term (employee / resident) Short-term (visitor)
	C2 Residential Institutions	1 space per 5 staff	1 space per 20 units	1 space per 8 staff	N/A	

		C3 Dwelling House 1 Bed	1.25 spaces per unit	1 space per 20 units	1.25 spaces per unit	1 space per 20 units
		<u>C3 Dwelling House 2+ bed</u>	<u>2.00 spaces per unit</u>		<u>1.75 spaces per unit</u>	
		<del>C3 Dwelling House 2 Bed</del>	<del>2.00 spaces per unit</del>		<del>1.75 spaces per unit</del>	
		<del>C3 Dwelling House 3+ Bed</del>	<del>2.50 space per unit</del>		<del>2.25 spaces per unit</del>	
		C4 Houses and Multiple Occupation	1 space per 2 bedrooms	1 space per 20 units	1 space per 2 bedrooms	1 space per 20 units

#### Appendix E: Car Parking Standards

M253	Non-residential, line 1, B2 General Industrial	B2 General Industrial (spaces per 1500sqm)
M254	Non-residential, line 1, B8 Storage and Distribution	B8 Storage and Distribution (spaces per 1500sqm)

#### Appendix G: Glossary

M255	<b>Specialist Care and Supported Living Accommodation</b>	<p><u>This includes the following forms of housing:</u></p> <ul style="list-style-type: none"> <li>• <b>Age-restricted general market housing:</b> <u>This type of housing is generally for people aged 55 and over and the active elderly. It may include amenities such as communal gardens, but does not include support or care services.</u></li> </ul>
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		<ul style="list-style-type: none"> <li>• <b>Retirement living or sheltered housing:</b> This usually consists of purpose-built flats or bungalows with limited communal facilities such as a kitchen, living room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This includes 24-hour on-site assistance (alarm) and a warden or house manager.</li> <li>• <b>Extra care housing or housing-with-care:</b> This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently but have access to support services and staff, and meals are also available.</li> </ul> <p>There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as care villages or communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.</p> <ul style="list-style-type: none"> <li>• <b>Residential care homes and nursing homes:</b> These have individual rooms within a residential building and provide a high level of care needed for independent living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.</li> </ul>
M256	Town Centre Uses	<p><b>Town Centre Uses:</b> Defined by the National Planning Policy Framework as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</p> <p><b>Main town centre uses:</b> Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</p>
<p><b>Appendix H: Planning policies to be superseded by the Watford Local Plan</b></p>		
M257	Page 214, title	<p><b>Appendix H: Planning policies to be superseded by the Watford Local Plan 2018—2036 2021 - 2038</b></p>