# **Local Plan Part 2 – Watford Borough Council**

### 1. Introduction

Part 1 of Watford's Local Plan – the Core Strategy - was adopted on 30<sup>th</sup> January 2013. The Core Strategy sets out the vision, objectives and spatial strategy for Watford borough to 2031 and forms the strategic planning context.

The Core Strategy and remaining policies of Watford District Plan (WDP) 2000 currently make up the development plan for Watford, along with Hertfordshire County Council Minerals and Waste Local Plans.

Part 2 of the Local Plan will replace and update the remaining Watford District Plan 2000 policies and site allocations, to support the delivery of the Core Strategy vision and objectives by.

- 1) identifying sites and areas for specific purposes; and
- 2) providing environmental criteria, against which development proposals and planning applications can be judged.

We first asked for views on what Local Plan Part 2 should cover, back in November 2012, and followed this up by publishing draft policies and a list of potential sites for consultation during November and December 2013. These views, and those submitted in response to this consultation, will be used in preparing a final plan for submission to the Secretary of State for examination.

# Purpose of this consultation:

Before we prepare the final plan for submission we are again asking for your views. We have made changes as result of feedback during the previous consultation, and also in light of further evidence and advice. These include combining development management policies and site allocations into a single document.

Changes to policy wording since the last consultation are shown for information, with new text <u>underlined</u> and deleted text shown as <del>strikethrough.</del> Changes to supporting text are not shown.

It would help if you could focus comments on these changes, to let us know if they address previous concerns.

Alongside this we are also consulting on the Environmental Report prepared to assess the sustainability of the proposed policies. This report contains the sustainability and strategic environmental assessment required by the European Strategic Environmental Assessment (SEA) Directive.

You will see that in many cases policy numbering in each chapter does not start at 1. This is because the numbering follows on from that in the Core Strategy, to make it clear that the policies will all form part of the same Local Plan. Once agreed the policies will all operate together and, following adoption, the policies will be shown on an adopted policies map.

At this consultation stage, we have not yet produced a full policies map. You can see all the maps in the accompanying map book.

# Summary of key changes:

Many of the changes are to improve the clarity of policies, but your attention is drawn to the more significant changes on which we would particularly like your views.

Special Policy Areas and Mixed Uses

The previous consultation presented some options for the boundaries of these.

Amendments have since been made to:

SPA2 - Watford Junction – Options A and B are both included in the SPA.

SPA3 – Health Campus - the boundary has been extended to include Laurence Haines School

Changes have been made to the mixed use allocations proposed in the last consultation: MXD1 The Town and Country Club is now proposed as housing allocation; MXD2 Colonial way is part of the employment policy; MXD 4 has been removed due to flooding constraints; MXD5 has been merged with the housing allocation proposed on the adjoining site; MXD 6 has been removed due to the requirement to retain as employment. There is now an option for the northern part of MXD 7 Ascot Road to form part of the Watford Business Park employment area; MXD 8 is part of the town centre and a new MXD 9 (The library and north Watford facilities) has been added.

### Sustainable Development

We are asking for views on changes to the noise policy to try to balance the interests of residents and businesses in the town centre. The policy already requires mitigation to ensure acceptable noise levels within residential properties, but we are asking whether it would be helpful to identify particular areas within the town centre where additional mitigation is likely to be required to secure

acceptable noise levels (the acceptable noise level would be the same as elsewhere).

## Housing

The site threshold has been removed and all housing sites are now identified. The list of sites has been amended in light of additional information since the last consultation. Appendix XXXX details the changes.

The affordable housing policy has been modified to allow replacement housing to be provided within the Borough, rather than necessarily on the same site.

An additional policy has been added to protect older persons' housing.

# **Economic Development and Employment**

The latest evidence on employment suggests that additional employment space is likely to be needed in future, particularly high quality office space. This means that policies protecting existing employment space, whether in designated employment areas or not, have been strengthened. We are also consulting on additional employment sites – the BT Depot on Reeds Crescent (as a designated employment area, given that the previous Local Plan housing allocation has never come forward), a site for Leavesden Studios Operations at The Island Site/Ashfields roundabout – to reflect an adjoining allocation in the recently adopted Three Rivers Local Plan, and a policy noting that should Woodside Leisure Park become available for development, employment would be the preferred use. The BT Depot at Reeds Crescent was presented as a housing site in the previous consultation – and we would welcome views on both alternatives for this site.

Boundaries of some employment areas have been amended – the most significant changes are to Fishers – which has been extended southwards to incorporate part of the Health Campus site, on which business uses are proposed; and to Greycaine/Odhams/Sandown – which now retains Sandown Road as an employment location (rather than releasing to mixed use as previously proposed). Land close to the CRL station at Ascot Road could be part of the Watford Business Park employment area, rather than part of a mixed use site – this is now presented as a new option.

#### Town Centre and Retail:

An additional policy is proposed to restrict clustering of betting shops and money shops, which had been identified as a concern. Whilst at present such changes do not require planning permission and so are difficult to control, the Government has proposed changes which will allow such control, once they come into force.

#### Education:

The sites proposed in the last consultation have all now been delivered or secured planning permission and so do not require allocation. An additional site has been identified at Bedford Street.

## Transport:

The parking policy has been expanded to provide for car clubs.

## Infrastructure:

A new policy has been added to cover mobile communications infrastructure.

#### Green infrastructure:

In the last consultation we proposed a woodland cemetery site at Paddock Road in Hertsmere. Due to concerns about the suitability of this site we are also asking for views on two additional options for cemetery provision. These are expansion of the existing North Watford cemetery, and a new site at Russell Lane.

The proposed Sports Hub allocations have been removed due to concerns about potential conflict with green belt policy.

An additional amendment to the green belt boundary is proposed at the Island site/Ashfield roundabout. This change is proposed in order to maintain a logical green belt boundary following amendments made in the Three Rivers Local Plan, and is specifically to allow for the future expansion of Leavesden Studios operations.

#### How to comment:

Please submit comments on either the proposed policies or the Environmental Report by 2<sup>nd</sup> February 2015

The quickest and easiest way to submit comments is via our online system at this link: TO ADD ONCE CONSULTATION SET UP. Comments may be submitted by selecting the relevant document then clicking on the pen symbol next to the policy on which you wish to comment. Before you submit comments for the first time you will need to register on the system. This is a simple process requiring a valid email address. Submitting comments this way is easy to do, and avoids any chance of confusion as to which policy you are commenting on.

If you are unable or prefer not to submit comments online, please email them to <a href="mailto:strategy@watford.gov.uk">strategy@watford.gov.uk</a>, ensuring each comment clearly indicates the policy referred to, and the change being sought, suggesting revised wording if appropriate. Such comments should be sent in a format that allows comments to be easily cut and pasted into the consultation system.

Our postal address and contact details are:

Watford Borough Council Planning Policy FREEPOST ANG0394 Watford WD17 3BR

Email: strategy@watford.gov.uk

Tel: 01923 278263

# **Preparation process**

There are a number of formal stages in the preparation of the Local Plan, which we are supplementing with additional consultation to ensure all interested parties have a chance to help shape the plan.

Policies are also subject to sustainability appraisal / strategic environmental assessment which considers the environmental impact of the preferred policy approach and all reasonable alternatives, and equalities impact assessment which considers the effect on defined "protected characteristics". Plan preparation is therefore an iterative process, with the aim of arriving at a plan that there is as much agreement on as possible by the time we reach the formal publication stage (Stage 2 in Table 1 below).

By Stage 2 the plan should be ready to submit for examination, and the scope of consultation is then limited to compliance with defined legal and soundness tests. It is therefore in everyone's interest to express their views on the plan content at an early a stage as possible.

Preparatory work was already well underway alongside Core Strategy preparation before the "notification" stage below which was introduced by new regulations.

Table 1 Local Plan Part 2 Preparation Process				
Preparatory	Much of the work undertaken since 2005	Call for sites in		

work	including evidence gathering, consultation on options and sustainability appraisal for the Core Strategy is also relevant to Local Plan Part 2. Suggestions for site allocations were requested on two previous occasions.	2006 and 2009.	
1. Notification	Regulatory stage – a letter was sent to all consultees informing them of our intention to prepare the Local Plan Part 2 and the subject matter thereof. Suggestions on content were invited.	November 2012	
1 <sup>st</sup> Consultation	At this stage we consulted on initial policy ideas and alternatives, giving an indication, where possible, of our preferred approach. The alternatives had already been subject to sustainability appraisal – these findings were also published for consultation.	November- December 2013	
2 <sup>nd</sup> Consultation	At this stage we are publishing our first full draft of the plan for comment. The Environmental Report (which sets out the findings of the sustainability appraisal) is also being published for comment.	Current Stage Dec 2014- Feb 2015	
2. Publication	Publication of the plan we intend to submit for examination. This involves a 6 week consultation. At this stage the scope for comment is limited to compliance with specific legal and soundness tests.	Spring 2015	
3.	Plan submitted for independent		
Submission	examination by a Government appointed inspector.		

	stage.	
5. Adoption	On adoption the policies become part of the statutory development plan.	