LOCAL PLAN - Part 2

Site Allocations and Development Management Policies 2006-31
Consultation Statement (Regulation 18)
July 2016
Contents

1.1 Introduction 2

2.1 Background 2

3.1 Consultation 1: Development Management Policies and Site Allocations 5

4.1 Consultation 2: Development Management Policies and Site Allocations 18

5.1 Consultation 3: Local Plan Part 2 Additional Policies and Key Changes 34

6.1 Conclusions and Next Steps 39

Appendices

A Public Notices and articles in *Watford Observer* and *About Watford*

B Letters to Consultees

C Intu Consultation Event

D Bedford Street Consultation
1.1 Introduction

1.1.1 This Consultation Statement sets out how Watford Borough Council has undertaken consultation on Local Plan Part 2: Site Allocations and Development Management Policies. The report identifies those consulted, the issues raised and how the council has responded to those issues. The statement seeks to assist the Inspector at the Examination in determining whether Watford’s Local Plan complies with requirements for public participation.

1.1.2 The statement describes the consultation and engagement carried out by the Council and how it has complied with statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). The statement also shows that public involvement is broadly consistent with Watford’s Statement of Community Involvement (SCI). The statement sets out the number of representations received during pre-publication consultation and summarises the main issues raised in those representations.

2.1 Background

2.1.1 Watford Council’s Local Plan Part 1 Core Strategy was adopted in January 2013. This sets out the key elements of the Council’s planning vision and spatial strategy for the borough. Subsequently the Council has prepared a Local Plan Part 2 Site Allocations and Development Management Policies.

2.1.2 In preparing Local Plan Part 2, regular meetings have been held with members through the Planning Policy Advisory Group (PPAG), a cross-party group set up to advise on the plan (a list of PPAG meetings is given in Appendix C). Presentations have been made to the Developers Forum and Town Centre Group. The Local Economic Partnership (LEP) and Local Strategic Partnership (LSP) have been kept informed of the local plan consultation process. Engagement with the Town Centre Partnership has taken place via the Watford Town Centre Manager. A two day manned exhibition was held in the INTU Centre in November 2013. Direct discussions held with statutory bodies have also helped inform the drafting of the plan.

2.1.3 On 26th November 2012, statutory consultees were sent a letter (Regulation 18 Consultation Letter) informing them that the Council intended to prepare a Site Allocations and Development Management Policies plan document.
2.1.4 Feedback was received from 4 organisations – Natural England, Environment Agency, Herts and Middlesex Wildlife Trust and Campaign to Protect Rural England (CPRE). The main issues arising from this consultation were:

- The need for a Level 2 Strategic Flood Risk Assessment of sites within Zones 2 and 3 (includes Health Campus and Lower High Street), and further work on the Water Cycle Study.
- The need for risk assessments of development within the source protection zone and potentially contaminated land.
- The need for protection of biodiversity and habitat networks, and improvements to green infrastructure.
- A list of designations and issues to be taken into account in determining site allocations.
- An 8 metre buffer requirement along the Rivers Gade and Colne.
- Support for SuDs and for stringent sustainability standards (e.g. Code for Sustainable Homes and BREEAM) which become more stringent over time.

2.1.5 CPRE also asked for more stringent control on development in the Green Belt while the Environment Agency provided detailed input into early drafts of policy wording. The biodiversity, green infrastructure and habitat issues are covered by the Core Strategy. Local Plan Part 2 includes site schedules which identify any environmental and ecological constraints for development. In addition, a level 2 Strategic Flood Risk Assessment has been undertaken which has informed plan development.

2.1.6 The first consultation on the Local Plan Part 2 Site Allocations and Development Management Policies took place during November and December 2013.

2.1.7 A second consultation took place between 17 December 2014 and 4 February 2015. This consultation brought together site allocations and development management policies within a single document entitled ‘The Local Plan Part 2’. Although the focus of the consultation was on significant changes, respondents were able to comment on any aspect of the document.

2.1.8 A targeted consultation regarding school provision at Bedford Street was undertaken between 24th June and 22nd July 2015. See Section 4.9 (Education) for full details.

2.1.9 Finally, a further consultation was undertaken on “Local Plan Part 2 – Additional policies and key changes between 16 of December 2015 and 4 of
February 2016. This specifically focused on a number of new policies and any substantial changes from the previous consultation.

2.1.10 This report summarises the comments received in responses and the methods of consultation for the three consultations

Please note that policy numbering has changed over the three consultations, therefore the wording of the policy should be used for reference purpose.
3.1 **Consultation 1**

3.1.1 This consultation took place during November and December 2013. It was undertaken in two parts: the development management policies and the site allocations.

3.1.2 In November 2013, at the start of the consultation, everyone on the consultation database, which includes specific and general consultation bodies, was sent an email or letter informing them of how to respond and where to view the consultation material. Copies of these letters (as well as the letters sent for subsequent consultations) are included in Appendix A of this statement.

3.1.3 Local residents were also informed about the consultation by an article in the council newsletter *About Watford* and an article and formal notices in the *Watford Observer*. Copies of these articles and notices are included in Appendix A of this statement.

3.1.4 News items publicising, and containing links to the consultation were posted on Facebook and Twitter, and other council circulation lists such as the communication team’s e-bulletin, and the Mayor’s newsletter. A news item was posted on the front page of the council’s website. Information including the draft plan documents was also made available on the council’s website, at the Council’s Customer Service Centre, and at both local libraries.

3.1.5 A two day consultation event was held in the INTU shopping centre. This comprised a manned exhibition and post-it boards.

3.1.6 Responses were invited online, by email or by post. A comment form was available.

3.1.7 150 separate comments on the development management policies, from over 30 individuals or organisations were received. 37 respondents commented on site allocations, many commenting on several sites.

3.1.8 We subsequently had a “health check” of the draft plan from the Planning Officers Society (POS), whose recommendations were also considered moving forwards.

3.1.9 This section summarises the responses received.
3.2 General/overarching comments

3.2.1 Hertfordshire County Council Highways asked for specific reference to transport documents and provided information on bus services to some sites while Hertfordshire County Council Property provided information on other community facilities provided by the county council, and noted that there is no mention of waste management/recycling.

3.2.2 In response, the council noted that waste management and recycling are covered in the Core Strategy. There is also a specific policy [SD10 Waste] in the Local Plan Part 2: Site Allocations and Development Management Policies which specifically accounts for recycling and waste management based on the waste hierarchy.

3.2.3 Thames Water Utilities proposed the use of Grampian conditions to secure appropriate drainage (i.e. conditions that require drainage to be in place before development begins) and to work with Council and developers to ensure appropriate water infrastructure. The Council committed to continue to work with Thames Water Utilities to ensure appropriate infrastructure and agreed that these issues should be covered by existing Core Strategy policies along with new Development Management policies.

3.2.4 The Environment Agency noted that a Level 2 Strategic Flood Risk Assessment was underway and provided this is completed to inform the submission, and the sequential approach is applied; there is no ‘in principle’ objection to any sites proposed. The Council committed to continue to liaise with the EA. The SFRA Level 2 has now been completed.

3.2.5 Natural England provided advice on sites, objecting to proposed allocations close to locally designated wildlife sites and corridors. They asked that such allocations are deleted, or worded to ensure sufficient mitigation or as a last resort compensation. In addition they note that site allocations should also promote geodiversity and biodiversity and that developments should be required to achieve net biodiversity gain where possible. It was also suggested further consideration be given to soils, landscape and public rights of way.

3.2.6 These comments have been considered as we have reviewed sites for allocation and through Sustainability Appraisal. Geodiversity and biodiversity are promoted through the Core Strategy and Development Management policies. An additional biodiversity policy was added after the second consultation. Following consultation comments, allocations have changed or removed if there are any significant constraints including any environmental constraints that could not be resolved by mitigation. Sites with particular ecological sensitivities or sites located near designated wildlife sites will have ecological assessment requirements included as part
Consultation Statement (Regulation 18)

of site development considerations. This includes sites such as H14 (Bill Everett Community Centre) and E3 (Fishers Employment site).

3.2.7 English Heritage made a general comment about seeking advice from the council’s conservation staff and the county archaeologist, as well as from them on specific sites. They also note that the sustainability appraisal does not refer to conservation areas, and that it would be helpful for heritage assets including conservation areas to be shown on the map.

3.2.8 In response the council noted that the conservation staff work within the team preparing the Local Plan and have been fully involved while the county archaeologist has also provided detailed comments. Information on conservation areas was provided for sustainability appraisal purposes although the Council agrees that they have not been specifically referred to and there was a commitment that such information would be added. Conservation Areas have also been included in the policies map which will accompany the local plan.

3.2.9 A comment was made that congestion at Bushey Arches is a major issue for that part of the town. In response, the council noted that this will be a key consideration for such sites in the allocation process. A glossary was also requested which is now included.

3.3 Sustainable Development Policies

3.3.1. There was general support (subject to wording changes) for the sustainable development policies from agencies such as the Environment Agency, Natural England, Herts and Middlesex Wildlife Trust and local residents. The Wildlife Trust and Hertsmere Borough Council suggested that we ask for more progressive sustainability (BREEAM and Code for Sustainable Homes) standards. Developers, however, felt that we should not expect higher standards for Code for Sustainable Homes/BREEAM in SPAs or require sustainability statements, flood prevention measures, decentralised energy, water consumption standards, set backs from watercourses etc, but determine requirements on a site by site basis. Caveats relating to viability and wording changes were suggested by the Health Campus team.

3.3.2. The POS health check flagged up the importance of viability i.e. higher BREEAM and Code for Sustainable Homes standards go beyond the Core Strategy requirement and could affect viability. There is a potential trade off between delivery of higher sustainability standards and affordable housing.

3.3.3. Further to discussion with members Option 2 [All residential development will be expected to meet a minimum of Code for Sustainable Homes level 4*Non-residential development should meet BREEAM Very Good. All Major Development should meet current BREEAM Communities standards. Major development within the Special Policy Areas should achieve a minimum of}
Consultation Statement (Regulation 18)

Code for Sustainable Homes level 5 or BREEAM Excellent] was considered the preferred way forward unless viability work demonstrated otherwise. The council undertook liaisons with DCLG regarding the matter and the policy now reflects the most recent guidance on the matter which is in line with government guidance. This policy has also been assessed for viability as part of the Local Plan and plan policies as proposed were found to be viable. The council will review this should the situation change regarding any new energy performance standards.

3.3.4. English Heritage noted that the historic environment is a key element of sustainability, suggesting additions to policies SD12 (Protection and Restoration of River Corridors, Canals and Watercourses) and SD19 (External Lighting). In light of points raised, it was agreed to make wording changes to the draft plan to clarify the integral role of the historic environment.

3.3.5. Thames Water suggested additional wording to cover surface water and sewer flooding.

3.4.1 Special Policy Areas

3.4.1 Thames Water utilities asked for developer funded work to demonstrate waste water capacity at SPA2 (Watford Junction) and SPA3 (Health Campus). Other comments concerned site boundaries, safeguarding of the concrete batching plant in SPA2 Watford Junction, ecology, wildlife and highways.

3.4.2 It is noted that policies relating to the Special Policy Areas, setting out the type of development envisaged, and issues such as the concrete batching plant, are already adopted in the Core Strategy. To supplement this, Local Plan Part 2, as well as defining site boundaries, contains a schedule of particular development objectives/site considerations to inform how sites are taken forward. This sets out environmental risks or particular safeguarding requirements and how the sites should be progressed in light of any known constraints including any waste water issues.

3.5 Town and Local Centres

Policies

3.5.1. The consultation included questions about options put forward for town centre policies. The response rate was disappointing given additional efforts to encourage town centre businesses to respond (including a letter from the Economic Development Officer). Good feedback was received from two days spent in the INTU centre but this was mostly verbal or using the post it note board rather than responses to the full set of questions. From responses the following trends were identified:
3.5.2. On question 1 (relating to the extent of the primary and secondary shopping frontages and the percentage restrictions on non A1 uses)

- Respondents felt that the redeveloped Charter Place and current Intu centre should be considered as one entity for the purposes of planning policy.

- With regard to the extent of the primary shopping frontage: half thought that it should stay as now between the flyover and King Street, and half thought that it should be reduced to the High Street between King Street and Clarendon Road removing the stretch between the flyover and Clarendon Road from primary frontage and placing it within secondary frontage.

- Responses were split concerning the appropriate percentage level for the mall areas (90% A1 retail and 10% non A1 retail). Intu sought a lower 70/30 split as for the lower option proposed for the rest of the primary shopping frontage. Generally respondents supported the use of percentage controls but there was a strong bias towards the lower percentage option proposed at 70% A1 retail and 30% non A1 retail.

Question 2:

- This question concerned the vacancy period before a change of use from either a shop/financial or other service or restaurant use to a drinking establishment or take away; most respondents felt that the period of 2 years proposed was too long and alternatives of 15 months or 1 year were proposed.

Question 3:

- Respondents supported the introduction of restaurant hub areas but did not propose any additional ones at this stage.

Question 4:

- No respondents thought we should allocate further sections of the High Street as primary shopping frontage.

Question 5:

- No alternative approaches for town centre policy to those set out in the options were proposed by respondents.

Other TLC policies:

- Support was shown for the noise and nuisance policy [PolicyTLC7 – Nuisance and Community Safety (Classes A3 – Restaurant, A4 – Drinking Establishment A5 – Takeaway)].

- A few changes to the boundary of the character areas were suggested such as including the Palace Theatre in the cultural area and some
comments regarding consistency of titles etc.; no objections to the principle of TLC8 Character Areas

- One representation on TLC9 [Public Realm] was received supporting the approach of public realm improvement
- Respondents to the proposed percentage option for local centres felt that this might result in more vacant units but at the same time wanted to keep convenience shops in these centres. The Health Campus team suggested that the percentage could be a guidance target rather than a limit
- There was support for retaining community facilities in the Borough and requiring new ones as opportunities arise. Suggested tighter wording for the explanation of what is covered by community facilities

3.5.3. We received no comments regarding the proposed town centre boundary.

Retail Sites

3.5.4. Concern was expressed by Hertsmere Borough Council about the level of retail floorspace, particularly out-of-centre stores, and the potential impact on retail facilities in Hertsmere, in particular Bushey village.

3.5.5. Intu, the owners of the intu centre (former Harlequin centre), supported the focus on town centre retail and the Charter Place allocation, but raised concerns about the potential scale of retail development coming forward outside the town centre.

3.5.6. Sainsburys noted that they would expect to see a store of at least comparable size to their existing store as part of any redevelopment of their town centre site.

3.5.7. Telereal Trillium suggested the telephone exchange site should be either retail and/or residential led. JM Rowe Investments Ltd, whilst supporting mixed use development, suggested more information is needed on how this would be brought forward given multiple ownership issues. In response the council agrees that retail led development is appropriate in this location, however it is noted that uses appropriate to the town centre are also considered suitable. This may include an element of office, leisure and residential uses.

3.5.8. In light of consultation responses and wider evidence, it was proposed that the following should inform in the next iteration of the draft plan:

- Combine policy for all Intu covered mall areas
- Retain a percentage for retail and non retail in Intu at 90/10 or if this is considered too high 80/20 but consider that it should be higher then the primary shopping area
- Set the extent of the primary shopping area at the stretch from the Flyover to King Street
• Set the percentage for the primary frontage at 70/30 (subsequently changed to 60/40 following an up to date survey of existing frontages)
• Continue with the A3 hub concept but leave it to the two identified areas (the extent of which was increased in response to subsequent consultations).
• Retain character areas but review boundaries of cultural area to include Palace Theatre and make clear that the Colosseum is functionally part of the cultural offer whilst being physically separated from the cultural character area.
• Seek s106 and CIL and other funding to ensure that the public realm is enhanced within the town centre
• Suggest we have a target of 50% of units to be retail in all local centres
• Retain policy regarding community facilities.

3.6 Housing

Policies

3.6.1. Residents generally supported the protection of back gardens and control of HMO and flat conversions. Differing views were expressed by some WBC housing colleagues, who see these as important components of supply and would also like to see reference to housing above shops and conversion of unused offices to residential use (currently permitted development apart from in Clarendon Road).

3.6.2. Support was shown for the policy protecting affordable housing. Support was shown for self build and the older persons housing policy, but also comments (including from the health check) that a separate self build policy is not needed.

3.6.3. Further discussions were held to develop WBC housing strategy alongside the Local Plan 2, and to ensure consistency between these two documents.

Sites

3.6.4. Hertsmere Borough Council recognised the need to encourage regeneration in Watford and to plan for more than 1,330 dwellings (which was the remaining figure for plan allocation at that time) as a contingency against some sites not coming forward as envisaged.

3.6.5. Hertfordshire County Council Property provided information on school requirements likely to be generated by new housing developments, and sought greater certainty about what will be delivered on each site.

3.6.6. Thames Water Utilities provided additional information on sites, noting concerns about sewerage capacity on proposed housing sites H7 (Vicarage Road), H9 (Whippendell Road), H10 (Humphreys Yard), H14 (Queens
Avenue) and H16 (Bill Everett Centre). These sites were shown as having potential for up to 276 homes. The consultation highlighted the need for further work to assess site deliverability, liaising with Thames Water. Only Vicarage Road and the Bill Everett Centre remain as allocations in the Publication draft – assessment of sewerage capacity would be required as part of any proposed scheme.

3.6.7. Herts and Middlesex Wildlife Trust commented on individual sites which has subsequently informed further work.

3.6.8. Hertfordshire County Council Property supported the allocation of H16 Bill Everett Community Centre for housing. Sport England asked that we ensure that changing facilities are retained or reprovided for in adjacent playing fields. We remain committed to providing such facilities at this site or to be compensated off site.

3.6.9. The Architects Corporation commented on the boundaries of housing sites H1 [Chalk Hill] and H5 [Land at Pinner Road], and a resident commented on the boundary of H12 [Site at Dome Roundabout] and boundary amendments were undertaken if relevant.

3.7 Employment Policies

3.7.1. Bugler Developments, in relation to 77 Clarendon Road, dispute the need for offices and the Core Strategy requirement of at least 7,000 additional jobs. They suggested that as TLC8 [Character Areas] identifies Clarendon Road as an employment area, EMP3 [Clarendon Road and Bridle Path Office Area] is not needed.

3.7.2. Hertsmere District Council agreed with the 7,000 job target.

3.7.3. Further evidence on employment requirements has been undertaken since (Economic Growth and Delivery Assessment 2014) which supports the need to protect Clarendon Road. The Clarendon Road Study (2016) shows the delivery of office space to be viable.

3.7.4. Bugler suggested 77 Clarendon Road should form part of SPA2 rather then the Clarendon Road employment area. WBC do not consider this site would form a logical part of the SPA.

3.7.5. Hertfordshire County Council, as minerals and waste authority, supported the continued protection of employment areas which include safeguarded sites.
3.8  **Gypsy and Traveller Site**

3.8.1. Hertsmere Borough Council supported the identified site at Tolpits Lane. Hertfordshire County Council agreed in principle, assuming the twenty pitches would be provided in stages to minimise the impact on the adjacent HCC site and neighbours. Suitable screening should be incorporated into any new scheme.

3.8.2. CPRE objected to GT1 as inappropriate development within the Green Belt. HWMT objected to loss of open space and potential habitat loss.

3.8.3. The principle of this location is established in the adopted Core Strategy. No alternative site has been proposed.

3.9  **Schools**

3.9.1. Hertfordshire County Council property supported the inclusion of primary schools at SPA2 Watford Junction, SPA6 Western Gateway, (Site S1 Ascot Road), Site S2 Lanchester House and Site S3 Orchard.

3.9.2. English Heritage supported the reuse of Lanchester House but objected to the allocation, stressing the importance of open space around the building. The school has since been granted permission and opened in 2014, so an allocation is no longer required.

3.9.3. Herts and Middlesex Wildlife Trust would like to see green space retained at S2 and S3.

3.9.4. The Local Plan does not now include any new school allocations – Ascot Road and Lanchester House, and the expansion to Orchard School are already up and running. School provision at SPA2 will be delivered through the Watford Junction Masterplan.

3.10  **Transport**

**Policies**

3.10.1  The Highways Agency were concerned that the reintroduction of minimum parking standards for residential uses in some parts of town would cause a rise in car use – they were sent a link to the survey and report which supported the policy. This policy has been amended to reflect guidance as discussed below.

3.10.2  Hertsmere supported the approach to parking standards but advocated caution at edges of zones. Valad and the Health Campus partnership sought a more flexible approach to parking. One resident felt care home parking was too low.
3.10.3 HCC noted that no specific requirement is proposed for schools. We subsequently agreed that assessing the requirement on a case by case basis is appropriate for schools.

3.10.4 No comments were received on the cycling or electric vehicle charging point policies.

3.10.5 Changes in national policy have since taken place which means the approach to parking standards has been revised. The government released a written statement in March 2015, stating that Councils should not impose parking standards unless there is exceptional justification and that levels of parking should instead be set by the market. The Council has therefore adjusted its parking standards to function as guidance on the appropriate levels of parking rather than a set requirement.

3.11 Urban Design and Built Heritage

Policies

3.11.1 The British Sign and Graphics Association (BSGS) objected to references to the shopfront design guide upon which they had not been consulted. The Shopfront Design Guide was already adopted and not part of the current Local Plan Consultation. However, all shops in the borough were consulted on the design guide and the BSGS has been added to the consultee list for any future revisions.

3.11.2 National Grid asked that heritage protection be weighed against public benefit.

3.12 Green Infrastructure, Sport and recreation

3.12.1 Hertfordshire County Council provided extensive information on ecology and wildlife sites and corridors, and commented on methodology and evidence.

Trees/woodlands

3.12.2 Natural England provided detailed information on issues to cover in policies. They suggest expanding the trees policy into a wider natural environment policy, and adding material on the need to protect birds.

3.12.3 Whilst supporting the approach to tree planting, HCC noted this could conflict with some site allocations.

Open Space/play facilities

3.12.4 Developers (Valad, Health Campus partnership) were concerned about requirements for open space/play space.

3.12.5 Natural England suggested clear standards to refer for both open space and play space.
3.12.6 This policy has now been revised to more closely align with the Council’s Green Spaces Strategy.

Green Belt and Sports Hubs

3.12.7 A potential conflict between new sports facilities in sports hubs and green belt policy was raised in light of a legal decision on the interpretation of NPPF green belt policy. Hertfordshire County Council expressed concern about the proposed allocation of sports hubs and HCC property highlighted a potential conflict with existing school uses. CPRE objected.

3.12.8 Sport England supported the Sports Hubs and suggested cross referring to Policy GI6 [Sports Hubs] of the Development Management policies (to which they propose wording changes). Clarity needs to be provided on what development is acceptable.

3.12.9 Decathlon supported the sports hub concept and considered that the Knutsford Fields area should be an additional sports hub to be identified in the document, to incorporate their large retail store concept as well as other sports activities. Retail development in this area would be contrary to green belt policy, and to the favoured approach of focussing retail in the town centre and local centres.

3.12.10 The sports hub policy has been removed to ensure that there is no perceived conflict with green belt policy, which was not the intention. Sports hubs will be primarily delivered through the Council’s Sports Facilities Strategy. A separate Sports Facilities Policy was introduced following comments at the next round of consultation.

3.12.11 Hertfordshire County Council Property were concerned about green belt designation “washing over” school sites as this may restrict school expansion. This issue was discussed at the Core Strategy examination, where it was agreed they should remain washed over.

3.12.12 CPRE objected to the removal of G6 [Caxton Way] from the green belt into the employment area. However, this area is already in use as car parking and does not serve the purposes of the green belt. The part which is not developed is outside of the Watford Borough boundary so would not be affected by this change. The removed area has been incorporated into the Watford Business Park employment allocation.

3.12.13 Three Rivers District Council, supported by Warner Bros, proposed green belt changes, and a Leavesden Studios Operations allocation in connection with Leavesden Studios. These are necessary for consistency with the Three Rivers Site Allocations plan incorporating changes recommended by the inspector examining that plan and it is therefore logical for us to incorporate these changes.

3.12.14 Natural England note that site G7 [Clock Tower] is currently green belt land set aside for the Croxley Rail Link and ask that we ensure ecological
consultation is undertaken as part of any development proposal and mitigation measures secured to minimise impacts on local biodiversity.

3.12.15 With regard to G7 [Clock Tower], it is noted that a Phase 1 Habitat Survey may be required on this site. This has been included in the development considerations.

3.13 Cemetery

3.13.1 Bucks Meadow Riding School felt the potential site identified at Paddock Road in Hertsmere was unsuitable for a green burial site. Hertsmere Borough Council had no objection in principle and subsequently included it for consultation in their proposed site allocations, although the allocation did not then proceed. They noted there may be a need for a better access route, particularly if there are any intentions to enlarge the area shown, either as a woodland cemetery or conventional burial space. This would need to be subject to further discussion between the two authorities.

3.13.2 There would be no need to show the proposal in our final plan as it is outside our boundaries.

3.13.3 In light of the objections received we consulted on 2 alternative cemetery sites in the next consultation – land at Russell Lane and an extension to the existing North Watford Cemetery.

3.13.4 Both of the alternative sites raised concerns about potential groundwater contamination from the Environment Agency. There is now no specific cemetery allocation included in the plan, but cemetery provision will be assessed and delivered through the Council’s Cemetery Strategy.

3.14 Additional Proposed Sites

3.14.1 Affinity Water proposed the redundant covered reservoir site at Paddock Road for residential use, to accommodate 12-15 homes.

3.14.2 The landowner proposed the area bounded by Grove Mill/M25/canal/Hempstead Road for residential use.

3.14.3 Both of these sites are within the green belt and so considered unsuitable to take forward at this stage. The reservoir is locally listed.

3.14.4 Wakelin Associates suggested land to the rear of 2-34 and 46-72 Gade Avenue. These sites were previously submitted to the site allocation process but discounted as they are back garden land and considered unsuitable for allocation by members.

3.14.5 Hertfordshire Property proposed additional sites for allocation (some previously considered and discounted), with further information, such as scope for the retention of existing community uses as part of mixed use redevelopment: 3-5 Estcourt Road, 74 Sandringham Road, Land at 44/46 Woodford Road, Magistrates Court, 501 St Albans Road/Beechwood Family
Centre, North Watford Library/Garston Fire and Ambulance Station, 36 Clarendon Road.

3.14.6 A late submission was received from Transport for London to include land at the Metropolitan Station for residential use which will become redundant after the Croxley Rail link becomes operational. This site is now included as one of the allocations in Local Plan Part 2.

3.14.7 Watford Community Housing Trust proposed the strip of land west of Croxley View housing estate, adjacent to Watford Business Park, running from Tolpits Lane to Ascot Road for residential use. This site was previously identified in Watford District Plan as a regeneration site, potentially suitable for housing, open space or community uses (although the relevant policy is no longer current). This site is now included as one of the allocations in Local Plan Part 2.

3.15 Next Steps

3.15.1 In the light of comments received and the POS health check, it was decided to amalgamate the development management policies and site allocations into a single document, Local Plan Part 2; to carry out further detailed work on delivery on all sites; and take into account additional evidence as it emerges, primarily viability information, SFRA2, employment study, and local green belt review.

3.15.2 This further work enabled us to more clearly assess the suitability and deliverability of our housing sites in particular, in order to demonstrate we can meet the target (or if we cannot, to work to identify alternative sources of supply).

3.15.3 We also reviewed the nature of the proposed allocations, to make a distinction between proposed allocations, policy areas, and other contextual information (such as constraints). This is expected to significantly reduce the number of new site allocation proposals being consulted upon.
4.1 Consultation 2

4.1.1 A second consultation took place between December 2014 and February 2016. A letter was sent by email or post to approximately 550 consultees on the Local Plan consultation database, which includes both specific and general consultees. The letter gave information about the consultation, explained how to respond, gave information about where documents could be viewed and contained a link to/gave the address of the consultation portal. Consultees were given the option of responding online, by email and by post.

4.1.2 A notice and article were published in the Watford Observer on 12 December 2014.

4.1.3 News items publicising, and containing links to, the consultation were posted on Facebook and Twitter. A news item was posted on the front page of the council’s website.

4.1.4 Paper copies of the Draft Local Plan Part 2 were made available at Watford Central and North Watford libraries and at the Town Hall’s Customer Service Centre, along with An Environmental Report (Sustainability Appraisal), Response Form and updated list of the evidence base.

4.1.5 272 comments were received from 46 separate consultees. Some of these were the same type of comment repeated against a number of policies - e.g. 35 comments identifying to the demand for school places each development could generate, 34 identifying the level of flood risk at each site, 56 identifying the degree of archaeological assessment needed at each site and 15 identifying the sewerage capacity of each site.

4.2 Main issues raised and how they have been addressed

4.2.1 Some of the potentially more significant issues raised relate to the need for additional evidence on water and sewerage capacity, a need for transport modelling, objections to and significant constraints on the proposed cemetery sites, and a number of objections to the restriction on residential uses in the Clarendon Road/Station Road/Bridle Path area.

4.2.2 In response to concerns about the impact of the proposed cemetery sites on the groundwater supply we have withdrawn the proposed allocation of these sites. We have currently no identified additional cemetery sites which mean that remaining space will be carefully managed alongside a search for new capacity – this will be done through the Council’s Cemetery Strategy.

4.2.3 In response to the objections regarding Clarendon Road consultants were appointed to prepare a Study for Clarendon Road to assess viability and the appropriate mix of uses. The initial work quickly established that redevelopment for Grade A office use is viable in this location. We
therefore intend to continue to seek additional quality office space in this area.

4.3 Process/ overarching issues

Waste water

4.3.1 The Environment Agency advised that a Water Cycle Study should be prepared before submission, to consider foul sewerage capacity and any associated issues. Thames Water commented on the need to demonstrate waste water capacity for new developments (inc. a requirement on developers to demonstrate this/ provide improvements) – and provided a list of sites which may need further investigation. We agree it is appropriate to add words to this effect as the automatic right to connect to sewers was removed by the 2010 Flood and Water Management Act. This is detailed in the list of development considerations for each site.

4.3.2 These responses were discussed at several meetings with the Environment Agency on 23rd Feb 2015, with the EA and Thames Water on 30th March 2015 (along with colleagues from Dacorum Council) and with Thames Water on 29th July 2015, and 2nd December 2015.

4.3.3 The Council has now received a position statement from Thames Water demonstrating sufficient sewerage capacity and acknowledges that Thames Water will monitor factors that may lead to necessary upgrades. Whilst the EA are still concerned regarding foul drainage they acknowledge that an engineering solution is possible and that the Hertfordshire Water Project will identify issues in upcoming phases. The EA state that with the results of phase 1 of the Hertfordshire Water Project, in addition to a strongly worded policy requiring developers to engage with TW as part of development proposals and to assess foul drainage issues associated with their developments, they will no longer consider the Local Plan unsound on this matter. However it must be (and is) made clear that foul drainage remains a significant issue within the borough and that developers must adequately assess the impacts that their development proposals.

4.3.4 The Environment Agency also provided information on which sites may be contaminated and which require a preliminary flood risk assessment / flood risk assessment. We have recorded this in the detailed information for each site.

Sports Hubs

4.3.5 Sport England were concerned that the removal of the sports hub policy results in the local plan having no detail policy guidance for assessing proposals relating to sport. The Council agrees - a new policy on sports facilities was therefore included in the next consultation and is now included in the Local Plan Part 2.
Transport

4.3.6 Hertfordshire Highways (part of Hertfordshire County Council) suggested that additional traffic modelling be carried out. However, the County Council is currently developing a new transport model which is not yet available for use. The County Council have confirmed that their comment is not an objection to the plan and we are liaising with them on the appropriate point to run transport modelling, as the new model becomes available.

Heritage

4.3.7 Historic England felt that more detail should be provided on relevant heritage assets in the text for each allocation. This information will be added.

Archaeological assessment

4.3.8 Hertfordshire County Council submitted a list of sites [inc. special policy areas, mixed use areas, housing and retail sites] which require various levels of archaeological assessment. The adopted Core Strategy already requires that appropriate archaeological investigation is undertaken, but this information can be added to the table of relevant issues for each site for avoidance of doubt.

Education and Services

4.3.9 HCC Property provided information on existing schools capacity, libraries and other services in relation to a number of sites. This has been noted and the Council is continuing to work with HCC to ensure appropriate school provision.

4.4.1 Special Policy Areas and Mixed Use Allocations

Special Policy Areas

4.4.1 60 comments were received on this chapter. Many of these comments provided additional information and comment. Only 8 comments, from 4 respondents were objections.

4.4.2 Historic England suggest that supporting text should refer to additional policy guidance on the SPAs where appropriate and refer to the core strategy and that individual policies should be provided for the Mixed Use Allocations to provide more detail. Additional detail has been added to signpost other relevant policies (i.e. to show that other policies in the plan also apply to SPAs).

SPA1 Town Centre

4.4.3 Historic England highlight the importance of future trading on the historic character of the High Street and Parade by recreating integration with the main linear axis of the town based on heritage led regeneration. In addition, HE note that a number of the development proposals in SPA1 may
impact on heritage assets – it should be made clear that these heritage assets should be retained or refurbished where appropriate. The council agree with this point.

**SPA2 Watford Junction**

**4.4.4** HCC note the existence of safeguarded waste management facilities including the rail aggregates depot within SPA2, and ask that these are protected in line with Waste Policy 5 and Minerals Policy 10 in the relevant county waste and minerals plans. London Concrete Ltd object to the inclusion of the aggregates depot and concrete batching plant and land adjacent to this safeguarded area in the SPA. They ask that this area is identified in the boundary/mapping.

**4.4.5** This issue was discussed at the Core Strategy Examination and wording was included to protect the aggregates depot and associated facilities (Core Strategy Policy SPA2). The need for these sites to be protected is recorded in the detailed information for each site – Core Strategy Policy SPA2 will still apply. These safeguarded sites will also be taken into account in the preparation of a Masterplan for Watford Junction.

**4.4.6** Hertfordshire County Council Property welcomed the extension of the SPA to include land at Bedford Street, at that stage being considered as a potential school site, whilst noting the need for further work to assess constraints and feasibility. The Council is continuing to work with HCC regarding suitable school sites. The Council have commissioned consultants to develop a Masterplan for Watford Junction. This is considering alternative school locations in the SPA.

**4.4.7** Stewart M&PS Ltd on behalf of Origin Housing Association object to the exclusion of 73-77 Clarendon Road from the SPA. This repeated an objection made to the first consultation – our position remains that we feel this is more appropriately part of the Clarendon Road employment area. Additional masterplanning work is being done for both the Watford Junction SPA and the Clarendon Road area.

**4.4.8** Historic England requests that Benskins House [Grade II Listed Building] be considered. This is better known as The Flag public house adjacent to Watford Junction. This has not been referred to in the Core Strategy and Part 2 of the Plan should do this. HE recommend that the boundary of the SPA should be carefully considered to ensure the hotel is a beneficiary of future development. The SPA boundary has been revised to exclude the listed building, and wording added to the site schedules which accounts for nearby heritage assets.

**4.4.9** Brasier Freeth, on behalf of S Hille and Co objected to the inclusion of the Hille Land [lands at 132 St Albans Road] in the employment area rather than the SPA. This site is now being considered as part of work on a masterplan for Watford Junction and included in the SPA boundary.
4.4.10 Nathaniel Lichfield and Partners object to the policy on behalf of INTU Properties, asking that it is made clear that any retail should be convenience. The approach to retail in this location is set out in the adopted Core Strategy Policy SPA2 rather than in the policy subject to this consultation. The forthcoming Masterplan for the site will also inform the role of any retail on site.

**SPA3 Health Campus**

4.4.11 Historic England ask that reference is made to the protection of Shrodells wing of Watford General Hospital [Grade II Listed]. The Council agree with this and the SPA will, via a statement of heritage significance, include a reference to protect this asset. This is included in the site allocations development considerations annex for this SPA.

4.4.12 HCC ask that regard is had to safeguarded waste management facilities at Wiggenhall Road. The Council with continue to work with HCC on this matter.

4.4.13 Natural England note the inclusion of the Lairage Land Local Nature Reserve within SPA3 and ask that it is protected from built development. This is noted by the Council – this area is also identified as a local nature reserve and part of the Green Belt and therefore will not be built on.

**SPA4 Lower High St**

4.4.14 Historic England ask that Local Plan Part 2 makes it clear that the Grade II* listed Frogmore House must benefit from any development here. This also relevant for MXD3 [the Gas Holder Site]. This point is agreed and further information has been included.

4.4.15 National Grid advise on the location of an overhead power line and underground cables cross the site, which is noted and will be added to the site information.

**SPA5 The Dome Roundabout**

4.4.16 HCC Property welcome the inclusion of developable land in the allocation and also note that the waste transfer station at Colne Way is safeguarded and future development needs to consider this. They also welcome the inclusion of MXD9 [North Watford Library and Health Facilities] in the SPA. These have been noted.

**SPA6 Western Gateway**

4.4.17 Hertfordshire County Council note that the Watford Business Park part of the Western Gateway is covered by an area of search in the waste Site Allocations document and as such they would not wish to see non-B uses in this area.

4.4.18 No change to policy is needed as the area is identified an employment area.

**Mixed Allocations**
4.4.19 NLP, on behalf of INTU, ask that retail elements in a number of sites be small in scale and limited to that needed to serve the development. This includes MXD3 [Gas Holder Site]; MXD10 [Former Petrol Station, Dome Roundabout] MXD11 [The Gossamers and MXD12 – [The Brow]. This is covered by the Core Strategy.

MXD3 – Gas Holder Site

4.4.20 National Grid advised us of an overhead high voltage ZC line on site which has been noted as part of the site considerations.

4.4.21 Developer St James asked for residential uses to be added to the mix of uses appropriate on this site. This has been noted, however further information is required before a clear housing allocation is made in terms of compatibility of uses with the flood zone and the Council would prefer to keep a flexible approach to the site to ensure that the restoration of Frogmore House is not compromised.

MXD9 – North Watford Library and Health Facilities

4.4.22 HCC welcome this allocation and provide more information on fire ambulance services, schools and libraries. These matters have been noted by the Council.

4.5 Sustainable Development

4.5.1 23 comments were received on this chapter. Natural England supported policies SD5 [Sustainable Design Standards], SD7 [Renewable Energy], SD9 [Managing Flood Risk], SD12 [Protection and Restoration of River Corridors, Canals and Watercourse] and 19 [External Lighting].

4.5.2 Regarding Policy SD5 [Sustainable Design Standards], INTU sought to qualify the BREEAM target with “where viable”. However the Council considers that it is not necessary to qualify the policy for an applicant to make a case for exemption. Work was subsequently commissioned to assess the viability of the plan’s requirements which showed the proposed policies in the plan to be viable.

4.5.3 The Environment Agency and Thames Water suggested additional wording for Policy SD9 [Managing Flood Risk] and Policy SD12 [Protection of Rivers, Canals and other Watercourses] to account for changing requirements of flood risk assessment, drainage and contamination.

4.5.4 Thames Water asked for additional text to clarify that developers will need to demonstrate there is sufficient wastewater capacity and that they may need to pay for infrastructure to make up any shortfall. This has now been included. Some of the points were followed up in a meeting with Hertfordshire County Council who have taken on the role of Lead Local Flood Authority.
4.5.5 Regarding SD11 [Water Consumption], the EA strongly support the inclusion of a target related to reducing water consumption. They also suggested a similar target for non-residential uses.

4.5.6 The Canals and Rivers Trust felt SD12 [Protection and Restoration of River Corridors, Canals and Watercourse] did not sufficiently cover development close to canals as development may on occasions be required closer to the water edge. The Trust was concerned that the improvements identified for the water environment and water ecology in the policy imply that all such improvements should relate to ecology; whereas other types of improvements [i.e. public realm, hard landscaping] will be required. They consider that an amended policy or a new stand alone canal policy is required to widen the scope to include all possible improvements and to account for development closer to the waters edge. Comments were followed up with some suggested wording which has been included as a separate policy for Canals.

4.5.7 Agents acting on behalf of National Grid objected to the setback requirement for development from the bank of a river or watercourse and asked for information about why the Environment Agency required this.

4.5.8 The origin of the set back requirement, which is also used by other local authorities, has been clarified with the Environment Agency and relates to the Thames Land Drainage byelaws.

4.5.9 In light of the various comments policies SD9 [Managing Flood Risk] and SD12 [Protection and Restoration of River Corridors, Canals and Watercourse] have been revised.

4.5.10 HCC Property on behalf of the Waste Management Section suggested wording additions to the supporting text to Policy SD14 [Waste] which has since been updated in discussion with HCC.

4.5.11 Regarding Policy SD15 [Unstable, Contaminated and Potentially Contaminated Land], the EA suggested some wording changes to include the accurate link to the EA’s website and is keen that the policy should stress that there may be previously developed sites that may have land contamination. This has been noted by the Council which considers the wording accounts for contamination potential. The Council has also noted the EA’s support for Policy SD16 [Potentially Hazardous or Polluting Development].

4.5.12 Regarding SD17 [Air Quality], National Grid considers the wording to be restrictive and unrealistic. They consider that the policy should take account of wider planning benefits and that it is unrealistic for new development to mitigate existing air quality impacts. They consider that national policy does not require development to improve existing air quality as many sources of air pollution are outside of the applicant’s control.
4.5.13 The policy has been amended to refer to delivery of the Council’s Air Quality Action Plan.

4.5.14 In relation to SD18 [Noise] Hertfordshire Police recommended requirements for noise mitigation for residential dwellings in close proximity to emergency services. Reference to specific noise generating uses has since been removed so that the policy will apply to any potential noise generating use. The policy has also included requirements for noise assessments and any required mitigation in cases where there may be noise disturbance.

4.5.15 The EA suggested additional wording for Policy SD19 [External Lighting] in relation to light spill over river corridors and its impacts on biodiversity, while Natural England generally support the policy. In the case of the former, the Council has noted this and reworded the policy.

4.6 Town and Local Centres/ Retail

4.6.1 36 representations were made on this chapter.

4.6.2 JM Rowe Investments object to a percentage level of A1 uses identified in Policy TLC3 [Restriction of Non Retail Use in Prime Retail Frontage], given the importance of the shopping centre and suggest further flexibility is required. They also consider it unclear what constitutes a shopfront. There is also concern from Nathaniel Lichfield and Partners on behalf of INTU, that there is insufficient flexibility in terms of thresholds for other non retail town centre uses and that applications should be assessed on a case by case basis. Equally, they consider that the INTU Watford should not be treated differently from Primary Retail Frontage in terms of restriction of uses identified in Policy TLC4 [Restriction of Non Retail Use in Prime Retail Frontage] and request further flexibility.

4.6.3 The percentage level of A1 use has since been amended to reflect information from the latest retail survey. The Council considers there is sufficient divergence between the primary shopping area and INTU to make a different approach appropriate, and note that the A3 hubs do partly exist within INTU. Clarity on unit measurements will be provided and constant review of the mall area and the high street will be undertaken.

4.6.4 INTU consider the vacancy period identified in Policy TLC5 [Restriction of Non Retail Uses Within Secondary Retail Frontage] in terms of change of use from A1 retail to be too restrictive and would prefer a case by case approach. The vacancy period has already been reduced to take account of the response following the first consultation. The Council does not consider that removing the vacancy period is appropriate.

4.6.5 INTU considered that the restaurant hubs are too limited, and ask that both the northern and southern hubs, as identified in TL6C [A3 Hub Areas], are expanded. The Council subsequently consulted on an extension to the northern hub to account for the uses permitted in the redevelopment of
Charter Place. The council is keen to ensure an appropriate balance between the High Street and INTU and therefore consider it inappropriate to include units which are not contiguous with the A3 Hubs.

4.6.6 There was general support, including from the Central Town Centre Residents’ Association regarding Policies TLC 6A [Restriction of Betting and Money Shops] and TLC 7 [Nuisance and Community Safety (Classes A3 – Restaurant, A4 – Drinking Establishment and A5 – Takeaway)].

4.6.7 Hertfordshire Police suggest some additional wording to include CCTV security measures for TLC 6A [Restriction of Betting and Money Shops] and to account for the differences in the licensing and planning regimes regarding opening hours. The Council has noted these comments and consulted the Licensing Team to identify appropriate wording.

4.6.8 With regard to Policy TLC 8 [Character Areas] Historic England are pleased to see reference to the protection of heritage assets but concerned about the potential impact of retail use on the setting of St. Mary’s Church and churchyard, the green area abutting the car park and Market Street, and Holy Rood Church as it is unclear how much of the site is intended for development. They also for further wording to reflect the character and appearance of the conservation area. The Council takes account of these comments and have reworded where appropriate.

4.6.9 A repeat objection as detailed in the SPA2 section was received regarding 73-77 Clarendon Road in the Commercial Character area.

4.6.10 Regarding TLC10 [Restriction of Non A1 Use Classes in District and Local Centres], a resident on Langley Road considers that a further study of the St. Albans Road area should be considered in terms of retail and residential use. The Council recognises this and further work will be done but it will not be part of this local plan document.

4.6.11 Planwise Ltd consider Policy TLC11 [Community Facilities] to be too restrictive and inconsistent with National Planning Policy Framework policies and that a shorter time limit should be adopted regarding potential use change. The Council intend the policy to support the provision of facilities in more sustainable locations, reducing car use and is content with the robustness of the policy regarding the NPPF.

4.6.12 Sport England suggest this policy [Policy TLC11 – Community Facilities] should be expanded, in light of the removal of G16 [Sports Hubs], and that further wording is needed to ensure that the policy covers indoor and outdoor sports facilities. An additional policy has been included to address this. They also suggest the policy should require developer contributions for sports and recreational facilities. The Council notes that this is covered by the Community Infrastructure Levy requirements.

4.6.13 The Theatre Trust’s support of this policy [TLC11 – Community Facilities] is welcomed.
4.6.14 Historic England (HE) considers the proposed retail sites lack specific policy guidance and should be expanded, including referring to heritage assets and showing them on the map. Further detail on specific site considerations and constraints has been provided by HE for each of the retail allocations identified under Policy TLC13 [Town Centre Retail Site Allocations]. Information has been added to the schedule of site development considerations.

4.6.15 Allocation R5 [Charter Place centre and adjoining land] is supported by INTU.

4.7 Housing

4.7.1. 82 representations were made on this chapter. A number of general comments were made, not specific to the housing allocations proposed at consultation stage.

4.7.2. The Defence Infrastructure Organisation brought the statutory height safeguarding consultation zone to the Council’s attention. This has been noted.

4.7.3. No objections were received to Policies HS5 [Conversion of Houses in Multiple Occupation (HMOs) to Flats], HS6 [Applications for House in Multiple Occupation (HMOs), self contained flats (as block HMOs) or Hostels, and HS7 [Conversions and Subdivisions of Family Housing], although in relation to Policy HS7 the Central Residents’ Association ask that such changes should only be allowed if they are not detrimental to the area. This has been noted by the council and measures including the residential design guide address character area considerations.

4.7.4. Hertfordshire Constabulary recommend secure by design standards for Policy HS5 [Conversion of Houses in Multiple Occupation (HMOs) to Flats], to be included and to consider secure cycle storage and other polices. This has been included in Appendix H Cycle Parking Standards and in other cases new national standards suffice as well as the relevant core strategies policies.

4.7.5. Natural England welcome Policy HS10 [Quality of Garden Development] while HCC Property welcome HS11 [Older Persons’ and Specialist Housing]. This support has been noted.

4.7.6. Policy HS12 [Housing Delivery] and the associated specific allocations received a considerable volume of comments. Recurring themes have been identified in the overarching issues section and relate to sewerage capacity and requirements, the need for school places, the need for archaeological assessment and to make specific reference to heritage assets. Relevant information has been recorded and taken into account for each site.

4.7.7. Regarding site H5 [Land at Pinner Road] comments related to controls on height, light and noise pollution, and secure boundary treatment. These comments have been noted and are covered by other policies in the plan.
4.7.8. Sport England welcome that the proposed H6 [Skate Park] would be dependent on the re-location of the Skate Park, and seek that the location is confirmed. The Council agrees with this position and appropriate wording has been included.

4.7.9. Regarding H16 [Bill Everett Community Centre] Sport England have no objection to principle of redevelopment, however an issue with changing facilities in the adjacent sites is noted and appropriate wording has been included.

4.7.10. The owner of H21 Town and Country Club, Halsey House, Rosslyn Road, does not want the site be allocated for residential and has no intention to sell. This site has now been withdrawn from allocation.

4.7.11. Transport for London reiterated that a site at the Metropolitan Line Station for mixed use should be allocated. The Council has included this site in the allocations [Site H9 – Watford Station Cassiobury] and has continued to liaise with TFL to define the site boundary and specific development parameters.

4.7.12. Historic England considers it appropriate to include positive guidance on the protection and enhancement of the listed building on site H22 [Watford Station Cassiobury]. The Council agrees with this and accordingly appropriate wording has been included.

4.7.13. Regarding GT 1 [Gypsy and Traveller Provision] HCC agree with the location of the site but recommend screening, while the EA have noted that a foul sewer traverses the site. The Council has noted these comments and will continue to work with the EA on this matter, while the development considerations in the site schedules will add relevant wording regarding boundary and landscaping treatment.

4.8 Economic Development and Employment

4.8.1 19 comments were received on this chapter. Several developers objected to the restriction on residential use in Clarendon Road, in policies EMP3 [Employment Areas] and EMP4 [Clarendon Road, Station and Bridle Path Office Area] and queried the evidence for, and viability of, additional office space. Amendments to the employment area boundary (for Clarendon Road/ Station Road/Bridle Path) were also proposed in respect of 27 Woodford Road, 39 Clarendon Road, and 73-77 Clarendon Road. There is a concern that the Clarendon Road policy does not account for the need for other types of uses (those uses that are not just B1a/b) which add to the diversity of the area.

4.8.2 An objection was also received in respect of the proposed employment use of E5 [BT Depot] at Reeds Crescent in Policy EMP3 [Employment Areas]. The owner would prefer the site to have a residential allocation. This site has now been removed as an allocation.
4.8.3 In response to these comments the employment area boundary has been amended to exclude 27 Woodford Road and additional evidence has been commissioned regarding the deliverability of office space in the Clarendon Road employment area. This evidence shows office space to be fully viable. It is not considered appropriate to exclude the other properties [73-77 Clarendon Road, 39 Clarendon Road].

4.8.4 Hertfordshire County Council (HCC) support the inclusion of employment area E4 [Greycaine Road/Odham/Sandown] in policy EMP3 as well as the policy’s aims to resist the loss of B uses. However they seek additional wording to refer to the Waste Core Strategy Area of Search allocation. This wording is included.

4.8.5 Historic England consider that Policy EMP4 [Clarendon Road, Station and Bridle Path Office Area] should refer to the locally listed Victorian villas at 36, 73 and 75 Clarendon Road. The Locally Listed Buildings relating to site E6 (Clarendon Road) have been mentioned in the site schedules to ensure any impact on the heritage assets is considered. Number 36 Clarendon Road has already been demolished.

4.8.6 Warner Brothers welcomed Policy EMP5 [Leavesden Studios Operations – The Island Site] and seek further acknowledgement of the economic potential of the site. Further wording was proposed and has been included in supporting text.

4.8.7 One objection was received to the potential employment use of Woodside Leisure Park under Policy EMP6 [Woodside Leisure Park], suggesting that residential would be a better use. Given uncertainty around the availability of this site it has now been removed as an allocation.

4.8.8 Natural England noted that the development on Policy EMP6 [Woodside Leisure Park] land should be mindful of the Albans Wood LNR and that a buffer may be required. The site has now been removed.

4.9 Education

4.9.1 3 comments were received on this chapter. Hertfordshire County Council encourages the provision of development for education and supported the proposed allocation of a school site on land at Bedford Street (this relates to Policy SP1 [Education]), whilst noting potential feasibility issues with the Bedford Street Site.

4.9.2 Due to the small number of responses and subsequent enquiry from landowners, additional consultation in relation to the land south of Bedford Street was undertaken between 24th June and 22nd July 2015. Letters (see appendix E) were sent to known landowners, addresses within the site, and to addresses on the other side of Bedford Street.

4.9.3 7 responses were received to this additional consultation – most concerns related to access and road capacity, parking congestion, property values, construction duration, school status, impacts on the conservation area, and
safety as well as the unsuitability of the site due to noise pollution. There are other significant objections from the owner of an existing business on the site who objected as they were already operating a successful business and would fear its viability should they be required to move, as there are no suitable replacement sites. Another landowner would like residential development on part of the site and is concerned about impacts on land values. The objection considers it unreasonable and unsuitable to seek to locate the school here rather than within the main part of the Watford Junction SPA to which the needs relates.

4.9.4 The Council has continued to liaise with the county council and alternative school locations are now being sought as part of the masterplanning work for Watford Junction and the site specific allocation has been removed from the plan.

4.10 Transport

4.10.1 5 comments were received on this chapter. HCC submitted a late comment requesting reference to travels plans.

4.10.2 Core Strategy Policy T3 [Improving Accessibility] requires all development proposals to be accompanied by a green travel plan and Policy T4 [Transport Assessments] requires a transport assessment/transport statement as applicable so there is no need for an additional policy in Local Plan Part 2.

4.10.3 On Policy T6 [Car Parking Provision] Hertfordshire Constabulary asked for additional wording to discourage rear parking courts, in terms of crime prevention. Such content is more relevant to, and already present in, the Residential Design Guide.

4.10.4 HSBC Bank (UK) Ltd. considers T6 [Car Parking Provision] and Appendix G (associated requirements for minimum parking standards for residential and commercial development) is contrary to the NPPF, and are not appropriate in a special policy area. The approach to parking has since been revised and is now presented as guidance to reflect the change in national policy.

4.10.5 Hertfordshire Property welcomes the flexibility in Appendix G [Car Parking Standards] in relation to the assessment of uses not included, particularly in relation to schools. This is noted by the Council.

4.11 Infrastructure

4.11.1 1 comment was received on this chapter. Policy INF2 [Mobile Communications] was supported by the mobile operators association. Following internal discussions some small changes were proposed to add reference to rationalising equipment where possible to minimise proliferation. These changes have been sent to the Mobile Operators’ Association agents who were happy with the changes.
4.12 Urban Design and the Historic Environment

4.12.1 6 comments were received on this chapter. Regarding Policy UD3 [Design Policy: Shopfronts and Advertisements/Signs] Hertfordshire constabulary identify the deadening effect on the street scene of exterior roller shutters if solid/pinhole as well as certain advertisement types. The Police Architectural Liaison Officer asked for guidance on the type of shutters to be used. This has been noted and is fully covered in the Council’s Guide on shop front design.

4.12.2 British Sign and Graphics object to reference to the Shopfront Design Guide because they have concerns about the consultation on that document (same comments made in response to first consultation). The council considers the consultation was sound and reaffirms that the design guidance is as stated, guidance.

4.12.3 Historic England support policy UD4 [The Historic Environment, Listed Building (Nationally Listed Buildings)] and a number of suggestions have been submitted to align it more closely with the terminology in the NPPF. These have been taken into account in revised wording.

4.12.4 National Grid has concerns about the consistency of Policy UD4 [The Historic Environment, Listed Building (Nationally Listed Buildings)] with the NPPF and objects to the proposed wording which it considers does not fully appreciate wider planning benefits relative to development and heritage assets. A rewording is suggested. The Council is keen to ensure that new development does not harm heritage assets and considers wording changes unnecessary. Consideration would of course be given to any wider benefits.

4.12.5 HCC welcome Policy UD4 [The Historic Environment, Listed Building (Nationally Listed Buildings)] and ask that any archaeological written scheme of investigation include adequate provision for deposition of archives with the museums. HCC also propose additional wording to ensure that the historic environment accounts for below ground archaeological remains and historic landscapes in accordance with the NPPF. The text had been amended to reflect these comments.

4.13 Green Infrastructure, Sport and Recreation

4.13.1 12 comments were made on this chapter. Regarding Policy GI5 [Trees, Woodlands and Hedgerows] the Herts and Middlesex Trust seek an additional policy on biodiversity for assessing the ecological value of a site to ensure that there is no net loss or where possible result in enhancement. A new policy has now been included.
4.13.2  The Environment Agency suggests a wording change to account for cases where removing trees will result in an ecological benefit. The Council has now included wording in the policy to reflect this.

4.13.3  Natural England support policy GI5 [Trees, Woodlands and Hedgerows] however, they believe it should be expanded to ensure that development proposals will comply with the NPPF’s paragraphs on the protection and enhancement of biodiversity and habitat networks. The Council notes this and while a new specific policy on biodiversity has been added, a wider policy already exists in the adopted core strategy.

4.13.4  Regarding Policy GI7 [Open Space and Children/Young Person’s Play Space in Residential Development] Hertfordshire Constabulary requests that such play areas should be designed with regard to the Fields in Trust’s “Planning and Design for Outdoor Sports and Play”. Natural England welcomes the policy and considers that green infrastructure should be an integral part of the process and provide further guidance for consideration. The Council has noted these responses and references to relevant standards and guidance included where appropriate. The policy has been updated to reflect the Council’s Green Spaces Strategy which covers these issues in more detail.

4.13.5  Cemeteries: We consulted on 3 options for cemetery provision – land at Paddock Road (within Hertsmere), land at Russell Lane, and land at North Watford cemetery. As Paddock Road is outside of Watford's Borough boundary we cannot allocate in our Local Plan. Hertsmere have not allocated it in their submitted local plan, and received objections when they included it for consultation at an earlier stage. We also received objections from the West Watford and Oxhey Garden and Allotment Society. The Environment Agency objected to land at Russell Lane due to its location in Source Protection Zone 1, where there would be a high risk of pollution of the groundwater. The landowners of this site also objected. The Environment Agency also raised concern about the use of additional areas at North Watford Cemetery, also due to potential groundwater contamination and asked that further testing be done on this site. Further testing has been undertaken and shows that there may be some limited capacity for additional burials here – this is already identified as a cemetery so does not require additional allocation.

4.13.6  In light of the above we do not intend to include any additional cemetery allocation in the Local Plan Part 2, but to use existing cemetery sites and continue testing as required to protect against groundwater contamination. Cemetery capacity will be managed through the Cemetery Strategy, a separate document to the Local Plan.

4.13.7  Regarding Policy G19 [Changes to the Green Belt] HCC Property consider that the presence of a green belt designation on sites used for education acts as a constraint and obstacle to providing new, or enhancing existing facilities. This matter was raised at the time of the core strategy when it was agreed there was no need to remove schools from the Green Belt.
4.13.8 Warner Brothers Studio Leavesden support the policy to amend the greenbelt specifically for studio operations.

4.14 Appendices

3.13.1 Appendix F - Noise, Odour and Vibration - No Comments Received

3.13.2 Appendix G - Car Parking Standards - No comments received – although the comments received under the Transport Chapter relevant to this appendix have been noted in this case.

3.13.3 Appendix H - Cycle Parking Standards - No comments received

4.15 Environmental Report

3.14.1 Alternative wording / policy proposed by respondents in Hertfordshire Ecology. Natural England are content with the environmental report and support the biodiversity objectives.
5.1 Consultation 3

5.1.1. A third consultation was undertaken on new policies and key changes between the 16th December 2015 and 4th February 2016.

5.1.2. A letter was sent by email or post to approximately 568 people. The letter gave information about the consultation, explained how to respond, gave information about where documents could be viewed and contained a link to/gave the address of the consultation portal. Consultees were given the option of responding online, by email and by post.

5.1.3. A notice and article were published in the Watford Observer on 11 December 2015. News items publicising, and containing links to, the consultation were posted on Facebook and Twitter.

5.1.4. Paper copies of the additional policies and key changes, as well as a consultation summary were made available at Watford Central and North Watford libraries and at the Town Hall’s Customer Service Centre, along with an updated Environmental Report Addendum (Sustainability Appraisal), Response Form.

5.1.5. 53 comments were received from 12 separate consultees.

5.1.6. This report summarises the responses received. However the full representation can be accessed online through the following link http://watford.jdi-consult.net/localplan/viewreps.php?action=search

5.2 Extending the boundary of the A3 restaurant hubs

5.2.1 5 representations were received regarding the extension of the boundary for the A3 hubs. A number of comments considered the extension appropriate and support the change. Two comments were received regarding the designation of the new Watford market and street food hub and how this can be accounted for by way of provision in the policy/ map. JM Rowe Investments consider that the A3 hub remains too limited and should include more premises (nos 52-56 High Street) to encourage greater footfall.

5.2.2 The Council has noted support for the policy. The map illustrates policies in the plan. There is no separate policy or use class for the market, therefore no need for it to be shown separately on the map. The A3 boundary has been extended.
5.3 Car parking provision

5.3.1 9 separate representations were received regarding car parking provision. There was support for the policy generally, provided the standards reflect levels of transport accessibility. Respondents also flagged up that it is often more convenient to drive and asked that adequate provision for C2 uses (residential institutions such as care homes) is made.

5.3.2 Transport for London (TFL) generally support the policy but feel that the parking standards for office space should reflect those in outer London, that the accessibility zone 1 should include new metropolitan line stations, reference be made to electric vehicle charging infrastructure, and that a greater link between cycle parking and car parking is made. TFL also recommend that the policy should promote ‘car lite’ development in areas with the highest transport accessibility.

5.3.3 In response to comments regarding transport accessibility, C2 uses and the convenience of driving by car, changes to national policy mean we can now only provide guidance regarding parking levels to be provided. The availability of public transport was considered and used in determining the zones for the different levels of parking suggested.

5.3.4 The policy has been amended to partially reflect comments from TFL although it is considered better to wait until the metropolitan stations are open to amend the accessibility zones. Electric vehicle charging infrastructure is covered by a separate policy, however this has been amended to reflect more appropriate standards.

5.4 Taller buildings – new polices

5.4.1 16 representations were received on the new taller buildings policies. There was generally support from Three Rivers District Council, Cassiobury Residents’ Association and TFL. A number of the supporting comments agree that the taller buildings should be limited to specific areas. It was suggested that taller buildings be considered for the Dome Roundabout, Bushey Arches, Town Centre High Street areas and areas between Market Street and Exchange Road.

5.4.2 The whole of Watford was assessed for suitability for taller buildings taking into account a range of criteria that have been assessed (Taller Buildings Location Assessment January 2016) as part of identifying the most suitable locations for taller buildings. The three locations proposed in the policy are felt to be the most appropriate.

5.4.3 Three Rivers District Council do not wish to see more than 35 metre buildings (option 1) at Ascot Road. However, the progression of master planning work has identified potential for buildings up to 15 storeys (50 metres) in this location. This is supported by the assessment work which identified this area
as lacking in significant constraints and being generally suitable for accommodating higher density.

5.4.4 One representation considers that Watford in general and Clarendon Road in particular are not suitable for taller buildings. The locations have been proposed as the focus for taller buildings in order to direct such buildings to the most appropriate locations. However it is the intention of the policy to ensure that any taller buildings are of good design.

5.4.5 TFL suggest that a specific marked area on the plan be avoided to ensure that areas near, but not currently in the marked area in the plan, such as new stations are not precluded from potential higher density development. This includes employment and other uses in the stations hinterland. TFL also recommend that higher density be included for the new Vicarage Road Station.

5.4.6 In response to TFL, it is felt some mapped area is necessary as otherwise it will become difficult to identify which location is suitable. It is considered that the Vicarage Road station will already have more regeneration in terms of the Health Campus development. The potential locations have also been chosen as gateways to Watford.

5.4.7 Most comments supported the policy on design of taller buildings. St. William object to part 10 regarding conservation areas and listed buildings, believing the wording conflicts with the NPPF 2012 and that more weight should be given to wider planning benefits. The policy has since been reworded to ensure consistency with the NPPF.

5.4.8 Some respondents felt the policies/options/criteria were too prescriptive. The policy has been reviewed and restructured to make it clearer that the intention is to allow well designed, appropriately located taller buildings. This would not preclude exceptional buildings in other locations.

5.4.9 Historic England have noted that some rewording is required and that the preferred locations of taller buildings will evolve as a result of the sustainability appraisal, whereby the duty of s72 of the Planning and Listed Buildings Act will need to be accounted for. In response the Council agrees with the rewording and that the SA is integral in formulating policies.

5.4 Sports Facilities

5.5.1 6 representations were received regarding the policy. Cassiobury Park Residents partly object to the policy. They provide clarification that the sites are not in the centre of the borough but to western edge (this was a drafting error which has now been corrected) and note that they would be served by two residential roads. Combined with other uses, there is concern regarding increased traffic generation, congestion and pollution, air quality to this area.
Furthermore, the association would not agree to increasing access via an unadopted road to the Fullerians and Grammar School site.

5.5.2 The council recognises these concerns but has not been able to identify alternative sites. Any intensification in use via an application for planning permission would need to demonstrate that there are no negative transport impacts.

5.5.3 There was also support for the policy. Some rewording was suggested to improve clarity and to add reference to CIL contributions. CIL contributions are already covered in the Council’s Regulation 123 List which includes Green Infrastructure including Sports Facilities.

5.6 Cemetery Provision

5.6.1 No objection was received regarding the deletion of the cemetery policy.

5.7 Biodiversity

5.7.1 3 representations were received on the new policy. Natural England proposed some rewording, while Warner Bros Ltd and the Cassiobury Park Residents’ Association support the Policy. The policy has been reworded as suggested. In addition, the Local Nature Partnership provided further wording and advice regarding the policy. Additional information was required to ensure that the plan meet their principles, which has now been incorporated into the policy.

5.8 Greenbelt

5.8.1 19 representations were received on the sites that were to be removed from the greenbelt. The majority of the representations raised no objection to the removal of the sites identified from the greenbelt. Three Rivers District Council sought clarification that sites G9 [High Road] and G10 [Ashfields] would be allocated as open space. A respondent also asked that the sun clock tower (Site G7) be retained as a local landmark.

5.8.2 The plan does not propose the clock tower for development, but its locally listed status would be considered as part of any planning application. G9 and G10 are currently open space and will be protected by policy GI1 of the Core Strategy and policy GI7 of Local Plan part 2. This will be made clear on the policies map.

5.9 Gypsy and Traveller Provision

5.9.1 There were 4 representations received on this policy change. There was no objection to the change.

5.9.2 Hertfordshire Constabulary recommended that advice regarding number of pitches per site is followed as per the DCLG Good Practice Guide. The Council
is aware of the guidance. The area of search for a new site was identified in the adopted Core Strategy and subject to examination - there were no alternative suitable locations.

5.10 Environmental Report Addendum

5.10.1 3 comments were received on the Environmental Report Addendum. Natural England agreed with the assessment. Historic England noted that the findings support their suggested changes to policy TB one and the need for use of a robust and comprehensive method of assessment such as good practice advice note AN4 (these changes have been made to the policy). Cassiobury Residents Association felt the assessment had insufficiently considered the impact of any increase in traffic on congestion, air pollution, air quality and residents amenity.
6.1 Conclusions and Next Steps

6.1.1 This consultation statement forms part of the supporting information for the publication of the Local Plan for Formal Consultation (under Regulation 19) of the Town and Country (Local Development) (England) Regulations 2012.

6.1.2 The formal publication will run for a minimum of 6 weeks, following which a review of the comments received will be undertaken to determine whether further changes are required before the plan is submitted for examination. The consultation will consider whether the plan is “sound” according to the 4 tests set out in paragraph 182 of the National Planning Policy Framework (NPPF). Submission is currently scheduled for February 2017, with an indicative date for adoption in January 2018.
APPENDICES
APPENDIX A: Formal Notices and Newspaper Adverts

WATFORD LOCAL PLAN PART 2
Watford Borough Council is consulting on initial ideas for the Local Plan Part 2 – Development Management Policies and Site Allocations, and on a revised Residential Design Guide.

The consultation runs from Mon 4th November to Mon 16th December 2013.

to find out more and to comment please visit: http://watford.linhousethe.co.uk/portal/lnp2
or call Planning Policy on 01923 278263.

Paper copies will be available for inspection at Watford Town Hall, Customer Service Centre and Watford Central and North libraries during normal opening hours.

Consultation 1

WATFORD LOCAL PLAN
CONSULTATION 16TH DECEMBER 2015 – 3RD FEBRUARY 2016
- Local Plan Part 2 – additional policies and key changes
- Addendum to the Environmental Report to accompany Local Plan Part 2
- Skyline – Watford’s Approach to Tall Buildings – Supplementary Planning Document

Watford Borough Council is consulting on new and amended policies created in consultation on Local Plan Part 2 – Development Management Policies and Site Allocations. There are new policies on taller buildings, traffic density, sports facilities, removal of a consultancy policy, an amended parking policy, and an extension to the river and public area in Chorley Wood. The consultation also proposes 2 additional changes in the green belt and the safeguarding of the existing green and development site in St George’s Lake. An addendum to the Environmental Report is also available.

Amended please to the following or Skyline – a new supplementary planning document (SPD) setting out an approach to taller buildings in Watford.

The consultation runs from Wednesday, 16th December 2015 to Wednesday, 3rd February 2016.

to find out more and to comment please visit: https://watford.fw-consult.netwebplan
or call Planning Policy on 01923 278263, or email strategy@watford.gov.uk.

Paper copies will be available for inspection at Watford Town Hall, Customer Service Centre and Watford Central and North libraries during normal opening hours.

Consultation 3

Local Plan Part 2: Site Allocations and Development Management Policies
Have your say on our local plan policies

Every council has to have a local plan. All our planning decisions – from deciding whether to allow the building of a new shop or approving a new housing development – are assessed against planning policies set out in our local plan.

Earlier this year, the strategy that guides our local plan was adopted, after we asked residents their views, and had an independent inspector approve it. Known as our Core Strategy – it is basically how we want the borough to look in 2031. This includes being a centre of regional economic significance, with an important transport interchange role and having a family friendly town centre with sustainable and distinctive neighbourhoods.

Since then, we have been working hard to develop our plans that will help us deliver this strategy.

These policies will help to make sure the town is developed in the right way, using the latest available evidence. We have thought about the number of homes needed in the future, how we can develop the right kind of shopping and recreation facilities and what we need to do to create opportunities for local jobs.

We want to hear what you think about our ideas for Site Allocations: which proposes sites for specific land uses or new buildings such as homes, shops, offices or schools.

Development Management: which includes things like parking standards and design and sustainability requirements – that will help us decide planning applications.

Residential Design Guide: we have revised our design guide from 2008; which sets out the design principles for new housing and any extensions or alterations to existing homes.

The public consultation on all of the above runs until 5pm on Monday 16 December. To comment, please take a look at our consultation portal: http://watford.limehouse.co.uk/portal/lp2/ If you don’t have internet access you can also view the documents at the Town Hall Customer Service Centre and Watford Central and North libraries. Please call tel: 01923 272283 if you need any further information.

Consultation 1: About Watford

Watford’s Local Plan

Thank you to everyone who got involved with our recent consultation on proposed development sites and planning policies in Watford.

In light of responses we will be taking another look at the best use of some of the proposed sites and doing further work relating to water, transport and development potential.

More specific guidance will be prepared for the Watford Junction and Clarendon Road areas.

Once we have fully considered all your comments we will publish a response to each at http://watford.jds-consult.net/localplan

We currently expect to publish the Local Plan 2 for final consultation in the summer. After this it will be submitted for independent examination.

For more information please contact the policy team at strategy@watford.gov.uk

www.watford.gov.uk

Consultation 2: About Watford
First Consultation

Have your say on our local plan policies

Watford Borough Council is asking residents for their views on our ideas for the town in the future.

Every council has to have a local plan. All our planning decisions – from deciding whether to allow the building of a new shop or approving a new housing development - are assessed against planning policies set out in our local plan.

We already have a vision for Watford to 2031 in Part 1 of the Local Plan, the Core Strategy, and we are now asking for views on Part 2. The policies in Part 2 will help to make sure the town is developed in line with the vision, using the latest available evidence. We have thought about where homes and schools could be built in the future, how we can develop the right kind of shopping and recreation facilities and what we need to do to create opportunities for local jobs.

A revised Residential Design Guide has also been produced. This is a key guidance document for residents and developers when preparing plans for house extensions or new houses.

We want to know what you think about the local plan policies and the revised Residential Design Guide. As well as being able to comment online, there will be an exhibition at intu Watford (formerly The Harlequin) from 8am to 6pm on Monday 25 and Tuesday 26 November. Come and see us in the upper mall outside Next and Marks and Spencer.

The public consultation runs from Monday 4 November until 5pm on Monday 16 December. To comment, please take a look at our consultation portal: http://watford.limehouse.co.uk/portal/lp/2

If you don’t have internet access you can also view the documents at the Town Hall Customer Service Centre and Watford Central and North libraries. Please call tel: 01923 278263 if you need any further information.
Get involved with shaping the future of Watford

Release Date: 11 December 2014

Our Local Plan contains all the planning policies that will shape the future development of our town up to 2031. Sections of the plan have been updated in light of feedback from our previous consultation. So now, we are asking for residents’ views again.

Elected Mayor Dorothy Thornhill said: “We want to get the right kind of development in the right places. Maybe you are interested in where there will be new homes, or perhaps you want to influence the development of the town centre. Whatever it is, your views really do count.”

Like many parts of the country, Watford is suffering from an acute housing shortage and we are committed to seeing 6500 homes built in the town. Now we are asking where these homes should go. Tell us what you think about the sites we have proposed for future housing development – these include land on The Gossamers, Croxley View, Chalk Hill and around 1500 new homes in and around Watford Junction station.

New evidence has shown that we will need to provide for more high quality office space – to help us hit our target of creating at least 7000 more jobs. Another example is that we have amended our town centre noise policy to try and balance the interests of residents and businesses in the town centre. Have we got this right?

Managing Director Manny Lewis said: “We are working hard to ensure Watford has a strong and vibrant town centre. We don’t want any empty shops – so in our plan in key locations, we have made it easier for shops to become restaurants – which all seem to be doing fantastically well at the bottom of town. We also want a family friendly town centre, so we have drawn up a new policy to avoid clustering of betting and money lending shops which you have told us is a concern.”

The easiest way to get involved is to make comments online at: https://watford.jdiconsult.net/localplan Residents can also email us at: strategy@watford.gov.uk
ensuring each comment clearly indicates the policy referred to, and the change being sought. The consultation is open from Wednesday 17 December until 4 February 2015.

16 December 2015

Tell us what you think about our plans for Watford

Watford residents are being asked for their views on Local Plan Part 2, and on new guidance on taller buildings.

The consultation, run by Watford borough council is open for 7 weeks until Thursday 4 February 2016 and can be viewed online at https://watford.jdi-consult.net/localplan Interested residents will also be able to look at the feedback already received, and see what action the council is taking as a result.

The council is asking for views on the new and amended policies for Local Plan Part 2, and the new tall buildings guidance. The continued economic success of the town has led to an increased number of planning applications for taller buildings, usually between 7 and 10 storeys high. The principles and advice set out in the policy will ensure that any proposed taller buildings are architecturally exciting structures that protect important local views and create an iconic skyline for the town.

Reference copies of the new and changed local plan policies and taller buildings guidance will also be available, along with response forms, at the Town Hall Customer Service Centre and at Watford Central and North Watford libraries during opening hours. Please note that the Town Hall will be closed between Christmas and New Year. Please check the latest library opening times at: http://www.hertsdirect.org/services/libraries/findlib/ before visiting.

Ends...
APPENDIX B – Consultation Letters to Consultees

Regulation 18 Notification Letter

«Title» «Given_Name» «Family_Name»
«Company/Organisation»
«Address_Line_1»
«Address_Line_2»
«Address_Line_3»
«Post_Town»
«Post_Code»

Enquiries to: Planning Policy Team
Phone No: 01923 278263
Our ref: P.00.02/Core Strategy
Your ref: 
Date: 26 November 2012
E-mail: strategy@watford.gov.uk

«GreetingLine»

Watford Local Plan:


1. Core Strategy – Inspector’s Report

I am writing to inform you that the report of Ms J Kingaby, the independent inspector appointed to examine the Watford Local Plan Core Strategy, has now been published and is available to view at www.watford.gov.uk/corestrategy.

The inspector concludes that the Watford Core Strategy (Local Plan) provides an appropriate basis for the planning of the Borough to 2031 providing a number of modifications are made. These main modifications were subject to consultation between July and September 2012.

The report is also available to view at:

- Customer Service Centre
  Watford Borough Council
  Town Hall
  Hempstead Road
  Watford
  Hertfordshire  WD17 3EX
And at:

- All Watford Libraries (details set out below)

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The council will be asked to formally adopt the Core Strategy (as modified) at a meeting planned for 30th January 2013. Once made, this decision will be published on the council’s website but if you wish to be separately notified of the adoption of the Core Strategy, and to receive a copy of the adoption statement, please email strategy@watford.gov.uk with your request. At that time, adoption documents will also be made available to view at the locations listed above, for a period of 6 weeks.

2. Preparation of the rest of the Local Plan

I am also writing to let you know how we propose to prepare the rest of the Local Plan and to invite your input into that process. If you have any comments on what information or policies the rest of the Local Plan should contain, or any potential development sites you have not previously told us about, please let us know by Mon 14th January.

The Core Strategy sets out the overall local vision, objectives and spatial strategy to 2031, and the broad policies for delivery of this strategy. The vision and objectives, and alternative strategies for delivery have been considered and assessed (for Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) purposes) through the Core Strategy preparation and consultation process, commencing back in 2005. Additional policy documents will be prepared only where more detail is required, or to allocate specific sites.

We therefore intend to prepare the additional Local Plan documents identified below, which will help deliver the vision, objectives and spatial strategy set out in the Core Strategy. The Town Centre Area Action Plan previously proposed will now be incorporated into the Development Management Policies and Site Allocations documents. Much work already undertaken on the Core Strategy is relevant to, and will be used in the preparation of these
documents including: the evidence base, consultations and sustainability appraisal. Public consultation is likely to take place in the first half of 2013.

**Development Management Policies Document** – to set out policies relevant to determining planning applications, where policies are required in addition to the strategic policies set out in the Core Strategy. Supplementary Planning Documents such as the Residential Design Guide will be reviewed alongside this process.

Progress so far: During 2011 and 2012 we have been assessing how well the current District Plan 2000 policies work, which elements may need to be retained or revised, which policies will be covered sufficiently by the Core Strategy, and what reasonable alternative policies there might be. We have also considered the impact of changes to national policy (in the National Planning Policy Framework), and the proposed revocation of the regional policies in the East of England Plan. This process has involved some informal liaison with external organisations.

The Core Strategy identifies which policies in the Watford District Plan 2000 are to be replaced by the Core Strategy policies.

**Site Allocations Document** – to identify particular sites and their suitable uses (e.g. housing sites, employment areas), including defining the boundaries of the Special Policy Areas and the Green Belt.

Progress so far: The Strategic Housing Land Availability Assessment (SHLAA) identified a long list of potential development sites, to be considered for housing allocation. This list has been supplemented on an ongoing basis, including publicly requesting sites to be put forward (for housing or other uses) in August 2006; and Feb-Apr 2009. If you are aware of a potential development site you have not previously informed us of, please do so by completing the form available at [http://www.watford.gov.uk/ccm/content/planning-and-development/housing-documents/consultation---site-allocations-in-watford.en](http://www.watford.gov.uk/ccm/content/planning-and-development/housing-documents/consultation---site-allocations-in-watford.en)

**Community Infrastructure Levy Charging schedule** – to agree the levy appropriate for Watford and to be adopted by April 2014.

Progress so far: – Evidence on the viability of development in Watford has been prepared by consultants and a Draft Preliminary Charging Schedule is expected to be published for consultation in January/February 2013

Please send any comments, suggested sites or requests for further information to strategy@watford.gov.uk.

Yours sincerely

Philip Bylo
Planning Policy Section Head
Dear

Watford Local Plan Part 2: Development Management Policies and Site Allocations

Residential Design Guide Supplementary Planning Guidance

I am writing to inform you of a forthcoming consultation on the Local Plan Part 2 and an updated Residential Design Guide. The consultation runs from 4th November to 16th December 2013.

Local Plan Part 1 – the Core Strategy, was adopted in January this year. Since then, we have been working hard to develop all the policies that will help us deliver this strategy, taking account of comments received in response to the first stage of consultation in November 2012.

We want to hear what you think about our ideas for:

Site Allocations: which proposes sites for specific land uses or new buildings such as homes, shops, offices or schools.

Development Management: which includes things like parking standards and design and sustainability requirements – that will help us decide planning applications, as well as options for the future mix of uses within the town centre.

Residential Design Guide: we have revised our design guide from 2008; which sets out the design principles for new housing and any extensions or alterations to existing homes.

The public consultation on all of the above runs until 5pm on Monday 16 December. To comment, please take a look at our consultation portal: http://watford.limehouse.co.uk/portal/lp/2

As a reminder, your username for the online consultation portal is «Username»

There will be a staffed exhibition in the intu centre Watford (formerly The Harlequin) from 8am to 6pm on Monday 25th and Tuesday 26th November in the upper mall outside Next and Marks and Spencer.

You can also view the documents at the Town Hall Customer Service Centre and Watford Central and North libraries. Please call 01923 278263 if you need any further information.

Yours sincerely

Philip Bylo
I am writing to inform you of a forthcoming consultation on the Local Plan Part 2 and the accompanying Environmental Report. The 7 week consultation runs from noon on Wednesday 17th December to midnight on Wednesday 4th February 2015.

Part 1 of Watford’s Local Plan – the Core Strategy - was adopted in January 2013. The Core Strategy set 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 and other 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. Responses to all stages of consultation will be used in preparing a final plan for submission to the Secretary of State for examination.

We have made changes to the draft plan as result of feedback during the previous consultation, and also in light of further evidence and advice. A summary of the key changes can be seen in the Introduction to the consultation document. Before we
Consultation Statement (Regulation 18)

prepare the final plan for submission we would like to know your views. Whilst we are particularly interested in views on the changes we have made since the previous consultation, you are still able to comment on any of the policies, and we would welcome any alternative proposals you may have.

We are also consulting on the Environmental Report, which assesses the impact of proposed policies and sites on sustainability objectives.

You can view both the Local Plan Part 2 and the Environmental Report online at https://watford.jdi-consult.net/localplan. You do not need to login to read the consultation material.

Reference copies will also be available, along with response forms, at the Town Hall Customer Service Centre and at Watford Central and North Watford libraries during opening hours. Please note that the Town Hall will be closed between Christmas and New Year. Please check the latest library opening times at: http://www.hertsdirect.org/services/libraries/findlib/ before visiting.

How to comment:

The quickest and easiest way to submit comments is via our online system at this link: https://watford.jdi-consult.net/localplan. 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 were registered on our previous Local Plan consultation system your contact details will have been carried across. Please note that your username will now be your email address (where you have one) and you will be prompted to create a new password when you first login.

If you are unable or prefer not to submit comments online please use the comment form available at www.watford.gov.uk/localplan (or in paper form from the reference locations identified above). Or you can email your comments to strategy@watford.gov.uk 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 (not pdf).
Please submit comments on Local Plan Part 2 and/or the Environmental Report by midnight on Wednesday 4th February 2015

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

Yours sincerely

Vicky Owen
Spatial Planning Manager
Watford Local Plan consultation:

- **Local Plan Part 2 – additional policies and key changes**
- **Addendum to the Environmental Report to accompany Local Plan Part 2**
- **Skyline – Watford’s Approach to Taller Buildings – A Supplementary Planning Document**

I am writing to inform you of a forthcoming consultation on the Local Plan Part 2, an accompanying addendum to the Environmental Report, and a Supplementary Planning Document on Taller Buildings. The 7 week consultation begins on Wednesday 16th December 2015 and ends just before midnight on Wednesday 4th February 2016.

Watford’s Local Plan Part 2 will help deliver the strategy and vision set out in Local Plan Part 1 – The Core Strategy, adopted in 2013.

A second consultation on Local Plan Part 2 took place a year ago, running from December 2014 to February 2015. A consultation report, summarising the responses to that consultation, and action the council is taking as a result, is published alongside this consultation.

At this stage, we are not consulting on a revised version of the full Local Plan Part 2. This is because additional studies are currently underway which will inform the preparation of the publication version, including viability and master planning work in relation to Watford Junction and Clarendon Road. Once this work is sufficiently advanced to inform the plan, a revised version will be published for consultation, which will also include other amendments to policies resulting from earlier consultations.

This consultation focuses on a small number of primarily new policies, resulting from comments made in relation to the previous consultation and changes in, or clarification of, national policy. These are:
1) Changes to the extent of the restaurant hubs in the High St (A3 hubs) in response to comments and to accurately match the extent of the recently begun Charter Place redevelopment.

2) An amended policy providing guidance on parking standards – in response to a change in national policy set out in a ministerial statement dated 25th March 2015.

3) A new policy and accompanying supplementary planning document in relation to taller buildings, identifying the particular issues to be considered when designing taller buildings and identifying areas of the town where they may be appropriate. This has been prepared in light of an increased number of pre-application enquiries including taller buildings.

4) A new policy on sports facilities - in response to comments made on the previous consultation.

5) The deletion of the previously proposed policy relating to cemetery provision, in light of responses to the previous consultation. No new suitable site has been identified. Cemetery provision will be managed through the Council’s Cemetery Strategy.

6) A new policy on biodiversity - in response to comments made on the previous consultation.

7) Two additional changes to the Green Belt boundary – these are to exclude the existing gypsy and traveller site in Tolpits Lane from the Green Belt (as it is already developed) and the proposed new site adjacent to it. The allocation of a new gypsy and traveller site in this location is identified in the adopted Core Strategy and featured in the previous Local Plan Part 2 consultations. Clarification of national policy means that to be taken forward this site should be removed from the Green Belt. The consultation document also sets out more explicitly the exceptional circumstances behind the proposed changes to the Green Belt, including those which have already been subject to consultation.

8) Linked to the proposed changes above, the existing Gypsy and Traveller site will be safeguarded to continue in that use.

All new policies have been subject to independent sustainability appraisal – the findings are also published for comment as part of this consultation, in an Addendum to the Environmental Report.

You can view and comment on the consultation material online at https://watford.jdi-consult.net/localplan. You do not need to login to read the consultation material.

Reference copies will also be available, along with response forms, at the Town Hall Customer Service Centre and at Watford Central and North Watford libraries during opening hours. Please note that the Town Hall will be closed between Christmas and
New Year. Please check the latest library opening times at: http://www.hertsdirect.org/services/libraries/findlib/ before visiting.

How to comment:

The easiest way to comment is online via our consultation portal at https://watford.jdi-consult.net/localplan/. All comments must be received by 23:59 on Wed 3rd February 2016. If you have any problems using the online portal please call the Planning Policy Team on 01923 278263.

You will see that specific questions are posed in each section. If you are commenting online a pencil icon shows where you can comment. Please click on the icon. The response form will ask you to indicate whether you are supporting, objecting to or just commenting on the proposal and give you the opportunity to add further detail to your response.

You can also comment on the Addendum to the Environmental Report and on the draft Supplementary Planning Document: Skyline – Watford’s Approach to Taller Buildings. These appear in the consultation portal as pdf documents with associated response forms.

If you are unable to use the online consultation portal a response form can be downloaded from www.watford.gov.uk/ldf. Please ensure that all responses clearly indicate to which document they relates, are directed to the relevant consultation questions and indicate whether you are supporting, objecting or commenting, and whether you have made the same points previously (in response to an earlier consultation). Such responses can be emailed to strategy@watford.gov.uk or sent by post to:

Watford Borough Council
Planning Policy
FREEPOST ANG0394
Watford WD17 3BR

Any comments sent by email must be in a format that allows comments to be easily cut and pasted into the consultation system (ie not pdf).

Yours sincerely

Vicky Owen
Spatial Planning Manager
Appendix C – INTU Consultation Event

Consultation event at Intu shopping centre, Watford Mon 25th and Tues 26th November 2013 – Local Plan Part 2 and Residential Design Guide

A staffed exhibition took place in the Upper Mall in a busy location outside Marks and Spencer and Next during the full centre opening hours from 9am-6pm both days (with set up and display removal outside of these times)

Information on the boards summarised the context of the consultation (The adopted Core Strategy) and outlined the more detailed matters being consulted upon in Local Plan Part 2 (Development Management Policies, Town Centre Policies and Sites and Site Allocations) and the Residential Design Guide. In addition material relating to the proposed redevelopment of the Charter Place Shopping Centre was included for information (at the time this was a current application). Staff were available throughout to explain the information and engage in discussion around the ideas presented.

A “post–it note” wall was available for people to leave brief comments. There were questionnaires specific to the town centre proposals, and an information sheet summarising the consultation and providing details of the consultation portal to enable more detailed comments and consideration of the full consultation material.

Feedback received:

Post-it Notes

- Good thing letting us know what is happening in Watford.
- Many don’t like change but this will be good – well done!
- Support cinema and nightlife improvements generally
- Good for Watford – let’s keep improving the town
- Like food and drink hub at centre entrances.
- Let’s have Waitrose
- How about Debenhams where TJ Hughes used to be?
- Can we have a Hollister shop?
- More independent shops in Harlequin.
- Open late every night for eating and shops in Harlequin.
- Change Whippendell Road into a shopping centre
- Implement no cycling in town centre
- Have some café activity at the front of the park
- Improve facades of shops along The Parade – nasty 60s buildings
· Need cycle paths along Clarendon Road.
· Watford is over developed. Too many flats/houses squashed into area. Not enough doctors, dentists and schools.
· Please protect people living in town centre from excessive commercial development (this relates to the options to exclude residential areas from the town centre boundary)
· Make sure there is simultaneous expansion of local primary schools where there is new residential development.
· Please don’t build too much office development – mixed development? History of empty offices in Clarendon Road – please consider whether new offices will be needed – over optimistic? Boom and bust.
· Affordable central housing please.
· Adequate car parking essential for all housing. Keep parked cars off the street.
· Want to avoid a “fortress intu” being developed – needs to integrate with High St better – e.g. M&S, BHS High St entrances look like back of shop.
· Sort out the crossing next to the High St station and the back of Charter Place.
· Impact on ring road – more traffic due to proposed new shops.
· BT Exchange site would be good for retail, bringing people to top of town.

Verbal

During discussion of the town centre options there was generally positive feedback on diversifying the nature of the town centre to reflect changing shopping habits – making a day in town more of a leisure experience rather than purely to shop (given much shopping now done online). Included support for reducing extent of primary shopping frontage and for the proposed restaurant hubs. Support for more independent shops.

Concerns expressed around top of the town and how to attract occupiers.
Can Queens Road be improved to make it feel more like part of the town centre e.g. better paving. Can anything be done to tidy up spaces outside housing?
Concerns about traffic/parking issues related to having more shops (including the cost of parking compared to centres like Brent Cross).
Questions about specific sites – e.g. cemetery – and related access issues.
Charter Place – will it be covered? Will the access through to ring road past YMCA be retained?
Congestion at Bushey Arches and potential relief roads that could help eg Health Campus access road and also the potential for the CRL to relieve road congestion.
Quality of housing design could be improved beyond the typical designs we see in this country, a more modern approach would be desirable.

Sustainability features for residential properties should have happened more quickly than has been the case, policy should ensure this.

Support for town centre public realm improvements being carried out at the current time.

Support for the Charter Place development and in particular the new cinema.

Support for restaurant and cafe hub concept like the successful scheme at King St.

Concerns about the practical ability to deliver the green burial site in that location given ground conditions and space available.

The retailer Decathlon again set out their ideas for a new sports hub with a retail component in the Stephenson Way corridor and will make a submission to LP2.

The importance of planning for housing growth in conjunction with our neighbouring authorities given the limited land availability on the fringe of Watford.

**Other**

A completed town centre questionnaire and a written comment on the cemetery proposal were received on the day and added to our consultation portal as formal responses. Others took away web details in order to comment online themselves.
Appendix D: Bedford Street School Proposal

Dear Sir/Madam

Watford Local Plan Part 2 - proposed allocation of land south of Bedford Street

I am writing to advise you that an area of land to the south of Bedford Street (shown on the attached plan) is being assessed as a potential site for a primary school in connection with future development around Watford Junction. The site is currently proposed for allocation as a school site in the Watford Local Plan Part 2, which is in preparation. This means that planning applications for alternative uses are unlikely to be granted at present.

This proposal has already been subject to 2 rounds of public consultation, firstly in Nov-Dec 2013, and again in Dec 2014-Feb 2015. I apologise if you were not aware of these previous consultations which were advertised in the local press. As we have thus far received little comment on the proposals, I am now writing to ensure you are aware of this proposal, to provide you with as much information as I can, and to invite you to comment. If you are a tenant, I would be grateful if you could pass a copy of this letter to your landlord.

Background:

The Local Plan Part 1 – Core Strategy, adopted in January 2013 after independent examination, identified the area around Watford Junction as a Special Policy Area in which a significant amount of development is to take place, with a mix of uses including residential. The County Council, as education authority, identified the need for a school to be provided as part of this development, to meet the school need arising from the new homes.

Land to the south of Bedford Street has been identified as a potential site to meet this need, and consultation on the Local Plan Part 2 therefore proposed extending the Special Policy Area to include this site, and specifically allocate it for a school. The County Council is undertaking feasibility work to assess whether this site would work in terms of size and access, taking account of any constraints and also to
determine whether a school would need the whole site. The outcome of that feasibility work will inform whether the school proposal for this site remains when we submit the plan for examination, or if an alternative site needs to be found. If the school allocation is not retained, the site, or parts of it, could be considered for a different use.

More information on the feasibility work and on what would happen if the school proposal goes ahead can be obtained from Hertfordshire County Council which is the education authority. In the first instance you can contact Andrea Gilmour: andrea.gilmour@hertfordshire.gov.uk.

**How can you comment?**

The site plan and relevant extract from the most recent consultation can be found at the end of this letter. If you would like to see the full consultation document along with comments made by other respondents, you can find this on our consultation portal at [https://watford.jdi-consult.net/localplan](https://watford.jdi-consult.net/localplan). Scroll down to the section headed Draft and Historic Documents and select the Local Plan Part 2 – Second Consultation. Other documents such as the sustainability appraisal of Local Plan 2 and various evidence studies can also be found in this section. You can also view paper copies at the Town Hall if you prefer – it would be helpful to arrange this in advance so that we can ensure any information you wish to look at is available at the Customer Service Centre.

Please send in your comments to us at the address above using the enclosed representation form, or by email to strategy@watford.gov.uk. I would be grateful for any comments by Wednesday 22nd July 2015. If you would prefer to submit comments via the online consultation portal, please let me know and this can be arranged.

Please contact me or my colleague Catriona on the number above if you require any additional information.

Yours faithfully,

Vicky Owen
Spatial Planning Manager
Extract from Local Plan 2 Second Consultation:

7. Education

7.1 The County Council has a duty to plan for and secure sufficient school places for their area in line with their duties under section 14 of the Education Act 1996. In the wider Watford town area, the County Council identified a need for up to 4 additional primary schools (or 10 to 11 form entry classes (FE)) over the lifetime of the Core Strategy (to 2031). This is largely as a result of the planned housing growth on strategic sites in central and west Watford, and individual sites in other areas. It is also related to recent increases in birth rates. Watford Borough Council has been actively engaging with HCC to ensure this demand is met.

7.2 Based on current pupil forecasts, the County Council recommends that two sites should be allocated and reserved for secondary education in SW Herts across the plan period. Given the geographic spread of existing schools, this secondary school need is to be provided in neighbouring Three Rivers District.

7.3 The Core Strategy sets out the education need within Policy INF1 and also in the Infrastructure Delivery Plan (IDP).

Why is this policy needed?

7.4 Policy INF1 of the Core Strategy identifies new school capacity as a priority for infrastructure delivery in Watford.

7.5 The sites proposed in the last consultation (Lanchester House, Orchard and Ascot Road) have all now been delivered or secured planning permission and so do not require allocation. An additional site has been identified at Bedford Street, which could meet identified need related to planned development at Watford Junction.

7.6 In the Special Policy Areas, the boundary of the Health Campus SPA has been extended to include the existing Laurance Haines School – future expansion here may be possible to meet needs relating to the Health Campus development, which is one additional form of entry.

7.7 This equates to 8 additional primary school forms of entry, the current need identified by the County Council. Nevertheless, there may be a need for additional primary school places within Watford over the plan period and the Borough Council will continue to work with the County Council to ensure that adequate provision is made.

What is it intended to do?

7.8 It is intended to ensure that education facilities will be delivered in the plan period. It identifies sites suitable for primary school facilities.
**Policy SP 1 Education**

Development for education and training needs will be encouraged and supported by the council in conjunction with other relevant Local Plan policies.

The following site is allocated for primary school use:

- **Bedford Street**

**S1 Bedford Street**

This policy supports/delivers

<table>
<thead>
<tr>
<th>National Policy</th>
<th>NPPF (para 37, 72)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Watford Sustainable Community Strategy Objectives</td>
<td>A well-planned town with homes to suit all needs.</td>
</tr>
<tr>
<td>Core Strategy Policies</td>
<td>INF1</td>
</tr>
</tbody>
</table>
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