LOCAL PLAN - Part 2

Site Allocations and Development Management Policies 2006-31
Statement of Compliance with Duty to Cooperate
July 2016
1.0 Introduction

1.1 The Duty to Co-operate (the Duty) is set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011). This applies to all local planning authorities, county councils in England, and to a number of other “prescribed” bodies.

1.2 Local planning authorities, county councils and other “prescribed” bodies are required to co-operate with each other to address strategic matters relevant to their areas in the preparation of a development plan document. The duty relates to sustainable development or use of land in connection with infrastructure which is strategic and that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of the county council.

1.3 The duty requires:
Councils and public bodies to “engage constructively, actively and on an ongoing basis” to develop strategic policy, Councils to set out planning policies to address such issues; and Councils to consider joint approaches to plan making;

1.4 Relevant bodies
1.5 The PPG confirms that, in addition to relevant local planning authorities and the County Council, the bodies listed in Figure 1 are subject to the duty to co-operate.

1.6 For the purposes of the Local Plan 2, those denoted with an asterisk are not generally considered to be relevant for Watford. This is because there are either no direct linkages due to the location of the borough, or any linkages are only at the very strategic (Core Strategy level), i.e. relating to overall jobs and housing targets.

Figure 1
Duty to Co-operate Bodies as prescribed by the PPG
- Environment Agency
- Historic Buildings and Monuments Commission for England (English Heritage)
- Natural England
- Mayor of London*
- Civil Aviation Authority*
- Homes and Communities Agency
- Clinical Commissioning Groups established via the National health Service Act 2006
- National Health Service Commissioning Board
- Office for Rail Regulation*
- Transport for London*
- The relevant Integrated Transport Authority
- The Local Highway Authority
- Marine Management Organisation*
Further guidance on the duty is provided in National Planning Practise Guidance, dated April 2014.

2.0 Strategic Planning Issues

2.1 Strategic Geography

2.2 Watford is an urban borough in South West Hertfordshire, on the edge of the East of England region, and to the north-west of London. It covers 2,142 hectares (8.3 sq. miles), and is the only non-metropolitan borough wholly contained within the M25.

2.3 The borough has excellent transport links with mainline rail connections to London, Gatwick Airport, the Midlands and the North, Underground and Overground connections to London, its north–west suburbs and the rural Chilterns, community rail connections to St Albans, coach services to Heathrow airport, bus services to Luton Airport, and convenient road connections via the M1, M25 and A41.

2.4 Watford is the centre of a sub-region serving around 500,000 people, living within a 20 minute travelling time catchment. As part of the London commuter belt Watford is strongly influenced by London; and whilst this brings the benefits of a buoyant economy, it also brings significant environmental pressures such as high levels of traffic congestion, high house prices and, with limited land available for development, pressure on all land, including the green belt.

2.5 Throughout the Local Plan process the Council has consulted with all neighbouring borough and county councils at each stage of the Core Strategy and Local Plan 2. Similarly statutory and non-statutory organisations/bodies at each stage were notified, invited to attend events and asked for comment. A full list of those consulted is included within appendix 1.

2.6 Strategic issues of cross boundary significance.

2.7 The following are considered to be the key issues of cross boundary and strategic significance to spatial planning in Watford and the delivery of sustainable development for local communities:

**Housing** - delivery of new housing to meet need and housing market requirements

**Economy** - provision of jobs to retain the local economy

**Retail** – the role of the town centres in the wider sub-region

**Transport** – improvements to connectivity within the sub-region and London

**Landscape** – protection and management of the strategic landscape.

**Green Infrastructure** – delivery of a sustainable GI framework across the sub-region

**Flooding and Water Management** – management of flood risk; water capacity and quality.

**Waste** – managing waste treatment across the sub-region

**Education** – provision of facilities and training opportunities across the sub-region

**Health** – meeting healthcare needs across the sub-region
2.8 Watford Context

2.9 The Council has been working towards the replacement of Watford’s Local Plan. Its replacement will consist of two documents:

- Core Strategy (adopted 2013)
- Site allocations and Development Management Policies.

2.10 The Core Strategy is a very important strategic planning document, setting a balance between the Borough’s housing and economic development needs, social welfare and protection of the environment for the period 2006 to 2031. It sets the framework for more detailed planning policies and provides the foundation for decisions on planning applications and development proposals. The Council worked collaboratively with a wide range of organisations and interests and actively engaged the local community in the preparation of the Core Strategy.

2.11 The Site Allocations and Development Management Policies document has been under preparation from 2006: a specific call for sites was launched in 2009, followed by a draft in 2013, 2014, 2015 and the publication aimed for autumn 2016. The policies in the SADM are primarily intended to help deliver aspirations, targets and intentions of the Core Strategy.

2.12 With regard to the Strategic Planning, the principal changes since the adoption of the Watford Local Plan part 1 Core Strategy in 2013 is as follows.

Economy

2.13 The Economic Growth Delivery Assessment
The study prepared by Nathaniel Lichfield and partners on behalf of WBC in 2014 provides an up to date understanding of the existing economic situation in Watford and explores the Borough’s employment growth potential in order to compare this with employment numbers as defined in the Council’s adopted Core Strategy.

Waste Plan

2.14 Hertfordshire County Council is responsible for minerals and waste planning. Since the Duty to Co-operate Statement was prepared for Watford’s Core Strategy, Hertfordshire County Council has adopted their Waste Site Allocations DPD (July 2014). The Supplementary Guidance on Employment Land Areas of Search has now been adopted. Site-specific policies and guidance within these documents are reflected in the Watford’s Local Plan Part 2.

Community Infrastructure Levy

2.15 The final significant change to the spatial planning context relates to work carried out by Watford Borough Council to progress the introduction of the Community Infrastructure Levy (CIL) for the Borough. This work involved extensive and on-going consultation with Hertfordshire County Council (in their capacity as the local education and highway authority) and other infrastructure providers.
Watford’s CIL was inspected by a government inspection in July 2014 and adopted by the Council in 2015. All examination documents (including technical studies) are available on the CIL examination library page of the Council’s website: www.watford.gov.uk/cil

In addition to the above topics the main topics and issues that arose from in the period from the Core Strategy to the Publication of LP2 has been:

Policies in relation to flooding /water – Environment Agency and Thames Water

Cemetery Provision - Hertsmere

Leavesden Studios allocation – Three Rivers

Green Belt boundary changes – Three Rivers

School provision – HCC

3. Implementation of the Duty

Core Strategy

3.1 The Council has worked collaboratively with a wide range of organisations and interests and actively engaged the local community in the preparation of its new Local Plan. This co-operation began as part of developing the Core Strategy, which was adopted in January 2013.

3.2 The Core Strategy sets out the planning framework for delivering growth and development within the Borough, and the infrastructure which supports it. Preparing and consulting on the Core Strategy, working on other borough-wide strategies and initiatives (such as developing the Community Infrastructure Levy), and commissioning and managing numerous technical studies, has involved a close working relationship with other local planning authorities, the County Council and other key agencies and stakeholders.

3.3 The emerging Local Plan Part 2 provides locally specific polices and proposals which implement the Core Strategy and seek to further its objectives. It is considered that the majority of the evidence required to show compliance with the Duty to Co-operate will of necessity be about collaborative working on strategic level issues, which have already taken place through the Core Strategy process. This in turn has directly informed the preparation of the Local Plan 2.

Local Plan Part 2: Site Allocations

3.4 Work on the Site Allocations part of Local Plan part 2 began in 2006 and was initially carried out in parallel with the Core Strategy.

3.5 The Council’s approach has included:
Joint commissioning of many of a number of cross boundary studies as well as some being specific to Watford studies.
In regards to the joint studies the involvement of local authorities and other public bodies, which were relevant to the particular study. English Nature were involved in the Green Infrastructure report; the Environment Agency and neighbouring Authorities were involved in the Strategic Flood Risk Assessment and Water Cycle Report) in agreement of the output: the recommendations of all commissioned studies were independent – the role of the bodies involved was to ensure that the study met the project brief and that the recommendations of the study logically related to the evidence and expertise of the consultants.

Other studies applied to Watford only – Green Spaces Strategy, Cemetery Strategy and this involved other consultation. The majority of technical work was prepared in support of the Core Strategy and remains relevant to the Local Plan 2.

**Continuing Co-operation**

3.6 The Statement of Compliance with the Duty to co-operate (Addendum) has focused on co-operation with key public sector bodies up to the Pre-Submission of the Local Plan 2. Co-operation does not, however, end here or with the adoption of the Local Plan 2. It will continue through the completion of the current Local Planning Framework. Co-operation is already underway to inform subsequent DPDs and the early partial review process of the Local Plan. Actual co-operation is reported every year in the Annual Monitoring Report in accordance with Regulation 34(6) in the Town and Country Planning (Local Planning) (England) Regulations 2012.

3.7 Looking ahead to the Local Plan Review of the Local Development Scheme, the Council:

- Will need to consider whether to accommodate all of its objectively assessed development needs (or more than at present);
- May be required to consider requests from neighbouring authorities in London or Hertfordshire to accommodate some of their development needs within the borough; and/or
- May request that neighbouring authorities accommodate some of Watford’s development needs.
- The Council is working with Dacorum, Three Rivers and Hertsmere Councils on a new Strategic Housing Market Assessment and Functional Economic Market Area.
## APPENDIX 1

### Organisations engaged

**Main Issues**

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<th>Date of meeting</th>
<th>Issues discussed</th>
<th>Conclusion</th>
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<tbody>
<tr>
<td><strong>HCC Schools/Property</strong></td>
<td>April 2010</td>
<td>Primary school provision within Watford- and in particular at Watford Junction SPA which will require 2 X 2 FE primary schools onsite.</td>
<td>There is ongoing work with HCC with the Watford junction Masterplan looking at options on school sizes and location. HCC update information on requirements to school places within Watford and areas most at constraint.</td>
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<td>September 2010</td>
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<td></td>
<td>May 2016</td>
<td>(ongoing meetings with the MD of WBC and HCC property team)</td>
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<td><strong>HCC Transport</strong></td>
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<td>Herts Highways were concerned that updated modelling was required in order to plan the location of the site allocations.</td>
<td>This has been resolved as WBC are continuing to work with HCC on future Transport Assessment work that has been undertaken for LP2.</td>
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<td><strong>Environment Agency</strong></td>
<td>Jan 2013</td>
<td>EA originally objected to Dacorum and Watford’s respective Local Plan 2. This was due to further work being required on the Water Cycle Study to show what constraints and further work to the network is required for waste water. Both authorities are signed up to the HCC led Water Project which looks at constraints in the Hertfordshire area including waste water capacity.</td>
<td>EA confirmed they will withdraw their objection following further work from Thames Water and the forthcoming HCC water project modelling work.</td>
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<td>March 2015</td>
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<td></td>
<td>December 2015</td>
<td></td>
<td></td>
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<tr>
<td><strong>Thames Water</strong></td>
<td>Jan 2013</td>
<td>Discussion with TW and EA over waste water capacity issues. Thames</td>
<td>EA withdrew their objections to LP2 in December 2015.</td>
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<td>March 2015</td>
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December 2015 Water updated their guidance note on waste water issues.

Other bodies consulted over the Local Plan period.

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<tr>
<th>Key public body</th>
<th>Date consulted</th>
<th>Nature of Co-operation</th>
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| Hertsmere       | Nov 14 November 15 May 14 September 14 | ● Informal liaison  
● Statutory consultation (2 rounds of consultation, further policy consultation)  
● Consultation on selected evidence work  
● Joint working (with others) on economic development, housing markets, gypsies and travellers, landscape, green infrastructure, climate and energy, building design, infrastructure and community infrastructure levy charging  
● Discussion of potential cemetery allocation (not taken forwards) |
| Dacorum         | Nov 14 November 15 May 14 September January 16 | ● Informal liaison  
● Statutory consultation (2 rounds of consultation, further policy consultation)  
● Consultation on selected evidence work. Joint working (with others) on economic development, housing markets, gypsies and travellers, landscape, green infrastructure, climate and energy, building design, infrastructure and community infrastructure levy charging |
| St Albans       | April 15 | ● Informal liaison  
● Statutory consultation  
● Joint evidence for some issues (including water.) |
<p>| Three Rivers    | Nov 14 November 15 May 14 | ● Joint working (with others) on economic development, housing markets, gypsies and travellers, landscape, green infrastructure, climate and energy, building design, infrastructure and community infrastructure levy charging |</p>
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<th>Date</th>
<th>Events and Discussion Points</th>
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| Broxbourne     | Letter 6<sup>th</sup> August 2015 | • Informal consultation  
• Responded to letters sent from Broxbourne.  
• DTC meetings                                                                                                                                                                                                                 |
| LEP            |                             | • Informal consultation and formal consultation  
Strategic Economic Plan and associated documents  
In January 2013 the regional strategy for the area (the East of England Plan) was formally revoked.  
Whilst key decisions regarding housing and employment targets are now the responsibility of local planning authorities, the future strategic planning context should be informed by new Strategic Economic Plan (SEPs) prepared by Local Economic Partnership (LEPs). The Hertfordshire LEP published their plan – ‘Perfectly Placed for Business’ in March 2014: [http://mediafiles.thedms.co.uk/Publication/BH-Herts/cms/pdf/Herts%20-%20SEP%20FINAL.pdf](http://mediafiles.thedms.co.uk/Publication/BH-Herts/cms/pdf/Herts%20-%20SEP%20FINAL.pdf) which includes Watford in an M1/M25 Growth Area  
Production of the LEP SEP was supported by the publication of a draft Spatial Plan for Hertfordshire, prepared by the Hertfordshire Planning Group (HPG) and endorsed by the Hertfordshire Infrastructure and Planning Panel (HIPP). The intention is that this is updated and elaborated to provide a ‘Local Strategic
Statement’ for the County. This will look in greater details at both pressures and opportunities relating to growth and infrastructure. This work has been informed by a workshop facilitated by Catriona Riddell of POS, involving senior Officers and Members from Hertfordshire authorities.

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<td>HCC</td>
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|      | ● Continuous informal liaison in respect of transport, education planning and other services  
|      | ● Engaged with HCC on local transport planning, including future urban transport assessments and modelling.  
|      | ● Information monitoring and liaison  
|      | ● Statutory consultation  
|      | ● Joint working (with others) on economic development, housing markets, gypsies and travellers, landscape, green infrastructure, climate and energy, building design, infrastructure and community infrastructure levy charging  
|      | ● Consultation/liaison on relevant studies, on drainage and on environmental partnership issues  
|      | ● Collaboration on infrastructure provision and Watford Infrastructure Delivery Plan in particular.  
|      | ● Herts 2050 Transport Vision  
|      | ● STIBLET  
|      | ● Watford Junction Steering Group  
|      | ● Growth and transport plan  

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<tr>
<td>HCA</td>
<td>●</td>
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</table>
|      | ● Informal liaison  
|      | ● Joint preparation of Local Investment Plan  

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<tr>
<td>CCG (Previously the PCT)</td>
<td>● May 2016</td>
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|      | ● Informal liaison  
|      | ● Statutory consultation  
|      | ● Collaboration on infrastructure provision and Watford Infrastructure Delivery Plan in particular.  

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<td>Network Rail</td>
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|      | ● Informal liaison  
|      | ● Working together on Watford Junction, especially with capacity improvements and input into the Watford
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<thead>
<tr>
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<th>Development brief.</th>
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<tr>
<td>Highways Agency</td>
<td>●</td>
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<td></td>
<td>● Informal liaison</td>
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<td></td>
<td>● Discussion over strategic highway aspects of the evidence base</td>
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<td>● Statutory consultation</td>
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<td>● Collaboration on infrastructure provision, and Watford’s Infrastructure Delivery Plan.</td>
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<td>HPG</td>
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<td>Hedog</td>
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<td>HIPP</td>
<td>At a senior political level discuss; HCC Transport modelling, engagement, London Wider South East group, Water Cycle Study.</td>
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Appendix 2: The main (selected) areas of co-operation for the next few years

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Prospective nature of Co-operation relates to</th>
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| Hertfordshire County Council                         | Co-ordination of local plan with minerals and waste planning  
County-wide water cycle study and liaison as Lead Local Flood Authority.  
Transport issues.                                        |
| Dacorum Borough Council                               | Market area housing and employment needs (to 2036) |
| St Albans Council                                    | Market area housing and employment needs (to 2036)  
S W Herts Green Belt Assessment  
Taller building – cross boundary locations.             |
| Three Rivers District Council                        | Market area housing and employment needs (to 2036)  
SW Herts Green Belt Assessment.                         |
| Environment Agency                                   | Implementation of development management policies  
Updated strategic flood risk assessment  
County-wide water cycle study (underway)             |
| Natural England                                      | Implementation of development management policies         |
| Civil Aviation Authority                             | Tall building policies                               |
| Passenger Transport (HCC)                            | Implementation of development management policies         |
| Local Highway Authority (HCC)                        |                                               |
| HCC as a provider                                    | Potential support of new infrastructure via CIL)  
Implementation of development management policies         |
| Historic England                                     | Implementation of development management policies         |
| National Health Service                              | Potential support of new infrastructure (via CIL)  
Watford Health Campus                                  |
| Clinical Commissioning Group                         | Potential support of new infrastructure (via CIL)         |
| TFL                                                  | Metropolitan Line Extension                       |
| Local Nature Partnership                             | Green infrastructure issues                        |

**Conclusion**

The Council has worked with a number of neighbouring authorities in the production of evidence which underpins the Local Plan 2. Joint working, particularly with authorities in the south of the county on the production of evidence, has allowed the sharing of ideas, best practise and where possible cooperation on ideas and policies.

The Council has positively produced the plan in line with relevant national and regional planning policy.
The policies of the Local Plan 2 are justified and take the most appropriate strategy for Watford considered against reasonable alternative approaches, the characteristics of the Borough and based on a proportionate evidence base.
APPENDIX 3

Map of strategic planning area
Proposed Submission Documents:

Local Plan Part 2 – Site Allocations and Development Management Policies
Proposed Submission Policies Map
Environmental Report
Statement of Consultation

Supporting Documents – new since CS:

Statement of Compliance with Duty to Cooperate
(EquiA?)
PAS Compliance Checklist (if we want to publish)
Core Strategy

By chapter:

**Town and Local Centres**
Shopping Survey 2016
Character of the Area Study 2011

**Housing**
Housing Strategy 2014 and Action Plan 2014
Residential Design Guide 2016 (JDI has 2014 version)

**Economic Development and Employment**
Economic Growth and Delivery Assessment 2014
Economic Development Strategy (most recent)
Clarendon Road Strategy – NOT AVAILABLE

**Transport**
Review of Car Parking Policy and Standards 2012
Green Infrastructure, Sport and Recreation

Green Spaces Strategy
Sports Facilities Strategy 2015-25
Cemetery Strategy

Taller Buildings

Assessment of potential locations

Sites
Strategic Flood Risk Assessment Level 2 2014

Core Strategy supporting evidence still relevant: ADD DATES

Low and Zero Carbon Energy Study 2010
Strategic Flood Risk Assessment
Flood Risk Management Strategy (HCC – undated maybe 2011?)
Surface Water Management Plan 2011
Water Cycle Study 2010
Strategic Housing Land Availability Assessment 2008
Strategic Housing Market Assessment 2008
Employment Market Assessment 2010 (still rel?)
Community Infrastructure Levy Charging Schedule 2014
Herts Waste Local Plan: 2012 and 2014
http://www.hertfordshire.gov.uk/services/envplan/plan/hccdevplan/wasteplan/wstdevfrmrk/

Air Quality Action Plan 2011
Streetscape Design Guide 2013
Shopfront Design Guide 201

Green Infrastructure Plan 2011

Open Space Study 2010

Retail Study and Updates (2013 in JDI)

Infrastructure Delivery Plan (2013 in JDI)
APPENDIX 4  Key Representations and Responses 2013

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.

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 Site Allocations and Development Management Policies which specifically accounts for recycling and waste management based on the waste hierarchy.

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.

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.

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.

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 due to a variety of factors, 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 of site development considerations. This includes sites such as H14 (Bill Everett Community Centre) and E3 (Fishers Employment site).

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.
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. The council also committed to reviewing the detail shown on the map.

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 will be included.

Comments from 2014/15 consultation

Process/ overarching issues

Waste water

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 will be included in the development considerations for each site.

These responses have been discussed further at numerous 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.

In conclusion the Council have received a position statement from Thames Water which demonstrates 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 find your Local Plan unsound at the 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.

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 with our detailed information for each site and these related to special policy areas, mixed use areas, housing and retail sites.

Sport England are 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 with the comments and are keen to prevent sports pitches being lost. A new policy on sports facilities was therefore included in the next consultation.

Transport
As mentioned above, Hertfordshire Highways (part of Hertfordshire County Council) asked that additional traffic modelling be carried out, but the County Council is currently developing a new transport model which is not yet available for use. The County Council have confirmed that this comment is not an objection to the plan.

Heritage

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

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 will also be added to the table of relevant issues for each site identified to be included in any development briefs for avoidance of doubt.

Education and Services

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.

Additional Policy consultation

Extending the boundary of the A3 restaurant hubs

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.

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.

Greenbelt

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.

In response to the clock tower, the plan does not propose this site for development. However, as a locally listed structure the clock tower would be considered as part of any planning application. With regard to G9 and G10 sites these 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.

Gypsy and Traveller Provision

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