



## Sustainability Appraisal of the First Draft Local Plan

### **Sustainability Appraisal**

### **Non-Technical Summary**



Prepared on behalf of:



**Watford Borough Council**

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**Prepared by:**

ClearLead Consulting Limited  
The Barn, Cadhay, Ottery St Mary, Devon, EX11 1QT, UK  
01404 814273

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Project Director (signature):	J Mitchell 
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## 1 Introduction

This Non-Technical Summary (NTS) summarises the findings of the Sustainability Appraisal (SA) Report for the First Draft Local Plan being prepared by Watford Borough Council (WBC). The First Draft Local Plan will guide development in the Borough to 2036 and will replace the Watford Local Plan Core Strategy adopted in 2013, which is now considered to be out of date.

ClearLead Consulting Ltd were commissioned by WBC to undertake the SA of the First Draft Local Plan. The SA Report accompanies the First Draft Local Plan which sets out the Council's preferred approach to new development up to 2036 and includes draft planning policies and potential sites for development. The draft Local Plan Consultation stage is also known as 'Preferred Options'. The SA will play an important role in the evolution of the plan and consideration of all reasonable alternatives.

### 1.1 What is a Sustainability Appraisal?

A SA has been undertaken on the Watford Borough Council First Draft Local Plan as required by the Environmental Assessment of Plans and Programmes Regulations, 2004 (the SEA Regulations). SA is used to evaluate Local Plans against a set of objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental, social and economic effects, as well as identifying opportunities to improve the environmental quality of Watford and the quality of life of residents in Watford Borough.

The Appraisal sets out the alternative policy approaches considered to date and the potential impact they could have on the three elements of sustainability: economy, environment and society. This work will be further refined for the publication version of the draft Local Plan.

### 1.2 Watford Borough Council First Draft Local Plan

The Watford Local Plan Core Strategy was adopted in 2013 and covered the period 2006-2031. It is now considered to be out of date as there have been changes to planning legislation and national planning guidance. A new Local Plan is required to better manage the planning process and replace the Core Strategy. Key issues to be considered as part of the new Local Plan are housing, employment, infrastructure and transport.

To date, a SA Scoping Report has been published and strategic options assessed, and the findings presented in a 'Sustainability Appraisal of Strategic Options' report (June 2018). This was published alongside the 'Issues and Options for the new Watford Local Plan' document dated September 2018. In addition, more recently an SA of the reasonable policy options was undertaken between March and August 2019 and provided to WBC officers internally.

The Vision for Watford as set out in the First Draft Local Plan is:

*“The vision of Watford in 2036 is based on embracing key sustainability principles and priorities set out in the Watford Corporate Plan and other key strategies. These are aimed at delivering important objectives to meet the needs of the community. More widely, the vision for Watford will contribute towards a larger vision for South West Hertfordshire that is to be a successful place for people and businesses offering a high quality of life and economic prosperity and opportunity.*

### 1.3 Strategic Objectives of the First Draft Local Plan

The plan objectives cover:

- Transport and mobility;
- Housing;
- Economic Growth;
- Climate Change;
- Historic Environment;
- Place Making and Design;
- Public Realm and Outdoor Environment;
- Health and Well Being;
- Infrastructure; and
- Monitoring and Adaptive Management.

**Figure NTS.1: Watford First Draft Plan Area**

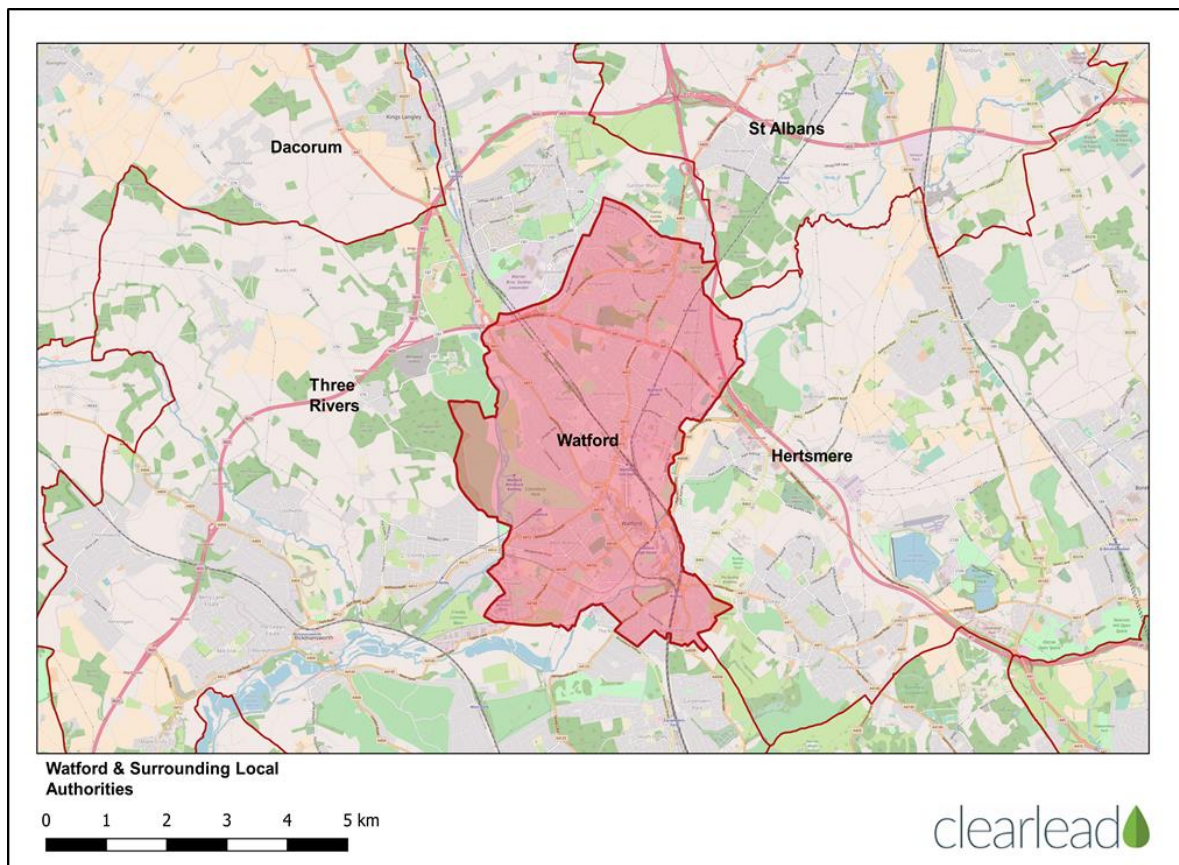


Table NTS.1 lists the policies which includes the site allocations and Strategic Development Areas currently included in the First Draft Local Plan and which have been assessed as part of this SA.

<b>Table NTS.1: First Draft Local Plan Policies</b>		
Strategic Policies	SD2.1 SD2.2 SD2.3 SD2.4 SD2.5 SD2.6 SD2.7 SD2.8 SD2.9 SD2.10 SD2.11	Planning for Growth Achieving Sustainable Development Making Effective Use of Land Safeguarding and Connecting to Strategic Transport Infrastructure Protecting Green Belt Land Development Contributions Watford Junction Strategic Development Area Bushey Station Strategic Development Area Town Centre Strategic Development Area Lower High Street Strategic Development Area Dome Roundabout Strategic Development Area
Local Planning Policies	ST3.1 ST3.2 ST3.3 H4.1 H4.2 H4.3 H4.4 H4.5 H4.6 H4.7 H4.8 E5.1 E5.2 E5.3 CC6.1 CC6.2 DC7.1 DC7.2 DC7.3 DC7.4 DC7.5 DC7.6 DC7.7 DC7.8 DC7.9 NE8.1 NE8.2 NE8.3 NE8.4 NE8.5	Cycle Parking and Storage Car Parking, Car Clubs and Electric Vehicles Access, Travel plans and Transport Assessments Allocated Housing Sites for Delivery Housing Mix Affordable Housing Garage Site Development Accessible and Adaptable Homes Specialist Housing Self-build and Custom Build Housing Residential Conversions Designated Employment Sites Economic Development Outside of Designated Employment Locat Mixed Use Development Sustainable Construction and Design Flooding and Resilience Strategic Principles for High Quality Design Quality of Place Building Design Taller Buildings Heritage Assets and the Historic Environment Nationally Listed Buildings and Registered Parks and Gardens Conservation Areas Locally Listed Buildings Archaeology Green and Blue Infrastructure Network Protecting Open Space Providing New Open Space Biodiversity Net Gain Managing Air Quality

	NE8.6	Managing the Impacts of Development
	V9.1	Ensuring the Vitality of the Town and Local Centres
	V9.2	Primary and Secondary Retail Frontage
	V9.3	Non-Retail uses in the Intu Shopping Centre
	V9.4	District and Local Centres
	V9.5	Infrastructure Provision
	V9.6	Utilities and Digital Infrastructure
	V9.7	Community Facilities

#### 1.4 What is the current situation in the First Draft Plan Area?

In order to test whether the First Draft Local Plan will contribute to improving the economic, social and environmental situation in Watford, we need to understand the how things are currently and how they might change without a Local Plan. Table NTS. presents this information. This section presents the key sustainability issues currently affecting Watford and the predicted future evolution of the baseline without the First Draft Local Plan. This section is supported by Appendix B to the full SA Report which presents the full review of baseline data for the Borough.

The initial baseline data was gathered in April 2018. This identified data relevant to Watford Borough, and was placed into the following categories:

- Economy;
- Employment and Skills;
- Population;
- Housing;
- Human Health;
- Crime and Safety;
- Transport and Accessibility;
- Air, Noise and Light Pollution;
- Climate;
- Biodiversity;
- Cultural Heritage;
- Landscape and Townscape;
- Soils and Geology;
- Water; and
- Waste.

This baseline was then updated in 2019, to reflect any changes within the Borough.

Some baseline data was not available at a local authority level. In some cases, the most recent data available, such as Census data, is now in excess of five years old. This may not therefore reflect current trends within the Borough.

No other difficulties have been encountered in collating the baseline data.

Some assumptions have been made in the assessments of the plan, including in relation to the site allocations assessed. These assumptions are detailed within Section 2.6 of the SA Report.

**Table NTS.2: Sustainability Issues & Likely Evolution without the Neighbourhood Plan**

Theme	Sustainability Issues	Likely Evolution without the First Draft Local Plan
Health, Population and Community	<ul style="list-style-type: none"> <li>• As the population continues to increase, so does the demand for housing, infrastructure, facilities and employment;</li> <li>• The population density within the Borough exceeds both the local and the national averages;</li> <li>• Adequate support and facilities will be needed for older residents.</li> <li>• The population is ageing;</li> <li>• Mortality rates remain high and exceed the regional average;</li> <li>• There are large disparities in health between wards;</li> <li>• Levels of smoking continue to rise;</li> <li>• A quarter of residents in Hertfordshire are physically inactive;</li> <li>• The proportion of deaths caused by circulatory disease exceeds the national and regional average;</li> <li>• There is a need to promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation;</li> <li>• The number of reported crimes continues to increase;</li> <li>• There has been a large shift towards more violent types of crimes;</li> <li>• There are large disparities in the number of crimes committed in different wards across the Borough;</li> <li>• The number of hate crimes reported continues to increase; and</li> <li>• There is a need to provide safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life.</li> </ul>	<ul style="list-style-type: none"> <li>• Likely Evolution without the First Draft Local Plan</li> <li>• There may be additional strain placed on the Borough’s resources due to the continual growth of the population;</li> <li>• Increased demand for housing, services and infrastructure;</li> <li>• Increased demand for health and social care;</li> <li>• The disparity between wards with regards to deprivation, overcrowding and poverty could widen; and</li> <li>• Crime rates could continue to rise.</li> </ul>



Theme	Sustainability Issues	Likely Evolution without the First Draft Local Plan
Housing	<ul style="list-style-type: none"> <li>• The proportion of affordable housing being delivered as part of developments is decreasing and failing to meet the Council's 35% target;</li> <li>• There is a need for a mix of housing types, sizes and tenures to meet the requirements of all areas of the community;</li> <li>• An ageing population will require different housing needs;</li> <li>• Homelessness continues to rise; and</li> <li>• There remains a large shortfall between local housing allowances and average rental prices.</li> </ul>	<ul style="list-style-type: none"> <li>• Demand for housing is expected to increase further beyond supply;</li> <li>• An increase in the number of housing applications made through the homelessness register could increase.</li> </ul>
Employment and Economy	<ul style="list-style-type: none"> <li>• There are inequalities in skill levels and income between wards within the Borough;</li> <li>• The number of residents that have no qualifications is on the rise;</li> <li>• There is a need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment.</li> <li>• Employment spaces are being lost to other uses;</li> <li>• Despite currently being a net importer of labour, the Borough is gradually becoming a net exporter with more residents commuting to London and the surrounding boroughs; and</li> <li>• Manufacturing and human health and social work activities sectors are under-represented compared with the regional and national rates.</li> </ul>	<ul style="list-style-type: none"> <li>• The number of residents without any qualifications is expected to rise;</li> <li>• The development of the Metropolitan Line could lead to a greater number of workers commuting into central London.</li> </ul>
Transport and Accessibility	<ul style="list-style-type: none"> <li>• Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity;</li> <li>• As the population grows, so does the need to change current infrastructure to meet the demands of all residents, whilst making it future proof; and</li> <li>• Need to provide public transport capacity and safeguard land for transport.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic is expected to continue to rise within the Borough;</li> <li>• Increased strain on the road networks; and</li> <li>• Development of the Metropolitan Line could help to ease this pressure on roads.</li> </ul>

Theme	Sustainability Issues	Likely Evolution without the First Draft Local Plan
Air, Noise and light Pollution	<ul style="list-style-type: none"> <li>• Need to help reduce pollution from road vehicles;</li> <li>• Reliance on the petrol or diesel-fuelled private car as the main mode of transport;</li> <li>• Air pollution from the strategic road network is an issue across the Borough and NO<sup>2</sup> emissions have remained constant;</li> <li>• Noise, air and light pollution could be generated through construction works in the Borough, resulting from growth proposed in the First Draft Local Plan. This pollution will need to be minimised and controlled through Local Plan policies; and</li> <li>• There is a need to reduce light pollution and restrict further intensification of light pollution from new developments.</li> </ul>	<ul style="list-style-type: none"> <li>• Air quality will continue to be an issue due to the road network and high levels of private car dependency;</li> <li>• AQMA boundaries may need to be expanded, or new AQMAs added;</li> <li>• Light pollution is expected to increase with population growth and development; and</li> <li>• Noise complaints could increase due to increased development.</li> </ul>
Climate Change	<ul style="list-style-type: none"> <li>• Reliance on the petrol or diesel-fuelled private car as the main mode of transport;</li> <li>• Greenhouse gas emissions need to be stabilised and reduced over time;</li> <li>• Need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding;</li> <li>• Need to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology;</li> <li>• New developments need to minimise vulnerability and provide resilience to climate change; and</li> <li>• Need to work with communities to help tackle climate change.</li> </ul>	<ul style="list-style-type: none"> <li>• Greenhouse gas emissions could rise due to the transport issues and additional development;</li> <li>• Temperature increase and rainfall patterns are unlikely to alter from current predictions; and</li> <li>• There will be an increased need for climate change adaptation.</li> </ul>

Theme	Sustainability Issues	
Biodiversity	<ul style="list-style-type: none"> <li>• Biodiversity generally remains under pressure nationally;</li> <li>• Need to protect and enhance the wildlife and habitats in Watford;</li> <li>• There is increasing pressure presented by invasive non-native species, which is expected to be exacerbated by climate change.</li> <li>• Growing population will increase demand for more development, possibly where there is a potential for loss of habitats and species but there is an opportunity to increase biodiversity in new developments, such as installing green roofs;</li> <li>• Consider and plan for the impacts of climate change on species and habitats;</li> <li>• Need to support the delivery of the Green Infrastructure network in Watford; and</li> <li>• There is a need to ensure that all residents have sufficient access to natural greenspace in order to enjoy the benefits of these assets.</li> </ul>	<ul style="list-style-type: none"> <li>• Likely Evolution without the First Draft Local Plan</li> <li>• Pressure on biodiversity is likely to increase with future development require to meet housing targets; and</li> <li>• Climate change is likely to exacerbate pressure on habitats and species, including pressure from invasive non-native species.</li> </ul>
Cultural Heritage	<ul style="list-style-type: none"> <li>• Ensure that the Conservation Areas, heritage assets and features are preserved or enhanced, including identified 'Heritage at Risk';</li> <li>• New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy;</li> <li>• Impacts of future development on the local historic environment need to be considered, including currently unknown sites of historic and archaeological interest which may be discovered through new developments;</li> <li>• Traffic management and the impacts of traffic on amenity have been raised as issues within the Conservation Area Action Plans;</li> <li>• Heritage assets should be managed to sustain their significance;</li> <li>• Ensure that everyone is able to participate in understanding and sustaining their local historic environment;</li> <li>• There is a perceived lack of distinctiveness within the Borough; and</li> <li>• The Borough needs to develop more of a distinctive cultural offer in order to compete amongst the broader cultural dynamism of London.</li> </ul>	<ul style="list-style-type: none"> <li>• Continual population growth and the associated increased development for housing could encroach on Conservation Areas, which may negatively affect townscape and heritage assets.</li> </ul>

Theme	Sustainability Issues	
Landscape and Townscape	<ul style="list-style-type: none"> <li>• Green Belt in the surrounding sub-region constrains development to existing urban areas in Watford but provides important Green Infrastructure functions;</li> <li>• The Chilterns AONB is in close proximity to the Borough and it's setting could potentially be affected by development in Watford, depending on its nature and location; and</li> <li>• Character areas in the Borough are at risk of degradation from the pressures of new development. Planning policy needs to guide development to ensure it is contextually responsive development and reinforces local character.</li> </ul>	<ul style="list-style-type: none"> <li>• Likely Evolution without the First Draft Local Plan</li> <li>• Inconsistent changes to landscape character may well continue if there is no strategic strategy in place which is enforced through Development Management;</li> <li>• Green Belt will continue to provide separation between urban areas;</li> <li>• Opportunities exist to improve the public realm may not come forward without planning policy intervention or developer contributions; and</li> <li>• The risk of character degradation in parts of the Borough will continue without planning intervention to guide development to reinforce local character.</li> </ul>
Soils and Geology	<ul style="list-style-type: none"> <li>• There are sites within the Borough that have had a previous potentially contaminative use. Previously developed sites which come forward for redevelopment will need to be assessed for soil contamination and remediated if deemed necessary, depending on the use proposed.</li> <li>• There is a need to protect soils and underlying aquifers from pollution.</li> <li>• Most of the Borough is covered by a Minerals Safeguarding Area.</li> <li>• The Orphanage Road Goods Yard concrete batching plant has permanent planning permission that safeguards it from development, and this could pose a constraint for the redevelopment of this part of the Borough.</li> </ul>	<ul style="list-style-type: none"> <li>• Due to past activities, contaminated land may be present within the Borough which may require remediation when development proposals come forward.</li> <li>• Underlying aquifers will continue to be vulnerable to pollution and will require protection.</li> </ul>

Theme	Sustainability Issues	Likely Evolution without the First Draft Local Plan
Water	<ul style="list-style-type: none"> <li>• Properties in the Lower High Street, Water Lane and Bushey Mill areas are at risk from fluvial and surface water flooding<sup>1</sup>, whereas properties in the Kingsfield Road and Cedar Road, Oxhey and Molteno Road areas are the most prone to groundwater flooding within the Borough.</li> <li>• There is a need to promote flood resistance and resilience measures for properties at risk from flooding.</li> <li>• Increasing population will put additional strain on already stressed water resources and wastewater infrastructure.</li> <li>• New development will need to incorporate sustainable drainage systems to sustainability reduce flood risk.</li> </ul>	<ul style="list-style-type: none"> <li>• Population increased will cause further water demand in the Borough, increasing strain on water resources and wastewater infrastructure;</li> <li>• Development could increase hardstanding surfaces, reducing water infiltration and increasing surface runoff. This is likely to increase flooding risk; and</li> <li>• The number of areas at subjected to flooding is likely to increase considering to climate change predictions.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• The amount of household waste produced is on the rise;</li> <li>• Recycling should be encouraged through planning and development; and</li> <li>• There is a need to minimise the impact of municipal waste management on the Borough's environment.</li> </ul>	<ul style="list-style-type: none"> <li>• An increase in population is likely to increase waste produced within the Borough.</li> </ul>

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<sup>1</sup> Watford Borough Council Level 2 Strategic Flood Risk Assessment, 2014 (Produced by AECOM)

## 2 How the Plan and its Alternatives Were Assessed

The sustainability issues and the environmental protection objectives of other plans, programmes and policies which are relevant to the First Draft Local Plan have been reviewed and used to develop a framework of sustainability objectives and sub-objectives which have been used to assess the plan. The SA Framework is presented in Table NTS.3.

**Table NTS.3: SA Framework**

<b>Objectives</b>	<b>Sub-objectives</b>
<b>SA1) Achieve sustainable levels of prosperity and economic growth</b>	<ul style="list-style-type: none"> <li>To support existing businesses, attracting inward investment and encouraging new businesses start-ups through the creation of employment spaces.</li> <li>To promote and support economic diversity, and particularly manufacturing and human health and care sectors.</li> </ul>
<b>SA2) To ensure that local residents have employment opportunities and access to training.</b>	<ul style="list-style-type: none"> <li>To support the delivery of high-quality jobs within the Borough.</li> <li>To give greater focus to learning and skills through the provision / support of education and training facilities in order to meet needs.</li> </ul>
<b>SA3) To ensure ready access to essential services and facilities for all residents</b>	<ul style="list-style-type: none"> <li>To improve everyone's access to high quality health, education, recreation, community facilities and public transport.</li> <li>To ensure facilities and services are accessible by everyone, regardless of age or ability.</li> </ul>
<b>SA4) Ensure that everyone has access to good quality housing that meets their needs</b>	<ul style="list-style-type: none"> <li>Promote a range of housing types and tenure.</li> <li>To improve the provision of affordable housing.</li> </ul>
<b>SA5) Encourage healthy lifestyles and improve quality of life for local residents</b>	<ul style="list-style-type: none"> <li>To promote walking and cycling and community-based activities.</li> <li>To provide enhanced access to open spaces as part of the Borough's Green Infrastructure network.</li> <li>To provide access to sporting and recreational facilities.</li> <li>To provide good quality play spaces to meet the needs of residents.</li> <li>To provide health facilities to meet the needs of residents.</li> <li>To provide opportunities for residents to grow their own food.</li> </ul>

Objectives	Sub-objectives
<b>SA6) Reduce both crime and the fear of crime</b>	<ul style="list-style-type: none"> <li>• Improve community cohesion by reducing barriers between neighbourhoods and ensuring that everyone benefits from regeneration.</li> <li>• To plan new development to help reduce crime and the fear of crime through the design of the physical environment and by promoting well-used and over-looked streets and public spaces.</li> </ul>
<b>SA7) To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes</b>	<ul style="list-style-type: none"> <li>• To reduce the need to travel through closer integration of housing, jobs and services and promoting mixed use development.</li> <li>• To prioritise the use of sustainable modes of transport and reduce the reliance on private vehicles.</li> <li>• To help create safe and secure layouts which minimise conflicts between vehicle traffic, cyclists and pedestrians.</li> <li>• To support the expansion of electronic communications networks, including telecommunications and high-speed broadband.</li> <li>• Deliver more facilities for charging plug-in and other ultra-low emission vehicles.</li> </ul>
<b>SA8) To achieve good air quality SA9) To minimise noise and light pollution</b>	<ul style="list-style-type: none"> <li>• To improve air quality across the Borough and avoid exacerbating existing areas of poor air quality.</li> <li>• To minimise noise pollution and consider sensitivity of receptors to existing noise sources.</li> <li>• To limit light pollution and promote and less invasive lighting sources, considering the balance between safety and environmental impacts.</li> </ul>
<b>SA10) Reduce the Borough's contribution to climate change</b>	<ul style="list-style-type: none"> <li>• To minimise CO2 emissions.</li> <li>• To promote the design and construction of energy efficient developments and encourage the use of low carbon and renewable energy where practicable.</li> </ul>
<b>SA11) Ensure that the Borough is resilient to the effects of climate change</b>	<ul style="list-style-type: none"> <li>• To improve the resilience of the Borough to climate change, particularly with respect to the design of new developments.</li> </ul>
<b>SA12) To protect and enhance biodiversity</b>	<ul style="list-style-type: none"> <li>• To protect and enhance designated wildlife sites (international, national and local).</li> <li>• To support the achievement of BAP targets.</li> <li>• To create habitats to ensure sustainable and linked species populations and protect and enhance the Green Infrastructure network in the Borough.</li> <li>• To increase tree cover and protect existing woodland.</li> <li>• To eradicate invasive non-native species from the Borough.</li> </ul>
<b>SA13) To maintain and enhance historic and cultural assets</b>	<ul style="list-style-type: none"> <li>• To safeguard and enhance historic and cultural assets.</li> <li>• To promote local distinctiveness and local identity by repairing historic buildings and areas, and by encouraging the re-use of valued buildings.</li> <li>• Enhance understanding of the historic assets of the Borough.</li> </ul>

Objectives	Sub-objectives
<b>SA14) Conserve and enhance the landscape and townscape, encouraging local distinctiveness</b>	<ul style="list-style-type: none"> <li>• To encourage high quality design, which respects local context, and improves local character and distinctiveness.</li> <li>• To improve the quality of life in urban areas by making them more attractive places in which to live, work and visit.</li> <li>• To protect and enhance the Borough's townscape and local sensitive landscapes.</li> <li>• To encourage the use of previously developed (brownfield) land and the re-use of derelict land and buildings.</li> <li>• To identify, protect and improve quantity and quality of open spaces and public realm.</li> </ul>
<b>SA15) Revitalise the town centre to promote a return to sustainable urban living</b>	<ul style="list-style-type: none"> <li>• Create a viable and attractive town centres that has vitality and life and discourage competing out of town developments.</li> </ul>
<b>SA16) Maximise the use of previously developed land and buildings and the efficient use of land</b>	<ul style="list-style-type: none"> <li>• To protect soils from pollution and remediate contaminated land.</li> <li>• To concentrate development through the reuse of previously developed land and buildings and urban extensions only where the development of greenfield land is unavoidable.</li> <li>• To maximise the efficient use of land through encouraging high-density development.</li> </ul>
<b>SA17) Maintain and enhance water quality and limit water consumption</b>	<ul style="list-style-type: none"> <li>• To encourage high water efficiency and conservation, including retrofitting older buildings.</li> <li>• To improve quality and flow of rivers and protect and improve groundwater quality.</li> <li>• To ensure the Borough has the appropriate wastewater and sewerage capacity to deliver any predicted new development.</li> </ul>
<b>SA18) Ensure that new development does not increase flood risk</b>	<ul style="list-style-type: none"> <li>• To avoid development from being located in areas at risk of flooding taking account of climate change.</li> <li>• To ensure that green infrastructure schemes make space for water and reinstate floodplain.</li> <li>• To promote sustainable urban drainage systems to reduce flood risk and water loss from natural systems.</li> </ul>
<b>SA19) To minimise use and make efficient use of natural resources</b>	<ul style="list-style-type: none"> <li>• To minimise the production of waste and promote the re-use, recycling and composting.</li> <li>• To safeguard land for waste processing / disposal within the Borough.</li> <li>• To safeguard reserves of exploitable minerals from sterilisation by other development.</li> </ul>



## 3 Assessment of Alternatives and the Reasons for Choosing the Plan

### 3.1 Introduction

This section of the SA Report describes the SA work undertaken to date on the First Draft Local Plan and how it has evolved. It summarises the findings of the appraisal work which helped inform the options (including strategic options (2018) and policy options (2019)) that have been taken forward and which have developed into the First Draft Local Plan policies. Appendix C to the full SA Report provides a summary of the output of the options assessments which are described below. It also reproduces a table developed by WBC which maps the evolution of the policy development from the options to the Draft Local Plan Policies.

As the policy options were considered along with their potential strengths and weaknesses, several gaps in the Draft Plan were identified as it was being prepared. These have been addressed by the inclusion of draft policies which have been identified as “New” within Table 3 in Appendix C to the full SA Report. At this stage, these policies have not been appraised as part of the Sustainability Appraisal. However, as part of the evolution of the plan it will be considered whether there are any reasonable alternatives to these policies and if so then these will be assessed as part of the next iteration of the Draft Local Plan and accompanying Sustainability Appraisal.

### 3.2 Appraisal of the First Draft Local Plan Strategic Options

The SA Report which accompanied the 2018 Local Plan Issues and Options document considered alternative strategic options relating to the key challenges and issues for Watford Borough.

These alternative strategic options consisted of seven distinct issues as follows:

- Housing Development;
- Affordable Housing;
- Types of New Housing;
- Housing for an Aging Population;
- Employment;
- Tall Buildings; and
- Transport.

The potential significant sustainability effects of each alternative strategic option are presented in Table 6.1 within the full SA Report. Full details on the assessment are contained in the main body of the SA of Strategic Options Report produced in June 2018<sup>2</sup>.

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<sup>2</sup> Sustainability Appraisal of Strategic Options Report June 2018 accessed via WBC's website:

This report was consulted on alongside the Issues and Options Consultation (September 2018) and the results of the assessment alongside the consultation responses were used to inform the development of the policy options in 2018-2019.

### 3.3 Appraisal of the First Draft Local Plan Policy Options

The policy options being considered by WBC have been assessed as part of the SA and an internal report provided to officers to inform the development of the policies for inclusion within the First Draft Local Plan. The Policy options assessed within the SA are listed in Table NTS.4 below and full details of the options assessed is provided in Table 1 in Appendix to the full SA Report. A summary of the Policy Options Appraisal is provided within Table 2 of Appendix C of the full SA Report.

<b>Topic Paper</b>	<b>Policy Option</b>
Air Quality, Pollution and Contamination	Air Quality (options 1 & 2)
	Noise Pollution (options 1 & 2)
	Contamination (options 1 & 2)
Built Community Facilities	Built Community Facilities (options 1, 2 & 3)
Climate Change and Resilience	Climate Change and Low Carbon Energy (options 1 & 2)
	Overheating (options 1 & 2)
	Flood Risk (options 1 & 2)
	Water Supply (options 1 & 2)
	Waste Management (options 1, 2 & 3)
High Quality Design and Conservation	High Quality Design (options 1, 2, 3 & 4)
	Conservation (options 1, 2 & 3)
Green Infrastructure, Biodiversity and the Natural Environment	Protection and Enhancement of Biodiversity (options 1 & 2)
	Green Infrastructure and the Natural Environment (options 1 & 2)
	Protecting Open Space (options 1, 2, 3 & 4)
	Provision of Functional Open Space in New Developments (options 1, 2, & 3)
	Landscaping and Green Infrastructure in New Developments (options 1 & 2)
Growth Strategy and Strategic Planning	Approach to Housing Growth (options 1, 2, 3, 4 & 5)
	Approach to Employment (options 1, 2 & 3)
	Approach to Retail (options 1 & 2)
	Approach to Infrastructure (options 1 & 2)
	Approach to Transport Infrastructure (options 1 & 2)
Density and Optimising Land Potential	Housing Density and Optimising Land (options 1 & 2)
Infrastructure	Infrastructure (options 1 & 2)
	Utilities (options 1 & 2)
Employment	Designated Employment Sites (options 1 & 2)
	Non-Designated Employment Sites (options 1 & 2)

<https://www.watfordlocalplan.co.uk/consultation-documents>

<b>Table NTS.4: Policy Options Assessed</b>	
<b>Topic Paper</b>	<b>Policy Option</b>
	Mixed use Development (options 1 & 2)
Housing	Housing Mix (options 1, 2, 3 & 4)
	Affordable Housing (options 1, 2, 3 & 4)
	Commuted Sums (options 1 & 2)
	Housing Tenure (options 1, 2 & 3)
	Ageing Population (options 1 & 2)
	Starter Homes (options 1 & 2)
	Self-Build and Custom Housebuilding (options 1 & 2)
	Windfall Sites (options 1 & 2)
	Residential Conversions (options 1, 2 & 3)
	Gypsies and Travellers (option 1)
Promoting Sustainable Transport	Enhancing Public Transport Provision and Supporting Watford as an Important Regional Transport Hub (options 1 & 2)
	Car Parking Standards (options 1, 2 & 3)
	Cycle Parking and Storage (options 1, 2 & 3)
	Prioritising Pedestrians and Cyclists in New Schemes. (options 1, 2 & 3)
Retail and Town Centre	Approach to Retail Throughout the Borough (options 1, 2 & 3)
	Retail Frontages in the Town Centre (options 1, 2, 3 & 4)
	Restriction of Non-Retail Uses in Retail Frontages (options 1, 2 & 3)
	Restaurants (options 1 & 2)
	Evening Economy (options 1 & 2)
	Vacant Units (options 1, 2 & 3)
	Clustering of Betting and Loan Shops (options 1, 2 & 3)
	Small and Independent Shops in the Town Centre (options 1 & 2)
Local, Neighbourhood and District Centres (options 1, 2 & 3)	
Strategic Approaches to Growth	Strategic Approaches to Growth (options 1, 2, 3 & 4)

WBC have used the findings from the Policy Options Assessments to inform decisions regarding the preferred options being developed into First Draft Local Plan policies. Table 3 within Appendix C of the full SA Report presents the changes in policy development and shows which policy options are now being taken forward as the 'preferred options' and are being assessed for this SA Report.

## 4 Sustainability Assessment of the First Draft Local Plan

Following the assessment of site options, the First Draft Local Plan policies were assessed for their sustainability effects. The assessment has identified that the First Draft Local Plan is likely to result in a number of significant positive effects. Significant positive effects have been recorded against all but three SA objectives. A summary of the results of the assessment is provided in Table NTS.5 below.

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Chapter 2: Spatial Strategy	+	+	++	+	-	+	+	+	+/-	+	+/-	+	++	++	++	++	+/-	+/-	+/-
Chapter 3: Sustainable Transport	+/-	+/-	++	+/-	++	+/-	++	++	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
Chapter 4: Housing	+	+/-	+	++	++	+	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-
Chapter 5: Economy	++	++	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	++	+/-	+/-	+/-
Chapter 6: Climate	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	++	++	+	+/-	+/-	+/-	+/-	++	++	+/-
Chapter 7: Heritage and Design	+/-	+/-	+/-	+	+	+	+	+/-	+/-	+	?	+/-	?	++	+	++	+/-	+/-	+
Chapter 8: Environment	+/-	+/-	+/-	+/-	++	+/-	+/-	+	+	++	+	++	+/-	+	+/-	+/-	+/-	?	+/-
Chapter 9: Facilities	+	+/-	++	+/-	++	+/-	++	+/-	+/-	+/-	+/-	+/-	++	+/-	++	+	+/-	+/-	+/-
Policy H4.1	+/-	+	?	?	-	+/-	+	+/-	-	+/-	+/-	--	--	+/-	+/-	--	+/-	-	?
Policy E5.1	++	+	+/-	+/-	+/-	+	-	+/-	-	+/-	+/-	-	+/-	+/-	-	++	+/-	+/-	-

There were some potential significant negative effects identified in the assessment of the First Draft Local Plan. These are all resulting from some of the housing allocation sites in Policy H4.1. In addition, potential cumulative impacts have been identified as part of the assessment. The SA report has recommended potential mitigation measures to address potential significant negative effects and uncertainties identified through the SA of the plan and these are presented in the following Table NTS.6.

Chapter	Policies	Explanation and Mitigation Measures to Minimise or Avoid Effects
Chapter 2: Spatial Strategy	SD2.1, SD2.2, SD2.3, SD2.4, SD2.5, SD2.6, SD2.7,	SA5: The predicted negative cumulative effect which could result from increased housing, leading to a shortage of recreational and sporting facilities could be addressed through the polices within Chapter 8: Conserving and Enhancing the Natural Environment and Chapter 9: Ensuring the Vitality of Town and Local Centres and Providing Communities with Facilities and Services. However, it is unclear if these policies

	SD2.8, SD2.9, SD2.10, SD2.11	are strong enough to ensure the needs of future residents will be met in a timely manner.
Chapter 4: Housing	H4.1	<p>SA3: Whilst most of the sites proposed within policy H4.1 have good access to facilities, such as H16 and MXD09, some are over 800m walking distance from such services. At this stage in the assessment, it is unclear which sites will be brought forward and therefore whether all sites developed will have good access to local services for residents. Therefore, an uncertain effect has been recorded for SA3. Mitigation to address the effect is to provide clarity on which sites are being brought forward.</p> <p>SA4: Policy H4.1 should help to increase housing across the Borough, the policy includes the designation of 37 sites for housing development. There is potential for the quantity of affordable housing with the Borough to be increased by the implementation of policy H4.1. However, it is unclear if all development sites will deliver the required affordable housing. Local Plan policy H4.3 states that all sites delivering over 10 homes will need to provide 50% affordable homes. Whilst for larger sites such as H7, H24 and H30, this will be met, it is unclear if smaller sites such as H14, H19 and H21 with an expected yield of 10 to 12 homes will still provide this. For this reason, an uncertain effect has been recorded. Mitigation to address the effect is to provide clarity on which sites are being brought forward.</p> <p>SA12: Consideration of the effects of development on nearby listed buildings should be carried out prior to development. This could help to identify and prevent any negative impacts, which will address the identified significant negative effect.</p> <p>SA13: Careful consideration of sites H15, H22, H25, MXD03, MDX05 and MXD13 and control of development should be used to ensure no harm to historical or cultural buildings (direct or unintentional) occurs, during development at these sites. Policies DC7.5, DC7.6 and DC7.8 could help to further protect and monitor such sites. Thus, it is possible to prevent unmitigable damage to listed buildings through other Local Plan Policies.</p> <p>SA16: Some greenfield sites may be protected from development by policy NE8.2: Protecting Open Space. This could help to prevent the permanent loss of green space and thus mitigate the significant negative effect identified. Development at site H02 has also been identified as having the potential to result in development on contaminated land. However, prior assessment of the site to identify if the land is contaminated could help to mitigate the effect recorded.</p> <p>SA19: There may be no mitigation for the uncertain effect identified for SA19, as the majority of developable land within the Borough is located within the sand and gravel</p>

		safeguarding zone. This effect may therefore not be mitigatable, but instead accepted as an inevitable result of development. Further clarity should be sought on the consequences of development at site H02, and if this would be at the detriment of the current recycling facility. If this could be re-provided elsewhere within the Borough, with no adverse effects on the recycling service offered, the identified uncertain effect could be modified to a neutral effect.
Chapter 7: Climate	DC7.1, DC7.2, DC7.3, DC7.4, DC7.5, DC7.6, DC7.7, DC7.8, DC7.9	SA11: The identified uncertain effect for SA11 could be mitigated for by referencing the climate change policies in the plan e.g. CC6.1 Sustainable Construction and Design relating to climate change and resilience.
Chapter 8: Environment	NE8.1, NE8.2, NE8.3, NE8.4, NE8.5, NE8.6	SA18: An uncertain effect is predicted for Policy NE8.1 in relation to SA18, as this policy does not link how green infrastructure can help to mitigate flooding. It is recommended that the policy is enhanced to emphasise the positive effects green infrastructure can have to mitigate flooding. This may help to resolve the identified uncertain effect.

## 5 Monitoring

The SEA Regulations require monitoring of the significant environmental effects of a plan. SA monitoring should cover the significant economic and social effects, as well as the environmental ones.

The following monitoring schedule sets out how the potential effects associated with each of the policy chapters within the First Draft Local Plan could be monitored. Following a review of the First Draft Local Plan after the consultation period, it is proposed that this schedule is refined to focus specifically on the monitoring of any residual significant negative or uncertain effects.

<b>Table NTS.7: Proposed Monitoring Schedule</b>	
<b>Sustainability Theme</b>	<b>Monitoring Indicators</b>
Transport	<ul style="list-style-type: none"> <li>• Financial contributions towards transport infrastructure improvements.</li> <li>• Ratio of workplace- based employment to residence-based employment.</li> <li>• Proportion of new housing developments within 400m of a bus stop/rail station, primary school.</li> <li>• Peak time congestion and traffic count monitoring.</li> <li>• Public transport use monitoring.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Annual number of housing completions and percentage of annual targets/projections.</li> <li>• Annual number of affordable dwellings delivered and percentage of target.</li> </ul>
Economy	<ul style="list-style-type: none"> <li>• Employment land lost to other uses.</li> <li>• Commuting trends.</li> </ul>
Climate Change, Adaptation and Resilience	<ul style="list-style-type: none"> <li>• Renewable energy capacity installed by type.</li> <li>• Domestic emissions per capita (tonnes).</li> <li>• Number of strategic flood risk assessments undertaken.</li> <li>• Applications granted contrary to Environment Agency advice.</li> <li>• Net change in surface water run-off rates.</li> </ul>
Built and historic environment	<ul style="list-style-type: none"> <li>• Conservation Area Assessments – Changes in character compared to previous assessments.</li> <li>• Change in the number and condition of heritage assets 'at risk'. Community perception of changes to their settlements.</li> </ul>
Natural Environment	<ul style="list-style-type: none"> <li>• Net loss / gain in priority habitats and local wildlife sites.</li> <li>• Biodiversity enhancement secured through new development.</li> <li>• Habitat Regulations Assessments undertaken.</li> <li>• Development requiring compensation and % with appropriate schemes secured.</li> <li>• Air quality monitoring.</li> <li>• Achievement of water framework directive targets.</li> <li>• Landscape character assessments undertaken.</li> </ul>
Communities, towns and village centres	<ul style="list-style-type: none"> <li>• Vacancy rates in town and village centres.</li> <li>• Net change in the amount of open space.</li> <li>• Financial contributions to open space provision.</li> <li>• Net loss / gain in community facilities.</li> <li>• Health profile monitoring</li> </ul>

## 6 Next Steps

The SA Report, including this NTS, is being published for consultation with the First Draft Local Plan in September/November 2019 for a 6 week period.

Following consultation on the First Draft Local Plan, comments received on both the Local Plan and this SA Report will be considered. Any necessary changes will be made to the SA Report and to the First Draft Local Plan in response to consultee comments.

A publication version of the Local Plan is expected to be published in May 2020 and this will be accompanied by an updated version of the SA Report (see Table NTS.8).

<b>Table NTS.8: Watford Local Plan Timetable</b>	
<b>Local Plan Activity</b>	<b>Timeframe</b>
First Draft Local Plan Consultation (Preferred Options)	September/November 2019
Consultation comments considered	November 2019/March 2020
Consultation on Publication New Local Plan (Regulation 19)	May 2020