



Sustainability Appraisal of the First Draft Local Plan







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Prepared by:

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

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Signature				
Checked by	J Mitchell	J Mitchell		
Signature				
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1 Introduction

1.1 Background

Watford Borough Council (WBC) is preparing a new Local Plan that will guide development in the Borough to 2036. 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 It is now considered to be out of date as there have been changes to planning legislation and national planning guidance.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.

ClearLead Consulting Ltd have been commissioned to undertake the Sustainability Appraisal (SA) of the First Draft Local Plan. 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.

This 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.

1.2 This Document

This SA Report incorporates Strategic Environmental Assessment and SA as an integrated assessment and sets out the alternative policy approaches considered to date and the potential effects they could have on sustainability. It presents the findings of the appraisal of the First Draft Local Plan, which covers three areas including: Strategic and Local Planning Policies; Strategic Development Areas; and Site Allocations.

SA is an iterative process that is used to identify the most suitable and sustainable approaches to development in a local plan.

Alternatives to the First Draft Local Plan assessed through SA during the Issues and Options consultation stage and during the development of the draft plan policies are discussed within Section 6. The Sustainability Appraisal of the Strategic Options Report June 2018 can be accessed via the following link on the Council's website:

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

1.3 Purpose and Requirements for the Impact Assessments

Sustainability Appraisal and Strategic Environmental Assessment

SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (February 2019) also requires SA of Local Plans. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations¹). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including Local Plans. The purpose of the SEA Directive is to ensure a high level of environmental protection, and to integrate the consideration of the environment into the preparation and adoption of plans, with a view to promoting sustainable development.

Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process as set out in the Planning Practice Guidance² (updated 2014). The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA 'testing' of the First Draft Local Plan policies and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's development.

1.4 Habitat Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2010 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a 'Habitats Regulations Assessment' (HRA). This requirement includes strategic plans with an impact on land use.

HRA is being undertaken in parallel to the SA and is being reported on separately.

The scope of the HRA was confirmed through correspondence with Natural England dated 31st January 2018. Following consultation on the First Draft Local Plan, the plan policies will be subject to HRA screening and, if necessary, Appropriate Assessment, in consultation with Natural England. The outputs of the HRA will be integrated into the next iteration of the SA Report where appropriate.

¹ Environmental Assessment of Plans and Programmes Regulations 2004 SI 1644:
<http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

² <https://www.gov.uk/government/collections/planning-practice-guidance>

1.5 Equalities Impact Assessment

An Equalities Impact Assessment (EqIA) is a way of measuring the potential impact (positive, negative or neutral) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. This Act places a general duty on the Council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics. The equality duty came into force in April 2011 and covers the following Personal Protected Characteristics:

- Age;
- Disability;
- Gender (male/female);
- Gender reassignment;
- Marriage and civil partnership³;
- Pregnancy and maternity;
- Race;
- Religion or belief; and
- Sexual orientation.

EqIA is therefore an essential tool for demonstrating that the Council has complied with the law by shaping the way decisions are taken and thereby improving outcomes. It enables a good understanding of different needs and the differential impacts that the policies may have on different groups. A separate EqIA will be undertaken by the Council in parallel with the SA. Equalities issues will also be addressed within the SA Framework (see Section 2) and the assessment of options and First Draft Local Plan policies will be informed by the EqIA when outputs of the separate process are available.

1.6 Structure of the SA Report

This section has described the background to the SA Report for the First Draft Local Plan and the requirement to undertake this. The remaining sections of this document are structured as follows:

- Section 2 describes the approach to the SA;
- Section 3 presents the scope and content of the First Draft Local Plan;
- Section 4 presents the findings from the review of policies, plans and programmes;
- Section 5 presents the summary of baseline data;
- Section 6 provides details of the alternative options developed and assessed for the new Local Plan;
- Section 7 presents the findings of the Appraisal of Alternatives;

³ Age, Marriage and civil partnership - not all aspects of the duty apply.

- Section 8 presents the mitigation and enhancement measures put forward in the assessment of the First Draft Local Plan;
- Section 9 presents the potential cumulative effects of the new Local Plan with other plans, programmes and projects;
- Section 10 presents Mitigation / enhancement measures proposed
- Section 11 provides details of the Proposed Monitoring Framework; and
- Section 12 presents the Next Steps.

1.7 How to comment on this document

This SA Report is being consulted on with the statutory consultees⁴ and the public alongside the First Draft Local Plan.

The consultation period will be six weeks from 27th September until 8th November 2019. We would welcome your views on this SA Report. A series of questions are set out below in order to guide responses.

Questions to guide responses:

1. Do you agree that all of the reasonable alternatives have been identified?
2. Do you agree that the potential significant effects identified in the assessment and the alternative options are correct?
3. Do you agree with the proposed mitigation?
4. Do you agree with the proposed monitoring schedule?

How to comment:

Please provide responses **by 8th November 2019**.

Responses should be sent by email to the at Watford Planning Policy team:

strategy@watford.gov.uk

or by post to:

Planning Policy, Watford Borough Council, Town Hall, Watford, WD17 3EX

⁴ Environment Agency, Historic England and Natural England.

2 Approach to the SA

2.1 SA Process

The SA process is shown in Figure 2.1. Stage A, Scoping, has been completed and culminated in the production of a SA framework of objectives and sub-objectives against which to assess the First Draft Local Plan. This was completed in April 2018.

This SA Report encompasses Stage A, Stage B and Stage C of the SA process (evaluation of the First Draft Local Plan against the SA framework and SA report preparation) and fulfils the requirements to:

- Evaluate the potential effects of the First Draft Local Plan implementation;
- Identify and propose mitigation of significant adverse effects; and
- Propose appropriate monitoring of significant effects⁵.

2.2 Methodology

The following text sets out the approach taken to complete the SA stages outlined in Figure 2.1.

2.2.1 Stage A Scoping

The purpose of the scoping stage is to set out proposals for conducting the SA, so that the SA tests the sustainability of the First Draft Local Plan using up to date information about the social, environmental and economic issues in the Borough.

Task A1: Identifying other relevant policies, plans and programmes, and sustainability objectives

The legislative context in which the First Draft Local Plan is being prepared can best be understood through a review of related policies, plans, and programmes (PPP). The SEA Regulations require information on:

- *“an outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes”* (Schedule 2, Paragraph 1); and
- *“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”* (Schedule 2, Paragraph 5).

⁵ Requirements of the SEA Regulations. See Table 2.5 for further details.

The review process ensures that the First Draft Local Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the First Draft Local Plan and the SA. Carrying out this review at an early stage of plan development allows for any inconsistencies or constraints within the First Draft Local Plan to be addressed. It also provides the context for the SA and informs the development of the SA assessment framework (see Table 2.2).

For practical reasons, the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The focus has been to ensure that only policies that are current and have direct relevance to the First Draft Local Plan are reviewed. An outline of the policy documents and their objectives are provided in Appendix A and a summary of the key messages / objectives is provided in Table 4.1 in Section 4 of this report.

In some cases, where lower level plans include the objectives set out at a national or international level, then the national and international plans have not been included.

Task A2: Collecting baseline information

The SEA Regulations require a description of the following to be presented:

- “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Schedule 2, Paragraph 2);
- “the environmental characteristics of areas likely to be significantly affected” (Schedule 2, Paragraph 3);” and
- “the likely significant effects on the environment... on issues such as (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape (Schedule 2, Paragraph 6).”

Baseline data enables a characterisation of the plan area to be developed, including the sensitivity of the environment. Gaining an understanding of this information allows the impacts of the plan to be assessed and its performance to be monitored after adoption. Baseline information can put the plan area into context in relation to a national or regional situation or in relation to adjacent areas.

It is, therefore, necessary to collect sufficient information about the current baseline state of Watford borough to predict the future environmental and socio-economic trends to allow effects to be adequately predicted and monitored. The detailed baseline information has been compiled

in a series of topics in line with published guidance⁶ and includes comparators, targets and trends where possible. The topics set out within the SEA Regulations have been expanded into a number of sustainability topics as presented within Table 2.1 to include socio-economic topics as well as environmental. Interrelationships between topics are considered (where appropriate) within the individual SA topic chapters.

Table 2.1: First Draft Local Plan SA topics compared with SEA Topics	
SA Topics adopted for this assessment	SEA Regulations topics required to be considered
Population & Communities	Population Human Health
Housing	Material Assets
Employment & Economy	Not required by SEA regulations
Transport & Access	Material Assets
Air, Noise & Light Pollution	Air
Climate Change	Climatic Factors
Biodiversity & Geodiversity	Biodiversity, flora and fauna
Landscape, Townscape & Land	Landscape Soils
Cultural Heritage	Cultural heritage, including architectural and archaeological heritage Material assets
Water	Water
Waste & Minerals	Not required by SEA regulations

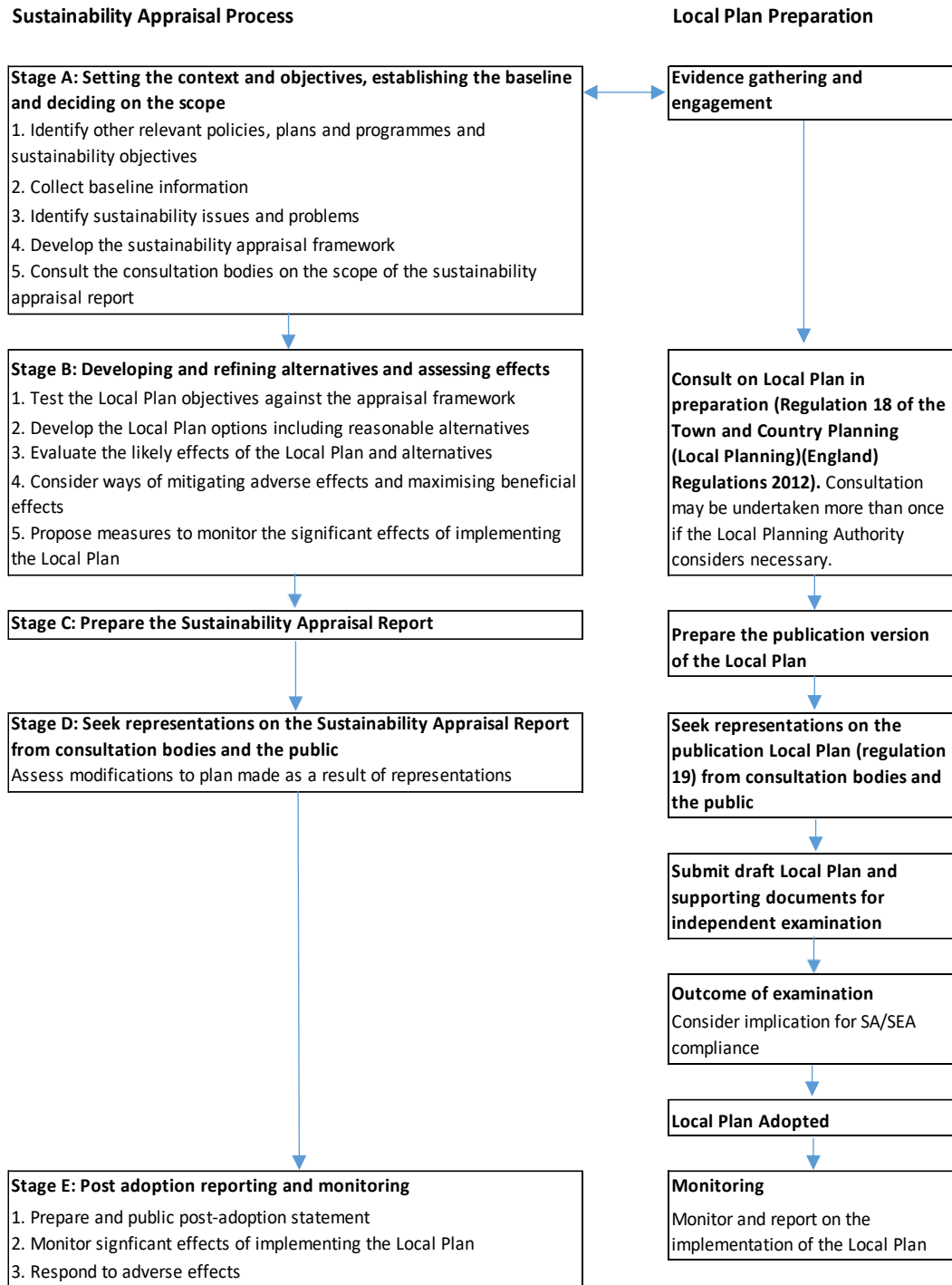
⁶ A practical guide to the Strategic Environmental Assessment Directive 2005 ODPM ISBN 1851127887

Relevant baseline information is provided in relation to health and equalities within the Employment & Skills and Human Health SA topics (see Appendix B sections 3 and 6).

The SA Scoping Report prepared for the WBC Local Plan Review produced in April 2018⁷ has been reviewed and any relevant data transferred into the SA Report. The report also describes the evolution of the baseline without the plan and identifies key sustainability issues for each topic.

⁷ Watford Borough Council Local Plan Review Sustainability Appraisal Scoping Report, 2018

Figure 2.1: The SA Process



(Source: Adapted from Department for Communities and Local Government (2014) Planning Practice Guidance)

2.2.2 Task A3: Identifying sustainability issues and problems

Key sustainability issues have been identified within Section 5 of this report and are derived from the baseline data collated.

2.2.3 Task A4: Developing the SA assessment framework

The preparation of the Scoping Report culminated in the presentation of a framework of 19 SA objectives against which the First Draft Local Plan and its reasonable alternatives will be tested. For consistency the SA Framework proposed is based on the SA framework previously used to assess the DPDs in Watford. The previous SA Framework adopted for the SA of Watford DPDs is also similar to the SA Frameworks being used to assess DPDs in neighbouring authorities, particularly those in the South West Hertfordshire group of authorities (Dacorum, Hertsmere, St Albans, Three Rivers). These authorities have committed to work together on planning matters⁸ and therefore it is beneficial that each authority assesses the sustainability of policy and sites in a similar manner as far as possible given that local issues may differ between authorities.

The SA Framework has been updated and amended to reflect up to date sustainability issues identified during the scoping stage. In updating the SA framework, the previous SA Objectives were reviewed with relation to:

- Their relevance to the scope and objectives of the First Draft Local Plan;
- The practicalities of assessing against these objectives;
- Any additional sustainability objectives which should be potentially included or scoped out identified through the review and update of the plans, policies, and programmes; and

Any additional sustainability objectives which should be potentially included or scoped out identified through the key sustainability issues and problems identified in the baseline review and update. The SA framework is presented in Table 2.2.

⁸ Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council, and Watford Borough Council are committed to working together under the Duty-to-Co-operate (DtC) to ensure that the growth needs of the four council areas are appropriately considered in the context of:

- the area covered by the districts above;
- the relevant provisions of the National Planning Policy Framework (NPPF); and
- any other material considerations so that their collective development needs are planned for in the most sustainable ways (Draft Memorandum of Understanding (August 2017).

Table 2.2: SA Framework	
Objectives	Sub-objectives
SA1) Achieve sustainable levels of prosperity and economic growth	<ul style="list-style-type: none"> • To support existing businesses, attracting inward investment and encouraging new businesses start-ups through the creation of employment spaces. • To promote and support economic diversity, and particularly manufacturing and human health and care sectors.
SA2) To ensure that local residents have employment opportunities and access to training.	<ul style="list-style-type: none"> • To support the delivery of high-quality jobs within the Borough. • To give greater focus to learning and skills through the provision / support of education and training facilities in order to meet needs.
SA3) To ensure ready access to essential services and facilities for all residents	<ul style="list-style-type: none"> • To improve everyone's access to high quality health, education, recreation, community facilities and public transport. • To ensure facilities and services are accessible by everyone, regardless of age or ability.
SA4) Ensure that everyone has access to good quality housing that meets their needs	<ul style="list-style-type: none"> • Promote a range of housing types and tenure. <p>To improve the provision of affordable housing.</p>
SA5) Encourage healthy lifestyles and improve quality of life for local residents	<ul style="list-style-type: none"> • To promote walking and cycling and community-based activities. • To provide enhanced access to open spaces as part of the Borough's Green Infrastructure network. • To provide access to sporting and recreational facilities. • To provide good quality play spaces to meet the needs of residents. • To provide health facilities to meet the needs of residents. • To provide opportunities for residents to grow their own food.

Table 2.2: SA Framework	
Objectives	Sub-objectives
SA6) Reduce both crime and the fear of crime	<ul style="list-style-type: none"> • Improve community cohesion by reducing barriers between neighbourhoods and ensuring that everyone benefits from regeneration. • 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.
SA7) To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes	<ul style="list-style-type: none"> • To reduce the need to travel through closer integration of housing, jobs and services and promoting mixed use development. • To prioritise the use of sustainable modes of transport and reduce the reliance on private vehicles. • To help create safe and secure layouts which minimise conflicts between vehicle traffic, cyclists and pedestrians. • To support the expansion of electronic communications networks, including telecommunications and high-speed broadband. • Deliver more facilities for charging plug-in and other ultra-low emission vehicles.
SA8) To achieve good air quality SA9) To minimise noise and light pollution	<ul style="list-style-type: none"> • To improve air quality across the Borough and avoid exacerbating existing areas of poor air quality. • To minimise noise pollution and consider sensitivity of receptors to existing noise sources. • To limit light pollution and promote and less invasive lighting sources, considering the balance between safety and environmental impacts.
SA10) Reduce the Borough's contribution to climate change	<ul style="list-style-type: none"> • To minimise CO2 emissions. • To promote the design and construction of energy-efficient developments and encourage the use of low-carbon and renewable energy where practicable.

Table 2.2: SA Framework	
Objectives	Sub-objectives
SA11) Ensure that the Borough is resilient to the effects of climate change	<ul style="list-style-type: none"> • To improve the resilience of the Borough to climate change, particularly with respect to the design of new developments.
SA12) To protect and enhance biodiversity	<ul style="list-style-type: none"> • To protect and enhance designated wildlife sites (international, national and local). • To support the achievement of BAP targets. • To create habitats to ensure sustainable and linked species populations and protect and enhance the Green Infrastructure network in the Borough. • To increase tree cover and protect existing woodland. • To eradicate invasive non-native species from the Borough.
SA13) To maintain and enhance historic and cultural assets	<ul style="list-style-type: none"> • To safeguard and enhance historic and cultural assets. • To promote local distinctiveness and local identity by repairing historic buildings and areas, and by encouraging the re-use of valued buildings. • Enhance understanding of the historic assets of the Borough.
SA14) Conserve and enhance the landscape and townscape, encouraging local distinctiveness	<ul style="list-style-type: none"> • To encourage high quality design, which respects local context, and improves local character and distinctiveness. • To improve the quality of life in urban areas by making them more attractive places in which to live, work and visit. • To protect and enhance the Borough's townscape and local sensitive landscapes. • To encourage the use of previously developed (brownfield) land and the re-use of derelict land and buildings. • To identify, protect and improve quantity and quality of open spaces and public realm.

Table 2.2: SA Framework	
Objectives	Sub-objectives
SA15) Revitalise the town centre to promote a return to sustainable urban living	<ul style="list-style-type: none"> • Create a viable and attractive town centre that has vitality and life and discourage competing out-of-town developments.
SA16) Maximise the use of previously developed land and buildings and the efficient use of land.	<ul style="list-style-type: none"> • To protect soils from pollution and remediate contaminated land. • To concentrate development through the reuse of previously developed land and buildings and urban extensions only where the development of greenfield land is unavoidable. • To maximise the efficient use of land through encouraging high-density development.
SA17) Maintain and enhance water quality and limit water consumption.	<ul style="list-style-type: none"> • To encourage high water efficiency and conservation, including retrofitting older buildings. • To improve quality and flow of rivers and protect and improve groundwater quality. • To ensure the Borough has the appropriate wastewater and sewerage capacity to deliver any predicted new development.
SA18) Ensure that new development does not increase flood risk.	<ul style="list-style-type: none"> • To avoid development from being located in areas at risk of flooding taking account of climate change. • To ensure that green infrastructure schemes make space for water and reinstate floodplain. • To promote sustainable urban drainage systems to reduce flood risk and water loss from natural systems.
SA19) To minimise use and make efficient use of natural resources.	<ul style="list-style-type: none"> • To minimise the production of waste and promote the re-use, recycling and composting. • To safeguard land for waste processing / disposal within the Borough. • To safeguard reserves of exploitable minerals from sterilisation by other development.

2.2.4 Task A5: Consulting on the scope of the SA

The Scoping Report was consulted on with the statutory consultees for a period of 6 weeks between 18 December 2017 and 29 January 2018. The SA Scoping Report can be accessed on the Council's website via this link:

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

Comments reviewed on the Scoping Report have been recorded in a 'recommendations tracker' and used to update the Scoping Report. The scoping information presented in Section 5 of this report will inform the next stages of the SA.

2.3 Stage B Developing and refining alternatives and assessing effects

2.3.1 Task B1 Develop options including reasonable alternatives

This stage consists of developing and refining reasonable alternatives and assessing effects. It fulfils the requirements to identify, describe and evaluate the likely significant effects on the environment of "*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*"⁹.

Strategic policy options were assessed in 2018 and the findings were presented in a report which accompanied the Issues and Options consultation (see Section 2.3.2 below). The findings are also reproduced within Section 6 of this report. Since then, more detailed policy approach options have been developed by WBC in 2018/2019 and these policy options have been assessed against the SA Framework in the same way as the strategic options. The findings of the policy options are also summarised in this report in Section 6 of this report. These assessments are described in more detail below.

2.3.2 WBC First Draft Local Plan - Strategic Options

The key issues and challenges for Watford Borough are described within the Issues and Options consultation document (September 2018). The options set out within this document were subject to SA and consisted of seven distinct issues, each with between two and eight different options to be considered as follows:

- Housing Development;
- Affordable Housing;

⁹ SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004) (Reg 12 (1(b)))

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

A list of the options appraised are presented in Box 2.1 below. References are provided in this table (Box 2.1) to the corresponding questions within the Issues and Options document (June 2018)¹⁰.

Box 2.1: Options Assessed by the SA

Housing Development (Questions 4 and 5)

1. Building more flats, especially in taller buildings at key locations.
2. When opportunities arise redeveloping existing residential areas with more homes than they currently support (intensification).
3. Building on some of our open spaces or green belt where these are of low quality and poorly used.
4. Working with neighbouring councils to see if some of our housing need can be met outside the Watford Borough boundary.

Affordable Housing (Questions 6 and 7)

1. The Council continues to prioritise affordable housing onsite when new housing development comes forward.
2. The Council encourages developers to make a financial contribution that can be used to provide affordable housing on other sites in the Borough.

Types of New Housing (Question 9)

1. Focus on delivering mainly flats.
2. Focus on delivering mainly family sized flats.
3. Focus on delivering mainly small houses.
4. Focus on delivering mainly family sized housing.
5. Deliver a mix of different housing types.

Housing for an Aging Population (Questions 12 and 13)

1. Deliver purpose built retirement homes.

¹⁰ Sustainability Appraisal of the Strategic Options Report (June 2018)
<https://www.watfordlocalplan.co.uk/consultation-documents>

2. Ensure new homes are adaptable for all ages to live in.

Employment (Question 14)

1. Continue to protect existing employment areas from redevelopment to other uses such as housing.
2. Do not protect existing employment areas from redevelopment to other uses such as housing.

Tall Buildings (Question 17)

1. Allow tall buildings to be built anywhere in Watford.
2. Do not allow any more tall buildings in Watford.
3. Allow tall buildings if the suitability of each is considered on a case by case basis.
4. Identify which parts of the Borough where tall buildings are acceptable.

Transport (Question 19, 23 and 24)

1. A 20mph speed limit on all residential roads.
2. Congestion charging in the most congested areas.
3. Improving the quality and continuity of walking and cycling routes.
4. Increasing the frequency of buses and providing priority bus lanes.
5. Creating better access to the railway networks.

2.3.3 WBC First Draft Local Plan - Policy Options

The consideration of different policy options for the Local Plan is a key part of the development of the Local Plan, and SA plays a role in presenting the sustainability implications of each of the options considered, informing decision-making by Council officers.

Policy approach options were set out within a series of detailed topic papers prepared by WBC in 2018/19. The policy options grouped within the topic papers address the key issues identified within the Borough at the issues and options stage. For example, the employment topic paper contains policy options which address the key issue of employment growth. In total the policy options considered 47 key issues.

The 13 topic papers include the following:

- Air Quality, Pollution and Contamination;
- Built Community Facilities;
- Climate Change and Resilience;
- High Quality Design and Conservation;
- Green Infrastructure, Biodiversity and the Natural Environment;
- Growth Strategy and Planning;

- Density and Optimising Land Potential;
- Infrastructure;
- Employment;
- Housing;
- Promoting Sustainable Transport;
- Retail and Town Centre; and
- Strategic Approaches to Growth.

Full details of the options assessed is provided in Appendix C.

2.3.4 WBC First Draft Local Plan

The content of the First Draft New Local Plan has been informed by the findings of the SA of the Issues and Options consultation document and the consultation findings on the key issues facing the borough to 2036. The first draft of the new Local Plan includes:

- 11 strategic policies which set out the planning requirements to guide future growth. Within these polices are 5 relating to Strategic Development Areas. These are strategic areas in the borough where new development will be supported in principle if it is consistent with the Local Plan; and
- 39 local planning policies which are intended to address local issues. 2 of these policies allocate sites for housing (Policy 4H.1) and employment (Policy E5.1) development in the borough.

Table 2.3 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.

Strategic Policies	SD2.1	Planning for Growth
	SD2.2	Achieving Sustainable Development
	SD2.3	Making Effective Use of Land
	SD2.4	Safeguarding and Connecting to Strategic Transport Infrastructure
	SD2.5	Protecting Green Belt Land
	SD2.6	Development Contributions
	SD2.7	Watford Junction Strategic Development Area
	SD2.8	Bushey Station Strategic Development Area
	SD2.9	Town Centre Strategic Development Area
	SD2.10	Lower High Street Strategic Development Area
	SD2.11	Dome Roundabout Strategic Development Area
Local Planning Policies	ST3.1	Cycle Parking and Storage
	ST3.2	Car Parking, Car Clubs and Electric Vehicles

ST3.3	Access, Travel plans and Transport Assessments
H4.1	Allocated Housing Sites for Delivery
H4.2	Housing Mix
H4.3	Affordable Housing
H4.4	Garage Site Development
H4.5	Accessible and Adaptable Homes
H4.6	Specialist Housing
H4.7	Self-build and Custom Build Housing
H4.8	Residential Conversions
E5.1	Designated Employment Sites
E5.2	Economic Development Outside of Designated Employment Locations
E5.3	Mixed Use Development
CC6.1	Sustainable Construction and Design
CC6.2	Flooding and Resilience
DC7.1	Strategic Principles for High Quality Design
DC7.2	Quality of Place
DC7.3	Building Design
DC7.4	Taller Buildings
DC7.5	Heritage Assets and the Historic Environment
DC7.6	Nationally Listed Buildings and Registered Parks and Gardens
DC7.7	Conservation Areas
DC7.8	Locally Listed Buildings
DC7.9	Archaeology
NE8.1	Green and Blue Infrastructure Network
NE8.2	Protecting Open Space
NE8.3	Providing New Open Space
NE8.4	Biodiversity Net Gain
NE8.5	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

2.3.5 Task B2 Evaluate the likely effects of the plan and alternatives

The potential effects of alternatives to the First Draft Local Plan policies have been assessed and the findings are summarised in Section 6 of this report.

Each draft policy has been assessed against the 19 SA Objectives in the SA Framework (Table 2.2) using the criteria in Table 2.4 below. These criteria informed the overall significance score of the potential sustainability effects identified for each SA Objective (Table 2.5).

Table 2.4: Definition of Assessment Criteria	
Criterion	Description
Significance	An assessment of the significance of the potential effects identified. This could be a positive effect, negative effect, neutral effect, significant positive effect or significant negative effect. The definitions for these effects are detailed in Table 2.5
Permanent/temporary	An assessment of whether the predicted effects would be permanent (P), or temporary (T).
Reversible/irreversible	An assessment of whether or not the identified effect can be reversed (R) e.g. the loss of greenfield land to development would be irreversible (I).
Spatial extent	How far the effect is predicted to be spread geographically. <ul style="list-style-type: none"> • Low (L) = A specific area within WBC boundary • Medium (M) = Across the entire WBC boundary, possibly reaching to neighbouring boroughs • High (H) = Beyond the WBC Local Plan Boundary, with national or international ramifications
Magnitude	An assessment of the proportion of the receptor affected by the identified effect. <ul style="list-style-type: none"> • Low (L) =20-40% of receptor or capacity affected • Medium (M) = 40-80% of receptor affected • High (H) =80+% of the receptor affected
Duration	An assessment of the time period the predicted effects are likely to last. This could be: <ul style="list-style-type: none"> • Short (S)= 0-5 years • Medium (M) = 5-10 years • Long (L)= 10 years or more, up to the end of the Local Plan period (2036)
Direct/Indirect	An assessment of whether the predicted effect will be directly (D) as a result of option implementation, or indirectly (I) caused by the policy option.
Likelihood	An assessment of how likely it is that the implementation of the policy option will lead to the predicted effect. This could be low (L), moderate (M) or high (H).
Cumulative effect	An assessment of whether or not there is potential for a cumulative effect to occur on the Sa objective as a result of the policy option working in combination with other circumstances, policies or factors. Y= potential cumulative effect. No potential cumulative effect identified.

Table 2.5: Definitions of Significance Scores

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
++	<p>Significant Positive Effect: the policy option supports the achievement of this objective; it addresses all relevant sub-objectives and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre</p>	<p>Permanent Continual</p> <p>Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected</p> <p>The effect could be to:</p> <ul style="list-style-type: none"> • enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • enhance and redefine the location in a positive manner; • repair or restore receptors badly damaged or degraded through previous uses; and/or • improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.
+	<p>Minor Positive Effect: the policy option supports the achievement of this objective; it addresses some relevant sub-objectives, although it may have only a minor beneficial effect</p>	<p>Reversible Infrequent or intermittent</p> <p>Magnitude: Low 20-40% of receptor or capacity affected.</p> <p>The size, nature and location of a proposed scheme would:</p> <ul style="list-style-type: none"> • improve undesignated yet recognised receptor qualities at the neighbourhood scale; • fit into or with the existing location and existing receptor qualities; and/or • enable the restoration of valued characteristic features partially lost through other land uses.
0	<p>Neutral Effect: the policy option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant</p>	N/A
?	<p>Uncertain Effect: Uncertain or insufficient information on which to determine the assessment this stage</p>	N/A

Table 2.5: Definitions of Significance Scores		
Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
-	Minor Negative Effect: the policy option appears to conflict with the achievement of this objective; it does not address relevant sub-objectives and may result in minor adverse effects	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <ul style="list-style-type: none"> • be out of scale with the location; or • leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.
--	Significant Negative Effect: the policy option works against the achievement of this objective; it could exacerbate relevant sub-objectives and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	Permanent Irreversible Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> • permanently degrade, diminish or destroy the integrity of the receptor; • cause a very high quality receptor to be permanently changed and its quality diminished; • cannot be fully mitigated and may cumulatively amount to a severe adverse effect; • be at a considerable variance to the location, degrading the integrity of the receptor; and/or • will be substantially damaging to a high quality receptor such as a specific regional or national designation.

The assessment of housing and employment site options needed to consider site characteristics and location. In order to do this, GIS was used. In addition, the assessment had to ensure that all sites options were considered consistently to ensure a 'level playing field' (i.e. ensure consistent data are used for all site options assessed). In this case, time and resource limitations meant there was limited potential to generate data for all site options through site visits and/or discussions with site promoters. An efficient and standardised site assessment methodology therefore needed to be developed, making use of GIS to support the spatial analysis. To achieve this, an analysis has been undertaken of data available to inform the site assessment for each

SA Framework Objective which was then been used to develop RAG site assessment criteria which are linked to the SA Objectives (Table 2.6).

GIS data was not appropriate or available to support the assessment against SA objectives:

- SA1: Achieve sustainable levels of prosperity and economic growth
- SA6: Reduce both crime and the fear of crime

This is because the sub-objectives which support these SA objectives are not spatial i.e. whether a site could contribute to the achievement of these SA objectives does not relate to its location. Therefore, the assessment of these SA objectives has used the significance criteria described above, without the additional data from the GIS which has been available for the spatial elements of the other objectives.

Where GIS has been identified as being able to inform the assessment, a 'RAG' (red, amber, green) rating was applied to each indicator. This was determined through the application of a set of RAG criteria which are set out in Table 2.6. These criteria have been generated through reference to existing guidance / good practice and the sources of this guidance and good practice are also included within Table 2.6. Some criteria have been identified using professional judgement of the consultants and where this is the case it is indicated within Table 2.6. Only the SA objectives which can be informed by the GIS are included within this table.

The results of the RAG ratings (see appendix C) then informed the assessment of policies H4.1 and E5.1 against the SA framework, when the specific housing site allocation and employment site allocation policies were examined.

Table 2.6: RAG criteria used in the assessment of policies H4.1 and E5.1			
SA Objective	Indicator	RAG	Justification
SA2: To ensure that local residents have employment opportunities and access to training	Proximity to Employment Areas	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2012
	Income Deprivation	Top 10%-30% Most Deprived Top 40%-50% Most Deprived 40%-10% Least Deprived	Indices of Deprivation 2015 Online map http://dclgapps.communities.gov.uk/imd/idmap.html

Table 2.6: RAG criteria used in the assessment of policies H4.1 and E5.1

SA Objective	Indicator	RAG	Justification
SA3: To ensure ready access to essential services and facilities for all residents	Proximity to leisure and recreation	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to healthcare facility	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to a train station	>800m <800m	CIHT Planning for Walking Guidelines, 2015
	Proximity to community centre	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2013
	Proximity to place of Worship	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2014
	Proximity to town or Local centre	>0.8km walking distance <0.8km walking distance <0.4km walking distance	CIHT Planning for Walking Guidelines, 2015
SA4: Ensure that everyone has access to good quality housing that meets their needs	Affordable housing expected yield	<12 houses 12-30 houses 31+ houses	Based on the requirements within policy H4.3.
SA5: Encourage healthy lifestyles and	Access to open space	>300m to nearest 2ha site <300m to nearest 2ha site	Natural England ANGSt guidance, 2010

Table 2.6: RAG criteria used in the assessment of policies H4.1 and E5.1

SA Objective	Indicator	RAG	Justification
improve quality of life for local residents	Proximity to leisure and recreation	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to healthcare facility	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015
SA7: To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to a train station	>800m <800m	CIHT Planning for Walking Guidelines, 2015
	Proximity to employment areas	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2012
SA9: To minimise noise and light pollution	Light Pollution	8->32 Nanowatts 1-7 nanowatts <0.25-0.99 Nanowatts	CPRE Light Pollution map
	Noise pollution	>70dB 65-70dB <65dB	Extrium- England Noise Map Viewer http://www.extrium.co.uk/noiseviewer.html
SA12: To protect and enhance biodiversity	Local Nature Reserve	Includes or is adjacent <50m >50m	Natural England
	Proximity to SSSI	<200m 200-800m >800m	RTPI Strategic Environmental Assessment, Practice advice, 2018. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a SSSI.

Table 2.6: RAG criteria used in the assessment of policies H4.1 and E5.1

SA Objective	Indicator	RAG	Justification	
	Environmental Deprivation	Top 10%-30% Most deprived Top 40%-50% Most deprived 40%-10% Least Deprived	Indices of Deprivation, 2015 Online map http://dclgapps.communities.gov.uk/imd/idmap.html	
SA13: To maintain and enhance historic and cultural assets	Conservation Areas	Intersects or is adjacent <50m >50m	It is appropriate to 'flag' a site red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a conservation area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects in a heritage asset.	
	Listed Buildings	Intersects or is adjacent <50m >50m		
	Scheduled Monuments	<10m <25m >25m		RTPI Practice Advice 2018
	Historic Park or Garden	<10m <25m >25m		RTPI Practice Advice 2019
SA16: Maximise the use of previously developed land and buildings and the efficient use of land.	Previously Developed Land	No Part Yes	RTPI Practice advice, 2017	
SA17: Maintain and enhance water quality and limit water consumption.	Water Course	<10m 10-1000m >1000m	Cirra Environmental Good Practice on Site (Third Edition), 2010	
	Groundwater Source Protection Zone	Zone 1 Zone 2 Zone 3	Environment Agency	

Table 2.6: RAG criteria used in the assessment of policies H4.1 and E5.1			
SA Objective	Indicator	RAG	Justification
SA18: Ensure that new development does not increase flood risk.	Flood Zone	Zone 3 Zone 2 Zone 1	Environment Agency
SA19: To minimise and make efficient use of natural resources	Sand and Mineral Safeguarding	Within Safeguarding Zone Outside of Safeguarding Zone	Professional judgement

Task B3 Consider ways of mitigating adverse effects and maximising beneficial effects

Consideration has been given to appropriate mitigation measures that could be adopted within the First Draft Local Plan for any uncertain and potential negative effects identified within the policies. Consideration has also been given to measures which could enhance the sustainability performance of the policies. Mitigation and enhancement measures are presented in Section 9.

Task B4 Proposed Measures to monitor the significant effects of implementing the plan

A proposed monitoring framework has been put forward in Section 10 to monitor the potential effects of the First Draft Local Plan. this will be refined as part of the next iteration of the Local Plan to more specifically address any residual significant effects of the new Local Plan policies.

2.4 Stage C Preparing the Sustainability Appraisal Report

This stage involves documenting the SA process and presenting the findings within a formal SA Report (this report). It sets out the SA findings of the First Draft Local Plan policies as well as the reasonable alternatives considered.

The ways in which this SA report meets the legal requirements of the SEA Regulations are demonstrated in Table 2.7.

2.5 How the requirements of the SEA Regulations are being met

Table 2.7 outlines where elements of the SEA regulations¹ are addressed within this SA report.

Table 2.7: Fulfilling the requirements of the SEA Regulations	
What the regulations say¹¹	How this is addressed
An outline of the contents, main objectives of the plan or programme.	Set out in Section 3 of this document.
An outline of the relationship with other relevant plans and programmes.	Set out in Section 4 of this document.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 5 of this document.
The environmental characteristics of areas likely to be significantly affected.	Sections 6 & 7 outline the potential environmental effects on areas likely to be significantly affected. The characteristics of the borough and potential interactions have been informed by information contained within the SA baseline data (Section 5).
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 of this document outlines key issues (including problems) related to each SA topic. This includes sites designated pursuant to Directives 79/409/EEC and 92/43/EEC.
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4 and Appendix A outline relevant environmental protection objectives. The way that those environmental objectives have been taken into account has been through integrating them into the SA framework.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and	Section 7 sets out the potential significant effects of the proposed new policies and its reasonable alternatives. Details of the nature of effects are provided within Appendix D. This includes indirect (secondary),

¹¹ Please see Schedule 2 of the SEA regulations: *Information for Environmental Reports*.

Table 2.7: Fulfilling the requirements of the SEA Regulations

What the regulations say ¹¹	How this is addressed
<p>archaeological heritage, landscape and the interrelationship between the above factors. The identification of the above effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.</p>	<p>cumulative (cumulative and synergistic), duration (short/medium/long term), permanent or temporary and negative or positive effects. Definitions are provided within Section 2.3, Tables 2.4 and 2.5.</p> <p>Potential cumulative effects of the First Draft Local Plan policies are presented in Section 8. Potential cumulative effects of the First Draft Local Plan with other plans, programmes and projects are presented in Section 8.</p>
<p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>Section 9 sets out mitigation measures for significant negative effects and uncertain effects and relevant enhancement measures.</p>
<p>An outline of the reasons for selecting the alternatives dealt with.</p>	<p>Section 6 and Appendix C outline the reasons for selecting the alternatives dealt with.</p>
<p>A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Section 2 outlines the methodology for all stages of the SA and Section 2.6 specifically describes any technical difficulties that were encountered.</p> <p>Section 5 outlines data gaps.</p>
<p>A description of measures envisaged concerning monitoring.</p>	<p>Set out in Section 10 of this document.</p>
<p>A Non-Technical Summary of the information provided under the above headings.</p>	<p>See separate Non-Technical Summary.</p>
<p>The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.</p>	<p>The whole SA Report addresses this.</p>

Table 2.7: Fulfilling the requirements of the SEA Regulations	
What the regulations say¹¹	How this is addressed
<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).</p>	<p>The Scoping Report was consulted on with the statutory consultees for a period of 6 weeks between 3rd September and 15th October 2018.</p> <p>Comments have been reviewed and used to update the Revised Scoping Report (August 2019).</p>
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.</p>	<p>This SA Report will be consulted on with the public between 27th September and 8th November 2019 alongside the First Draft Local Plan and will specifically be sent to the SEA statutory consultees for their comment.</p>
<p>EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.</p>	<p>No potential effects have been identified in the assessment of the preferred options (see Section 7) on other EU Member States. There is therefore no requirement to consult with other EU Member States on this SA Report.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p> <p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted.</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as</p>	<p>This will be set out in the SA Adoption Statement.</p>

Table 2.7: Fulfilling the requirements of the SEA Regulations	
What the regulations say¹¹	How this is addressed
<p>adopted, in the light of the other reasonable alternatives dealt with.</p> <p>The measures decided concerning monitoring.</p>	
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation.</p>	<p>This will be set out in the SA Adoption Statement.</p>

2.6 Assumptions and Limitations

The SEA Regulations require the SA Report to include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

No other technical difficulties have been identified in undertaking the assessments.

Baseline data has been available across the Borough however there are cases where data gaps have been identified. This have been listed for each topic areas in Section 5 of this report, Summary of Baseline Data. The baseline data was gathered between October-December 2017 and was considered up to date when published post-consultation in April 2018.

The assessment of sites has been undertaken as a desk-based exercise using the baseline information presented in Appendix B. No site visits have been undertaken specifically for the purposes of the SA. The red line boundaries for the potential site allocations have been provided to the assessors based on the knowledge at the time and there may be some inaccuracies in the boundaries assessed.

Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of precisely how the plan will be implemented and limited by understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions. Assumptions are made cautiously and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

Some assumptions are noted within the assessments of the sites and the First Draft Local Plan policies. For example, we have assumed that not all proposed sites will be developed.

The appraisal findings have needed to make assumptions regarding future infrastructure delivery. In practice, however, infrastructure delivery is highly uncertain. If it is a case that infrastructure delivery lags behind housing development, or does not materialise at all, then the results of the appraisal may alter.

3 The Scope and Content of Watford Borough Council's First Draft Local Plan

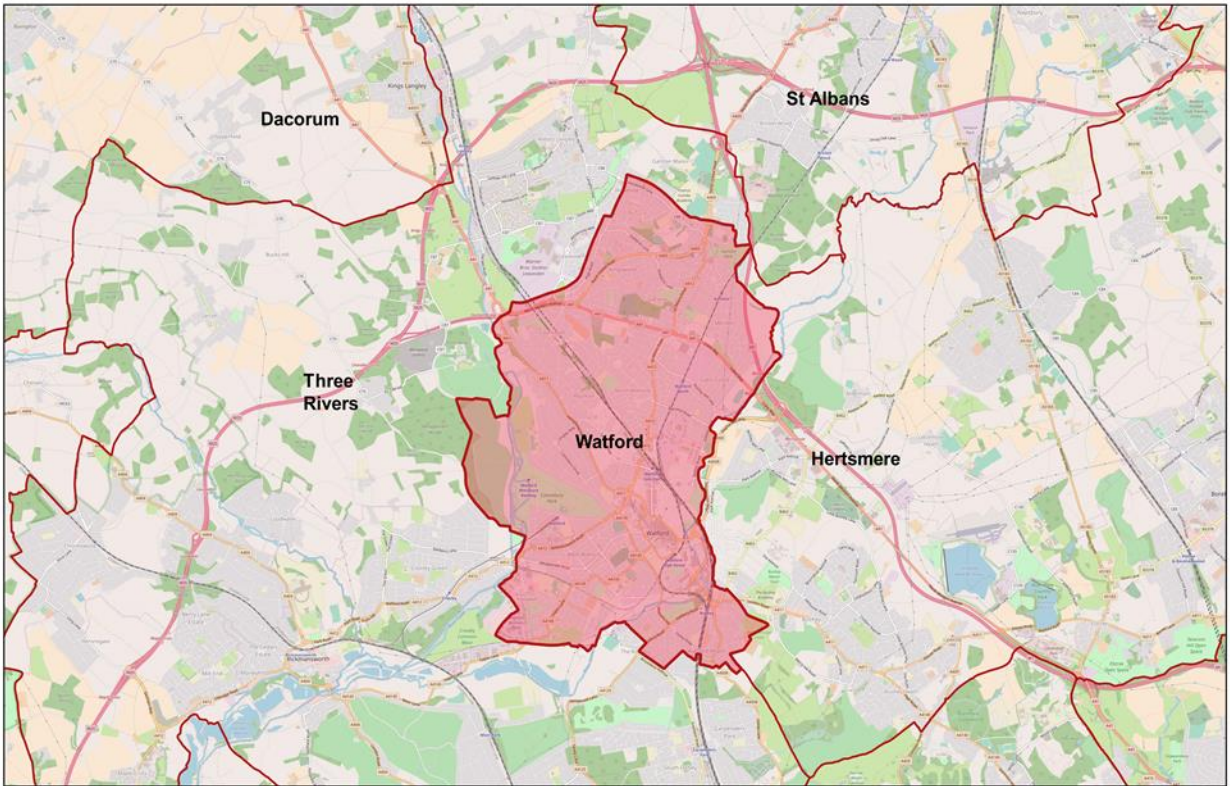
3.1 Introduction

The First Draft Local Plan, when adopted, will form the development plan for Watford, along with Hertfordshire County Council Minerals and Waste Local Plans. The role of the First Draft Local Plan is to help deliver the Council's Corporate Business Plan and other Council policies and strategies, where relevant. It will set out the growth strategy for the borough.

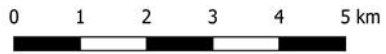
The First Draft Local Plan will replace the Core Strategy (adopted January 2013) and remaining policies of the Watford District Plan (WDP) 2003 which are more than five years old.

The First Draft Local Plan area is shown in Figure 3.1 (area in red).

Figure 3.1: Watford First Draft Local Plan Area



Watford & Surrounding Local Authorities



4 Review of Policies, Plans and Programmes

4.1 Introduction

The policy context in which the First Draft Local Plan is being prepared can best be understood through a review of related Policies, Plans and Programmes (PPP). The SEA Regulations require information on:

- *“An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.”* (Schedule 2, Paragraph 1); and
- *“The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.”* (Schedule 2, Paragraph 5)

The review process ensures that the First Draft Local Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the First Draft Local Plan and the SA.

For practical reasons the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focussed to ensure that only policies that are current and of direct relevance to the First Draft Local Plan are reviewed. A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Appendix A. Table 4.1 outlines the key messages of the PPP.

The completed review of policies, plans and programmes provides the context for the SA and helps to inform an SA Framework of objectives and sub-objectives which will guide the subsequent appraisal process (see Chapter 20).

4.2 PPP Review - Summary of Key Messages

Table 4.1 sets out the key messages drawn from the review of PPP. In Appendix A, some topics have been combined because the PPP related to them overlap or are very similar and therefore the SA Topics listed in Table 4.1 are not entirely the same as those in Section 5 of this document. This applies to Economy and Employment and Skills (which have been combined into ‘Economy and Employment’ in Appendix A) and Population, Human Health and Crime and Safety (which have been combined into ‘Health and Community’ in Appendix A). The messages presented in Table 4.1 are reflected within the detailed SA Framework which can be found in Table 2.2.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
Economy and Employment	<ul style="list-style-type: none"> • Support the sustainable growth and expansion of all types of business and enterprise. • Create jobs and prosperity to meet the twin challenges of global competition and of a low-carbon future. • Ensure that there is an adequate supply of employment land to meet local needs. Additional space is required to meet business needs within Watford up to 2031. • Raise the economic performance of the Borough by supporting existing businesses, attracting inward investment and encouraging new businesses start-ups. • Support opportunities for the improvement of the skills and educational attainment levels of the Borough’s labour supply. • Protect and strengthen apprenticeship schemes. • Support small businesses.
Health and Community	<ul style="list-style-type: none"> • Reduce crime including the fear of crime. • Reduce anti-social behaviour. • Deliver safe and secure networks of green infrastructure and open space. • Optimise the health and wellbeing of people in Hertfordshire throughout the course of their lives • Promote healthier lifestyles. • Increase physical activity levels. • Contribute to the improvement of health and quality of life. • Ensure an integrated approach to housing and community facilities and services. • Provide opportunities for members of the community to mix and meet. • Improve access to allotments. • Play spaces are attractive, welcoming, engaging and accessible for all local children and young people. • Improve public health by strengthening local activities which connect people with nature. • Protect important green spaces. • Support policies for the protection of existing open spaces and provision for new open spaces, sports and recreational facilities. • Ensure that there are appropriate facilities for the disabled and elderly. • Improve participation in sports. Improve access to high quality open spaces and opportunities for sport and recreation in order to contribute to the health and well-being of communities.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Ensure everyone has access to local, good quality health and social care services that meet their needs, especially children, older people and those living in more deprived areas. • Ensure social equality and prosperity for all. • Prevent and reduce homelessness. • Ensuring that Gypsies and Travellers have fair access to suitable accommodation, education, health and welfare provisions.
Housing	<ul style="list-style-type: none"> • Enable housing growth and deliver a mix of high-quality housing to meet local needs. • Deliver high quality, adequately size and thermally efficient housing; at a location that allows access to community facilities. • The NPPF requires the Local Plan to seek to deliver the full Objectively Assessed Housing Need (OAHN) of the area for market and affordable housing and identify a five year supply of deliverable sites to meet the identified need. • Ensure that housing growth requirements are accommodated in the most sustainable way. • Priority to address the housing needs of older people and small households. • Improve the condition and management of existing housing. • Prevent and reduce homelessness. • Investigate options to expand the portfolio of temporary accommodation in the Borough.
Transport and Accessibility	<ul style="list-style-type: none"> • Prioritise walking, cycling and public transport. • Enhance accessibility to key community facilities, services and jobs for all. • Create a more reliable, less congested and better-connected transport network. • Encourage sustainable transport and reduce the need to travel. • Reduce greenhouse gas emissions from transport. • To develop a transport system that provides access to employment, shopping, education, leisure and health facilities for all, including those without a car and those with impaired mobility. • To ensure that the transport system contributes towards improving the efficiency of commerce and industry and the provision of sustainable economic development in appropriate locations. • To mitigate the effect of the transport system on the built and natural environment and on personal health. • Support the expansion of electronic communications networks, including telecommunications and high-speed broadband.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Incorporate facilities for charging plug-in and other ultra-low emission vehicles. • Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones.
Air, Noise and Light Pollution	<ul style="list-style-type: none"> • Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum and meet agreed air quality targets and objectives. • Minimise noise pollution. • Limit the impact of light pollution from artificial light on local amenity. • Promote low-carbon vehicles and renewable sources of energy. • Promotion of walking and cycling as a healthy and more preferable options to car for local journeys. • Minimise pollution and other adverse effects on the local and natural environment.
Climate	<ul style="list-style-type: none"> • Build resilience to climate change and flood risk. • Safeguard functional floodplain and areas for future flood alleviation schemes. • Avoid development in areas of flood risk. • Improve flood awareness and emergency planning. • Enhance and restore the river corridor. • Promote the use of Sustainable Drainage Systems (SDS). • Ensure that all residents are informed of the potential risk of flooding and their appropriate flood evacuation route. • Minimise the effects of climate change. • Encourage the implementation of sustainable land management techniques to reduce the impact of extreme weather events • Reduce emissions of greenhouse gases that may cause climate change. • Improve energy efficiency in homes as well as helping businesses improve their energy productivity. • Encourage the provision of renewable energy. • Move towards a low-carbon economy. • Increase energy efficiency. • Manage water use.
Biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks. • Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible. • Support is needed to achieve local BAP targets.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Creation of more resilient ecosystems, through better management of habitats by making them bigger and more joined up. • Prevention, control and eradication of invasive non-native species, especially those that will have the most detrimental effects on biodiversity. • Identify opportunities for green infrastructure provision, recognising the multiple functions that green infrastructure provides to the area. • Ensure that any new development will not harm nature conservation interests, unless the benefits of development at that location clearly outweigh the harm caused. • Conserve riparian landscapes and habitats. • Increase tree cover within urban areas. • Reduce the direct pressures on biodiversity and address the underlying causes of biodiversity loss. • Create or restore areas of wildlife-rich habitat outside the protected site network.
Cultural Heritage	<ul style="list-style-type: none"> • Conserve and enhance nationally and locally designated cultural and historical assets as well as those which are undesignated. • Maintain and enhance access to cultural heritage assets. • Respect, maintain and strengthen local character and distinctiveness. • Improve the quality of the built environment. • Preserve and enhance Conservation Areas.
Landscape and Townscape	<ul style="list-style-type: none"> • Protect and enhance the quality and distinctiveness of natural landscapes and townscapes, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures. • Promote high quality design that respects and enhances local character. • Ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. • Ensure that developments establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. • Conserve and enhance the green infrastructure of the Borough. Increase green connectivity for people and for wildlife, creating enhanced links to existing green infrastructure assets, including lateral links across town. • Encourage the use of previously developed (brownfield) land. • Promote the re-use of derelict land and buildings.

Table 4.1: Key Messages from the PPP review	
SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • There are major economic benefits to be gained from natural capital and their value should be incorporated into decision-making.
Soils and Geology	<ul style="list-style-type: none"> • Remediate land contamination. • Protect soil quality and avoid soil pollution.
Water	<ul style="list-style-type: none"> • Reduce the pollution of groundwater and prevent or limit the entry of pollutants. • Protect and enhance surface and groundwater quality. • Improve water efficiency. • Return watercourses to a more natural state, increasing the biodiversity value and generating Water Framework Directive improvements. • Ensure that water quality is improved or maintained where possible. • Promote sustainable and water efficient development.
Waste	<ul style="list-style-type: none"> • Waste should be managed in line with the waste hierarchy: <ul style="list-style-type: none"> – Prevent or reduce waste; – Reuse; – Recycle; – Other recovery methods; and – Dispose. • To improve the environment and protect human health by supporting a resource efficient economy. • To promote the provision of well-designed and efficient facilities, that drive waste management practices up the waste hierarchy and are located to ensure no harm to human health and the environment, and which reduce waste volumes to be disposed in landfill. • Encourage the increased and efficient use of recycled waste materials in Hertfordshire. • Work towards eliminating avoidable plastic waste.

5 Summary of Baseline Data

5.1 Introduction

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 arranged by SA topic as presented in Table 2.2 and is supported by Appendix B which presents the full review of baseline data for the borough.

5.2 Health, Population and Community

5.2.1 Key Sustainability Issues

The following sustainability issues have been identified:

- As the population continues to increase, so does the demand for housing, infrastructure, facilities and employment;
- The population density within the Borough exceeds both the local and the national averages;
- Adequate support and facilities will be needed for older residents.
- The population is ageing;
- Mortality rates remain high and exceed the regional average;
- There are large disparities in health between wards;
- Levels of smoking continue to rise;
- A quarter of residents in Hertfordshire are physically inactive;
- The proportion of deaths caused by circulatory disease exceeds the national and regional average;
- There is a need to promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation;
- The number of reported crimes continues to increase;
- There has been a large shift towards more violent types of crimes;
- There are large disparities in the number of crimes committed in different wards across the Borough;
- The number of hate crimes reported continues to increase; and
- 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.

5.2.2 Future Evolution of the Baseline

The population of Watford is set to continue to rise over the next 20 years. Going on current trends the population is likely to become both older and more diverse which may put additional strain on the Borough's resources. The continued growth in population is likely to cause an increase in demand for housing, services and infrastructure. There will also be an ongoing need to provide inclusive services in order to meet the needs of all residents.

As the population in Watford ages, the demand for health and social care needs will increase. In some of the most deprived areas, life expectancy is 8.9 years lower for men and 5.8 years lower for women than in the least deprived areas. This gap may well widen over time if levels of deprivation, overcrowding and poverty continue.

Without further intervention, it is likely that crime rates in Watford will continue to rise. This increasing trend mirrors what is being seen across Hertfordshire and London, but the changes in categorisation and types of crime may have an impact on the residents' overall feeling of safety. The 'One Watford' community safety partnership may help to tackle certain types of crime and improve the feeling of safety in the Borough. Without intervention, disparities may continue to exist at a ward level.

5.2.3 Data Gaps

Some of the data used has been taken from the 2011 Census which may not adequately reflect current trends. Data for physical activity of residents within the Borough could not be obtained.

The lack of hate crime data available at local authority level made it difficult to compare. Data could not be found on the fear of crime or residents' perception of safety.

5.3 Housing

5.3.1 Key Sustainability Issues

The following sustainability issues have been identified:

- The proportion of affordable housing being delivered as part of developments is decreasing and failing to meet the Council's 35% target;
- There is a need for a mix of housing types, sizes and tenures to meet the requirements of all areas of the community;
- An ageing population will require different housing needs;
- Homelessness continues to rise; and
- There remains a large shortfall between local housing allowances and average rental prices.

5.3.2 Future Evolution of the Baseline

As the popularity in the Borough continues to rise, so does the demand for housing and the current demand for affordable housing in Watford greatly exceeds supply. Households who are unable to wait for accommodation through the housing register and do not have other housing options may result in more applications being made for housing through the homelessness legislation.

5.3.3 Data Gaps

Low numbers of sales transactions in some local authorities can lead to volatility in data for annual price change by local authority for England. While efforts have been made to account for this volatility, the change in price in these local levels can be influenced by the type and number of properties sold in any given period.

5.4 Employment and Economy

5.4.1 Key Sustainability Issues

The following sustainability issues have been identified:

- There are inequalities in skill levels and income between wards within the Borough;
- The number of residents that have no qualifications is on the rise; and
- 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.
- Employment spaces are being lost to other uses;
- 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
- Manufacturing and human health and social work activities sectors are under-represented compared with the regional and national rates.

5.4.2 Future Evolution of the Baseline

The Borough has recovered from the recent drop in employment and levels are rising again. Attainment of qualifications continues to rise with more residents gaining NVQ4 levels and above, but the number of residents who have no qualifications is also rising and is still above both national and regional levels. With growing interest in the area from large employers there may be a new demand for higher educated employees.

Continued development in the Borough will work towards securing employment opportunities for and retain and improve its reputation as an attractive place for business. There has been an increase in the number of residents commuting from the Borough to London and the other surrounding areas for work. However, the extension of the Metropolitan line would provide greater

connectivity with London may draw more commuters into the Borough, but equally, it could make commuting into London more attractive.

5.4.3 Data Gaps

A lot of the data for the chapter was sourced from Nomis (ONS official labour market statistics), where some of the data for the tables used was missing. Data also had to be taken from 12-month totals with data points at the end of each quarter. There was not an overall end of year average, so all data was been taken from Q2 of each respective year.

5.5 Transport & Accessibility

5.5.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity;
- 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
- Need to provide public transport capacity and safeguard land for transport.

5.5.2 Future Evolution of the Baseline

Despite the Borough having good sustainable transport links there is still a high dependency on the private car. Traffic is expected to continue to rise within the Borough and at a higher rate than both the county and national average, this is likely to place additional pressure on the already stressed road network. However, if the extension of the Metropolitan Line is successful, traffic levels could decrease as residents may opt for quicker and more sustainable transport options. The creation of more accessible cycle routes may also help to deter residents from using private cars.

5.5.3 Data Gaps

The Watford Transport Study is currently being prepared and is expected to be completed in late 2019.

5.6 Air, Noise and Light Pollution

5.6.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Need to help reduce pollution from road vehicles;

- Reliance on the petrol or diesel-fuelled private car as the main mode of transport;
- Air pollution from the strategic road network is an issue across the Borough and NO² emissions have remained constant;
- 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
- There is a need to reduce light pollution and restrict further intensification of light pollution from new developments.

5.6.2 Future Evolution of the Baseline

It is likely that air quality will continue to be an issue in the Borough due to its large road network and the reliance on the private car. Continued growth across the Borough will increase the demand for housing and could subsequently result in more cars on the road. Further exceedance of the 40 µg/m³ annual mean objective within AQMAs may see boundaries revised or even the creation of additional AQMA sites. However, the Council have invested in a number of initiatives to help improve air quality and the increase in the number of electric vehicles is promising and it will go some way in reducing air pollution from transport within the Borough.

Further population growth and the increasing need for new development is likely to generate further light pollution and enhanced intensification of lighting levels in certain areas of the Borough. Additional construction work as a result of development may also lead to more noise complaints.

5.6.3 Data Gaps

The impact of proposed growth on traffic resulting from the First Draft Local Plan will be modelled prior to the Final Draft Local Plan being completed. This will provide information on constraints and actions required with regards to transport infrastructure.

5.7 Climate Change

5.7.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Reliance on the petrol or diesel-fuelled private car as the main mode of transport;
- Greenhouse gas emissions need to be stabilised and reduced over time;
- 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;

- Need to promote the construction of energy-efficient buildings, and to support the installation of renewable and low or zero carbon technology;
- New developments need to minimise vulnerability and provide resilience to climate change; and
- Need to work with communities to help tackle climate change.

5.7.2 Future Evolution of the Baseline

Given the reliance on the private car as the main mode of transport within the Borough, ongoing increases of vehicle ownership, the lack of vehicles meeting emissions standards and the requirement for additional residential development, it could be considered likely that greenhouse gas emissions will rise in the future. However, there is the potential for advances in technological solutions and changes in policy to begin to stabilise and reduce emissions over time. Local policy reducing car-based development could affect this as could the increasing use of electric vehicles.

Despite this, the current estimates for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future given the timescales associated with climate change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

5.7.3 Data Gaps

Data from the BEIS was only available up until 2014. The 2017 release, which includes data up until 2015, did not provide data at local authority level.

5.8 Biodiversity

5.8.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Biodiversity generally remains under pressure nationally;
- Need to protect and enhance the wildlife and habitats in Watford;
- There is increasing pressure presented by invasive non-native species, which is expected to be exacerbated by climate change.
- 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;
- Consider and plan for the impacts of climate change on species and habitats;
- Need to support the delivery of the Green Infrastructure network in Watford; and

- There is a need to ensure that all residents have sufficient access to natural greenspace in order to enjoy the benefits of these assets.

5.8.2 Future Evolution of the Baseline

Pressure on biodiversity in the Borough is likely to increase with development required to meet housing targets. Climate change is also likely to exacerbate pressure on habitats and species as habitats become less suitable, and native species need to adapt to survive, in competition with invasive non-native species such as Japanese knotweed, Giant hogweed and Himalayan balsam are known to occur within Watford and are often left unmanaged. The management of non-native invasive species, facilitating the movement of species across the Borough and creating a network of natural greenspaces would help improve biodiversity and help species adapt to climate change.

5.8.3 Data Gaps

Data on habitats and species present within the Borough is not available on a Borough wide basis. It could be accessible on a site by site basis via studies undertaken to support planning applications.

It would be useful to have more up to date data on ANG within the Borough in order to determine whether deficiency in access exists.

5.9 Cultural Heritage

5.9.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Ensure that the Conservation Areas, heritage assets and features are preserved or enhanced, including identified 'Heritage at Risk';
- New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy;
- 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;
- Traffic management and the impacts of traffic on amenity have been raised as issues within the Conservation Area Action Plans;
- Heritage assets should be managed to sustain their significance;
- Ensure that everyone is able to participate in understanding and sustaining their local historic environment;
- There is a perceived lack of distinctiveness within the Borough; and

- The Borough needs to develop more of a distinctive cultural offer in order to compete amongst the broader cultural dynamism of London.

5.9.2 Future Evolution of the Baseline

Continual growth in the Borough and the increasing demand for housing, may well mean development could encroach on Conservation Areas and could negatively affect townscape and heritage assets. Continued investment in culture within the Borough will help Watford better compete with the surrounding boroughs as well as London.

5.9.3 Data Gaps

No data gaps have been identified.

5.10 Landscape & Townscape

5.10.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Green Belt in the surrounding sub-region constrains development to existing urban areas in Watford but provides important Green Infrastructure functions;
- 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
- 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.

5.10.2 Future Evolution of the Baseline

There has been a trend for inconsistent changes to landscape character to take place which may well continue if there is no strategic strategy in place which is enforced through Development Management.

Green Belt will continue to provide separation between urban areas within the sub-region whilst constraining the built area in Watford. The Green Belt areas also provide important Green Infrastructure functions.

Opportunities exist to improve the public realm in some parts of the town centre; however, these may not come forward without planning policy intervention or developer contributions.

The risk of character degradation in parts of the Borough will continue without planning intervention to guide development to reinforce local character.

5.10.3 Data Gaps

No data gaps have been identified.

5.11 Soils & Geology

5.11.1 Key Sustainability Issues

- 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.
- There is a need to protect soils and underlying aquifers from pollution.
- Most of the Borough is covered by a Minerals Safeguarding Area.
- 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.

5.11.2 Future Evolution of the Baseline

Due to past activities, contaminated land may be present within the Borough which may require remediation when development proposals come forward.

Underlying aquifers will continue to be vulnerable to pollution and will require protection.

5.11.3 Data Gaps

No data gaps have been identified.

5.12 Water

5.12.1 Key Sustainability Issues

- Properties in the Lower High Street, Water Lane and Bushey Mill areas are at risk from fluvial and surface water flooding¹², whereas properties in the Kingsfield Road and Cedar

¹² Watford Borough Council Level 2 Strategic Flood Risk Assessment, 2014 (Produced by AECOM)

Road, Oxhey and Molteno Road areas are the most prone to groundwater flooding within the Borough.

- There is a need to promote flood resistance and resilience measures for properties at risk from flooding.
- Increasing population will put additional strain on already stressed water resources and waste water infrastructure.
- New development will need to incorporate sustainable drainage systems to sustainability reduce flood risk.

5.12.2 Future Evolution of the Baseline

The increases in population will drive further water demand in the Borough and place increasing strain, on the already stressed water resources and wastewater infrastructure. Development could result in the loss of green spaces to hardstanding surfaces. This will reduce water infiltration, increase surface runoff and subsequently increase the risk of flooding, unless sustainable urban drainage solutions are adopted. Taking predicted rainfall patterns into account and the future effects of climate change, it could be assumed that there will be an increase in areas subjected to flooding.

5.12.3 Data Gaps

Specific water quality data for the stretches of the Grand Union Canal, River Colne and the River Gade within the Borough could not be sourced. A Water Cycle Study for the South West Hertfordshire Councils is currently in preparation and will be reviewed when it is available.

Up to date water consumption data for the Borough will be used to update the SA baseline when available from either the Water Cycle Study or Affinity Water.

5.13 Waste

5.13.1 Key Sustainability Issues

- The amount of household waste produced is on the rise;
- Recycling should be encouraged through planning and development; and
- There is a need to minimise the impact of municipal waste management on the Borough's environment.

5.13.2 Future Evolution of the Baseline

With the increasing population it is likely that the amount of waste produced will continue to rise. The council have set an achievable target of 50% of waste to be reused, recycled or composted by 2020. Continued work with the Hertfordshire Waste Partnership may help the Borough meet this target.

5.13.3 Data Gaps

No data gaps have been identified.

6 Findings of the Appraisal of Alternatives

6.1 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 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 the table.

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.

6.2 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 the following Table 6.1. The tables only describe the potential significant effects; the options may also result in potential minor negative or minor positive effects. Full details on the assessment are contained in the main body of the SA of Strategic Options Report produced in June 2018¹³. 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.

¹³ Sustainability Appraisal of Strategic Options Report June 2018 accessed via WBC's website:

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

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
Housing Development (Questions 4 and 5)	
<p>Option 1: Building more flats, especially in taller buildings at key locations.</p>	<p>This option could lead to potential significant positive effects on the efficient use of land (SA16), sustainable patterns of development (SA7) and access to facilities and sustainable transport modes (SA3).</p> <p>This policy option could have a potential significant negative effect on light pollution (SA9) because taller buildings are likely to contribute to existing light pollution unless controlled. An uncertain effect is identified in relation to SA13 (maintain and enhance historic and cultural assets). It could be beneficial to provide development in tall buildings if they do not affect any heritage assets but if the tall buildings are near to Conservation Areas or other assets, they could negatively affect their character and/or settings.</p>
<p>Option 2: When opportunities arise redeveloping existing residential areas with more homes than they currently support (intensification).</p>	<p>The assessment mainly identifies potential minor negative and positive effects. The option could support local businesses but place pressure on existing facilities.</p> <p>A potential uncertain effect was also identified with regards to Borough's contribution to climate change (SA10) as the option provides opportunity for the delivery of more energy-efficient homes, but redevelopment could be resource intensive. Due to the unknown location of the development, other potential uncertain effects have been identified in relation to historical and cultural assets (SA13), revitalising the town centre (SA15), and delivery of more sustainable patterns of development (SA7).</p>
<p>Option 3: Building on some of our open spaces or green belt where these are of low quality and poorly used.</p>	<p>This option would result in the development of green spaces and therefore the assessment has identified potential significant negative effects on biodiversity (SA12), SA14 (landscape and townscape) and the efficient use of land (SA16). Due to the unknown location of development uncertain effects were identified in relation to historical and cultural assets (SA13), revitalising the town centre (SA15) and delivery of more sustainable patterns of development (SA7).</p>

<p>Option 4: Working with neighbouring councils to see if some of our housing need can be met outside the Watford Borough boundary.</p>	<p>The assessment mainly identifies minor positive and negative effects. Uncertainty is identified in relation to SA8 (air quality) and the contribution to climate change (SA10). Locating residents further away from the Borough may lead to residents travelling further to access facilities and services in Watford and contributing further to air quality issues. However, this is dependent upon the location of development, as they may be near to sustainable transport modes and facilities and services outside of the Borough.</p> <p>Maintaining historic and cultural assets (SA13), the efficient use of land (SA16) and the delivery of sustainable patterns of development (SA7) have been identified as being uncertain, as they are dependent upon the sites identified for development.</p>
<p>Affordable Housing (Questions 6 and 7)</p>	
<p>Option1: The Council continues to prioritise affordable housing onsite when new housing development comes forward.</p>	<p>Option 1 performed more strongly than option two as it provides more confidence that affordable housing will be delivered as part of developments. A potential significant positive effect was identified in relation to ensuring that everyone has access to good quality housing (SA4).</p>
<p>Option 2: The Council encourages developers to make a financial contribution that can be used to provide affordable housing on other sites in the Borough</p>	<p>An uncertain effect is identified in relation to health and wellbeing (SA5) because this option would not allow integration of affordable housing with market housing.</p>
<p>Types of New Housing (Question 9)</p>	
<p>Option 1: Focus on delivering mainly flats.</p>	<p>Potential significant positive effects have been identified in relation to the efficient use of land (SA16) because flats offer the potential to maximise housing delivery, whilst making efficient use of development plots.</p> <p>Uncertain effects are also identified for SA10 (Reduce the Borough's contribution to climate change) and SA13 (To maintain and enhance historic and cultural assets).</p>

<p>Option 2: Focus on delivering mainly family sized flats.</p>	<p>Like Option 1, a potential significant positive effect has been identified in relation to the efficient use of land (SA16). The assessment identified that flats may not be the appropriate style of housing to meet the needs of all of the Borough's residents, but family sized flats may offer additional internal and external space when compared to Option 1.</p> <p>Uncertain effects are also identified for SA7 (To deliver more sustainable patterns of development), SA8 (air quality), SA10 (Reduce the Borough's contribution to climate change) and SA 13 (to maintain and enhance historic and cultural assets).</p>
<p>Option 3: Focus on delivering mainly small houses.</p>	<p>Due to the unknown location of development, the assessment identifies uncertainty with regards to delivering more sustainable patterns of development (SA7), the maximisation of previously developed land (SA16), maintaining and enhancing historic and cultural assets (SA13) and the conservation and enhancement of the landscape and townscape (SA14). The effect on the contribution to climate change (SA10) and the encouragement of healthy lifestyles and improving quality of life for local residents (SA5) and has also been identified as uncertain. This will depend on the type and design of development, for example, the amount of outside space incorporated and the provision of walking and cycling access.</p>
<p>Option 4: Focus on delivering mainly family sized housing.</p>	<p>Due to the unknown location of development, the assessment identifies uncertainty with regards to delivering more sustainable patterns of development (SA7), the maximisation of previously developed land (SA16), maintaining and enhancing historic and cultural assets (SA13) and the conservation and enhancement of the landscape and townscape (SA14). The effect on the contribution to climate change (SA10) and the encouragement of healthy lifestyles and improving quality of life for local residents (SA5) and has also been identified as uncertain. As for Option 3, this will depend on the type and design of development.</p>
<p>Option 5: Deliver a mix of different housing types.</p>	<p>The assessment identified potential significant positive effects in relation to the provision of good quality housing to meets the needs of local residents (SA4). This option works positively towards ensuring housing needs are met and provides flexibility to delivery different types of housing, suitable for all.</p> <p>Due to the unknown location of development, the assessment identifies uncertainty with regards to delivering more sustainable patterns of development (SA7), the maximisation of previously developed land (SA16), maintaining and enhancing historic and cultural assets (SA13) and the conservation and</p>

	enhancement of the landscape and townscape (SA14). The effect on the contribution to climate change (SA10) and the encouragement of healthy lifestyles and improvement quality of life for local residents (SA5) and has also been identified as uncertain. As for Options 3 and 4 this will depend on the type and design of development.
Housing for an Aging Population (Questions 12 and 13)	
Option 1: Deliver purpose-built retirement homes.	A potential uncertain significant positive effect has been identified in relation to the encouragement of healthy lifestyles and improvement of the quality of life for local residents (SA5). Purpose built retirement homes may provide opportunities for residents to be more sociable and physically active, encouraging healthier lifestyles. However, this would depend on the type of development delivered. Uncertain effects are also identified for access to essential services and facilities (SA3) and delivering more sustainable patterns of development (SA7).
Option 2: Ensure new homes are adaptable for all ages to live in.	Potential significant positive effects have been identified with regards to SA5 (encouragement of healthy lifestyles and improvement of the quality of life for local residents) and SA4 (ensuring quality housing for all). This option has the potential to deliver homes that are adapted to suit varying needs such as older residents, families and shared homes. Homes that are adaptable to suit a variety of needs could assist in maintaining independence, integration within the community and provide a better quality of life. Uncertain effects are also identified for access to essential services and facilities (SA3) and delivering more sustainable patterns of development (SA7).
Employment (Question 14)	
Option 1: Continue to protect existing employment areas from redevelopment to other uses such as housing.	Significant positive effects have been identified in relation to SA1 (achieving sustainable levels of prosperity and growth) because protecting employment spaces will help to support existing businesses and may also attract inward investment and encourage new businesses start-ups. This option could contribute to providing job security but may not necessarily create more job opportunities.

<p>Option 2: Do not protect existing employment areas from redevelopment to other uses such as housing.</p>	<p>Potential significant negative effects have been identified in relation to SA1 (achieving sustainable levels of prosperity and growth) and SA2 (generation of employment opportunities), because the loss of employment areas to housing developments will not help to secure sustainable levels of economic growth and could result in the loss of jobs.</p> <p>Uncertain effects have been identified with regards to SA13 (maintain and enhance historic and cultural assets) and SA15 (revitalising the town centre), due to the uncertainty of development locations.</p>
<p>Tall Buildings (Question 17)</p>	
<p>Option 1: Allow tall buildings to be built anywhere in Watford.</p>	<p>This policy option could result in a significant positive effect on both SA1 (achieving sustainable levels of prosperity) and SA16 (maximising the use of previously developed land).</p> <p>Significant negative effects have been identified with regards to SA5 (encouraging healthy lifestyles) and SA14 (conservation and enhancement of the landscape and townscape). Taller buildings are unlikely to provide health benefits and may also impact negatively on existing neighbourhoods causing overshadowing, effecting the setting of nearby neighbourhoods, as well as creating micro-climates. Allowing tall buildings to be develop anywhere in the Borough will alter both the townscape and landscape. An uncertain significant negative effect has been identified for light and noise pollution (SA9) as tall buildings are likely to contribute further to the issue. However, there is some uncertainty because impacts on residents from noise sources would depend on the location of development. This option could allow tall buildings to be built away from key transport hubs and facilities, and may not provide a close integration of housing, jobs and services.</p>
<p>Option 2: Do not allow any more tall buildings in Watford.</p>	<p>A potential uncertain significant negative effect is identified in relation to ensuring sustainable prosperity (SA1). It is uncertain whether not allowing tall buildings in the Borough could negatively affect the local economy.</p> <p>New developments have the potential to enhance townscape in certain parts of the Borough and by not allowing tall buildings this option could result in land being developed which is less sustainably located or more environmentally constrained. Uncertain effects are therefore identified for SA7 (sustainable patterns of development) and SA12 (biodiversity).</p>

	Potential uncertain effects have also been identified with regards access to delivering good quality housing (SA4), maintaining and enhancing historical and cultural assets (SA13) and making optimal use of previously developed land.
Option 3: Allow tall buildings if the suitability of each is considered on a case by case basis.	The assessment of this option identifies a potential significant positive effect in relation to maximising the use of previously developed land (SA16). This option has the potential to concentrate development near transport nodes and the town centre. By considering the suitability of developments on a case by case basis there is potential for potential negative effects to be avoided or minimised.
Option 4: Identify which parts of the Borough where tall buildings are acceptable.	The potential effects of this option are similar to those of Option 3. This option provides control with regards to land use planning and greater certainty for developers. It could also be used to enhance the townscape of particular parts of the Borough (e.g. Clarendon Road) and could result in business clusters and therefore a potential significant positive effect is identified in relation to SA1 (achieving sustainable levels of prosperity) as well as for SA16 (maximising the use of previously developed land).
Transport (Questions 19, 23 and 24)	
Option 1: A 20mph speed limit on all residential roads.	A potential significant positive effect is identified in relation to SA5 (healthy lifestyles and quality of life). 20 mph speed limits on residential roads is likely to improve road safety in the Borough. An uncertain effect has been identified in relation to SA8 (air quality), because there is some evidence that suggests that reduced traffic speeds can help to improve air quality.
Option 2: Congestion charging in the most congested areas.	The assessment of this option has identified potential significant positive effects in relation to air quality (SA8), delivering sustainable levels of development (SA7) and reducing the Borough's contribution to climate change (SA10). This option discourages the use of private vehicles, reducing the number of vehicles on the Borough's roads and subsequently reducing the levels of greenhouse gas emissions and air pollution.
Option 3: Improving the quality and continuity of walking and cycling routes.	The assessment of this option has identified potential significant positive effects relating to SA5 (health and wellbeing), SA7 (delivering sustainable levels of development), SA8 (air quality) and SA10 (reducing the Borough's contribution to climate change). This option is likely to see an increased uptake of cycling and walking, providing health benefits to the Borough's residents, as well as reducing the number of

	private vehicles on the Borough's roads and reducing air pollution. Greater walking and cycling continuity should make the Borough more connected, facilitating walking and cycling to key facilities within Watford, including the town centre.
Option 4: Increasing the frequency of buses and providing priority bus lanes.	The assessment of this option has identified potential significant positive effects for air quality (SA8), delivering sustainable levels of development (SA7) and reducing the Borough's contribution to climate change (SA10). The option works towards reducing the number of private vehicles on the Borough's roads and subsequently reducing the levels of greenhouse gas emissions and air pollution within the Borough. Increasing the frequency of buses and providing priority bus lanes will make bus journeys quicker, encouraging greater bus patronage.
Option 5: Creating better access to the railway networks.	The assessment of this option has identified potential significant positive effects relating to SA7 (delivering sustainable levels of development), SA8 (air quality), and SA10 (reducing the Borough's contribution to climate change). Creating better access to public transport will help to reduce the number of private vehicles on the road and allow greater choice regarding transport modes.
Option 6: In new developments, prioritise walking, cycling and public transport over access by private vehicles	The assessment of this option has identified potential significant positive effects relating to SA7 (delivering sustainable levels of development), SA5 (health wellbeing and quality of life), SA8 (air quality), and SA10 (reducing the Borough's contribution to climate change). This option is likely to see an increased uptake of cycling and walking, providing health benefits to the Borough's residents, as well as reducing the number of private vehicles on the Borough's roads and subsequently reducing the levels of greenhouse gas emissions and air pollution.
Option 7: Deliver car-free neighbourhoods in areas where there is good access to other types of transport (e.g. new developments with no car parking)	The assessment of this option has identified potential significant positive effects relating to SA7 (delivering sustainable levels of development), SA5 (health wellbeing and quality of life), SA8 (air quality), SA10 (reducing the Borough's contribution to climate change) and SA3 (access to services and facilities). This option is likely to see increased uptake in cycling and walking, providing health benefits to the Borough's residents as well as improved street safety. Introducing car free neighbourhoods would help reduce reliance on private vehicles as well as improving air quality within these neighbourhoods.

	<p>A potential uncertain effect has been identified in relation to access to high quality housing (SA3). Not providing parking spaces in new developments may not be a suitable option for all the Borough's residents but may be attractive for others.</p>
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6.3 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 6.2 below and full details of the options assessed is provided in Table 1 in Appendix C. Each policy option has been considered against each of the SA Objectives and sub-objectives set out in the SA Framework (Table 2.2), and the effects are described in relation to the significance criteria (Table 2.3). A summary of the Policy Options Appraisal is provided within Table 2 of Appendix C and the full report can be made available on request.

Table 6.2: Policy Options Assessed	
Topic Paper	Policy Option
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)

Table 6.2: Policy Options Assessed	
Topic Paper	Policy Option
	Non-Designated Employment Sites (options 1 & 2)
	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 summarised above to inform decisions regarding the preferred options being developed into First Draft Local Plan policies. Table 3 within Appendix C 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. The SA findings for the First Draft Local Plan policies are presented in the following section.

7 SA Findings of the First Draft Local Plan Policies

7.1 Introduction

This section describes the SA findings of the 11 strategic policies and 39 thematic policies which have been developed for the First Draft Local Plan. The policies have been assessed in groups, by chapter and the findings are therefore summarised by chapter, as follows:

- Chapter 2 – Spatial Strategy for Achieving Sustainable Development (Policies SD2.1-SD2.11)
- Chapter 3 – Supporting Sustainable Transport (Policies ST3.1-ST3.3)
- Chapter 4 – Housing (Policies H4.1-H4.9)
- Chapter 5 – Building a Strong and Competitive Economy (Policies E5.1-E5.3)
- Chapter 6 – Tackling Climate Change, Adaptation and Resilience (Policies CC6.1-CC6.2)
- Chapter 7 – Quality Design and Conserving and Enhancing the Historic Environment (Policies DC7.1-DC7.9)
- Chapter 8 - Conserving and Enhancing the Natural Environment (Policies NE8.1 – NE8.6)
- Chapter 9 - Ensuring the Vitality of Town and Local Centres and Providing Communities with Facilities and Services (Policies V9.1 -V9.7)

The exception is the site allocation policies (Policy 4H.1 Allocated Housing Sites for Delivery and Policy E5.1 Designated Employment Sites) which have been assessed separately and are presented after the policies listed above in Sections 7.10 and 7.11 below. This is because these two policy assessments have been informed by the potential effects of the allocation sites.

The SA matrices prepared during the assessment of each chapter and for the allocation policies are presented in Appendix D. For the specific housing and employment site allocations within Policies H4.1 and E5.1, GIS data was used to do a RAG assessment the methodology for which is described in Section 2.3.5 of this report. The results of the assessments of Policies H4.1 and E5.1 are also presented in Appendix D along with the supporting RAG assessment. The assessments are also described below.

7.2 Spatial Strategy for Achieving Sustainable Development (Chapter 2)

Table 7.1 below summarises the SA scores for the direct effects of the eleven policies in Chapter 2 of the First Draft Local Plan. Cumulative effects related to these policies are also reported on below.

Table 7.1	SA Objective																		
Chapter 2: Spatial Strategy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+	++	+	-	+	+	+	+/-	+	+/-	+	++	++	++	++	+/-	+/-	+/-

No potential significant negative effects have been identified for the implementation of the Spatial Strategy policies of the First Draft Local Plan.

SA3: A potential significant positive effect has been identified for this SA objective following the implementation of the Spatial Strategy policies, as this chapter is expected to improve the rail, cycle and walking networks throughout the Borough. New development is also focused within areas of high sustainability, which should help to ensure that all new developments have access to essential facilities and services. This chapter should help in the achievement of all sub-objectives; thus, a potential significant positive effect has been recorded.

SA4: With regards to cumulative effects, the Spatial Strategy chapter of the Local Plan is expected to result in a significant positive cumulative effect on the provision and quality of housing within Watford. Both chapters 2 and 4 aim to increase the number of dwellings within the Borough, and Chapter 4: Housing, also specifies affordability and mixed tenure requirements for newly built dwellings. Therefore, a potential significant positive cumulative effect has been identified for SA4.

SA5: The proposed increase in the number of dwellings within the Borough could lead to a shortage of areas for recreation and sports facilities. The provision of such facilities is not detailed within this chapter, hence there is potential for an indirect negative cumulative effect to occur.

SA12: There is potential for a significant positive cumulative effect on biodiversity, arising from the implementation of this chapter (specifically, policy SD2.5) in combination with Chapter 8: Conserving and Enhancing the Natural Environment. Both aim to decrease the impact of development on green spaces (and therefore biodiversity) within WBC, as well as enhance the Blue and Green Infrastructure networks where possible. Hence, a potential significant positive cumulative effect has been identified.

SA13: A potential significant positive cumulative effect has been identified for SA13. Local heritage assets are highlighted as requiring protection from development and enhancement in all areas of the Borough. This should help to not only conserve these assets but increase appreciation for them. Therefore, a potential positive effect has been identified.

SA14: A potential significant positive effect has been identified for SA14, due to the implementation of the Spatial Strategy chapter helping to meet most of the sub-objectives. Quality of life should be improved through the improvement of local character, distinctiveness and access to services. The townscape of Watford Borough should also be improved by the tailored approach of the Special Area Policies, which aim to guide development closely within certain Borough areas, such as Bushey Arches. For these reasons, a potential significant positive effect has been identified.

SA15: Policy SD2.9 with Chapter 2: Spatial Strategy, aims to increase the vitality of the Town Centre Strategic Development Area. This will be achieved through retaining and redeveloping the current primary frontage in ground floor spaces of the area, thus ensuring a vibrant Town Centre remains. For this reason, a potential significant positive effect has been identified.

SA16: A potential significant positive effect has been identified for SA16 in relation to Chapter 2: Spatial Strategy. This chapter focuses development on brownfield sites and encourages a high density of development. This should help to increase land use efficiency. For these reasons, a potential significant positive has been recorded for SA16.

7.3 Supporting Sustainable Transport (Chapter 3)

Table 7.2 below summarises the SA scores for the direct effects of the eleven policies in Chapter 3 of the First Draft Local Plan. Cumulative effects are related to these policies are also reported on below.

Table 7.2	SA Objective																		
Chapter 3: Sustainable Transport	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+/-	+/-	++	+/-	++	+/-	++	++	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

No potential significant negative effects have been identified for the implementation of the policies within Sustainable Transport chapter of the First Draft Local Plan.

SA3: A potential significant positive effect is predicted for this objective as the policies support the provision of sustainable transport infrastructure (e.g. secure cycle parking) which will improve accessibility and connectivity for residents to local facilities and services. It also encourages cycling and walking as an alternative travel option to using a private vehicle. The policies are also considered likely to have positive cumulative effects by reducing air quality effects through the reduction of vehicle emissions.

SA5: A potential significant positive effect is predicted for this objective as the policies collectively promote the use of sustainable transport i.e. walking and cycling and the use of public transport

as an alternative travel option to a private vehicle. This will encourage healthier lifestyles and help improve quality of life for local residents. Policy ST3.1 specifically requires provision of on-site cycle parking facilities and sets clear criteria all development proposals have to meet. The policies are also considered likely to have positive cumulative effects by reducing air quality effects through the reduction of vehicle emissions.

SA7: A potential significant positive effect is predicted as the policies collectively promote the use of sustainable modes of transport as well as to reduce the reliance on private vehicles. Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles requires all development proposals to provide ready-to-use parking spaces for electric vehicles as well as meeting the car parking standards. The policies are also considered likely to have positive cumulative effects by reducing air quality effects through the reduction of car use and vehicle emissions.

SA8: The policies aim to promote and support the provision of sustainable transport infrastructure to reduce car use which is likely to help minimise air pollution. It is therefore considered to have significant positive effects for this objective and is also likely to have positive cumulative effects by reducing air quality effects.

7.4 Housing (Chapter 4)

Table 7.3 below summarises the SA scores for the direct effects of the eleven policies in Chapter 4 of the First Draft Local Plan. Cumulative effects are related to these policies are also reported on below.

Table 7.3	SA Objective																		
Chapter 4: Housing	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+/-	+	++	++	+	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-

No potential significant negative effects have been identified for the implementation of the Housing chapter of the First Draft Local Plan.

SA1: It is considered that this policy, when implemented, is likely to have significant positive indirect cumulative effects, as it will enable appropriate mixed-use developments to occur which could generate economic growth and promote inward investment.

SA4: Potential significant positive effects are predicted for all the housing policies as they individually or collectively:

- allocate sites for housing;
- stipulate the housing mix required for all sites across the borough;

- set out the requirements to provide affordable homes;
- encourage redevelopment of under-used garage sites;
- set out requirements to meet the growing need for accessible and adaptable homes for an ageing population;
- support for self-build and custom housebuilding and residential conversions; and
- set out what is acceptable in relation to proposals for houses in multiple occupation.

It is also considered that this policy when implemented is likely to have significant indirect cumulative beneficial effects as it will enable appropriate housing developments to occur which combined together will help ensure everyone in the borough has access to good quality housing.

SA5: A potential significant positive effect is predicted for Policies H4.5 and H4.6 for this objective as they promote accessible and adaptable homes for an ageing population. These set out design requirements for elderly people and those with disabilities and dementia with the aim for elderly people to be able to retain a good quality of life and continue to be active within the community.

SA16: Potential significant positive effects are predicted for Policies H4.1, H4.4, H4.7, H4.8 and H4.9 for this objective. The policies ensure the maximum use of previously developed land and buildings and the efficient use of land particularly through encouraging high-density development.

7.5 Building a Strong and Competitive Economy (Chapter 5)

Table 7.4 below summarises the SA scores for the direct effects of the eleven policies in Chapter 5 of the First Draft Local Plan. Cumulative effects are related to these policies are also reported on below.

Table 7.4	SA Objective																		
Chapter 5: Economy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	++	++	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	++	+/-	+/-	+/-

No potential significant negative effects have been identified for the implementation of the Economy chapter of the First Draft Local Plan.

SA1: Potential significant positive effects are predicted for these policies as they seek to strengthen the borough's employment offer as well as to ensure the right type of employment use is available in the right places.

It is also considered that these policies when implemented are likely to have significant indirect cumulative beneficial effects as they will enable appropriate employment sites to be developed out in the borough which combined together, will help promote and support economic growth and diversity in the borough.

SA2: Potential significant positive effects are predicted for these policies as they promote and support increased provision of employment floorspace in the borough which will help support job creation.

It is also considered that these policies when implemented are likely to have significant indirect cumulative beneficial effects as they will enable appropriate employment sites to be developed out in the borough which combined together, will help increase the number of jobs in the borough.

SA16: Potential significant positive effects are predicted for these policies as they support increased provision of employment land in the borough but also the increased intensification of employment floorspace through the efficient use of land and buildings.

7.6 Tackling Climate Change, Adaptation and Resilience (Chapter 6)

Table 7.5 below summarises the SA scores for the direct effects of the eleven policies in Chapter 6 of the First Draft Local Plan. Cumulative effects are related to these policies are also reported on below.

Table 7.5	SA Objective																		
Chapter 6: Climate	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	++	++	+	+/-	+/-	+/-	+/-	++	++	+/-

No potential significant negative effects have been identified for the implementation of the Climate Change chapter of the First Draft Local Plan.

SA10: A potential significant positive effect is predicted for Policy CC6.1 as the policy sets requirements that new proposals have to meet in terms of sustainable construction and design through for example energy efficiency, water efficiency and overheating. The policy also requires residential proposals for 5 or more units and/or non-residential proposals for 1000sqm+ to provide a Sustainability Statement.

It is also considered that the policy when implemented is likely to have positive cumulative effects in relation to other projects and plans if they work in combination together to ensure new development is more energy-efficient.

SA11: Potential significant positive effects are predicted for both policies which promote sustainable design and construction as well as resilience issues including overheating and flooding. Policy CC6.2 Flooding and Resilience sets an expectation for the treatment of surface water flood risk and establishes the requirements for sustainable urban drainage systems.

It is also considered that the policies when implemented are likely to have positive cumulative effects in relation to other strategic plans and other projects by ensuring that development is appropriately flood resistant and resilient.

SA17: A significant positive effect is predicted for Policy CC6.1 for this objective as the policy promotes water efficiency including water saving measures and requires proposals to provide a Sustainability Statement to show how they comply with this policy. The policy also encourages all residential development to be designed to achieve water consumption rates of 110 litres or less per person per day.

SA18: A significant positive effect is predicted for Policy CC6.2 for this objective as the policy sets out a requirement for a site-specific flood risk assessment for all development in Flood Zones 2 and 3. It also sets out expectation for the treatment of surface water flood risk and establishes the requirements for sustainable urban drainage systems.

It is also considered that the policy when implemented is likely to have positive cumulative effects in relation to other strategic plans and other projects by ensuring that development is appropriately flood resistant and resilient.

7.7 Conserving and Enhancing the Historic Environment (Chapter 7)

Table 7.6 below summarises the SA scores for the direct effects of the eleven policies in Chapter 7 of the First Draft Local Plan. Cumulative effects are related to these policies are also reported on below.

Table 7.6	SA Objective																		
Chapter 7: Heritage and Design	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+/-	+/-	+/-	+	+	+	+	+/-	+/-	+	?	+/-	?	++	+	++	+/-	+/-	+

SA14: A potential significant positive effect is predicted for the policies collectively as they aim to encourage high quality design making urban areas more attractive to live whilst also protecting and enhancing the borough's townscape and local sensitive landscapes.

SA16: A potential significant positive effect is predicted for Policy DC7.4 for this objective as it promotes proposals for taller buildings of 6 storeys or higher and sets out key design requirements to be complied with.

SA11: It is uncertain how much the policies particularly in relation to building design will support this objective. Mitigation is recommended to strengthen the wording of the policy to consider climate change resilience more.

SA13: It is uncertain how much the policies will fully support this objective as they allow for loss (whole or part) of an asset in exceptional circumstances as well as positively protecting heritage assets which makes the effect an uncertain one.

7.8 Conserving and Enhancing the Natural Environment (Chapter 8)

Table 7.7 below summarises the SA scores for the direct effects of the eleven policies in Chapter 8 of the First Draft Local Plan. Cumulative effects are related to these policies are also reported on below.

Table 7.7	SA Objective																		
Chapter 8 Environment	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+/-	+/-	+/-	+/-	++	+/-	+/-	+	+	++	+	++	+/-	+	+/-	+/-	+/-	?	+/-

No potential significant negative effects have been identified for the implementation of the Environment chapter of the First Draft Local Plan.

SA5: A potential significant positive effect is predicted for the green and blue infrastructure and open space related policies as they promote provision of enhanced access to open spaces and to sporting and recreational facilities. This will encourage healthier lifestyles and improve quality of life to local residents.

SA10: Potential significant positive effects are predicted for Policies NE8.1 and NE8.4 as they promote and protect green infrastructure which helps to mitigate the effects of climate change, such as flooding and the overheating of the built-up areas.

SA12: Potential significant positive effects are predicted for Policies NE8.1, NE8.2, NE8.3 and NE8.4 which protect and enhance green and blue infrastructure but also set out the requirements new developments are expected to provide in terms of new open space and biodiversity net gain.

There is also considered likely to be positive cumulative effects on biodiversity as a result of the number of policies seeking to protect and enhance biodiversity.

SA18: An uncertain effect is predicted for Policy NE8.1 for this objective as the policy wording does not make the link between how green infrastructure can also inform strategies to mitigate flooding. Recognition of this is made in the supporting text to the chapter for this policy so it is recommended that the policy is enhanced to emphasis the positive effects green infrastructure can have to mitigate flooding.

7.9 Ensuring the Vitality of Town and Local Centres and Providing Communities with Facilities and Services (Chapter 9)

Table 7.8 below summarises the SA scores for the direct effects of the eleven policies in Chapter 9 of the First Draft Local Plan. Cumulative effects are related to these policies are also reported on below.

Table 7.8	SA Objective																		
Chapter 9: Facilities	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+/-	++	+/-	++	+/-	++	+/-	+/-	+/-	+/-	+/-	++	+/-	++	+	+/-	+/-	+/-

No potential significant negative effects have been identified for the implementation of the Chapter 9 of the First Draft Local Plan.

SA3: Potential significant positive effects are predicted for Policies V9.5 and V9.7 for this objective as they seek to protect existing cultural and community facilities and promotes the provision of new community facilities where they are located in sustainable, accessible locations within or close to an identified local centre. These include provision of educational facilities, wayfinding and sustainable transport.

SA5: Potential significant positive effects are predicted for Policies V9.5 and V9.7 for this objective as they seek to protect existing cultural and community facilities and promotes the provision of new community facilities such as leisure and sports centres and on-site green infrastructure. The provision of good quality sports and recreational facilities and onsite green infrastructure will encourage healthy lifestyles and improve quality of life for local residents.

SA7: Potential significant positive effects are predicted for Policies V9.5 and V9.6 for this objective as they support the need for provision and expansion of digital infrastructure and future-proofed communications infrastructure, particularly broadband.

SA13: A potential significant positive effect is predicted for Policies V9.5 and V9.7 for this objective as they seek to protect existing community facilities such as arts buildings, local places of worship and other types of buildings where the function or use of the building is for cultural or religious needs of the local communities. This will help maintain and safeguard historic and cultural community assets. Policy V9.5 also promotes provision of new social infrastructure such as cultural centres and places of worship.

SA15: Potential positive significant effects are predicted for the policies collectively as they each protect or promote the provision of facilities, shops and infrastructure to meet the needs of the borough's growing population. If implemented this will continue the vitality of the town and local centres and promote sustainable urban living.

7.10 Housing Site Allocation: Policy H4.1 'Allocated Housing Sites for Delivery'

Table 7.9 below summarises the SA scores for Policy H4.1 'Allocated Housing Sites for Delivery', which is an individual housing site allocation policy found in Chapter 4 of the First Draft Local Plan. The assessment of policy H4.1 has been informed by the RAG ratings of each of the 37 housing and 13 mixed development sites. Scores are therefore a reflection of how the site allocation will help to achieve or conflict with the SA objectives.

Table 7.9	SA Objective																		
Policy H4.1	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+/-	+	?	?	-	+/-	+	+/-	-	+/-	+/-	--	--	+/-	+/-	--	+/-	-	?

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 forwards and therefore whether all sites developed will have good access to local services for residents. Therefore, an uncertain effect has been recorded for SA3.

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. First Draft 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.

SA12: Only 1 of the 50 proposed housing and mixed-use development sites is within 50m of a Local Nature Reserve.

Most sites are located on previously developed or partially previously developed land. However, sites H07, H09, H12, H16, H30 and H37 are located on greenfield land. Site H30 is located within 800m of Croxley Common Moor SSSI. Site H08 is located within 200m of Harebreaks Recreation Ground. Development of these sites could lead to the permanent and irreversible loss of green space; hence a potential significant negative effect has been identified for this SA objective.

SA13: Housing sites H15, H22 and H25 and mixed development sites MXD03, MDX05 and MXD13 are located within 50m or less of a locally or nationally important listed building. This could lead to the development of or damage to important historic assets, which could not be mitigated. For this reason, a potential significant negative effect has been identified for SA13.

SA16: Most sites are located on previously developed or partially previously developed land. However, sites H07, H09, H12, H16, H30 and H37 are located on greenfield land. Development of these sites would lead to the permanent and irreversible loss of greenfield land.

Development at site H02 could lead to the development of contaminated land. The site is currently a recycling facility for Waste Electrical and Electronic Equipment (WEEE). Development at this site may therefore require further assessment prior to development. Hence a potential significant negative effect has been identified for this SA objective.

SA19: Most sites are located within a sand and gravel safeguarding zone, therefore, the implementation of H4.1 could have negative effects on the reserves of exploitable mineral within Watford Borough. However, development here may have to be accepted as an inevitable effect of meeting local housing requirements, as much of the Borough is covered by this zone. This could have minor negative effects on SA19.

Site H02 is currently a Waste Electrical and Electronic Equipment (WEEE) recycling facility. It is unclear if development at this site would result in the loss of these facilities and the ability of the Borough to deal with the recycling currently carried out at the site.

Hence, an overall uncertain effect has been recorded for SA19.

7.11 Employment Site Allocation: Policy E5.1 'Designated Employment Sites'

Table 7.10 summarises the SA scores for Policy E5.1 'Designated Employment Sites' which is an individual employment site allocation policy found in Chapter 5 of the First Draft Local Plan. The assessment of policy E5.1 has been informed by the RAG rating of each of the three employment

development sites. The scores are therefore a reflection of how these sites will help to achieve or conflict with the achievement of the SA objectives.

Table 7.10	SA Objective																		
Policy E5.1	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	++	+	+/-	+/-	+/-	+	-	+/-	-	+/-	+/-	-	+/-	+/-	-	++	+/-	+/-	-

No potential significant negative effects have been identified for the implementation of the Economy chapter of the First Draft Local Plan.

SA1: Policy E5.1 directly aims to maintain existing employment space, as well as create new employment space within EMP1, EMP2 and EMP3. This should help to ensure businesses have the space required to establish and grow in central locations within Watford Borough. Class B uses are particularly promoted and protected through policy E5.1. For these reasons, a potential significant positive effect has been identified for SA1.

SA16: The implementation of policy E5.1 is expected to have a potential significant positive effect on SA16. All potential employment development sites are located on partially or fully previously developed land. Moreover, intensification of development sites is encouraged, and there is flexibility within the policy to allow for redevelopment of class B space where this is no longer in use. This should indirectly help to relieve development pressure on greenfield sites and increase land use efficiency. For these reasons, a potential significant positive effect has been identified.

8 Potential Inter-Plan Cumulative Effects

Potential cumulative effects which could result from the First Draft Local Plan policies have been identified within Section 8. The potential cumulative effects which could arise from the implementation of the First Draft Local Plan, working in combination with other local plans, programmes or projects is detailed within Table 8.1 below.

Plans, programmes or projects	Summary of cumulative effects of First Draft Local Plan development strategy with external plans, projects or policies
<p>Neighbouring Local Plans</p> <p><i>The adjacent authorities are Three Rivers, Hertsmere, and (minimally) St Albans, see Figure 3.1</i></p>	<p>Housing and employment growth are planned in the authorities immediately surrounding Watford, which may result in changes to existing travel patterns between Watford and neighbouring areas for work, services or leisure. Hertsmere¹⁴ is planning an average of around 50 houses per year in the Bushey area, the settlement closest to Watford; Three Rivers¹⁵ is projected to build an average of 180 homes a year, perhaps a third of which may abut the Watford council area.</p> <p>As the First Draft Local Plan aims to promote sustainable communities with improved access to a wider range of local jobs, housing, high quality service and facilities, no potentially negative cumulative effects have therefore been identified between the First Draft Local Plan and housing and economic growth within the neighbouring areas.</p> <p>Flooding: There is a potential minor negative cumulative effect from an overall increase in coverage of impermeable surfaces as a result of development, with potential impacts for flood risk and water cycle in the longer term. However, this is dependent on planning in adjacent areas; if comparable policies to those in the First Draft Local Plan are adopted, the cumulative impact on flood resistance and resilience may be neutral or even beneficial.</p> <p>It is noteworthy that a combined Strategic Flood Risk Assessment¹⁶ was created in 2018 for South West Hertfordshire, a combined Local Authority area which includes Watford, St Albans, and Three Rivers. However, the cumulative impact of this partly depends on future policies adopted in the adjacent areas, implying a synchronised approach to flood risk, which can be expected to the avoid of negative cumulative effects on flood risk.</p>

¹⁴ Hertsmere Core Strategy 2013: <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Development-Framework/Core-Strategy-DPD-2013.pdf>

¹⁵ Three Rivers Site Allocation Development Plan (Adopted November 2014): <https://www.threerivers.gov.uk/egcl-page/site-allocations-development-plan-document>

¹⁶ South West Hertfordshire Level 1 Strategic Flood Risk Assessment (October 2018): https://www.stalbans.gov.uk/Images/South%20West%20Hertfordshire%20Strategic%20Flood%20Risk%20Assessment%20-%20Report%20-%20Final%20Draft_tcm15-6

	<p>Greenhouse gas emissions: There are potential minor negative effects from development in Watford and neighbouring areas on greenhouse gas emissions from both a result of growth in transport and built development. Again, cumulative effects will depend on policies, notably around transport (see below), adopted in neighbouring areas.</p>
<p>Local Transport Plan</p>	<p>The Hertfordshire County Council's Local Transport Plan (LTP) (2018-2031) sets out various proposals regarding planned incremental improvements to roads, journeys and the cycling, rail and highway networks across Hertfordshire which could have potential positive significant cumulative effects on transport services and accessibility in Watford.</p> <p>These include the Watford North Curve, Metropolitan Line Extension (affecting Watford Junction and Watford High Street) and Station Upgrades (affecting Watford Junction). These proposals aim to improve three key corridors for which Watford is a part: Aylesbury-Watford-London; London-Watford-Luton-Milton Keynes; and Hemel Hempstead & Watford-St Albans-Harlow.</p> <p>Watford has also been designated by the Hertfordshire LTP as a Cycle Infrastructure Improvement Town.</p>
<p>Minerals and Waste Plans ¹⁷.</p>	<p>The Hertfordshire County Council's minerals and waste plans set out policies for minerals and waste planning in the county.</p> <p>Most of Watford Borough is covered by a minerals safeguarding zone. In addition, the Orphanage Road Goods Yard concrete batching plant within Watford Borough has permanent planning permission that safeguards it from development, however, there are no sites identified within Watford for minerals workings. Although the Orphanage Road Goods Yard batching plant could pose a constraint to development in this area, no potential cumulative effects have been identified in relation to the Minerals Plan.</p> <p>The waste plan makes provision for a network of waste management facilities in Hertfordshire that drive waste management practices up the waste hierarchy and are sufficient to provide adequate capacity for existing and future waste arisings within the county and for any agreed apportionment for waste arisings from outside the county. There are currently no waste management facilities within Watford Borough, however, Watford falls within a wider area of search for a new organic waste recovery facility. Should proposals come forward for such a facility within or close to Watford Borough, project-level Environmental Impact Assessment (EIA) will determine whether potential cumulative effects could arise with existing or planned development within Watford. Mitigation for any potential negative or uncertain cumulative effects would be put forward within an EIA.</p> <p>No potential cumulative effects have been identified in relation to local minerals and waste planning and the First Draft Local Plan.</p>

¹⁷ Hertfordshire Minerals and Waste planning policies: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/minerals-and-waste-planning.aspx>

9 Mitigation and Enhancement Measures Proposed

Mitigation has been put forward for potential significant negative effects and uncertain effects identified within the assessment of policies and the inter-plan cumulative effects assessment.

The potentially significant negative effects and uncertain effects identified in the assessments are listed in Table 9.1 along with the mitigation measures put forward to address them.

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, SD2.8, SD2.9, SD2.10, SD2.11	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 policies 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 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</p>

		<p>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 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.</p>
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.
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The assessment of the First Draft Local Plan has also suggested some enhancement measures in relation to policy E5.1:

- SA7: Development of sites EMP1 and EMP2 should be carefully considered. Improvements in public transport or cycle network links could be made prior to development, in order to mitigate for the poor access by transport links other than bus. This would mitigate the minor negative effect identified and could modify the potential effect to a minor positive effect.
- SA9: A noise impact assessment could help to identify and avoid potential noise related impacts from the development of sites EMP1 and EMP2. This may help to mitigate any negative noise effects.

11 Proposed Monitoring Framework

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.

Table 11.1: Proposed Monitoring Schedule	
Sustainability Theme	Monitoring Indicators
Transport	Financial contributions towards transport infrastructure improvements. Ratio of workplace- based employment to residence-based employment. Proportion of new housing developments within 400m of a bus stop/rail station, primary school. Peak time congestion and traffic count monitoring.

Table 11.1: Proposed Monitoring Schedule	
Sustainability Theme	Monitoring Indicators
	Public transport use monitoring.
Housing	Annual number of housing completions and percentage of annual targets/projections. Annual number of affordable dwellings delivered and percentage of target.
Economy	Employment land lost to other uses. Commuting trends.
Climate Change, Adaptation and Resilience	Renewable energy capacity installed by type. Domestic emissions per capita (tonnes). Number of strategic flood risk assessments undertaken. Applications granted contrary to Environment Agency advice. Net change in surface water run-off rates.
Built and historic environment	Conservation Area Assessments – Changes in character compared to previous assessments. Change in the number and condition of heritage assets 'at risk'. Community perception of changes to their settlements.
Natural Environment	Net loss / gain in priority habitats and local wildlife sites. Biodiversity enhancement secured through new development. Habitat Regulations Assessments undertaken. Development requiring compensation and % with appropriate schemes secured. Air quality monitoring. Achievement of water framework directive targets. Landscape character assessments undertaken.
Communities, towns and village centres	Vacancy rates in town and village centres. Net change in the amount of open space. Financial contributions to open space provision. Net loss / gain in community facilities. Health profile monitoring

12 Next Steps

This SA Report is being published for consultation with the First Draft Local Plan in September/October 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 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 12.1).

Table 12.1: Watford Local Plan Timetable	
Local Plan Activity	Timeframe
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