

# **Watford Borough Council**

Part 2 Local Plan-

Development Management

Policies Options

Proposed 1<sup>st</sup> Consultation

Version Sustainability Appraisal

Report

November 2013

**Appendix 4 Internal SA comments to first  
draft DM Options (June 2013)**

**Development Management Policies Sustainability Appraisal:  
Initial review comments on the Policy topics June 2013 by Kripa  
Dwarakanath, Halcrow.**

Note in all instances the “no plan” or “no additional policies” options are considered.

<b>Sustainable Development:</b>	<b>SA initial review comments</b>	<b>Watford Team comments</b>
<b>Water</b>		
Flood Risk	No comments	
Drainage	No comments	
Water Consumption	<p>Policy W3 on the document reads as Water Resources, but the topic Water consumption sounds more suitable; revision to the Policy document may be required.</p> <p>As the policy document is a long term document, flexibility in terms of revising the per capita consumption figure and water efficiency measures should be considered. This is to take into account possible revision to Water Cycle study figures, to accommodate integrated working for example with Thames Water who may introduce compulsory metering or similar measures that will affect consumption and to accommodate technological advancements, maybe something better than Green roofs will emerge during the plan period.</p>	
Protection and Restoration of River Corridors, Canals and Watercourses	No comments	
<b>Pollution and contamination</b>		
Unstable Land, Contaminated and potentially contaminated land	No comments; recommendations to strengthen the wordings may follow in our assessment	
Potentially Hazardous or polluting development	<p>You may want to add areas of biodiversity value explicitly, alongwith air, water and soil media. The recommendation must be viewed in the context that there is no separate policy on Biodiversity within the DM Policies. You may also want to include Natural England, RSPB and English Heritage to the list of typical external consultees.</p>	
<b>Groundwater</b>		
Groundwater protection (plus annex)	<p>The policy is supportive of maintaining ground water quality, but is not explicit about the quantity, although the explanatory text discusses quantity aspect.</p> <p>The EA is evolving methods to identify abstraction related quantity issues and</p>	

Sustainable Development:	SA initial review comments	Watford Team comments
	<p>may progress risk assessment methods more sophisticated than the current PRA within the plan period. Therefore in order to ensure that the policy works well in the future and to ensure integrated working with the EA, the policy may be reworded to suggest reference to most recent EA Guidance (at the time of application) is required. Similarly EA is now producing an update to the abstraction status in England which should become available in the future. This mapping exercise will indicate where abstraction should be refused or allowed having regard to ecological impact, fyi.</p>	
Groundwater & cemetery development	<p>Is this a separate policy or part of the above? The chapter does not indicate a separate policy box however text on approach to abstraction near cemeteries is available. If this is the policy wording, no comments.</p>	<p>No separate policy proposed at this stage – it was an alternative considered and deemed unnecessary as covered by other processes.</p>
<b>Amenities</b>		
Air Quality	<p>Consider including large construction projects with considerable construction period that can potentially alter the local air quality (especially within a AQMA).</p>	
Noise/ noise protection	<p>Similar comment to above- think about projects with longer construction periods; will rail projects and renewable energy projects be included in this policy? Think about Vibration issues alongwith Noise.</p>	
External Lighting	<p>Is this a good opportunity to encourage sensor based lighting design, or other innovative technology (similar to Pavegen) without compromising on safety standards?</p>	
<b>Waste</b>		
Waste (management)	<p>Policy wording may be further refined to make the distinction between operational and construction waste. At present the Policy (within the box) deals with operational waste only, although the supporting text mentions a requirement for the developers to demonstrate construction waste management.</p> <p>Unclear whether contents within the Policy box will have material</p>	

<b>Sustainable Development:</b>	<b>SA initial review comments</b>	Watford Team comments
	consideration (for planning applications), or the whole supporting text along with the box. If former, consider including construction waste item from the supporting text into the policy box.	
<b>Sustainable Design</b>		
Sustainable Design	Alternatives supplied address aspects of sustainability relating to buildings through CfSH and BREEAM ratings, which should cover most sustainability topics; while many non-building related developments may not be envisaged, there may be some value in adding reference to CEEQUAL, which will cover infrastructure projects	
Decentralised Energy	No gap/ issues identified	
Renewable Energy	Not clear why this is considered as an alternative option to SD 1 as the last part of the policy deals specifically with renewable projects, and SD 1 may not be suitable for such projects (BREEAM and CfSH may not be applicable rating systems for a district heating & cooling project). Suggestion is to keep this heading as a separate policy rather than as an option to SD1.	Note that this policy is an alternative to the Sustainable Design one, which is preferred.
<b>Town and Local Centres:</b>		
Restriction of non- retail uses in prime retail frontage	No comments	
Restriction of non retail uses in the INTU Watford (Harlequin Centre and Charter Place) –	No comments	
Restriction of non-retail uses within secondary retail frontage	Is mixed use (including residential use) not considered suitable for the Town centre (secondary areas)?	
A3 Hub Areas	No comments	
Policy to control use classes A3, A4 and A5	No comments	
Character Areas	Wondering whether TCP6 should form part of Site Allocations, as these are specific areas, although appreciate that they are not non-strategic sites. Perhaps a discussion on this item may be good.	
Public Realm enhancement	No comments on public realm but make appropriate cross reference to the design section for policy on Shopfront Design	
Maps and Boundaries	For SA analysis purposes, it will be useful to have GIS layers of traffic hotspots, conservation area boundaries, if available alongwith the proposed TC options boundaries.	

<b>Sustainable Development:</b>	<b>SA initial review comments</b>	Watford Team comments
Local Centre and Community Facilities Policies: <ul style="list-style-type: none"> <li>• Restriction of A1 uses in Local Centres</li> <li>• Community Facilities (protect)</li> <li>• Community Facilities (encourage)</li> </ul>	LCP2: re-word part b) of the policy for clarity.  Will School and Local Health Care facilities be covered by the CS Infrastructure Policy and Sites DPD policies? As the DM policies are an intermediate level document there may be some worth including education and health facilities under this section so as to provide guidance to planning applicants, unless it will be dealt with details within the Sites DPD policies.	
<b>Housing:</b>		
Quality of Garden Development	No comments	
Conversion of HMOS to flats		
Applications for new HMOs or hostels	Will the monitoring criteria go into the AMR? Can the policy be further strengthened by giving some more thought to monitoring?	
Conversions	Is encouraging work-live unit part of the Core Strategy/ Site Allocations policies? if yes, this policy may be linked to strengthen the policy justification.  It is presumed that there will be linkages to water and biodiversity policies of the DM and Sites DPD to provide a holistic guidance to any new applicant on the sustainability issues they should consider.	
Non-resi proposals in resi areas (carried forward from WDP)	No comments	Carried forward from WDP 2000
Retention of affordable housing	Is the policy open to alternative provision in a different location (without resulting in the loss of affordable houses)? If yes, no comment; if not, will this not conflict with any regeneration opportunities in the area?	Carried forward from WDP 2000
Self Build Housing		Additional policy being considered.
<b>Economic Development and Employment:</b>	To complete	
The Employment Land Allocation (extract from CS EMP2)		
Clarendon Road Office Area		
<b>Transport</b>	To complete	
Car Parking Standards (plus appendices)		Appendices Y and Z
Cycle Parking Standards (plus appendices)		Appendices Y and Z
<b>Infrastructure Delivery</b>	To complete	
CIL and S106		
<b>Urban Design and Built Heritage</b>		

<b>Sustainable Development:</b>	<b>SA initial review comments</b>	Watford Team comments
Shopfronts	Not available to comment	
Advertisement Design	Not available to comment	
Built Heritage	No comments	
<b>Green Infrastructure, Sport and Recreation</b>	Representation of overall biodiversity features is recommended within the DM policies. We acknowledge that Biodiversity is covered in the Core Strategy, however a guide to interpreting the CS policies at a lower level will be useful. This is particularly true in the case of Habitats Assessment, although a high level study at the Core strategy stage indicated no issues to European sites are likely, impact to biodiversity on these and other designated sites must be viewed on a case by case basis which can be dictated by policies at a level similar to DM or Sites Allocation.	
Trees	Will green roofs and green walls form part of this policy?	
Sport and Recreation	No comments	Policies will reflect work being done by parks department so may not be any options to assess.