

# **Watford Borough Council**

Part 2 Local Plan-

Site Allocation Plan Options

Proposed 1<sup>st</sup> Consultation Version

Sustainability Appraisal Report

November 2013

**Halcrow Group Limited, a CH2MHill Company,**

*in association with*

**Centre for Sustainability at TRL Limited**

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Appraisal Report

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## **Contents Amendment Record**

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Signed	Verified
01	00	First draft of Site Allocation options appraisal	Oct 2013	KD	
01	01	First draft of Site Allocation options appraisal	Oct 2013	KD	RG

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## Abbreviations

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BVPI	Best Value Performance Indicator
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
DEFRA	Department for the Environment, Food and Rural Affairs
EC	European Commission
EU	European Union
GIS	Geographical Information System
GHG	Greenhouse gas
LA	Local Authority
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
LTP	Local Transport Plan
MPG	Minerals Planning Guidance
NNR	National Nature Reserve
NO <sub>x</sub>	Nitrogen oxide
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PDL	Previously Developed Land
PM <sub>10</sub>	Particulate matter at less than 10 microns diameter
PSA	Public Service Agreement
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SO <sub>2</sub>	Sulphur dioxide
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
VAT	Value Added Tax

# 1 Introduction

## *1.1 Background to Strategic Environmental Assessment/ Sustainability Appraisal*

The new planning framework requires Local Authorities to prepare Local Plans that comprises of strategic plans, development management policies and site allocations- all of which will form material consideration to future planning applications in the Borough. Part 1 of Watford's Local Plan – the Core Strategy was adopted on 30<sup>th</sup> January 2013. The Core Strategy sets out the vision, objectives and spatial strategy for Watford borough to 2031 and forms the strategic planning context.

The Core Strategy and the remaining policies of the Watford District Plan (WDP) 2000 currently make up the development plan for Watford (along with the Hertfordshire County Council Minerals and Waste Local Plans).

Part 2 of the Local Plan will replace and update the remaining Watford District Plan 2000 policies, to support the delivery of the Core Strategy vision and objectives. Part 2 will include:

- Site allocations – to identify sites for specific types of development
- Development management policies – to guide the determination of planning applications
- Area specific policies for the town centre – to provide more detail about development appropriate for this central area

The Local Plan must be subject to both Sustainability Appraisal and Strategic Environmental Assessment under the Planning and Compulsory Purchase Act (2004) and The Environmental Assessment of Plans and Programmes Regulations (2004) which implement European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive.

Both the SA and the SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment of the objectives and Core Strategies against key sustainability issues.

Although the requirement to carry out both an SA and SEA is mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single

appraisal process. Government guidance for undertaking SEA<sup>1</sup> and for SA of Development Plan Documents<sup>2</sup> in particular details how the SA and SEA should be integrated into one process. The final output of the process is a combined Sustainability Appraisal/Environmental Report which will be published alongside the plan. This report will be referred to as the SA/Environmental Report.

This report must be read with Site Allocation Plan section of Part 2 of the Local Plan issued to support the 1<sup>st</sup> round of consultation in November 2013.

### 1.1.1

#### *Purpose of this Sustainability Report*

The SEA regulations require that the sustainability appraisal results of the sites allocated shall be consulted with statutory bodies and with members of the public to obtain their views prior to adoption of the Site Allocation Plan. This report also appraises the realistic alternative sites considered during the sites identification stage. Watford Borough Council applied a size threshold of 0.25ha to ensure that sites taken forward were of a certain size. Therefore these sites have been sieved out and for SA purposes these sites were not considered reasonable alternative sites that required an assessment. Further stage SA will include further appraisal of the cumulative, synergistic and secondary impacts of the allocations and will consider any changes to be made following the consultation.

This report will accompany the 1<sup>st</sup> consultation stage Part 2 Local Plan Report in November 2013, and will be updated in the subsequent stages up to the Adoption of the Local Plan.

### 1.1.2

#### *Background to the Project*

This SEA/SA is being carried out by Watford Borough Council. The Centre for Sustainability (C4S) at TRL Ltd and their project partners Halcrow Group Ltd, a CH2MHill Company, have been appointed to undertake this project.

## 1.2

### ***Part 2 Local Plan- Site Allocation Plan***

Under the New National Planning Policy Framework (2012), the Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of the local communities. The Local Plans provide guidance to planning development in the Borough and policies contained in the plans will become material consideration for future planning applications.

Part 1 of the Local Plan i.e., the Core Strategy sets out the overall vision for future development in the District and is the basis for subsequent Local plans which will be adopted, including the Development Management Policies and Site Allocations- jointly called Part 2 Local Plan.

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<sup>1</sup> "A Practical Guide to the Strategy Environmental Assessment Directive" (ODPM, 2005)

<sup>2</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)



The Site Allocation Plan, which forms part of Part 2 of the Local Plan identifies sites under various land use designations such as residential, retail, green space, mixed-use and so on to provide an indicative guideline on spatial location of future development that is aligned with the Core Strategy objective.

As the Local Plan Part 2- Development Management Policy SA Report (also put forward for this consultation) includes chapters on the Scoping stage i.e., Plans, Policies, Programmes Review; Baseline Review and the Sustainability Assessment Framework development, this report does not repeat these chapters. For continuity purposes Chapter 1 of the report includes the SA Framework. It is to note that the Site assessment methodology is slightly different to the policies appraisal, due to the level of detail available at the site level. The methodology and the assessment results are discussed in Chapter 2.

This SA Report has been prepared to present findings of the Draft version the Site Allocations plan which includes assessment of site put forward for housing, retail, open space, greenbelt, employment and community space use. The SA Report has also assessed reasonable alternative sites the Council has considered during the plan development process. This report only relates to the Site Allocations section of Part 2 Local Plan. Reference must be made to the Development Management SA issued alongside in this consultation to gather findings about the DM policies of Part 2 Local Plan.

Further stages will consider SA specific comments from the consultation, as well as assess significant changes to the Site Allocation Plan in the future. Future stage SA will also include monitoring framework, and discussions on cumulative, synergistic and secondary impacts of the plan options on the sustainability objectives.

The key stages of the SA/SEA process are broadly presented in Table 1.1.

**Table 1.1 Stages in the SA/SEA and Watford Site Allocation Plan**

Watford Site Allocation Plan Stage	SA/SEA Stages	Dates
Begin Document Preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> <li>• A1: identify other relevant policies, plans and document programmes, and sustainability objectives.</li> <li>• A2: collecting baseline information.</li> <li>• A3: Identifying sustainability issues and problems.</li> <li>• A4: Developing the SA framework.</li> <li>• A5: Consulting on the scope of the SA (<b>Scoping Report</b>).</li> </ul>	<p>Individual site level baseline information classified under environmental and social/ community topics included in the detailed assessment matrix presented in this SA Report.</p> <p>For the wider Borough level baseline, the Core Strategy SA Scoping Report information has been adopted.</p>
<p>Preparation of Issues and Options (I&amp;O) paper and consultation</p> <p>Preparation of preferred options, including consultation on possible preferred option</p>	<p>Stage B: Developing and refining options and assessing of effects</p> <ul style="list-style-type: none"> <li>• B1: Testing the Local Plan objectives against the SA Framework.</li> <li>• B2: Developing the Local Plan options.</li> <li>• B3: Predicting the effects of the Local Plan.</li> <li>• B4: Evaluating the effects of the Local Plan.</li> <li>• B5: Considering ways of mitigating adverse effects preferred and maximising beneficial effects.</li> <li>• B6: Proposing measures to monitor the significant effects of implementing the Local Plan.</li> </ul>	<p>SHLAA data and Call for Sites provided pool of sites that Watford Borough Council considered and sieved them using their criteria set.</p> <p>Presentation of the Allocated sites for the 1<sup>st</sup> Round of Consultation (this report).</p> <p>This SA is conducted on the sites that have been both taken forward and rejected (realistic options only). Commentary indicates issues that need mitigation to progress development.</p> <p>2<sup>nd</sup> Draft Consultation will contain finalised Sites to take forward for allocation, when a monitoring framework will be developed.</p>
Public consultation on Preferred options	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <ul style="list-style-type: none"> <li>• C1 Preparing the <b>SA Report</b>.</li> </ul> <p>Stage D: Consulting on the preferred options of the DPD and SA Report.</p> <ul style="list-style-type: none"> <li>• D1: Public participation on the preferred options of the DPD and the SA Report.</li> <li>• D2 (i) Appraising significant changes.</li> <li>• D2 (ii) Appraising significant changes resulting from representations.</li> <li>• D3: Making decisions and providing Information.</li> </ul>	Publication Version with the preferred options, and details.
Submission of DPD to Secretary of State	<p>Stage E: Monitoring the significant effects of implementing the DPD</p> <ul style="list-style-type: none"> <li>• E1: Finalising aims and methods for monitoring.</li> <li>• E2: Responding to adverse effects.</li> <li>• Preparing the <b>SEA Statement</b>.<sup>2</sup></li> </ul>	Submission of Part 2 Local Plan to the Secretary of State. Examination and Final adoption of the Site Allocation Plan.

<sup>1</sup>This output is not required by the SEA Regulations but was produced to assist in selecting the preferred options.

<sup>2</sup>The SEA Statement is required by the SEA Regulations.

### 1.3

#### ***Report structure***

The SEA Regulations require the Sustainability Report to clearly document findings of all stages of the SEA/SA process. The Report should show that the SEA Directive has been complied with and all components that meet these requirements should be easily identifiable. The reporting requirements and corresponding chapters contained in this report are shown below:

Chapter / Section	SEA Directive Requirement (abridged)
Chapter 2 Appendix 1	Polices review, baseline information and SA Framework
Chapters 3 Appendix 2	Site Allocation Plan Sustainability Assessment Methodology and Assessment results. Results indicate the likely significant effects of the proposed options on the environment, including on issues such as biodiversity, water, soil, population, human health, material assets, cultural heritage, landscape and the inter-relationship between the above. Chapter also includes discussion on assessment of the alternatives proposed.
Appendix 1	SEA/SA Framework
Appendix 2	Detailed Assessment matrix (along with site baseline information)
Appendix 3	Detailed Assessment matrix of Alternative sites

Further stage chapters will include discussion on the significant effects of the site proposals on each SA objective, including synergistic, cumulative and secondary impacts; mitigation measures to offset any identified significant effect and description of monitoring arrangements proposed.

### 1.4

#### ***Consultation***

The SEA Regulations require consultation at various stages of the SA process. The Core Strategy consultation was held at the end of the SA Scoping stage in 2006 (and subsequently updated prior to Adoption in January 2013). The Sustainability Framework from the Core Strategy Scoping Report has been adopted to assess Part 2 Local Plan Site Allocation Plan.

This Part 2 Local Plan 1<sup>st</sup> Consultation SA Report, along with the Site Allocation Plan is now presented for consultation between November 4<sup>th</sup> 2013 and December 16<sup>th</sup> 2013 to receive responses and comments.

### 1.5

#### ***How the SA influenced the Site Allocation Plan***

At this stage, the SA was conducted after Watford Borough Council conducted a sieving of the sites brought forward from the SHLAA study and from Call for Sites. Further stages of the Plan process may consider findings of the SA, after which this section will be updated.

### 1.6

#### ***Geographic and Temporal Scope***

The spatial scope for the assessment is largely local (around the site) and has in general considered the long term impact. Where specific short term or medium

term impacts apply, this has been discussed in the commentary within the detailed assessment matrix.

Further stages of the SA/SEA will examine secondary and cumulative effects of the site proposals.

## 2 SEA/SA Objectives and Framework<sup>3</sup>

### 2.1 *Introduction*

Current guidance on SA/SEA of development documents advocates the use of objectives in the appraisal process. This section provides an outline of the objectives and criteria, organised under a SA Framework that was used to appraise the Site Allocation Plan. This Framework, set out in Table 2.1, forms the basis of the Site Allocation Plan appraisal. This approach is recommended in Government good practice on carrying out environmental and sustainability appraisals<sup>4</sup>. An explanation of the methodology for formulating the Appraisal Framework is presented below.

### 2.2 *Watford Borough Council Local Plan SEA/SA Framework*

The sustainability objectives outlined in the Appraisal Framework have been arranged under SEA/SA topics. The topics that have been selected relate to the same topics listed in: Annex I of Directive 2001/42/EC of the European Parliament on ‘the assessment of the effects of certain plans and programmes’ (the SEA Directive); and Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005. This chapter presents only the objectives and criteria used for the assessment.

In January 2012, TRL-Halcrow developed a site level SA Framework, taking into account the Core Strategy SA Framework information. The site level framework was consulted with the consortium of four councils, who are joint clients in the TRL-Halcrow SA Framework contract: Watford Borough Council, Dacorum Borough Council, Three Rivers District Council and St Albans District Council. This site level framework has formed the basis for this site assessment. Reference must be made to Appendix 1 for the detailed SA Framework.

The topics used are set out in the first column (Biodiversity, Water, Soil, Climatic Factors, Air, Material Assets, Cultural Heritage, Landscape, Population & Human Health, Social Factors and Economic Factors).

#### 2.2.1 *Sustainability Objectives (Column 1)*

Objectives have focussed on those issues, which are directly relevant to Watford Borough Council and the scope of the Local Plan. They are based on the sustainability objectives presented in the “Sustainable Development Framework for the East of England<sup>5</sup>”.

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<sup>3</sup> Reiterated from the Core Strategy SA Report, with amendments

<sup>4</sup> The Strategic Environmental Assessment Directive: Guidance for Planning Authorities. ODPM, October 2003

<sup>5</sup> A Sustainable Development Framework For The East of England, The East of England Regional Assembly, October 2001

2.2.2

*Criteria (Column 2)*

Following on from the identification of objectives, a range of associated criteria were identified to provide further clarity in respect of future development direction. The criteria provide guidance in appraising the sites.

**Table 2.1 SEA/SA Framework**

Objective	Criteria
<b>Biodiversity</b>	
1. To protect, maintain and enhance biodiversity and geo-diversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets	To protect, maintain and enhance designated wildlife and geological sites (international, national and local) and protected species to achieve favourable condition
	To restore characteristic habitats and species, to achieve BAP targets
	To manage woodlands and other habitats of value for biodiversity in a sustainable manner and protect them against conversion to other uses
	To recognise the social/environmental value and increase access to woodlands, wildlife & geological sites and green spaces particularly near/in urban areas
	To encourage people to come into contact with, understand, and enjoy nature
<b>Water</b>	
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change	To raise awareness and encourage higher water efficiency and conservation by for instance promoting water reuse in new and existing developments; promoting local water recycling initiatives and rain water harvesting structures
	To ensure water consumption does not exceed levels which can be supported by natural processes and storage systems
	To reduce the number and severity of pollution incidents
	To maintain or restore the integrity of water dependent wildlife sites in the area
3. Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas	To avoid developments in areas being at risk from fluvial, sewer or storm surges while taking into account the impacts of climate change
	To ensure that developments, which are at risk from flooding or are likely to be at risk in future due to climate change, are sufficiently adapted
	To promote properly maintained sustainable urban drainage systems to reduce flood risk and surface water run off
<b>Soil</b>	

Objective	Criteria
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	To limit contamination/degradation/loss of soils due to development
Climatic factors	
5. Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO <sub>2</sub>	To minimise greenhouse gas emissions (particularly CO <sub>2</sub> ) for instance through more energy efficient design and reducing the need to travel
	To promote increased carbon sequestration e.g. through increases in woodland cover To encourage technological development to provide clean and efficient use of resources
	To adopt lifestyle changes which help to mitigate and adapt to climate change, such as promoting water and energy efficiency (through for instance higher levels of home insulation) To encourage positive attitudes towards renewable energy schemes (e.g., biomass and wind energy)
6. Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)	To promote design measures which enable developments to withstand and accommodate the likely impacts and results of climate change (for instance through robust and weather resistant building structures) To develop, adopt and ensure the effective use of built development design guides tackling energy use, to provide homes and businesses with self-sufficient energy
Air Quality	
7. Achieve good air quality, especially in urban areas	To reduce the need to travel by car through a combination of high quality transport alternatives, particularly public transport, walking and cycling networks, but also light rail, taxi, and water
	To integrate land use and transport planning by for instance: <ul style="list-style-type: none"> <li>▪ Promoting Green Transport Plans, including car pools, car sharing and, choice of non-fossil fuel powered vehicles, as part of new developments</li> <li>▪ Ensuring services and facilities are accessible by sustainable modes of transport</li> </ul>
	To ensure that development proposals do not make existing air quality problems worse and where possible improve the quality
	To address existing or potential air quality problems
Material Assets	
8. Maximise the use of previously developed land and buildings, and the efficient use of land	To concentrate new developments on previously developed land (PDL)
	To avoid use of Greenfield sites for development
	To maximise the efficient use of land and existing buildings by

Objective	Criteria
	measures such as higher densities and mixed use developments
	To encourage the remediation of contaminated and derelict land and buildings
9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	To encourage maximum efficiency and appropriate use of materials, particularly from local and regional sources
	To require new developments to incorporate renewable, secondary, or sustainably sourced local materials in buildings and infrastructure
	To promote renewable energy sources as part of new or refurbished developments (linked to Climatic Factors SA Objective)
	To increase recycling and composting rates and encourage easily accessible recycling systems as part of new developments To encourage new developments to incorporate renewable and recycled materials in buildings and infrastructure, or materials of lower environmental impact or locally sourced materials where possible.
	To promote awareness regarding waste/recycling and renewable energy issues through education programmes in schools and the community
Cultural Heritage	
10. To identify, maintain and enhance the historic environment and cultural assets	To safeguard and enhance the historic environment and restore historic character where appropriate, based on sound historical evidence
	To promote local distinctiveness by maintaining and restoring historic buildings and areas, encouraging the re-use of valued buildings and thoughtful high quality design in housing and mixed use developments – to a density which respects the local context and townscape character, and includes enhancement of the public realm
	To promote public education, enjoyment and access of the built heritage and archaeology
Landscape and Townscape	
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness	To protect and enhance landscape and townscape character
	To evaluate the sensitivity of the landscape to new/inappropriate developments and avoid inappropriate developments in these areas
	To protect ‘dark skies’ from light pollution, and promote low energy and less invasive lighting sources while considering the balance between safety and environmental impacts
	To minimise the visual impact of new developments
Population and Human Health	
12. To encourage healthier lifestyles and reduce adverse health impacts	To promote the health advantages of walking and cycling and community based activities



Objective	Criteria
of new developments	To identify, protect and enhance open spaces, such as rivers and canals, parks and gardens, allotments and playing fields, and the links between them, for the benefit of people and wildlife
	To include specific design and amenity policies to minimise noise and odour pollution, particularly in residential areas
	To narrow the income gap between the poorest and wealthiest parts of the area and to reduce health differential
	To improve the quality and quantity of publicly accessible open space. To include specific design measures to minimise noise and odour pollution, particularly in residences
13. To deliver more sustainable patterns of location of development	To reduce the need to travel through closer integration of housing, jobs and services
	To promote better and more sustainable access to health facilities
Social Factors	
14. Promote equity & address social exclusion by closing the gap between the poorest communities and the rest	To include measures which will improve everyone's access to high quality health, education, recreation, community facilities and public transport
	To ensure facilities and services are accessible by people with disabilities and minority groups
	To encourage people to access the learning and skills they need for high quality of life
	To ensure that the Local Plan does not discriminate on the basis of disability, ethnic minority, or gender. To encourage development of sporting and leisure opportunities To encourage businesses to access learning and skills for prosperity To give greater focus to learning and skills in regeneration areas
15. Ensure that everyone has access to good quality housing that meets their needs	Promote a range housing types and tenure, including high quality affordable and key worker housing
	To improve the provision and condition of affordable housing.
16. Enhance community identity and participation	To recognise the value of the multi-cultural/faith diversity of the peoples in the region
	To improve the quality of life in urban areas by making them more attractive places in which to live and work, and to visit
	To encourage high quality design in new developments, including mixed uses, to create local identity and encourage a sense of community pride
17. Reduce both crime and fear of crime	To reduce all levels of crime with particular focus on violent, drug related, environmental and racially motivated crime
	To plan new developments to help reducing crime and fear of crime through thoughtful design of the physical environment, and by promoting well-used streets and public spaces

Objective	Criteria
	<p>To support government-sponsored crime/safety initiatives, maximising the use of all tools available to police, local authorities and other agencies to tackle anti-social behaviour</p> <p>To encourage design that will prevent environmental crime</p>
Economic Factors	
18. Achieve sustainable levels of prosperity and economic growth	To support an economy in the Authority which draws on the knowledge base, creativity and enterprise of its people.
	To promote and support economic diversity, small and medium sized enterprises and community-based enterprises
	<p>To support the economy with high quality infrastructure and a high quality environment</p> <p>To support the development of micro-businesses, community economic development and local investment</p>
19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region	To encourage local provision of and access to jobs and services
	To complete the telecom links where there are network gaps
20. Revitalise town centres to promote a return to sustainable urban living	To promote the role of local centres as centres for sustainable development providing services, housing and employment, drawing on the principles of urban renaissance
	<p>To encourage well-designed mixed-use developments in the heart of urban areas, create viable and attractive town centres that have vitality and life, and discourage out-of-town developments</p> <p>To encourage complementary hierarchy of retail centres and to promote cohesive economic development</p>

# 3 Site Allocation Plan 1<sup>st</sup> Round Consultation

## 3.1

### *Introduction*

Following adoption of the Core Strategy in January 2013, Watford Borough Council are progressing Part 2 of the Local Plan which identifies and allocates sites to deliver the housing, employment, retail and social amenity aspirations documented in the Core Strategy. The sites were identified from the SHLAA evidence base document, and through Call for Sites that Watford Borough Council had undertaken during February 2009. From this pool of sites, Watford Borough Council applied a criteria based assessment system. Refer to the main Site Allocation Plan for the criteria list.

Although Watford BC have consulted internal stakeholders, this will be the first consultation with members of the public. In order to make an informed decision about choosing the right option and to comply with the SEA and SA Requirements, the options and their alternatives are being appraised using the SEA/SA Framework (Table 2.1). Due to the detailed level of information available at a site level with respect to environmental and social factors, the appraisal methodology includes an additional criteria based assessment of the baseline, while also considering the proposed development against the SEA/SA Framework. A commentary along with the assessment results is provided in Appendix 2. This section discusses key results of the sites appraisal.

## 3.2 *Assessment methodology*

After sieving through number of sites that were considered through the SHLAA study and through Call for Sites process, Watford Borough Council have put forward non-strategic development sites for various land use type such as housing, employment, town/local centre retail, mixed use, gypsy and traveller, primary school, green infrastructure, cemetery and community use. Watford Borough Council have undertaken a preliminary assessment of each of the proposed sites (over 0.25ha) that have been considered through the SHLAA and Call for Sites process.

The sustainability assessment team reviewed Watford Borough Council's criteria set and made further additions to the set to account further sustainability themes that are aligned with the sustainability framework set in Chapter 2. The sites put forward for allocations have been reviewed against these criteria to check their compatibility. Based on this compatibility result the effect of proposed development at each site is predicted bearing in mind the SEA/SA Framework (Table 2.1). A detailed matrix indicating site compatibility against the criteria set and a commentary on the predicted effect against the SA objectives are presented in Appendix 2.

The criteria set are also used to define the baseline information for each site. GIS layers supplied by Watford Borough Council (OS Licence 100018689), and those available in the public domain were used in capturing some baseline information. It is this baseline information, with details of the proposals (such as land-use or development plot size), an assessment is made to see how the proposals will support the SA Framework objectives.

The site criteria used to capture the baseline information are provided below.

Presence of the following in relation to the site location:

- Listed buildings and Scheduled Ancient Monuments (SAM)
- Flood Zone – 2, 3a or 3b
- AQMA and Congestion Hotspots
- Wildlife site, Ancient Woodland and Local Nature Reserve (LNR)
- Primary school within 600m
- Secondary school within 2,000m
- Town centre within 2,000m
- Bus route
- Rail station within 1,000m
- Greenspace: parks gardens ; amenity greenspace (GS)
- Public Open Space
- Proximity to community facilities
- Proximity to amenities GP/Dental/Post Office (PO)
- Major access constraints -severance
- Evidence of social deprivation
- Greenfield/Brownfield Site/ Loss of top soil/ contamination remediation
- Green Belt
- Allotments
- Contaminated Land

Table 3.2 below captures the rating assessments for each site, with headline issues to help decision makers conclude whether the site should be taken forward for development.

The Site Allocations Plan also lists the Special Policy Areas as Strategic sites and the details are the same as that indicated in the Core Strategy. The SPAs were assessed for their sustainability performance within the Core Strategy Publication Stage SA Report to which reference must be made to obtain the SA results.

The purposes of the assessment are;

- To predict the performance of each site under specific environment, social and economic criterion and rate them in a range of significant positive to significant negative.
- To identify high level mitigation measures to include at each site, where required to take them forward.

To be consistent with the approach Watford Borough Council have used in the sieving of sites this assessment has used a scoring system to represent site performance against each site criteria. Rather than simply using a Red, Amber and Green traffic light type of scoring, this assessment elaborates on the severity of performance and uses the same six levels of assessment that have been used for all the previous Sustainability Appraisals. The descriptions behind the scores have been amended to reflect the nature of this particular round of Sustainability Appraisal, as defined in the following table.

**Figure 3.1 Significance rating**

Symbol	Description
✓✓	Site location, or site condition is compatible with the site specific criteria and will significantly support relevant sustainability objective.
✓	Site location, or site condition is compatible with the site specific criteria and will support relevant sustainability objective.
0	Neutral – Site specific criteria is not relevant to the proposed land use type or is not applicable to the site, therefore effect on the corresponding sustainability objective will be neutral
?	Uncertain – Site specific information against the criteria is not known or site performance on relevant sustainability objective cannot be determined.
x	Site location, or site condition is not compatible with the site specific criteria and will have a minor negative effect on the relevant sustainability objective.
xx	Site location or site condition is not compatible with the site specific criteria and may significantly affect achievement of the relevant sustainability objective.

### 3.3

#### *Site Allocation Plan Assessment Results*

The baseline status of all the proposed sites, and alternative sites (over 0.25ha) were set out using set criteria (indicated along the header row of Table 3.2). Using this baseline, the land-use proposal and potential scale of the proposed development were considered against the SEA/SA Framework to predict the potential effect of the development in advancing the sustainability objectives.

While establishing baseline for the assessment, the following considerations were made:

- As no significant biodiversity designated sites (such as SSSI) or sites of landscape value are known to be present in Watford, baseline information on these aspects were not collected. Although at this stage, effect of development from individual site has been considered, further stages may consider in-combination effect of the proposed sites on designated sites.

- Sites with potential contamination have been identified and marked as minor negative for their current status. However due to existing national policies and development management policies developed, new developments will lead to their remediation- thus having a positive effect in achieving the soil objectives.
- Sites within areas of multiple deprivation have been identified in the table as baseline information and marked minor negative for their current status. This information is used to determine whether a proposed development will have positive or negative effect on the social and economic aspects for the local residents. Reference must be made to site specific commentary for details.

While it is not for the SA to provide decision on which site should be taken forward in the process, it should aim to aid in the decision making process. On this basis, this SA assessment has identified potential effects of the sites proposal and where negative effect has been predicted, mitigation options are suggested, if applicable. Further mitigation may also be applied through requirements of a planning application, such as the development management policies, existing national guidance and other requirements.

Tables 3.2 captures summary of the assessment and includes a short commentary on suggested mitigation to improve any negative predicted effect.

**Table 3.2 Part 2 Local Plan- Site Allocation Plan Options Sustainability Appraisal Summary Matrix.**

Site code	Listed buildings and SAM	Flood Zone – 2, 3a or 3b	AQMA and Congestion	Wildlife site, Ancient Woodland	Primary school within 600m	Secondary school within 2000m	Town centre within 2000m	Bus route	Rail station within 1000m	Green space: parks/gardens:	Public Open Space	Proximity to community	Proximity to amenities	Major access constraints -	Evidence of social deprivation	Greenfield/Brownfield Site/ Loss of	Green Belt	Contaminated Land	Economic contribution	Comment	
	Environmental factors				Social factors										Material assets						
<b>HOUSING SITES</b>																					
MX D 6	x	-	x	-	✓	-	✓	✓	✓	✓	x	x	✓	✓	-	-	✓	-	x	✓	Mitigation will be required to protect ground water SPZ; heritage setting (design), access to greenspace/ open space and traffic emissions reduction.
H2	-	-	x	x	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	-	-	✓	-	x	x	Site is directly adjacent to a wildlife corridor; within SPZ2; and close to AQMA. Long term positive effect on economic growth but short term loss of jobs from current site.
H3	x	-	x	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	✓	-	x	✓	Locally listed building on site and site is within 200m of a AQMA and is within SPZ2- mitigating effects on heritage, water and air quality objectives will be required.	
H4	x	x	x	-	✓	-	✓	✓	✓	✓	-	✓	✓	-	-	✓	-	-	✓	A national listed building next to site;	

Site code	Listed buildings and SAM	Flood Zone – 2, 3a or 3b	AQMA and Congestion	Wildlife site, Ancient Woodland	Primary school within 600m	Secondary school within 2000m	Town centre within 2000m	Bus route	Rail station within 1000m	Green space: parks gardens ;	Public Open Space	Proximity to community	Proximity to amenities	Major access constraints -	Evidence of social deprivation	Greenfield/Brownfield Site/ Loss of	Green Belt	Contaminated Land	Economic contribution	Comment
	Environmental factors				Social factors									Material assets						
																				it is at risk of surface water flooding (severe category) and close to AQMA. Mitigating effects on heritage, flood risk and air quality objectives will be required.
MX D5 /H 6	-	-	-	-	✓	-	✓	✓	✓	-	?	✓	✓	-	x	✓	-	-	✓	The site is located within SPZ1 and adjacent to noise source- effects on water and human health must be mitigated. Potential loss of caravan parking space.
H8	-	-	-	-	✓	-	✓	✓	✓	✓	-	✓	✓	-	x	✓	-	x	✓	Contamination remediation may occur (as part of required mitigation)
MX D1	-	-	-	-	✓	✓	✓	✓	✓	-	✓	✓	✓	-	x	-	-	-	✓	If site density is very high it may contribute to traffic generation (AQMA not far from site).
H11	-	-	-	-	✓	✓	x	✓	-	-	✓	✓	✓	-	-	✓	-	-	✓	Ensure good connectivity to the town centre/ local centre.
H1	x		x	x	✓	✓	✓	✓	x		✓	✓	✓			✓		x	✓	Site close to a nationally listed building, is within 1000m of a wildlife site and has a TPO tree. Site is located close to an AQMA- mitigation of impacts from above on heritage setting, air quality and biodiversity required.
H5	-	-	x	x	✓	✓	✓	✓	x	-	✓	✓	✓	-	-	✓	-	x	✓	Site is within 500m of Wildlife site and close to an AQMA- mitigation to reduce biodiversity and air quality impacts will be required.
H12	-	-	-	-	✓	✓	x	✓	x	x	✓	✓	✓	-	-	x	-	-	-	Site is part garden land- greenfield and not well linked to the town-centre or rail station. Loss of greenfield land cannot be mitigated, but connectivity to well serviced public transport recommended.
H7	x	-	x	-	✓	✓	✓	✓	✓	x	-	✓	✓	-	-	✓	-	x	✓	A locally listed building is located at the site- impact on heritage asset to be mitigated.
H14	-	-	-	-	✓	✓	✓	✓	x	x	✓	✓	✓	-	-	✓	-	x	✓	Not well linked to the town-centre or rail station- mitigate to improve connectivity.
MX D3	x	x	-	x	?	?	?	?	?	?	?	?	?	-	-	✓	-	x	✓	Site in surface water flooding zone, within 250m of wildlife site and nationally listed building at the site- mitigation required on biodiversity, heritage and flood risk aspects.
MX D7	-	?	-	x	✓	✓	✓	✓	✓	✓	-	✓	✓	-	x	✓	-	x	✓	Site adjacent to Tolpits semi-natural area- scale of development will affect biodiversity unless mitigated. It is adjacent to a large area of high surface water flood risk potential- mitigation required to reduce risk to neighbouring properties.
H9	-	-	-	-	✓	✓	✓	✓	-	✓	✓	✓	✓	-	x	✓	-	x	✓	Contaminated site- remediation

Site code	Listed buildings and SAM	Flood Zone – 2, 3a or 3b	AQMA and Congestion	Wildlife site, Ancient Woodland	Primary school within 600m	Secondary school within 2000m	Town centre within 2000m	Bus route	Rail station within 1000m	Green space: parks gardens ;	Public Open Space	Proximity to community	Proximity to amenities	Major access constraints -	Evidence of social deprivation	Greenfield/Brownfield Site/ Loss of	Green Belt	Contaminated Land	Economic contribution	Comment
	Environmental factors				Social factors										Material assets					
																				required. Part of deprived ward-proposal may bring economic benefits.
H10	-	-	-	-	✓	-	✓	✓	-	✓	-	✓	✓	-	x	✓	-	x	✓	In the short term, proposal may displace jobs, if the site is actively employing staff. Contaminated site-remediation required. Part of deprived ward- proposal may bring economic benefits.
H13	-	-	-	-	-	-	✓	-	x	✓	-	✓	✓	-	x	✓	-	-	✓	The site is not well connected to rail station, but connected to M11- potentially increasing car dependency. Part of deprived ward- proposal may bring economic benefits.
SP A2	-	-	-	-	x	-	✓	✓	✓	✓	-	✓	✓	-	-	✓	-	x	✓	Limited access to schools which must be addressed due to the potential scale of development at this site.
H15	-	-	-	-	✓	✓	x	✓	x	x	✓	✓	✓	-	-	x	-	-	-	Site forms part of greenspace typology 2 under PPG17 study. Development at the site will result in loss of greenspace for local residents.
H16	-	-	-	-	✓	-	x	?	-	x	✓	✓	-	-	-	✓	-	x	✓	Improvement to public transport connectivity to local centre/town centre is recommended.
MX D2	-	-	-	-	-	x	-	-	✓	✓	-	-	?	?	-	✓	-	x	-	Site is not well connected to primary school, implying development will potentially exacerbate any existing pressure on the service.
<b>MIXED USE</b>																				
MX D 8 & 9	-	-	-	-	-	-	✓	✓	✓	-	-	-	-	-	-	✓	-	-	✓	
MX D10	-	x	x	-	-	-	✓	✓	x	?	-	-	-	-	-	✓	-	x	✓	Site is within a flood zone and AQMA and the development may increase car traffic unless mitigated. Site is within Ground source protection zone 1 and 2 and is potentially contaminated, therefore requires mitigation to limit water resource impact.
<b>EMPLOYMENT SITE</b>																				
E1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Land use at site has already been altered.
E2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Land use at site has already been altered.
E5 a/b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	Consider reviewing vacancies at site over a time to determine whether the site must be safeguarded over the whole plan period of the Local Plan.
E6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
E7 a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
E7 b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Land use at site has already been altered.



Site code	Listed buildings and SAM	Flood Zone – 2, 3a or 3b	AQMA and Congestion	Wildlife site, Ancient Woodland	Primary school within 600m	Secondary school within 2000m	Town centre within 2000m	Bus route	Rail station within 1000m	Green space: parks gardens ;	Public Open Space	Proximity to community	Proximity to amenities	Major access constraints -	Evidence of social deprivation	Greenfield/Brownfield Site/ Loss of	Green Belt	Contaminated Land	Economic contribution	Comment
	Environmental factors				Social factors										Material assets					
<b>SCHOOLS</b>																				
S1- site S1 has been assessed as part of residential unit @ Ascot road																				
S2	x	-	-	-	✓	-	-	✓	✓	-	-	-	-	-	-	✓	-	-	-	Site houses a locally listed building which will be affected due to the proposal unless mitigation design is incorporated.
S3	-	-	-	-	✓	-	-	✓	-	-	x	-	-	-	-	x	-	-	-	Site includes allotment land (open space and greenfield site) which can be lost to the development. Proposals may investigate options to retain access to open space for the public.
<b>GYSIES AND TRAVELERS</b>																				
GT1	-	-	-	x	-	-	-	-	-	✓	x	?	?	-	x	x	x	-	-	Site is within the Greenbelt. It is a greenfield site and is a local nature reserve, possibly used by the surrounding community for recreation purposes. Significant environmental effects are likely. In addition, need for access to social and community facilities from caravan users may add pressure to existing provision. Further analysis must be conducted and suitable mitigation proposed to take the site forward.
<b>RETAIL</b>																				
R1	-	x	-	-	-	-	✓	✓	✓	x	✓	✓	✓	-	-	✓	-	-	✓	A small area along the access road to the site is a surface water flooding vulnerable zone which the design of the development must consider for mitigation. Mitigation must limit potential increase in traffic.
R1 (Option A)	x	-	-	-	-	-	✓	✓	✓	x	✓	✓	✓	-	-	✓	-	-	✓	Site is surrounded by listed buildings which may constrain development type and design aspects.
R2	x	x	-	-	-	-	✓	✓	✓	x	✓	✓	✓	-	-	✓	-	-	✓	Site houses a locally listed building. Demolition of the building will have a significant negative impact on cultural assets objective. A small area along the access road to the site is a zone vulnerable to surface water flooding, unless mitigated will pose risk to neighbours.
R3	x	-	-	-	-	-	✓	✓	✓	x	-	-	-	-	-	✓	-	x	x	Part of the site includes locally listed buildings which may be affected (minor negative on SA 10- cultural heritage).
R4	x	-	-	-	-	-	✓	✓	✓	✓	✓	-	-	-	-	✓	-	x	✓	The site overlooks St Mary's Church which is a listed building. Design and construction process must limit any negative effect on this heritage site.
	?	-	-	-	-	-	✓	✓	✓	-	-	-	-	-	-	✓	-	?	✓	
R5	-	-	x	-	-	-	✓	✓	✓	-	-	-	-	-	-	✓	-	?	✓	As site is already within an AQMA,

Site code	Listed buildings and SAM	Flood Zone – 2, 3a or 3b	AQMA and Congestion	Wildlife site, Ancient Woodland	Primary school within 600m	Secondary school within 2000m	Town centre within 2000m	Bus route	Rail station within 1000m	Green space: parks gardens ;	Public Open Space	Proximity to community	Proximity to amenities	Major access constraints -	Evidence of social deprivation	Greenfield/Brownfield Site/ Loss of	Green Belt	Contaminated Land	Economic contribution	Comment
	Environmental factors				Social factors										Material assets					
			x																	mitigation to limit vehicle emissions will be required.
<b>CEMETERY SITE</b>																				
CM1	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	x	-	SPZ and flood risk status not known.
<b>COMMUNITY USE</b>																				
	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	
<b>GREENSPACE AND SPORTS HUB</b>																				
G1	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	
G2	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
G3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Extension of an existing wildlife corridor is most likely to support habitat and species biodiversity in the area and may help in their health and well-being- SA12).
G4	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Minor positive effect on SA1 (biodiversity) and SA12 (health).
G5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Business as usual scenario
G6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	x	-	✓	By designating the greenbelt to employment use, there is potential for industry type buildings to occur at the site which will affect biodiversity and the character of the area as well as losing openness at the site.
G7	-	-	-	x	-	-	-	-	-	-	-	-	-	-	-	-	x	-	✓	By removing the designation, it will pave way for development (which may result in biodiversity and green space loss).
G8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	x	-	-	Site has been already developed and loss of greenbelt is recorded as minor negative.
G9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	Change in designation to greenbelt may help maintain biodiversity in the greenbelt area adjacent to the site.
G10	-	-	-	-	-	-	-	-	-	-	✓	?	-	x	✓	-	-	-	-	It is not clear whether the proposal will remove current Holywell Community Centre provision. Mitigation will be required to address this issue.
G11	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	
G12	-	-	-	-	-	-	-	-	-	-	✓	-	-	x	✓	-	-	-	-	Located in a deprived area- development may promote social inclusion and access to services.
G13	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	

### **3.4**

#### ***Assessment of Alternative sites***

Some of the sites on which SA was conducted were eventually removed from the Site Allocation listing. These sites are considered to be alternate sites for which SA have been conducted and presented in Appendix 3.

### **3.5**

#### ***Next Stages***

Further to receipt of the consultation comments from the 1<sup>st</sup> Round, Watford Borough Council will refine their Site Allocation Plan, as part of Local Plan Part 2 Preparation.

The sites proposed at this later stage will then be assessed against the site specific SA Framework (see Appendix 1). This assessment will also provide a commentary on the cumulative, synergistic and secondary impact of the sites proposed for development.