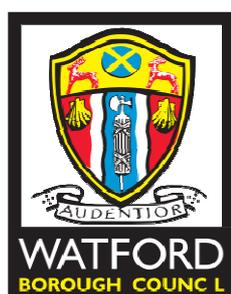


# Watford's Local Plan

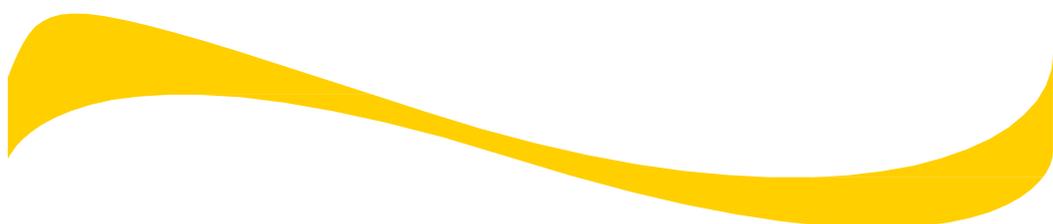


## Local Plan Part 2 – Second Consultation

### Consultation Summary



Planning for a Better Watford



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## **Local Plan Part 2 - Second Consultation - Consultation Summary**

### **1.1 Introduction**

- 1.1.1 The first consultation on the Local Plan Part 2 Site Allocations and Development Management Policies took place during November and December 2013.
- 1.1.2 A second consultation took place between 17 December 2014 and 4 February 2015. This consultation brought together site allocations and development management policies within a single document entitled 'The Local Plan Part 2'. Although the focus of the consultation was on significant changes, respondents were able to comment on any aspect of the document.
- 1.1.3 This report summarises the comments received in response to that second consultation, and the action to be taken as a result.

### **2.1 Who was consulted and how?**

- 2.1.1 A letter was sent by email or post to approximately 550 consultees on the Local Plan consultation database, which includes both specific and general consultees. The letter gave information about the consultation, explained how to respond, gave information about where documents could be viewed and contained a link to/gave the address of the consultation portal. Consultees were given the option of responding online, by email and by post.
- 2.1.2 A notice and article were published in the Watford Observer on 12 December 2014.
- 2.1.3 News items publicising, and containing links to, the consultation were posted on Facebook and Twitter. A news item was posted on the front page of the council's website
- 2.1.4 Paper copies of the Draft Local Plan Part 2 were made available at Watford Central and North Watford libraries and at the Town Hall's Customer Service Centre, along with An Environmental Report (Sustainability Appraisal), Response Form and updated list of the evidence base.

### **3.1 Number of comments received**

- 3.1.1 272 comments were received from 46 separate consultees. Some of these were the same type of comment repeated against a number of policies - there were 35 comments related to the number of school places each development could generate, 34 to the level of flood risk at each site, 56 to the degree of archaeological assessment needed at each site and 15 to the sewerage capacity of each sites.
- 3.1.2 This report summarises the responses received. However the full representations can be accessed online through the following link <http://watford.jdi-consult.net/localplan/viewreps.php?action=search>

## **4.1 Main issues raised and how they have been addressed**

- 4.1.1 Some of the potentially more significant issues raised relate to the need for additional evidence on water and sewerage capacity, a need for transport modelling, objections to and significant constraints on the proposed cemetery sites, and a number of objections to the restriction on residential uses in the Clarendon Road/Station Road/Bridle Path area.
- 4.1.2 In response to these concerns we are continuing discussions with the Environment Agency and Thames Water regarding water modelling – a Hertfordshire Wide Water Study is currently in the early stages and will not be available in time to inform this plan (it will instead inform the next plan review). Sewerage capacity issues can be dealt with on a site by site basis – remaining concerns are still being discussed. The County Council are also preparing a new transport model, which similarly is not yet available to use for this stage of the plan. The County Council have confirmed that they are not objecting to the plan on this basis and we are discussing at what stage modelling can be best undertaken.
- 4.1.3 In response to concerns about the impact of the proposed cemetery sites on the groundwater supply we intend to withdraw the proposed allocation of these sites. We have currently no identified additional cemetery sites which means that remaining space will have to be carefully managed – this will be done through the Council's Cemetery Strategy which is likely to include a restriction on the right of people who do not live in Watford to be buried here.
- 4.1.4 In response to the objections regarding Clarendon Road consultants are being appointed to prepare a Strategy for Clarendon Road which will consider viability and the appropriate mix of uses. This Strategy will inform any revisions to the policy approach.

## **4.2 Process/ overarching issues**

### Waste water

- 4.2.1 As noted above, the Environment Agency advised that a Water Cycle Study should be prepared before submission, to consider foul sewerage capacity and any associated issues. Thames Water commented on the need to demonstrate waste water capacity for new developments (inc. a requirement on developers to demonstrate this/ provide improvements) – and provided a list of sites which may need further investigation. We agree it is appropriate to add words to this effect as the automatic right to connect to sewers was removed by the 2010 Flood and Water Management Act.
- 4.2.2 These responses have been discussed further at meetings with the Environment Agency on 23<sup>rd</sup> Feb 2015, with the EA and Thames Water on 30<sup>th</sup> March 2015 (along with colleagues from Dacorum Council) and with Thames Water on 29<sup>th</sup> July 2015, and a further meeting with Thames Water and the EA on the 3<sup>rd</sup> December 2015 to agree a way forward.

4.2.3 The Environment Agency also provided information on which sites may be contaminated and which require a preliminary flood risk assessment / flood risk assessment. We have recorded this with our detailed information for each site and these related to special policy areas, mixed use areas, housing and retail sites.

4.2.4 Sport England are concerned that the removal of the sports hub policy results in the local plan having no detail policy guidance for assessing proposals relating to sport. The Council agrees with the comments and are keen to prevent sports pitches being lost. It is therefore consulting on a new policy on sports facilities.

#### Transport

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

#### Heritage

4.2.6 Historic England felt that more detail should be provided on relevant heritage assets in the text for each allocation. This information will be added.

#### Archaeological assessment

4.2.7 Hertfordshire County Council submitted a list of sites [inc. special policy areas, mixed use areas, housing and retail sites] which require various levels of archaeological assessment. The adopted Core Strategy already requires that appropriate archaeological investigation is undertaken, but this information will also be added to the table of relevant issues for each site identified to be included in any development briefs.

#### Education and Services

4.2.8 HCC Property provided information on existing schools capacity, libraries and other services in relation to a number of sites. This has been noted and the Council is continuing to work with HCC to ensure appropriate school provision.

### **4.3 Special Policy Areas and Mixed Use Allocations**

#### Special Policy Areas

4.3.1 60 comments were received on this chapter. Many of these comments provided additional information and comment. Only 8 comments, from 4 respondents were objections.

4.3.2 Historic England suggest that supporting text should refer to additional policy guidance on the SPAs where appropriate and refer to the core strategy and that individual policies should be provided for the Mixed Use Allocations to provide more detail. Additional detail will be added. This would signpost the additional policy guidance for other policies (i.e. to show that other policies in the plan also apply to SPAs).

### SPA1 Town Centre

- 4.3.3 Historic England highlight the importance of future trading on the historic character of the High Street and Parade by recreating integration with the main linear axis of the town based on heritage led regeneration. In addition, HE note that a number of the development proposals in SPA1 may impact on heritage assets – it should be made clear that these heritage assets should be retained or refurbished where appropriate. The council agree with this point.

### SPA2 Watford Junction

- 4.3.4 HCC note the existence of safeguarded waste management facilities including the rail aggregates depot within SPA2, and ask that these are protected in line with Waste Policy 5 and Minerals Policy 10. London Concrete Ltd. object to the inclusion of the aggregates depot and concrete batching plant and land adjacent to this safeguarded area in the SPA. They ask that this area is identified in the boundary/mapping.
- 4.3.5 This issue was discussed at the Core Strategy Examination and wording was included to protect the aggregates depot and associated facilities (Core Strategy Policy SPA2). The need for these sites to be protected is recorded in the detailed information for each site and will be made clear in the next draft policy/mapping as safeguarded – Core Strategy Policy SPA2 will still apply. These safeguarded sites will also be taken into account in the preparation of a Masterplan for Watford Junction.
- 4.3.6 Hertfordshire County Council Property welcome the extension of the SPA to include the potential school site at Bedford Street, whilst noting that further work is needed to assess constraints and feasibility. The Council is continuing to work with HCC regarding suitable school sites. The Council have commissioned consultants to develop a Masterplan for Watford Junction. This will assess a number of issues and will consider whether there are any alternative school locations in the SPA.
- 4.3.7 Stewart M&PS Ltd on behalf of Origin Housing Association object to the exclusion of 73-77 Clarendon Road from the SPA. This repeated an objection made to the first consultation – our position remains that we feel this is more appropriately part of the Clarendon Road employment area. Additional masterplanning work is being done for both the Watford Junction SPA and the Clarendon Road area.
- 4.3.8 Historic England requests that Benskins House [Grade II Listed Building] be considered. This is better known as The Flag public house adjacent to Watford Junction. This has not been referred to in the Core Strategy and Part 2 of the Plan should do this. HE recommend that the boundary of the SPA should be carefully considered to ensure the hotel is a beneficiary of future development. The SPA boundary has been assessed to ensure that the listed building is not included, and wording will be added to the policy to ensure an appreciation of the building's setting is fully considered.
- 4.3.9 Brasier Freeth, on behalf of S Hille and Co objected to the Hille Land [lands at 132 St Albans Road] being included in the employment area rather than the SPA. This site will be considered as part of work on a

masterplan for Watford Junction which will inform whether the boundary should be altered.

- 4.3.10 Nathaniel Lichfield and Partners object to the policy on behalf of INTU Properties, asking that it is made clear that any retail should be convenience. The approach to retail in this location is set out in the adopted Core Strategy Policy SPA2 rather than in the policy subject to this consultation. The forthcoming Masterplan for the site will also inform the role of any retail on site.

#### SPA3 Health Campus

- 4.3.11 Historic England ask that reference is made to the protection of Shrodells wing of Watford General Hospital [Grade II Listed]. The Council agree with this and the SPA will, via a statement of significance, include a reference to protect this asset.
- 4.3.12 HCC ask that regard is had to safeguarded waste management facilities at Wiggenhall Road. The Council will continue to work with HCC on this matter.
- 4.3.13 Natural England note the inclusion of the Lairage Land Local Nature Reserve within SPA3 and ask that it is protected from built development. This is noted by the Council – this area is also identified as a local nature reserve and part of the Green Belt and therefore will not be built on.

#### SPA4 Lower High St

- 4.3.14 Historic England ask that Local Plan Part 2 makes it clear that the Grade II listed Frogmore House must benefit from any development here. This also relevant for MXD3 [the Gas Holder Site]. This point is agreed and further information will be included.
- 4.3.15 National Grid advise on the location of an overhead power line and underground cables cross the site, which is noted and will be added to policy text.

#### SPA5 The Dome Roundabout

- 4.3.16 HCC Property welcome the inclusion of developable land in the allocation and also note that the waste transfer station at Colne Way is safeguarded and future development needs to consider this. They also welcome the inclusion of MXD9 [North Watford Library and Health Facilities] in the SPA. These have been noted.

#### SPA6 Western Gateway

- 4.3.17 Hertfordshire County Council note that the Watford Business Park part of the Western Gateway is covered by an area of search in the waste Site Allocations document and as such they would not wish to see non-B uses in this area.
- 4.3.18 No change to policy is needed as the area is identified an employment area.

### Mixed Allocations

- 4.3.19 NLP, on behalf of INTU, ask that retail elements in a number of sites be small in scale and limited to that needed to serve the development . This includes MXD3 [Gas Holder Site]; MXD10 [Former Petrol Station, Dome Roundabout] MXD11 [The Gossamers and MXD12 – [The Brow]. This is covered in the Core Strategy.

### MXD3 – Gas Holder Site

- 4.3.20 National Grid have identified a overhead ZC line on site. HE have also suggested a table for mixed use allocations sites to ensure consistency (comments within SPA4 also apply here). Both have been noted. Additional wording regarding heritage assets will be added to have a clearer structure.
- 4.3.21 A comment from St James ask that residential uses are specifically added to the mix of uses appropriate on this site. This has been noted, however further information is required before a clear housing allocation is made in terms of compatibility of uses with the flood zone and the Council would prefer to keep a flexible approach to the site to ensure that the restoration of Frogmore House is not compromised.

### MXD9 – North Watford Library and Health Facilities

- 4.3.22 HCC welcome this allocation and provide more information on fire ambulance services, schools and libraries. These matters have been noted by the Council.

## **4.4 Sustainable Development**

- 4.4.1 23 comments were received on this chapter. Natural England expressed support for policies SD5 [Sustainable Design Standards], SD7 [Renewable Energy], SD9 [Managing Flood Risk], SD12 [Protection and Restoration of River Corridors, Canals and Watercourse] and 19 [External Lighting]. This is noted.
- 4.4.2 Regarding Policy SD5 [Sustainable Design Standards], INTU sought to qualify the BREEAM target with “where viable” as it considers that the policy is a desired target. However the Council considers that it is not necessary to qualify the policy for an applicant to make a case for exemption. Work is being commissioned to assess the viability of the plan’s requirements which will be taken account of before publication.
- 4.4.3 The Environment Agency and Thames Water suggested additional wording for Policy SD9 [Managing Flood Risk] and Policy SD12 [Protection of Rivers, Canals and other Watercourses] to account for changing requirements of flood risk assessment, drainage and contamination.
- 4.4.4 Thames Water asked for additional text to clarify that developers will need to demonstrate there is sufficient wastewater capacity and that they may need to pay for infrastructure to make up any shortfall. This will be added to a revised Policy SD9 [Managing Flood Risk]. Some of

the points were followed up in a meeting with Hertfordshire County Council who have taken on the role of Lead Local Flood Authority.

- 4.4.5 Regarding SD11 [Water Consumption], the EA strongly support the inclusion of a target related to reducing water consumption. They also recommend that non-residential uses will have a requirement for water usage. A viability study of plan requirements will be commissioned and this requirement will be included if feasible.
- 4.4.6 The Canals and Rivers Trust felt SD12 [Protection and Restoration of River Corridors, Canals and Watercourse] did not sufficiently cover development close to canals as development may on occasions be required closer to the water edge. This comment was followed up with some suggested wording which is being considered for inclusion. The Trust is also concerned that the improvements identified for the water environment and water ecology in the policy imply that all such improvements should relate to ecology; whereas other types of improvements [i.e. public realm, hard landscaping] will be required. They consider that an amended policy or a new stand alone canal policy is required to widen the scope to include all possible improvements and to account for development closer to the waters edge. The council agrees with a more explicit reference to canals which will be included.
- 4.4.7 Agents acting on behalf of National Grid objected to the setback requirement for development from the bank of a river or watercourse and asked for information about why the Environment Agency required this.
- 4.4.8 The origin of the set back requirement, which is also used by other local authorities, has been clarified with the Environment Agency and relates to the Thames Land Drainage byelaws.
- 4.4.9 In light of the various comments redrafts of policies SD9 [Managing Flood Risk] and SD12 [Protection and Restoration of River Corridors, Canals and Watercourse] are being prepared which will be circulated to those who commented for further refinement before the publication stage.
- 4.4.10 HCC Property on behalf of the Waste Management Section suggested wording additions to the supporting text [specifically paragraph 3.33 and 3.37] to Policy SD14 [Waste], which will be reviewed should the text be carried forward.
- 4.4.11 Regarding Policy SD15 [Unstable, Contaminated and Potentially Contaminated Land], the EA suggested some wording changes to include the accurate link to the EA's website and is keen that the policy should stress that there may be previously developed sites that may have land contamination. This has been noted by the Council; the link has been updated and further wording regarding contamination will be considered. The Council has also noted the EA's support for Policy SD16 [Potentially Hazardous or Polluting Development].
- 4.4.12 Regarding SD17 [Air Quality], National Grid considers the wording to be too restrictive and unrealistic. They consider that the policy should take account of wider planning benefits and that it is unrealistic for new

development to mitigate existing air quality impacts. They consider that national policy does not require development to improve existing air quality as many sources of air pollution are outside of the applicant's control.

- 4.4.13 The Council does not consider the policy as worded as being too onerous as it is the purpose of Air Quality Management Areas (AQMAs) to secure an improvement in air quality.
- 4.4.14 In relation to SD18 [Noise] Hertfordshire Policy have recommended requirements for noise mitigation for residential dwellings in close proximity to emergency services. The Council agrees with the identification of other sources of noise and will review the policy to make it more open by removing references to potential noise generating land uses.
- 4.4.15 The EA has recommended some wording for Policy SD19 [External Lighting] in relation to light spill over river corridors and its impacts on biodiversity, while Natural England generally support the policy. In the case of the former, the Council has noted this and the policy will be reworded.

## **4.5 Town and Local Centres / Retail**

- 4.5.1 A total of 36 representations were received on this chapter of the Local Plan.
- 4.5.2 JM Rowe Investments object to a percentage level of A1 uses identified in Policy TLC3 [Restriction of Non Retail Use in Prime Retail Frontage], given the importance of the shopping centre and suggest further flexibility is required. They also consider it unclear what constitutes a shopfront. There is also concern from Nathaniel Lichfield and Partners on behalf of the INTU, that there is not sufficient flexibility in terms of thresholds for other non retail town centre uses and that applications should be assessed on a case by case basis. Equally, they consider that the INTU Watford should not be treated differently from Primary Retail Frontage in terms of restriction of uses identified in Policy TLC4 [Restriction of Non Retail Use in Prime Retail Frontage and request further flexibility
- 4.5.3 These comments are noted by the council, however the percentage level of A1 use identified is considered appropriate, and was based on the responses received from the previous consultation. It is also considered that there is sufficient divergence between the primary shopping area and INTU to account for the different approach, but it should be noted that A3 hubs do partly exist within INTU. Clarity on unit measurements will be provided and constant review of the mall area and the high street will be undertaken.
- 4.5.4 INTU also consider the vacancy timescale identified in Policy TLC5 [Restriction of Non Retail Uses Within Secondary Retail Frontage in terms of change of use from A1 retail to be too restrictive and that it should be avoided in favour of case by case approach. This vacancy timescale has already been reduced to take account of the response

following the first consultation. The Council does not consider that removing the vacancy timescale is appropriate.

- 4.5.5 INTU also considered that the restaurant hubs are too limited, and ask that both the northern and southern hubs, as identified in TL6C [A3 Hub Areas], are expanded. The Council is about to consult on an extension to the northern hub to account for Charter Place. The council is keen to ensure an appropriate balance between the High Street and INTU and therefore consider it inappropriate to include units which are not contiguous with the A3 Hubs.
- 4.5.6 There was general support, including from the Central Town Centre Residents' Association regarding Policies TLC 6A [Restriction of Betting and Money Shops] and TLC 7 [Nuisance and Community Safety (Classes A3 – Restaurant, A4 – Drinking Establishment and A5 – Takeaway)]. These comments are noted.
- 4.5.7 Comments from Hertfordshire Police suggest some additional wording to include CCTV security measures for TLC 6A [Restriction of Betting and Money Shops] and to account for the differences in the licensing and planning regimes regarding opening hours. The Council has noted these comments and will liaise with the Licensing Team to identify appropriate wording.
- 4.5.8 With regard to Policy TLC 8 [Character Areas] Historic England are pleased to see reference to the protection of heritage assets but concerned about the potential impact of retail use on the setting of St. Mary's Church and yard, the green area abutting the car park and Market Street, and Holy Rood Church as it is unclear how much of the site is intended for development. They also ask that further wording is inserted to account for the character and appearance of the conservation area. The Council takes account of these comments and have reworded where appropriate.
- 4.5.9 It was also brought to the Council's attention that Lower High Street starts at ring road south and continues to Bushey Arches. This is a clarification and is noted.
- 4.5.10 An objection as detailed in the SPA2 section has been received regarding 73-77 Clarendon Road in the Commercial Character area. This is noted.
- 4.5.11 Regarding TLC10 [Restriction of Non A1 Use Classes in District and Local Centres], a resident on Langley Road, considers that a further study of the St. Albans Road area should be considered in terms of retail and residential use. The Council recognises this and further work will be done but it will not be part of this local plan document.
- 4.5.12 Planwise Ltd consider Policy TLC11 [Community Facilities] to be too restrictive and inconsistent with National Planning Policy Framework policies and that a shorter time limit should be adopted regarding potential use change. The Council consider that the policy provides facilities in more sustainable locations, reducing car use and is content with the robustness of the policy regarding the NPPF. The Council will consider looking at the time limit regarding vacancy.

- 4.5.13 Sport England suggest this policy [Policy TLC11 – Community Facilities] should be expanded, in light of the removal of G16 [Sports Hubs], and that further wording is needed to ensure that the policy covers indoor and outdoor sports facilities. An additional policy has been prepared for consultation to cover this. They also suggest the policy should require developer contributions for sports and recreational facilities. The Council agrees with this and will look at the wording regarding contributions.
- 4.5.14 The Theatre Trust's support of this policy [TLC11 – Community Facilities] is welcomed.
- 4.5.15 Historic England (HE) consider the proposed retail sites lack specific policy guidance and should be expanded, including referring to heritage assets and showing them on the map. Further detail on specific site considerations and constraints has been provided by HE for each of the retail allocations identified under Policy TLC13 [Town Centre Retail Site Allocations]. This has been noted by the council.
- 4.5.16 Allocation R5 [Charter Place centre and adjoining land] is supported by INTU.

## **4.6 Housing**

- 4.6.1. There were 82 representations on this chapter. A number of general comments were made, not specific to the housing allocations proposed at consultation stage.
- 4.6.2. The Defence Infrastructure Organisation has brought to the Council's attention the statutory height safeguarding consultation zone. This has been noted.
- 4.6.3. No objections were received regarding Policies HS5 [Conversion of Houses in Multiple Occupation (HMOs) to Flats], HS6 [Applications for House in Multiple Occupation (HMOs), self contained flats (as block HMOs) or Hostels, and HS7 [Conversions and Subdivisions of Family Housing], although in relation to Policy HS7 the Central Residents' Association ask that such changes should only be allowed if they are not detrimental to the area. This has been noted by the council and measures including the residential design guide will address character area considerations.
- 4.6.4. Hertfordshire Constabulary recommend secure by design standards for Policy HS5 [Conversion of Houses in Multiple Occupation (HMOs) to Flats], to be included and to consider secure cycle storage and other policies. This has been included in Appendix H Cycle Parking Standards and in other cases new national standards suffice as well as the relevant core strategies policies.
- 4.6.5. Natural England welcome Policy HS10 [Quality of Garden Development] while HCC Property welcome HS11 [Older Persons' and Specialist Housing]. This support has been noted.
- 4.6.6. Policy HS12 [Housing Delivery] and the associated specific allocations received a considerable volume of comments. Recurring themes have been identified in the overarching issues section and relate to sewerage

capacity and requirements, the implication on schools and the need for archaeological assessment and to make specific reference to heritage assets. Relevant information will be recorded for each site and taken into account as more detailed work is done to set out the acceptable development for each site.

- 4.6.7. HE recommend that the heritage assets on site H1 [Chalk Hill] are referenced.
- 4.6.8. Regarding site H5 [Land at Pinner Road] comments were received requesting controls on height, light and noise pollution, and secure boundary treatment. These comments have been noted and are covered by other policies in the plan.
- 4.6.9. Sport England welcome that the proposed H6 [Skate Park] would be dependent on the re-location of the Skate Park, although seek that the location is confirmed. The Council agrees with this position and appropriate wording will be included.
- 4.6.10. Regarding H16 [Bill Everett Community Centre] Sport England have no objection to principle of redevelopment, however an issue with changing facilities in the adjacent sites is noted and appropriate wording will be included.
- 4.6.11. The owner of H21 Town and Country Club, Halsey House, Rosslyn Road, does not want the site be allocated for residential and has no intention to sell. This site has now been withdrawn from the allocation.
- 4.6.12. Transport for London reiterated that a site at the Metropolitan Line Station for mixed use should be allocated. The Council has included this site in the allocations [Site H22 – Watford Station Cassiobury] and will continue to liaise with TFL to define site boundary and specific development parameters.
- 4.6.13. Historic England consider it appropriate to include positive guidance on the protection and enhancement of the listed building on site H22 [Watford Station Cassiobury]. The Council agrees with this and accordingly appropriate wording will be included.
- 4.6.14. Regarding GT 1 [Gypsy and Traveller Provision] HCC agree with the location of the site but recommend screening, while the EA have noted that a foul sewer traverses the site. The Council has noted these comments and will continue to work with the EA on this matter, while background text will be added with regard to suitable screening.

#### **4.7 Economic Development and Employment**

- 4.7.1 19 comments were received on this chapter in total. Several developers objected to the restriction on residential use in Clarendon Road, in policies EMP3 [Employment Areas] and EMP4 [Clarendon Road, Station and Bridle Path Office Area] and queried the evidence for, and viability of, additional office space. Amendments to the employment area boundary (for Clarendon Road/ Station Road/Bridle Path) were also proposed in respect of 27 Woodford Road, 39 Clarendon Road, and 73-77 Clarendon Road. There is a concern that the Clarendon Road policy

does not account for the need for other types of uses (those uses that are not just B1a/b) which add to the diversity of the area.

- 4.7.2 An objection was also received in respect of the proposed employment use of E5 [BT Depot] at Reeds Crescent in Policy EMP3 [Employment Areas]. The owner would prefer the site to have a residential allocation. This matter continues to be considered by the Council in terms of suitable uses.
- 4.7.3 In response to these comments the employment area boundary will be amended to exclude 27 Woodford Road and additional evidence has been commissioned regarding the deliverability of office space in the Clarendon Road employment area. A Strategy for the Clarendon Road area is being prepared. It is not considered appropriate to exclude the other properties [73-77 Clarendon Road, 39 Clarendon Road] at this stage and the Council will await the findings of further work.
- 4.7.4 Hertfordshire County Council (HCC) support policy EMP3 in terms of inclusion of site E4 [Greycaine Road/Odhams/Sandown] as well as the policy's aims to resist the loss of B uses. However they seek additional wording to refer to the Waste Core Strategy Area of Search allocation. Additional wording will be included.
- 4.7.5 Historic England consider that Policy EMP4 [Clarendon Road, Station and Bridle Path Office Area] should fully consider Victorian villas [Listed Locally at 36, 73 and 75 Clarendon Road]. More detail on the Locally Listed Buildings relating to site E6 (Clarendon Road) will be included to ensure that the policy designation is consistent with for paragraphs 132 to 136 of the NPPF 2012 insofar as any impact on the heritage assets need to be weighed against the wider public benefit. Number 36 Clarendon Road has already been demolished.
- 4.7.6 Warner Brothers welcomed Policy EMP5 [Leavesden Studios Operations – The Island Site] and would seek further acknowledgement of the economic potential of the site. Further wording will be included.
- 4.7.7 One objection was received to the potential employment use of Woodside Leisure Park under Policy EMP6 [Woodside Leisure Park], suggesting that residential would be a better use. The Council will undertake further assessment of this site. However whilst it is not formally proposed as an employment area, should the site come forward for employment use, it would be preferred as the site already provides employment. The policy will be developed to ensure that any employment use will be compatible with the residential location. Further consideration will be given to the most appropriate use of these sites.
- 4.7.8 Natural England have noted that the development on Policy EMP6 [Woodside Leisure Park] land should be mindful of the Albans Wood LNR and that a buffer may be required. This will be noted as part of further site assessment and additional wording included as appropriate.

## **4.8 Education**

- 4.8.1 3 comments were received on this chapter. Hertfordshire County Council encourages the provision of development for education and support the proposed allocation of a school site on land at Bedford Street (this relates to Policy SP1 [Education]), but also note potential feasibility issues with the Bedford Street Site. This has been noted and work between Watford Borough Council and Hertfordshire County Council is ongoing.
- 4.8.2 Due to the small number of responses and subsequent enquiry from landowners, additional consultation in relation to the land south of Bedford Street was undertaken between 24<sup>th</sup> June and 22<sup>nd</sup> July 2015. Letters were sent to known landowners, addresses within the site, and to addresses on the other side of Bedford Street.
- 4.8.3 7 responses were received to this additional consultation – most concerns related to access and road capacity, parking congestion, property values, construction duration, school status, impacts on the conservation area, and safety as well as the unsuitability of the site due to noise pollution. There are other significant objections from the owner of an existing business on the site who objected as they were already operating a successful business and would fear its viability should they be required to move, as there are no suitable replacement sites. Another landowner would like residential development on part of the site and is concerned about impacts on land values. The objection considers it unreasonable and unsuitable to seek to locate the school here rather than within the main part of the Watford Junction SPA to which the needs relates.
- 4.8.4 The Council are continuing to liaise with the county council to see if there are alternative ways of delivering a school within the main part of the SPA (i.e. to the east of St Albans Road). This will also be considered as part of an updated masterplan for Watford Junction.

## **4.9 Transport**

- 4.9.1 5 comments were received on this chapter. HCC submitted a late comment requesting reference to travels plans
- 4.9.2 Core Strategy Policy T3 [Improving Accessibility] requires all development proposals to be accompanied by a green travel plan and Policy T4 [Transport Assessments] requires a transport assessment/transport statement as applicable so there is no need for an additional policy in Local Plan Part 2.
- 4.9.3 On Policy T6 [Car Parking Provision] Hertfordshire Constabulary requested that wording be added to the policy to discourage rear parking courts, in terms of crime prevention. This is acknowledged however such content is more relevant to, and already present in, the Residential Design Guide.
- 4.9.4 HSBC Bank (UK) Ltd. considers T6 [Car Parking Provision] and Appendix G (associated requirements for minimum parking standards for

residential and commercial development) is contrary to the NPPF, and are not appropriate in a special policy area. A revised approach to parking has been prepared for consultation.

- 4.9.5 Hertfordshire Property welcomes the flexibility in Appendix G [Car Parking Standards] in relation to the assessment of uses not included, particularly in relation to schools. This is noted by the Council.

#### **4.10 Infrastructure**

- 4.10.1 1 comment was received on this chapter. Policy INF2 [Mobile Communications] was supported by the mobile operators association. Following internal discussions some small changes were proposed to add reference to rationalising equipment where possible to minimise proliferation. These changes have been sent to the Mobile Operators' Association agents who were happy with the changes.

#### **4.11 Urban Design and the Historic Environment**

- 4.11.1 6 comments were received on this chapter. Regarding Policy UD3 [Design Policy: Shopfronts and Advertisements/Signs] Hertfordshire constabulary identify the deadening effect on the street scene of exterior roller shutters if solid/pinhole as well as certain advertisement types. The Police Architectural Liaison Officer asked for guidance on the type of shutters to be used. This has been noted and is fully covered in the Council's Guide on shop front design.
- 4.11.2 British Sign and Graphics object to reference to the Shopfront Design Guide because they have concerns about the consultation on that document (same comments made in response to first consultation). The council considers the consultation was sound and reaffirms that the design guidance is as stated, guidance.
- 4.11.3 Historic England support policy UD4 [The Historic Environment, Listed Building (Nationally Listed Buildings)] and a number of suggestions have been submitted to align it more closely with the terminology in the NPPF. Further text will be added to ensure to requested consistency.
- 4.11.4 National Grid has concerns about the consistency of the Policy UD4 [The Historic Environment, Listed Building (Nationally Listed Buildings)] with the NPPF and objects to the proposed wording which it considers does not fully appreciate wider planning benefits relative to development and heritage assets. A rewording is suggested. However the Council is keen to ensure that new development does not harm heritage assets and consider it unwarranted to alter to policy, however greater consideration will be given to wider benefits.
- 4.11.5 HCC welcome Policy UD4 [The Historic Environment, Listed Building (Nationally Listed Buildings)] and ask that any archaeological written scheme of investigation must include adequate provision for deposition of archives with the museums. HCC also suggest that explanatory text should be included to ensure that the historic environment accounts for below archaeological remains and historic landscapes in accordance

with the NPPF. The Council has noted this and the text will be amended to reflect these comments.

#### **4.12 Green Infrastructure, Sport and Recreation**

- 4.12.1 12 comments were received on this chapter. Regarding Policy GI5 [Trees, Woodlands and Hedgerows] the Herts and Middlesex Trust seek an additional policy on biodiversity for assessing the ecological value of a site to ensure that there is no net loss or where possible result in enhancement. The Council has prepared a new policy on biodiversity for consultation.
- 4.12.2 The Environment Agency suggests a wording change to account for cases where removing trees will result in an ecological benefit. The council will consider this suggestion when reviewing the policy.
- 4.12.3 Natural England support policy GI5 [Trees, Woodlands and Hedgerows] however, they believe it should be expanded to ensure that development proposals will comply with the NPPF's paragraphs on the protection and enhancement of biodiversity and habitat networks. The Council notes this and while a new specific policy has been prepared for consultation, a wider policy already exists in the adopted core strategy.
- 4.12.4 Regarding Policy GI7 [Open Space and Children/Young Person's Play Space in Residential Development] Hertfordshire Constabulary requests that such play areas should be designed with regard to the Fields in Trust's "Planning and Design for Outdoor Sports and Play". Natural England welcome the policy and considers that green infrastructure should be an integral part of the process and provide further guidance for consideration. The Council has noted these responses and references to relevant standards and guidance will be included where appropriate.
- 4.12.5 Cemeteries: We consulted on 3 options for cemetery provision – land at Paddock Road (within Hertsmere), land at Russell Lane, and land at North Watford cemetery. As Paddock Road is outside of Watford's Borough boundary we cannot allocate in our Local Plan. Hertsmere have not allocated it in the latest version of their local plan, and received objections when they included it for consultation at an earlier stage. We also received objections from the West Watford and Oxhey Garden and allotment Society. The Environment Agency objected to land at Russell Lane due to its location in Source Protection Zone 1, where there would be a high risk of pollution of the groundwater. The landowners of this site also objected. The Environment Agency also raised concern about the use of additional areas at North Watford Cemetery, also due to potential groundwater contamination and asked that further testing be done on this site. Further testing has been undertaken and shows that there may be some limited capacity for additional burials here – this is already identified as a cemetery so does not require additional allocation.
- 4.12.6 In light of the above we do not intend to include any additional cemetery allocation in the Local Plan Part 2, but to use existing cemetery sites and

continue testing as required to protect against groundwater contamination. Cemetery capacity will be managed through the Cemetery Strategy, a separate document to the Local Plan, and will include measures such as limiting burial to residents only, and investigating the use of space in adjacent districts.

- 4.12.7 Regarding Policy G19 [Changes to the Green Belt] HCC Property consider that the presence of a green belt designation on sites used for education acts as a constraint and obstacle to providing new, or enhancing existing facilities This matter was raised at the time of the core strategy when it was agreed there was no need to remove schools from the Green Belt.
- 4.12.8 Warner Brothers Studio Leavesden support the policy to amend the greenbelt specifically for studio operations.

#### **4.13 Monitoring and Delivery**

- 4.13.1 Appendix F - Noise, Odour and Vibration - No Comments Received
- 4.13.2 Appendix G - Car Parking Standards - No comments received – although the comments received under the Transport Chapter relevant to this appendix have been noted in this case.
- 4.13.3 Appendix H - Cycle Parking Standards - No comments received

#### **4.14 Environmental Report**

- 4.14.1 Alternative wording / policy proposed by respondents in Hertfordshire Ecology. Natural England are content with the environmental report and support the biodiversity objectives.

#### **5.1 Conclusion and next steps**

- 5.1.1 Having considered all the comments received it was agreed that additional work is needed before the plan is prepared for publication – a framework agreement was set up to procure consultancy services to complete additional evidence studies, design and masterplanning required.
- 5.1.2 In the meantime work has been continuing to make edit and update the plan to reflect the consultation feedback.
- 5.1.3 We are undertaking a consultation focussing on a small number of new and revised policies from December 2015 to February 2016. This includes new policies on sports facilities, biodiversity and tall buildings, accompanied by a Supplementary Planning Document on tall buildings as well as a change to the restaurant hub boundary near Charter Place, a revised approach to parking standards, the removal of the cemetery policy and sites, and a change to the green belt to exclude the existing and proposed gypsy and traveller sites, which will also be safeguarded for that use. .

- 5.1.4 Additional work is also underway to produce a Strategy for Clarendon Road, a Masterplan for Watford Junction and to assess the whole plan viability. The output of this additional work will be used to inform the publication version of the Local Plan Part 2.

This document can be made available in alternative formats including large print. The council also has staff who can verbally translate the document into a range of other languages. Please contact us on tel: **01923 226400** for more information.