

Document Section	Respondent	Comment ID	Summary	supobj	Officer Comments	
Chapter 1: Introduction	Mrs Renu Prinjha [3611]	932	Please refer to submitted representations	Support	None.	Change to Plan in response to comment No change.
Chapter 1: Introduction	Miss felicia blake [3647]	944	I will not submit this	Comment	None.	No change.
Chapter 1: Introduction	Sport England (Planning Manager - Mr Roy Warren) [3671]	973	Support is offered for the vision for Watford in relation to paragraph 1.17.7. This is because this part of the vision supports local people enjoying active lifestyles through measures such as the provision of pedestrian/cycle routes and quality open spaces. This approach would accord with Government policy in paragraph 91 of the NPPF and Sport England's 'Towards an Active Nation' strategy.	Support	Support welcomed.	No change.
Chapter 1: Introduction	Sport England (Planning Manager - Mr Roy Warren) [3671]	974	Support is offered for strategic objectives 1.18.1, 1.18.8 and 1.18.9. These objectives seek to encourage active and healthier lifestyles through measures such as delivering infrastructure that will provide active travel options and connecting people to services and facilities through better walking and cycling access. These objectives would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Towards an Active Nation' strategy.	Support	Support welcomed.	No change.
Chapter 1: Introduction	Sport England (Planning Manager - Mr Roy Warren) [3671]	995	A specific standalone health and well-being policy should be included in the local plan to support the Strategic Objective (1.18.8) to improve health and well-being which accords with Hertfordshire County Council's advice.	Object	Although health is implicit in the Draft Local Plan, WBC agree there is no overarching strategy as such that sets out objectives and although it is a land use document, there is scope to make health objectives more clear. A discussion on Policy and Health Impact Assessments will also be included.	New chapter 12 'Healthy Communities' added with policy included.
Chapter 1: Introduction	Wenta . [3738]	1032	Paragraph 1.10 - Wenta supports the Council's key strategic issues of providing new housing and employment space and delivery of infrastructure. We suggest a small amendment to 'physical and social infrastructure'. Paragraph 1.13.4 – Wenta supports the objectives of the Watford Corporate Plan. Wenta supports paragraph 1.13.5 to provide more small business space, intensify existing employment land, encourage mixed use developments, reduce carbon emissions and encourage sustainable development. Wenta believes that the young population of Watford and technological advancements means that an increasing number are seeking a more entrepreneurial lifestyle and access to small affordable workspaces will facilitate this.	Support	Support welcomed and comments noted.	Chapter 1 'A Spatial Strategy for Watford' has been revised and has included greater emphasis on social infrastructure required to support development. Additional text has also been added to Chapter 2 'Core Development Area'.
Chapter 1: Introduction	Friends of the Earth (Anna Addison) [3407]	1184	Under the key infrastructure stakeholders is Watford also engaging with Network Rail and other providers of public transport as these stakeholders will be crucial to achieving the aims of the Local Plan and the Councils Declaration on the Climate Emergency.	Comment	Network Rail are one of a number of key stakeholders that provide infrastructure that is affected, and affects, growth. The Council is engaging with Network Rail, among other infrastructure providers, as part of the Local Plan preparations.	No change.
Chapter 1: Introduction	Friends of the Earth (Anna Addison) [3407]	1186	1.11.1: Corporate Plan section does not also highlight the Plan's vision to "Enable a sustainable town". As this is a crucial part of the Local Plan it should be highlighted right at the start of the Local Plan, showing how the authority's Plans link on this important issue. 1.14.5: We welcome the Local Plan and the Council's Declaration of a Climate Emergency. 1.17.1: The Vision for 2036 does not mention the Councillors "pledged to do everything in their power to make the borough carbon neutral by 2030". 1.17.2: Why does this Economic section not also include sustainability/ environmental considerations?	Comment	Comments noted. The sustainable town objective is an important part of Watford's future aspirations and could be set out more clearly in the Introduction. The Local Plan has a number of policies that together seek to address climate change. As the Local Plan is a corporate document that is adopted at Council, the support for the climate change declaration and actions taken to address it as part of the Local Plan as included as part of this. There is overlap shared between the three sustainability principles. The first draft has separated out different elements to avoid duplication. Chapters 1 and 2 will be revised prior to the next iteration of the draft Local Plan to provide more clarity about sustainability within the Local Plan.	Chapters 1 'A Spatial Strategy for Watford' and 2 'Core Development Area' have been revised to provide references to Watford becoming a sustainable town and measures to address the climate emergency declaration. The issue of achieving sustainable development including being carbon neutral has been strengthened through the document.
Chapter 1: Introduction	Environment Agency (Planning Advsior - Mr Theo Plattsdunn) [3848]	1281	We believe many of the strategic objectives of the borough relate and interlink to our requirements at the EA	Comment	Comments noted and the offer for further engagement is welcomed.	Issues related to flood risk in Policy NE9.4 'Flood Risk and Mitigation' and Policy NE9.5 'Surface Water Management' have been revised and supporting text added to provide more clarity about the need and benefits associated with flood risk mitigation.
Chapter 1: Introduction	Canal and River Trust (Area Planner - Tessa Craig) [3892]	1383	We welcome recognition of the variety of functions the Grand Union Canal provides (1.14.2) and support the environmental vision (1.17.4) and the strategic objectives identified in the draft plan related to transport and mobility (1.18.1), climate change (1.18.4), the historic environment (1.18.5), public realm and outdoor environment (12.18.7), health and wellbeing (1.18.8) and infrastructure (1.18.9). Many of these objectives are consistent with our own and we are uniquely placed to support the health and wellbeing objectives identified in the draft plan.	Support	Support welcomed.	No change.
Chapter 1: Introduction	Warner Bros. (Mr Dan Dark) [3491]	1498	As you will be aware, an area to the south of the WBSL site and a proportion of the area referred to as "the island site" sit within the Borough of Watford. Given the significant economic benefits the Studio affords to the local area and the national economy, it is imperative that Studio uses and development of the Studios are not prejudiced by restrictive policies or allocations within the new local plan. In its current form, the local plan does not acknowledge the existence of the Studios within Watford Borough, which is surprising given the significance of the Studios. Therefore, we would ask that some recognition of WBSL, its importance and its location within Watford Borough be included within the plan.	Comment	The significance of the studios is acknowledged, however virtually all of it lies outside the Borough in Three Rivers District aside from land at North Western Avenue and does not merit a standalone policy to protect it.	No change.

Chapter 1: Introduction	Hertfordshire County Council (Martin Wells) [3559]	1707 Minerals & Waste Planning	Comment	<p>Comments noted. The introduction can be amended to make reference to the full development plan for Watford, which includes the Minerals Local Plan and Waste Local Plan to provide clarification and specify Hertfordshire County Council as the Minerals and Waste Planning Authority.</p> <p>Reference can be made to the Employment Land Areas of Search in the document and the Plan could also address the use of extracted materials in more detail.</p>	<p>Chapter 1 'A Spatial Strategy for Watford' has been revised to include a table setting out elements of the Development Plan, including the Minerals and Waste Local Plans. Reference to Hertfordshire County Council as the Minerals and Waste Authority is also set out.</p> <p>Reference to Employment Land Areas of Search has been added to the supporting text of Policy EM4.2 'Designated Industrial Areas'.</p> <p>Policy CC8.3 Sustainable Construction and Resource Management had been added to the Plan which seeks to reference the emerging Waste Local Plan and the requirement for circular economy statements.</p>
Chapter 1: Introduction	Hertfordshire County Council (Martin Wells) [3559]	<p>1711 The historic environment includes archaeological remains, historic buildings and historic parks and landscapes. The 2019 NPPF defines the historic environment as:</p> <p>“All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”</p> <p>And heritage assets as:</p> <p>“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority.”</p> <p>It is considered that the First Draft Local Plan should reflect the local distinctiveness of the borough as represented by the historic environment, rather than repetition or re-writing of the NPPF. The historic environment is absent as a continuing thread though the plan as currently written.</p> <p>For example, it is absent from Section 1.14: Environment and whilst It is noted in paragraphs 1.17.5 and 1.18.5, these paragraphs should be clear what the historic environment includes and what heritage assets are. The 2019 NPPF notes that sustainable development should:</p> <p>“contribute to protecting and enhancing our natural, built and historic environment” (paragraph 8)</p> <p>And further notes that strategic policies should:</p> <p>“be prepared with the objective of contributing to the achievement of sustainable development” and “make sufficient provision for.... conservation and enhancement of the natural, built and historic environment, including landscapes...” (paragraph 20).</p>	Comment	Chapter 1 has been redrafted and includes specific references to the historic environment.	Specific references (1.20; 1.23 and The Vision) are included in the revised chapter setting out the spatial strategy for Watford. This aspect has been strengthened in the revised wording.
Chapter 1: Introduction	Hertsmere Borough Council (Planning Officer - Oliver Galliford) [3920]	1719 Overall, Hertsmere supports the key principals within Watford’s new Draft Local Plan, including the redevelopment and intensification of land in sustainable locations. The council appreciates that Watford have taken to significant steps to address their identified need, and accept that there is unlikely to be enough suitable land to meet their targets. As part of the duty to cooperate Hertsmere will be open to further discussions about how long term growth requirements can be addressed across the wider Housing Market and Functional Economic Market Areas.	Comment	The Council welcomes Hertsmere Borough Council’s representations made on the first draft Local Plan. The Council looks forward to continued work with Hertsmere Borough Council to plan for the growth required strategically across the wider Housing Market and Functional Economic Market Areas.	No change.
1.10 Collaborative working	Hertsmere Borough Council (Planning Officer - Oliver Galliford) [3920]	<p>1715 Hertsmere encourages collaborative working between neighbouring authorities, and acknowledges that it is part of both the Housing Market and Functional Economic Market Areas for South West Herts, and thereby shares a responsibility for creating an environment that meets the demands for growth in the area.</p> <p>The NPPF encourages councils to first address their own identified need, which equates to 714 homes per year or 12,852 homes over an 18 year plan period (plus a 5% buffer) for Hertsmere, and the implications of this level of development. Bearing in mind that Hertsmere’s current housing capacity is considered to be solely that which can be developed on urban land, and therefore does not include any sources of land covered by Green Belt designation.</p> <p>The council feels that the wording used within the collaborative working section of the Local Plan suggests that any of Watford’s unmet need should automatically be met by the rest of the districts within the Housing Market and Functional Economic Market Areas. Hertsmere would ask for further clarification to be provided on this point with an acknowledgement, in line with the NPPF, that the starting point is for local authorities to address their own needs. We also recognise the requirement to consider addressing the unmet need of neighbouring authorities across the longer term and this work is also progressing through the Joint Strategy Plan for South West Hertfordshire.</p>	Comment	Work on the Housing and Economic Needs Assessment has continued and the revised Watford Local Plan has made provision to meet its housing need during the plan period. The Council welcomes continued engagement through the duty to cooperate to address cross-boundary issues.	No change.

1.13 Economy	Transport for London (Principal Planner - Mr Richard Car) [2980]	1492 1.13.7 - Correction The Metropolitan Line serves Watford Underground station but not Watford High Street which lies on the London Overground route to Watford Junction	Comment	Comments noted	Text and map amended.
Policy CC6.2 Flooding and Resilience	Claire Jones [3435]	959 The structure of the policy suggests sustainable drainage systems would be required only on developments in a flood risk zones 3 and 2 or on sites in flood zone 1 over 1 ha. However, to accord with NPPF paragraph 165 all major developments should be required to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. This should be clarified in policy.	Object	Objection noted. New policy will be created to ensure surface water and drainage systems are covered. WBC is working closely with the lead local flood authority, Hertfordshire County Council on this matter. HCC have a statutory role in evaluating surface water drainage plans for all new project proposals.	Amendments to policy adding information on surface water flooding and requirement of SUDs including reference the requirements for flood risk assessments in all zones as appropriate.
Policy CC6.1 Sustainable Construction and Design	Mr Eddie Page [3665]	971 What about embodied carbon in the materials that are used in construction ? What about chain of custody issues ? Do we want for instance to be using stone from an unregulated quarry in India which has to be transported half way round the world to get to Watford instead of stone from the East of England? Do we want developers to use uncertified timber? Can the plan do more around this please?	Comment	Concern noted. The Council supports the local sourcing of materials and the re-use of materials to reduce waste as part of the waste hierarchy to minimise unnecessary use of energy and resources. Government regulations provide the framework for sourcing of materials and competition and this lies outside the remit of planning. Developments also need to comply with UK building regulations including Regulation 7 on materials and workmanship. The suggestion will be forward to the Council's Procurement team.	Set out the waste hierarchy in Chapter 8 'A Climate Emergency'.
1.18 Strategic objectives	S Hille & Co (Holdings) Ltd (Mr Ian Scheer) [3404]	1342 The overall strategic objectives set out in para 1.18 of the First Draft Local Plan are supported, in particular, the objective of delivering new housing to meet the needs of the population and the creation of balanced and mixed communities.	Support	Support welcomed.	No change.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1549 Environment Resource Planning (Ecology). Although biodiversity is mentioned within Section 1.17 of the draft plan (which outlines the vision for the borough) it is not mentioned within Section 1.18, which lists the Strategic Objectives for the plan. Biodiversity and Ecosystem services should be referred to, (if not within its own section) under Climate Change (Strategic Objective 1.18.4) and/or Public Realm and Outdoor Environment (Strategic Objective 1.18.7). This is important with regard to the areas of Greenbelt which border the borough along the Gade and Colne Valleys, but elsewhere throughout the urban areas where the greenspaces and their quality are important resources for wildlife and people.	Comment	Agree. Biodiversity can be incorporated into the environmental objectives, vision and Chapter 1 'A Spatial Strategy' and Chapter 9 'Conserving and Enhancing the Environment'.	Reference the biodiversity has been added to the environmental objectives and vision. Text has also been added to the policies set out in Chapter 9 'Conserving and Enhancing the Environment' to clarify the importance of biodiversity.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1550 Highways & Transport To enable HCC as the Highways and Transport Authority to assess the Local Plan, the borough council will have to consider and demonstrate the traffic impact of the proposals, sites and policies and identify mitigation measures, with a focus on sustainable transport. To assist LPAs in gathering the evidence required, the county council's 'Local & Joint Strategic Plans Engagement Document' sets out the level of transport/highway information and evidence already available. It also provides a clear picture of what is required to enable a sound understanding and evidence base to be developed at each stage of the Plan making process. This is applied consistently across the County. HCC is aware that the borough council has commissioned transport modelling work for the Local Plan, using the countywide transport model (COMET) and using the Paramics Town Centre model to understand impacts of proposed development and mitigation for particular strategic sites. HCC also expects all the site allocations and strategic sites within this First Draft Local Plan to be considered in the next combined Local Plan run to be undertaken by HCC within the next 3 months. The potential transport and highways impact of windfall allocations will also need consideration. Continued close working with HCC is encouraged in terms of assessing the transport impact of the Plan and to identify mitigation needs, to ensure there is a mutual understanding on all matters relating to how the Local Plan manages transport issues. Watford Borough Council will need to work with other neighbouring LPAs and other key stakeholders such as Highways England and Network Rail to understand cumulative impacts and develop deliverable mitigations. It may be that some of these are of a more strategic nature and may be outside of the Borough or serve a wider area. Any identified impacts will need to be considered as part of the Local Plan development and suitable mitigation will need to be developed in line with the county council's LTP4, the South West Herts Growth & Transport Plan and any other relevant transport plans and strategies. Depending on the findings of the modelling already underway or planned, further transport modelling may be needed to test mitigation measures and to demonstrate that the residual impact of the proposed growth is not severe. Any needed mitigation must be incorporated into the Local Plan and supporting Infrastructure Delivery Plan as necessary (with costings and responsibilities). This will ensure that sufficient evidence is available by the time of any Examination so that the County Council is able to support the policies, development	Comment	Transport is a significant issue within the borough at present and new development will contribute to additional movements. To reduce impact on the transport network, the Plan has set out maximum car parking standards that reflect the core development area to reduce the potential impact of new development on the transport network. Additionally, there are policies in proposed to support sustainable transport measures in conjunction with new development including demand response transport, exploration to alternative options to the former Metropolitan Line Extension proposal. A strategic policy related to sustainable transport has been set out reflecting the objective and measures set out in the Local Transport Plan and supporting strategies. Watford Borough Council has worked with the Highways Authority to identify mitigation measures and set out a framework within the Local Plan to support the delivery of these. As part of the preparation of the Local Plan and the Infrastructure Delivery Plan, infrastructure providers, including those associated with the transport network have been contacted to get views on potential issues associated with new growth. We agree with the need for a more strategic approach and work through the Joint Strategic Plan may help with the Multi Modal Study commissioned as part of the Joint Strategic Plan. The Highways Authority will have a key role in co-ordinating cross boundary issues with Network Rail and Highways England working in collaboration with local authorities including Watford. WBC will support mitigation measures identified in the Local Transport Plan and future iterations that reflect additional transport modelling being undertaken. It is important to recognise that while the Local Plan can set out the framework to facilitate delivery of measures to mitigate impacts on the transport network, the Council is very much reliant on the County Council to set out the measures required being the Highways Authority. This is particularly important in the context of strategic growth and the wider transport network within and outside of Watford's boundaries. WBC and HCC have to support Government growth and must do so by working together.	A strategic Transport Policy has been included in the Local Plan, along with a wider focus on alternative sustainable transport options to the car. Reference to LTP 4 and the Transport User Hierarchy has been made within the strategic and local policies related to transport and infrastructure in Chapter 11.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1551 Housing Strategic Objective (1.18.2) Highways & Transport. The principle of the density level of housing reflecting the sustainability of the location is supported which HCC understands to be proximity to services and public transport nodes/interchanges. This is a key factor in reducing the need to travel as often or as far, as well as making walking, cycling and public transport more attractive and convenient and therefore aligns with the Transport User Hierarchy of LTP4.	Support	Comment noted. A majority of Watford's growth is in the High Sustainability Zone.	No change.
Policy SD2.2 Achieving Sustainable Development	Wenta . [3738]	1035 The points set out in the policy are appropriate and demonstrate the requirements of sustainable as set out by the NPPF 2019. We would suggest that some reference to mixed-use development is included on the policy text, which will help in achieving the policy objective.	Support	Support welcomed.	No change.

1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1553 Climate Change Strategic Objective (1.18.4) Highways & Transport. This paragraph is welcomed, with regard to encouraging non-car travel. We would note that the pattern of development has a role in creating conditions for reduced use of and reliance on cars, alongside having supporting infrastructure to enable and prioritise public transport, walking and cycling	Support	Support welcomed.	No change.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1554 Place making and design Strategic Objective (1.18.6) Highways & Transport This paragraph is supported including the mention of high-quality design and development seeking to create a sense of place and relationships with the street, which helps to create an activated environment which can encourage more walking, cycling and feeling of safety	Support	Support welcomed.	No change.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1555 Public realm and outdoor environment Strategic Objective (1.18.7) Highways & Transport This paragraph is supported and the county council agrees there are opportunities to bring together delivery of green infrastructure, public realm improvements, wayfinding and other active travel improvements.	Support	Support welcomed.	No change.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1556 Health and Wellbeing Strategic Objective (1.18.8) Public Health The Hertfordshire Public Health Strategy endorses the widely recognised need for a place-based, whole-system approach to improving health and reducing health inequalities; this means addressing the complex causes of health inequalities at the community level by improving the places, the physical, built, natural and social environments - in which we live, work, learn and play. This is an approach which aligns well with spatial planning and the principles of sustainable development. Spatial planning has a clear and strong influence on healthy choices made by individuals, and evidence suggests that there are a number of issues that impact on physical and mental health. • Environments which are safe, environmentally sustainable, have good environmental infrastructure to protect against extreme weather events, have good air quality and are not overly exposed to noise nuisances are those which can be regarded as healthy. • High quality environments i.e. those with good green space, visual amenity, accessibility to services are needed for people to undertake the optional and social activities which contribute to physical and mental wellbeing, and community life. Building health into our urban environments is a vital step towards delivering longer term improvements in health across the whole of society. This can be as important as investment in medical interventions. By building health into planning we seek to address some of the causes of poor health from the outset. The principle of health inequalities states that those who are most economically, environmentally and socially disadvantaged are also those more likely to experience poorer health and wellbeing. This is a fundamental concept for any planning that will effect change in these areas, and an important consideration for the Watford Local Plan. For further information on building health and wellbeing into spatial planning, we recommend referring to the Hertfordshire Health and Wellbeing Planning Guidance ² and Public Health England's Spatial Planning for Health	Comment	Health is an important issue referred to throughout the Plan in the context of healthy streets, safe and healthy communities, mental health, pollution, health of the elderly and those with degenerative conditions, better health and wellbeing, making a transition to healthy lifestyles, impacts of traffic on public health and poor design of buildings impact on health. However, agree with HCC that it is not explicit enough. The Marmot Review also makes clear that cuts to Local Government services and the increase in poverty are perhaps the key issue with regard to health problems, and outside the remit of a Local Plan. However, this is an important issue within the Local Plan and will be reviewed and amended.	A new chapter on health has been added and a requirement for Health Impact Assessments has been included in policy.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1557 Monitoring and adaptive management Strategic Objective (1.18.9) Highways & Transport Generally, this paragraph could be stronger. Infrastructure (of all types) to support development and to make that development sustainable must be delivered where and when it is needed. It is suggested that the following sentence is added: "New development needs to provide and contribute to improving transport infrastructure with a focus on infrastructure to enable and encourage walking, cycling and public transport use in line with Policy 9 in the county council's Local Transport Plan LTP4, adopted in May 2018." Improvements to public transport infrastructure will be necessary to support growth of the borough not just that mentioned in Strategic Objective 1.18.1 and not just about safeguarding the existing. For instance, bus priority measures, quality interchanges/bus stops/points of access to the network, pedestrian/cycle connections to the passenger transport network.	Comment	Agree there is a need to strengthen this section, or ensure the suggestions are elsewhere in the Local Plan. Further work on transport infrastructure requirements has been undertaken and referred to in the draft Plan.	Increased references to measures and objectives identified in the Local Transport Plan and supporting strategies have been set out in the draft Plan.
2.1 Introduction	Herts County Council (Planning Officer - Mrs faye Wells) [3752]	1060 HCC has an interest in the Dome Roundabout Strategic Development Area, subject to Policy SD2.11. It is noted that Part 4 of the policy requires: 'Mixed use development to include health and community uses near North Watford Library.'	Comment	Comments noted.	No change required
2.1 Introduction	Celia Rowbotham [3418]	1146 Has any research been done into the viability of using mid to high rise buildings close to the town centre with ground, 1st & 2nd floors as residential and upper floors for commercial use? This would enable residents to live close enough to the centre to walk to major shops/services or have easier access to bus services. Car parking to be beneath blocks or at the very top with shared use for commuting office workers and residents' visitors out of office time.	Comment	Comments noted. Further work has been undertaken related to viability. The tall buildings study has investigated potential capacity with viability considered and a viability study of the draft Plan has been completed which has explored the viability of site typologies.	No change required

2.2 Scale of Growth and Delivering New Development	Mr Peter Hutchinson [3698]	1007 Watford's growth can only be sustainable if there is a big modal shift in transport from cars to other modes. To date Watford's development has been akin to that of a city, with its policies of being a regional shopping centre, a major employment hub with large office buildings and many business parks, a provider of regional health services and increasing amounts of housing. The problem is that Watford does not have the transport infrastructure of a city and it never will. Current initiatives to get people onto bikes and buses will only have very limited results.	Object	Comments noted. The shift to sustainable transport is perhaps the biggest challenge Watford faces in the Local Plan. We will work with the County Council and service providers on this. Most congestion is at peak times and this is not unusual in the South East, also a lot of traffic problems are caused by people moving through Watford, not coming to it.	Strengthened commitment to sustainable transport infrastructure.
2.2 Scale of Growth and Delivering New Development	Wenta . [3738]	1033 Wenta appreciates and agrees that land availability is limited within the Borough as set out in paragraph 2.2.2. We suggest that the competition for land uses would be helped by encouraging more mixed-use development and intensification of existing employment and housing sites. There is support for employment growth. Wenta suggests that office use should be encouraged in all areas where it can be demonstrated that two different uses could be compatible with each other; not just in designated employment areas (paragraph 2.2.6). Paragraph 2.2.8 is welcomed by Wenta as a variety of commercial units/workspaces are needed in a diverse economy.	Support	Comments noted. Intensification and mixed use development will be supported where it will enhance the employment designation. Applications will need to be considered in the context of the wider surroundings. The SW Herts Economic Study has identified a need for land for industrial employment uses in Watford that will be difficult to meet in the Local Plan. Therefore, policies seek to protect existing areas used for industrial purposes. Office development should be focussed in existing office locations where possible.	Office use has since been considered as part of Policy EM4.3 'Office Development'. To support office development and protect employment areas for other types of employment a sequential approach has been set out. The strategy for mixed use development has been set out in Chapter 1, 'Policy SS1.1 'Spatial Strategy'.
2.2 Scale of Growth and Delivering New Development	Celia Rowbotham [3418]	1145 The majority of current and pending housing developments appear to be 1&2 bedroom apartments with high-rise as the norm, yet the average resident's age is recorded as 36. This surely indicates we can expect more families in the near future who will require more 2&3 bedroom dwellings with attached green space for healthy child development.	Comment	Concerns noted. Having a balanced and proportionate housing mix is important and this will be challenging given the development required and the limited land available to support this. Greater clarity about optimising use of land, mix of homes and providing a quality environment can be strengthened in the Plan.	A requirement for 20% of new homes to be family sized units has been set out in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land'. Requirements for communal amenity space is set out in Policies HO3.11 'Private and Communal Outdoor Amenity Space' and NE9.7 'Providing New Open Space' and improved access to community facilities through good design has been set out in Chapter 6 'An Attractive Town'.
2.2 Scale of Growth and Delivering New Development	APG Portfolio Management Ltd [3843]	1211 101 – 107 High Street should be allocated for a residential-led development with capacity for circa 100 residential units and new retail floorspace at ground floor. The site measures 0.2ha and currently comprises 4 commercial buildings and car parking spaces to the rear. The land at the rear is a redundant piece of landlocked land which is a hub for antisocial activity. A number of sites in the vicinity have recently been redeveloped/granted planning permission, including Intu Watford, 52a–56 High Street and 60 High Street. The proposed residential-led allocation would be a continuation of the regeneration of Watford Town Centre.	Comment	The site can be assessed through the second iteration of the Housing and Economic Land Availability Assessment.	The site has been assessed through the second iteration of the Housing and Economic Land Availability Assessment and has not been included in the Plan as it was not deemed available or suitable.
2.2 Scale of Growth and Delivering New Development	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	1433 Given the likely significant cross-boundary movement of school pupils between Watford and adjoining areas including Three Rivers District, DfE recommends that the Council covers this matter and progress in cooperating to address it as part of its Statement of Common Ground. This should be regularly updated during the plan-making process to reflect emerging agreements between participating authorities and the Council's own plan-making progress.	Comment	Agree, engagement has been taking place and will continue.	No change.
2.2 Scale of Growth and Delivering New Development	London Borough of Hillingdon (Planning Department) [3530]	1500 I write further to the meeting held on 23rd September 2019 and your invitation to comment on the Draft Watford Local Plan. I can confirm that at this stage, the London Borough of Hillingdon does not have any comments to make on the Draft Watford Local Plan. It is noted that no request has been sent to the London Borough of Hillingdon to accommodate any of the identified need for development at this stage. If you deem that a statement of common ground is necessary to establish a position on any strategic matters then please send officers a draft version for review. Please can you keep us informed on all future opportunities to consult further on the Local Plan Review and also ensure that the Mayor of London is consulted as part of all consultations. Thank you for engaging with the London Borough of Hillingdon Planning Policy Team.	Comment	Comments noted. WBC can keep LB Hillingdon informed of progress.	No change.
2.2 Scale of Growth and Delivering New Development	Chiltern and South Bucks District Councils (Principal Planner - Robert Davy) [3919]	1540 CSB's understanding is that the South West Herts Joint Strategic Plan (JSP) is intended to set a strategic framework across the districts of Watford, Dacorum, St Albans, Three Rivers and Hertsmere, and set out some shared priorities within which the relevant local plans will be prepared. There should be more references to the JSP within the draft Plan.	Comment	Comments noted. The Joint Strategic Plan is outlined in Chapter 1. The Joint Strategic plan will inform future reviews of the Watford draft Plan, however, is not at a stage to directly shape the current iteration. However, work progresses and this is being used to inform wider strategic issues and further studies being undertaken.	No change.

2.2 Scale of Growth and Delivering New Development	Chiltern and South Bucks District Councils (Principal Planner - Robert Davy) [3919]	1546 Finally Chiltern and South Bucks, like Watford, are Local Government districts which sit outside the jurisdiction of the Mayor of London. We note that the Planning Inspectorate has raised initial concerns about the achievability and deliverability of the draft London Plan's proposed Small Sites housing targets, the upshot being that PINS are poised to formally recommend that the city-wide target is reduced from 65,000 homes a year to 52,000. Any such reduction in London's future housing target may therefore affect parts of our areas. Returning to our general comment of housing 'need' being about more than simply 'numbers' (paragraph 4.4.1), in all probability, many of these 13,000 homes per year will still be physically required to cater for actual housing 'needs'. If London cannot physically accommodate those homes, any under provision will inevitably need to be located within parts of the wider South East which benefit from fast rail journeys to Central London, have a good availability of brownfield sites and limited Green Belt constraints.	Comment	Comments noted. Watford has completed a thorough search for developable land that complies with national guidance as part of the Housing and Economic Land Availability Assessment. While the draft Plan makes provision to meet Watford's need, a proportion of this is windfall and there is not land accommodate unmet need from other districts.	No change.
2.2 Scale of Growth and Delivering New Development	Hertfordshire County Council (Martin Wells) [3559]	1558 Paragraph 2.2.7 Minerals & Waste Planning This paragraph clearly states that there is not enough land available in the borough to allocate new sites for industrial, storage and distribution uses and so the policies should fully reflect the need to protect them from loss to other uses. The aspiration to deliver new employment land in Policy SD2.1: Planning for Growth, is supported.	Comment	Support welcomed.	No change.
2.2 Scale of Growth and Delivering New Development	Hertfordshire County Council (Martin Wells) [3559]	1559 Paragraph 2.2.11 Highways & Transport It is suggested that the final sentence within this paragraph is amended as follows: "Public transport infrastructure and service improvements and including pedestrian and cycle infrastructure are also needed to achieve a shift away from car dominated transport in favour of more healthy and sustainable lifestyles."	Comment	Comments noted. Support welcomed and agree to change of emphasis.	Added text as suggested.
2.2 Scale of Growth and Delivering New Development	Hertfordshire County Council (Martin Wells) [3559]	1560 Paragraph 2.2.15 Highways & Transport There will be a need for continued and ongoing positive working with HCC to understand the transport impacts of the Local Plan, its sites and other policies, and to get better understanding of the transport infrastructure improvements needed both for strategic sites specifically and cumulatively across the borough in recognition of the cumulative impacts of growth in Watford, wider South West Hertfordshire and beyond. The county council, the borough council and the remaining South West Herts authorities will likewise have to continue to work to secure funding to support delivery of sustainable transport infrastructure identified.	Comment	Comments noted. WBC and HCC will continue to discuss the transport aspects of the Local Plan to identify the best approach to ameliorating the impacts of growth and supporting a shift to sustainable modes of transport.	No change.
2.2 Scale of Growth and Delivering New Development	Three Rivers District Council (Ms Claire May) [2389]	1737 As referenced in 2.2.14, neighbouring authorities to Watford face similar challenges to Watford. Continuing to recognise that infrastructure such as education and transport are cross-boundary issues which necessitate joint working is important to meeting future growth sustainably. Three Rivers is heavily constrained by Green Belt and has its own extremely high housing target to meet. It has been reported to the Policy & Resources Committee that Officers do not feel that the Council can meet its housing target by just looking at urban intensification and extensions at the settlement edge. The Council will now be undertaking scoping work on whether there is potential for a new standalone settlement within the District. As such, it is highly unlikely that Three Rivers will be able to take any of Watford's housing need.	Comment	Comments noted. We also note the requirement of the NPPF in Para 35 that 'unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.' Further discussions will be welcomed.	No change.
Policy SD2.1 Planning for Growth	Mrs Helen Hartley [3603]	925 of=or I presume! Concerned about overdevelopment of SE against regeneration of North; impact upon conservation area and local amenities; over-development will lead to more pollution and we'll-being issues.	Object	Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford. Therefore, having a new Local Plan can better help the Council to manage Watford's growth in a co-ordinated manner.	No change.
Policy SD2.1 Planning for Growth	Wenta . [3738]	1034 Wenta fully supports the objective of this policy. This is in line with the objectives of Wenta themselves in providing business support for local firms as well as workspaces and training. The employment targets and intensification of existing employment areas as well as encouraging mixed use is welcomed. Employment land should be protected, however, if mixed-use proposals meet all other policies in the adopted Local Plan and do not result in a net loss of employment space they should be supported as set out in point (g) of the policy.	Support	Support welcomed.	No change.
Policy SD2.1 Planning for Growth	Friends of the Earth (Anna Addison) [3407]	1188 The planning for growth policy does not encompass all the infrastructure requirements for the growth outline i.e. the health service (lack of GP services), utilities (i.e. Watford is an area of serious water stress so water/ waste needs to be highlighted), transport (no inclusion of the increase service on the Abbey line), etc.. Recognising that this will involve working with HCC, the health service etc.)	Comment	Comments noted. The Council does not provide health facilities, that is the responsibility of the local NHS and we have been working with them on the growth figures and implications for surgeries and facilities needed. We will require funding when a trigger point is reached with new developments. Water Stress is discussed in Para 6.2.4, and increasing the service frequency of the Abbey Line is in Para 2.5.6	Provision for a new health facility has been added to the Watford Gateway SDA policy.
Policy SD2.1 Planning for Growth	APG Portfolio Management Ltd [3843]	1213 Support the broad principles of Policy SD2.1, including the role that identified Strategic Development Areas will have in aiding the delivery of new homes. The policy also recognises the contribution that windfall sites can make to housing need, through a 'windfall allowance' of 105 dwellings per year towards the Borough's housing requirement over the Plan period. We consider that 101 – 107 High Street should be allocated for residential-led development with capacity for c.100 residential units. The site would provide a substantial contribution towards the Borough's housing requirement as a windfall site, therefore the overarching principles of Policy SD2.1 are supported.	Support	The site can be assessed through the second iteration of the Housing and Economic Land Availability Assessment.	The site has been assessed through the second iteration of the Housing and Economic Land Availability Assessment and has not been included in the Plan as it was not deemed available or suitable.
Policy SD2.1 Planning for Growth	Cortland Partners (Cortland Partners) [3870]	1308 Draft Policy SD2.1 is especially supported as it encourages intensification to meet this housing need. This is necessary in the absence of available land capacity and will relieve pressures on open spaces and the green belt in the Plan period.	Support	Support welcomed.	No change.

Policy SD2.1 Planning for Growth	RDI REIT (RDI REIT) [3872]	<p>1322 Throughout the emerging Local Plan, there are policies and statements which seek to make the most efficient use of land by optimising development footprint, co-locating complementary land uses and intensifying development on existing sites. This approach is supported, but the ethos of this does not follow through to the relevant policy in the emerging Local Plan, as below.</p> <p>Policy SD2.1 supports the redevelopment, intensification and reprovision of retail facilities that contribute towards an additional capacity of at least 5,200 sq. m of convenience goods floor space and 7,100 sq. m of comparison goods floor space. Having reviewed the Retail and Leisure Study however, it is clear to see that the emerging Local Plan does not accord with its recommendations and therefore the policy will severely underprovide against the forecast capacity and fail to accord with NPPF Paragraph 85 which requires planning policies to promote long-term vitality and viability.</p> <p>The Retail and Leisure Study confirms that short-term growth of comparison floorspace is 2,800-3,800 sq. m net to 2021, rising sharply to between 11,400-22,800 sq. m net to 2026 and increasing further to 23,700-44,000 sq. m net by 2031 (depending on the population scenario applied). By under delivering against the comparison growth anticipated by the Retail and Leisure Study, the Council will be in danger of losing its current strong comparison market share to pipeline developments in other competing sub-regional centres in the wider area (Brent Cross, Luton etc).</p> <p>Accordingly, Policy SD2.1 should be updated to set out a framework to support growth and change in accordance with the evidence contained within the Retail and Leisure Study and paragraph 85 of the NPPF which requires planning policies to take a positive approach to a town's growth, management and adaptation.</p>	Comment	<p>The South West Hertfordshire Retail Survey also noted that in late 2019 Watford is doing very well with regard to town centre vacancies, as is all of South West Hertfordshire compared to UK averages. The Survey believes that fundamental to this are two things;</p> <ul style="list-style-type: none"> • A growing and, for the large part, affluent population, and • The fact that a relatively large proportion of the area's retail floor space is met in town centres, as opposed to out-of-centre retail parks <p>This evidence means we are not going to encourage any out of town retailing and with large store vacancies appearing in the town due to companies going under we will expect any new larger comparison units to go into the town centre.</p>	No change.
Policy SD2.1 Planning for Growth	Legal & General Property Management (Legal & General Property Management) [3875]	<p>1324 Throughout the emerging Local Plan, there are policies and statements which seek to make the most efficient use of land by optimising development footprint, co-locating complementary land uses and intensifying development on existing sites. This approach is supported, but the ethos of this does not follow through to the relevant policy in the emerging Local Plan, as below.</p> <p>Policy SD2.1 Planning for Growth has been drafted to make the most effective use of land by focussing and intensifying development on existing housing, employment and retail sites. This approach is supported, however the policy needs to be updated to recognise that other land uses beyond just housing, employment and retail can also be intensified to deliver additional development and other complementary land uses. Woodside for example, does not fall into the identified categories, but it is evident to see that the development footprint can be optimised and development intensified at this 3.5ha leisure park</p> <p>Accordingly, Policy SD2.1 should set out a framework to support growth and change and encourage a mix of uses at Woodside that complement each other and supports the local economy. The mix of uses should include leisure, entertainment, food and drink, health and fitness and other commercial uses where these would be compatible and support the existing and surrounding functions of Woodside. Recognising these additional functions within the emerging Local Plan will be vital to the leisure park's long term sustainability enabling the Landlord to act decisively to meet future opportunities and capture some of the substantial expenditure growth expected within the north. This approach would accord with making effective use of land 'for homes and other uses' [Savills emphasis added] as advocated by the NPPF at Chapter 11.</p>	Comment	<p>The Spatial Strategy supports mixed use development across the borough where these are appropriate and will benefit the area. Woodside, while an existing facility, is located outside of the Core Development Area and in an area of lower sustainability. Proposals here will be supported where they optimise densities to make efficient use of land and manage change within the surrounding development context. The focus for town centre uses such as retail and leisure will remain the Town Centre Strategic Development Area within the Core Development Area and with excellent access to services and public transport.</p>	<p>The Spatial Strategy Policy SS1.1 has been revised to provide clarity that growth will be focused in the Core Development Area, which has excellent access to public transport and facilities, and where development can be accommodated sustainably.</p>
Policy SD2.1 Planning for Growth	St. Albans City & District Council (Head of Planning - Mr Chris Briggs) [2363]	<p>1328 SADC wishes Watford Borough Council (WBC) the best of luck in moving forward and looks forward to continuing productive work between LPAs. SADC would make the following comments on WBC's first draft Local Plan:</p> <ol style="list-style-type: none"> 1. As raised previously in Duty to Cooperate discussions and elsewhere, SADC considers that WBC will need to fully demonstrate that it has 'left no stone unturned' with regard to considering options to meet its needs – in particular for housing. 2. For the avoidance of doubt, SADC currently considers that it has no capacity to meet any of WBC's unmet housing needs. We are committed to ongoing cooperation and dialogue around the issues of potential WBC unmet needs, in the context of the overall joint work on the South West Herts geography/SWH Joint Strategic Plan. 3. As also raised previously in Duty to Cooperate discussions and elsewhere, we are happy to confirm that there may be an opportunity for the employment growth at East Hemel (Central) within SADC's draft Local Plan to play a role in overall South West Herts employment land provision. Again, further discussion on this should be had in the context of the overall joint work on the South West Herts geography/SWH Joint Strategic Plan. <p>Duty to Cooperate: Request to Consider Unmet Development Needs in Watford</p> <p>On the specific enquiries:</p> <ol style="list-style-type: none"> 1 - Therefore, Watford Borough Council are requesting that should the draft St Albans & City District Local Plan submitted to the Planning Inspectorate be adopted, St Albans & City District Council consider if they can accommodate some of the growth shortfalls identified by Watford Borough Council as part of any future review of the Local Plan. Additionally, should any changes to the submitted Draft St Albans & City District Local Plan be proposed during the examination process that this request is taken into account. <p>As raised previously in Duty to Cooperate discussions and elsewhere, SADC currently considers that it has no capacity to meet any of WBC's unmet housing needs. We are committed to ongoing cooperation and dialogue around the issues of potential WBC unmet needs, in the context of the overall joint work on the South West Herts geography/SWH Joint Strategic Plan. As requested, should any changes to the submitted Draft St Albans & City District Local Plan be proposed during the examination process, this request will be taken into account – bearing in mind that SADC currently considers that it has no capacity to meet any of WBC's unmet housing needs.</p> <ol style="list-style-type: none"> 2 - Watford Borough Council would like to request, that due diligence be given to how your respective Local Plan can 	Comment	<p>Comments noted.</p> <p>Watford is confident its HELAA is one of the most thorough in the UK, and certainly the most thorough in South West Hertfordshire; it has indeed left no stone unturned.</p> <p>We also note the requirement of the NPPF in Para 35 that 'unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.' Further discussions will be welcomed.</p> <p>The Joint Strategic Plan is unlikely to allocate unmet housing need under the current round of Local Plans in South West Hertfordshire up to 2036.</p>	

Policy SD2.1 Planning for Growth	Dacorum Borough Council (Strategic Planning and Regeneration Officer - Mr Stephen Mendham) [3853]	1333 We would like to understand what alternative approaches the Council considered to accommodate its full development requirement and why were these options were dismissed. Could the Council draw our attention to any background Topic Papers or the findings of the SEA/SA process which may provide some clarification on these issues?	Comment	The Council has considered other approaches including intensification across the borough rather than being focused on any particular area and releasing land designated as Green Belt. Intensification in the borough has been restricted by the land available for redevelopment in the borough which meets the tests set out in planning practice guidance which underpins the Housing and Economic Land Availability Assessment. Much of the Green Belt in Watford performs additional functions including providing public open space or having biodiversity value. Given the constraints in the borough the strategic approach set out in the draft Plan is considered to be the most appropriate. The Sustainability Appraisal for the next version of the draft Local plan is available in the Council's website.	No change.
Policy SD2.1 Planning for Growth	Greater London Authority (Jorn Peters) [3466]	1336 We note that the Council may be unable to meet its housing and employment (in particular B2 and B8) need within its boundaries, although the scale and potential measures to address this shortfall could perhaps be expressed more clearly within the draft Plan. We suggest the Council explores all options to accommodate its housing need. In particular within the context of that shortfall, we welcome and support the closer collaboration with the authorities in South West Hertfordshire and the preparation of a Joint Strategic Plan. In terms of housing need, the Council is referring to the Government's standardised methodology for calculating need. It should be noted that our demographic modelling provides alternative population and household projections that could also be taken into account when applying this standardised approach. Our projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft new London Plan. They are available on the London Datastore: https://data.london.gov.uk/dataset/2016-based-projections-national-outputs . Given Watford's good access to the motorway network (M1 in particular), it would be useful to understand the Council's broad consideration of land for industry and logistics in the context of related requirements for the wider area.	Comment	Comments and suggestions noted. The government's 2016 population projects are significantly lower than the 2014 figures used to underpin the housing target identified using the government's standard method. The methodology set out in national guidance continues to require local authorities to use this methodology unless an alternative method is required. The SW Herts Local Housing Needs Assessment has found that such a deviation is unjustified for the SW Herts authorities. The shortfall of land available for B2 and B8 uses for Watford as identified in the SW Herts Economic Study will not be met in the Local Plan because of land availability. Watford's strength is office employment and the Plan over-allocates for this need to reinforce it as a sub regional location for this type of investment. Coinciding with this, provision for industrial land is less than required. A decision has been taken to focus on Watford's strengths as part of the sub region with other elements of employment continuing to form part of ongoing duty to cooperate discussions. focusses on this. This can be set out more clearly in employment chapter.	The introduction in Chapter 4 'A Strong Economy' has been revised to provide more clarity about office based employment being Watford's strength and why industrial land requirements will not be met in the draft Plan.
Policy SD2.1 Planning for Growth	S Hille & Co (Holdings) Ltd (Mr Ian Scheer) [3404]	1343 By way of general comment, our client supports the First Draft Local Plan Vision to deliver a range of housing types and support a diverse employment sector.	Support	Support welcomed.	No change.
Policy SD2.1 Planning for Growth	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1346 Draft policy SD2.1 sets out that over the plan period the intensification of employment opportunities and sites to meet the needs set out in the South West Hertfordshire Economic Study Update (2019) will be supported. The proposed support for non-residential uses, particularly in the sustainable areas including the town centre is supported.	Support	Support welcomed.	No change.
Policy SD2.1 Planning for Growth	IDA Plymouth Holdings Ltd. [3888]	1355 Draft Policy SD2.1 requires the provision of 5,736 new homes across the plan period which is supported by the Council's Housing and Economic Land Availability Assessment (HELAA - dated September 2019). The HELAA report sets out that this equates to 793 units per annum based on an objectively assessed need (OAN). The proposed housing target is supported in the recognition that Watford, in particular the high sustainability zones, can achieve higher density residential development.	Support	Support welcomed. Note that the 5736 figure consulted on in the first draft Local Plan equates to approximately 410 units per annum, which falls below Watford's OAN. After further work undertaken, the Council now plans to meet its OAN for housing in the final draft Local Plan.	No change.
Policy SD2.1 Planning for Growth	Berkeley Homes (Berkeley Homes) [3891]	1370 Since the adoption of the Core Strategy there have been changes to planning legislation and national planning guidance. This includes delivering new housing to meet a housing target based on the Government's standardised Objectively Assessed Need calculations. The housing requirement for Watford has increased from 260 dwellings per year in 2013 to 793 dwellings per year in 2019. As identified within the Housing and Economic Land Availability Assessment 2019 (HELAA), Watford has identified developable sites to support 5,736 new homes and made an allowance for 1,670 more homes to be delivered through unallocated windfall sites. This results in a capacity of 463 units per annum. The HELAA considers this to be a shortfall in capacity to meet Watford's Objectively Assessed Need of 793 units per annum. In order to address this shortfall, it is important that the Council take every opportunity to optimise density on the most sustainable sites in the Borough which have good access to transport and amenities for residents. We therefore support the Plan's strategy to meet this remaining need through increased housing density requirements, revised design guidance and supporting the intensification of existing residential, employment and retail areas. Specifically, draft Policy SD2.1 is supported as it encourages intensification to meet this housing need. This is necessary in the absence of available land capacity and will relieve pressures on open spaces and the green belt in the Plan period. We hope to play a key role in achieving and exceeding this housing target.	Support	Comments noted and support welcomed.	No change.
Policy SD2.1 Planning for Growth	Transport For London Property Developmen t (Planning Advisor - Mr Luke Burroughs) [3819]	1400 TfL welcomes this policy which identifies that an increase in new housing supply is needed in the borough. The objectives to intensify "existing residential areas, particularly low-density areas" and increase development on "windfall sites" are welcome. However, in line with National Planning Policy Framework Paragraphs 108 and 118d it should be made clear that development will be focused in the areas with the highest accessibility to Public Transport.	Comment	The strategy can be revised and be simplified to provide a more consistent approach.	The text in Chapter 1 'A Spatial Strategy for Watford' has been revised to explain how the Spatial Strategy focuses development in the Core Development Area which reflects land allocations in the draft Plan. This part of Watford has the best access to services and facilities including public transport. The proposed Strategic Development Areas of the Western Gateway and Dome Roundabout are not longer designated as Strategic Development Areas.

Policy SD2.1 Planning for Growth	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1404 The Council set out in policy SD2.1 that the Council make provision for the delivery of 5,736 new homes and expect a further 1,680 new homes to be delivered through windfall sites. The expectation would appear to be that the Council is expecting to deliver in the region of 7,500 homes over the plan period, around 463 dwellings per annum. If this is the case, then this should be stated in policy as a singular housing requirement against which delivery can be effectively monitored. As the Council will fully appreciate this is substantially below the Local Housing Needs Assessment for Watford which requires the Council to deliver a minimum of 798 homes per annum. However, whilst the local housing needs assessment is a fundamental part of national policy, we could find no reference in the plan as to the amount of homes that the Government is expecting to be delivered in Watford and the level of shortfall arising as a result of this plan. Given that a fundamental part of the national policy is that housing needs are met in full it would seem essential that where these needs are not being met the shortfall is identified. We recognise that in Boroughs such as Watford where Boundaries are tightly drawn to the urban area it will be difficult to meet needs without the co-operation of its neighbours. As such it is essential that the Council to identify how many homes must be provided elsewhere and where these homes will be delivered. The Council and its neighbours would appear to have started to examine how needs can be met in full across South West Hertfordshire. This nascent collaboration needs to be able to show by the submission of this local plan sufficient agreement that the unmet needs arising in Watford will be addressed. At present there is no compelling evidence to suggest that the unmet need for housing in Watford will be delivered by its neighbours and as such should be a priority for the Council if it expects its local plan to found sound. We would expect to see clear agreements between Watford and its neighbours in South West Hertfordshire stating that they will deliver sufficient homes to address the both their own needs and the shortfall arising in Watford. We are concerned that over a fifth of the housing delivery expected over the plan period will come from windfall sites. Whilst the Council have identified that a reasonable proportion of homes have been delivered on windfall sites this must be considered against the backdrop of: • a Council not having made any allocations since the 2001 Local Plan was adopted; and • the inevitably finite supply of smaller windfall opportunities. Given that the Council's last allocations were made in 2001 it is an unavoidable fact that windfall development in Watford will have formed a significant proportion of the new homes delivered. Without the Council allocating new sites	Comment	Comments noted. The Council has undertaken a significant amount of work to identify land for development that will meet its development need. The approach is set out in the Housing and Economic Land Availability Assessment and has been supported with additional work such as the Building Heights Study.	The housing provision in the draft Plan has been increased and aims to deliver the homes required to meet the housing target calculated using the Government's methodology. The target has been set out as a single figure including a 5% buffer added.
Policy SD2.1 Planning for Growth	LaSalle Investment Management (LaSalle) (n/a - n/a n/a n/a) [3044]	1415 Policy SD2.1 provides context for local planning policies and how they are expected to contribute towards growth objectives in the Borough. This includes the Council's approach to planning for housing, employment, retail and infrastructure over the plan period. Specifically, Policy SD2.1 states the role Strategic Development Areas could play in aiding in the provision of new homes. La Salle support the Council's growth objectives for the Borough, recognising these policies set out the planning requirements to guide Watford's future growth.	Support	Support welcomed.	No change.
Policy SD2.1 Planning for Growth	Cassio Watford Ltd. (Cassio Watford Ltd) [3903]	1420 Policy SD2.1 Planning for Growth states that the provision of 5,736 new homes will be delivered during the plan period supported by significant additional employment floorspace. We support this planned growth.	Support	Support welcomed.	No change.
Policy SD2.1 Planning for Growth	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	1428 DfE notes that growth in housing stock is expected in the borough; the Local Plan has identified an annual housing target of 5,736 homes to the end of the plan period in 2036. This will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.	Comment	Agree, the plan is prepared in consultation with infrastructure providers. An infrastructure delivery plan supports the Local Plan, this details the infrastructure required to support the growth identified.	No change.
Policy SD2.1 Planning for Growth	Telereal Trillium (Telereal Trillium) [3915]	1530 The Council's objective to provide 5,736 new dwellings is supported and future development proposals for the Site will include residential development and therefore be essential in contributing to achieving this growth.	Support	Support welcomed.	No change.
Policy SD2.1 Planning for Growth	Three Rivers District Council (Ms Claire May) [2389]	1738 HCC toolkit refers to developments over 300 dwellings being considered individually and that on site provision may be required for education. It may be worth adding a little more explanation to the 350 dwelling threshold for education requirements.	Comment	We are waiting to see the next iteration of the HCC toolkit but will happily reflect the contents in the Local Plan.	Amended to refer to standards set out by HCC.
Policy SD2.1 Planning for Growth	Three Rivers District Council (Ms Claire May) [2389]	1739 "Where these needs cannot be met within the borough, the council will work collaboratively with other local authorities and development partners to deliver the housing, employment and other types of development along with supporting infrastructure required in the area." – This statement should not be included within the policy itself, it will be very difficult for neighbouring authorities to take any of Watford's needs when they will most likely be struggling to meet their own.	Comment	Comment noted. The Council has undertaken a significant amount of work to identify land for development that will meet its development need and proposes to meet it housing need as calculated using the Government's standard methodology. There remain challenges to meet employment need in the borough and the Council will welcome opportunities to work with neighbouring authorities to address development needs through the Joint Strategic Plan.	The reference to working with neighbouring authorities has been moved to the supporting text in Chapter 1 'A Spatial Strategy for Watford'.
Policy SD2.7 Watford Junction Strategic Development Area	Wenta . [3738]	1039 Wenta are supportive of this site. This policy is concentrated on the development and enhancement of retail floor space, in particular large retail stores and well as providing housing to have mixed use development. This site does and will serve the occupants of surrounding employment areas as well as providing services to the existing residential developments nearby. The provision of such services is essential for surrounding employment areas, which can benefit from having services nearby.	Support	Support welcomed.	No change.
Policy CC6.1 Sustainable Construction and Design	Wenta . [3738]	1049 Wenta is fully supportive of the need for sustainable construction of new development, redevelopment and refurbishments. To be truly sustainable development, the buildings themselves need to be more environmentally friendly as well as how they are used and connected to the Borough. Sustainable development will also help in the reduction of running costs for homes and commercial developments, which in turn can lead to lower rentals etc. Wenta as a local provider of business services is fully supportive of this concept.	Support	Support welcomed.	No change.

6.1 Introduction	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1067 Planning and Compulsory Purchase Act of 2004 requires that local plans include policies “designed to secure” development and use of land that contributes to the mitigation of, and adaptation to, climate change. Please can you confirm how this plan is doing this. In relation to resilience to drought what are you doing to combat local water shortages which have caused local rivers to dry up.	Object	Concerns noted. Chapter 8 includes policies on the protection and acquisition of open space, biodiversity net gain and green/blue infrastructure networks. Chapter 6 will include further detail for development on flood plain and work with the EA to ensure these areas are used appropriately. Policy will include water policies.	Policy revised to include reference to water stress in Chapter 8 'A Climate Emergency'. Policy amendments added to Chapter 9 to provide more clarity about the value of green and blue infrastructure.
Policy SD2.2 Achieving Sustainable Development	Miss Vanessa Marlowe [3677]	1168 Watford Borough Council has declared a Climate Emergency and has a duty to limit the negative impacts on climate change and a commitment to aggressive reduction targets and carbon neutrality as quickly as possible. All existing and future social/community/residential/non residential/public /business/corporate/municipal developments need to be sustainable in all aspects of their design and construction complying with standards which enable Watford Borough Council to become carbon neutral by 2030.	Comment	Comment noted. This has been dealt with in Chapter 8 of the Local Plan and will be supported with the updated Design Guide.	No change required
Policy SD2.2 Achieving Sustainable Development	Mr Mark Nichols [3724]	1176 There is no explicit mention of provision of open space within designs. I think this is crucial to quality of the local environment.	Object	Provision of open space has been considered as part of Policy NE9.7 Providing New Open Space.	No change.
Policy CC6.1 Sustainable Construction and Design	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1075 This policy is very weak as it doesn't show how Watford is going to achieve zero carbon by 2030. It isn't robust and developers will find ways around the requirements because of the use of language.	Object	Concerns noted. Watford borough Council is committed to achieving carbon neutral status as soon as possible. There will be an additional policy on carbon emissions included in the plan. BREEAM standards are being used and this is mentioned throughout the plan including within this policy. The ability to retrofit existing stock is being measured and is a priority, however, is outside of the planning remit aside for changes of use. Wording of this policy will be reviewed.	Policy for high energy efficiency included and reference to a carbon off-set fund in the supporting text added to the Climate Emergency chapter. BREEAM 'Excellent' standard required for non-residential developments larger than 1,000sqm. No change.
Policy SD2.2 Achieving Sustainable Development	Cortland Partners (Cortland Partners) [3870]	1316 We strongly believe that the Council can promote sustainable modes of travel and encourage lower levels of car parking in areas which benefit from good access to public transport, cycling and walking routes. Promoting sustainable travel has the potential to increase wellbeing and help reduce CO2 emissions. We therefore support Draft Policies SD2.2 and SD2.4 and their encouragement of higher density development to make the provision of public transport services easier and improve the population's access to services and facilities and encourage more walking, cycling and public transport use.	Support	Support welcomed.	No change.
Policy SD2.2 Achieving Sustainable Development	Berkeley Homes (Berkeley Homes) [3891]	1378 We agree that the Council should promote sustainable modes of travel and encourage lower levels of car parking in areas which benefit from good access to public transport, cycling and walking routes. This has the potential to increase wellbeing and help reduce CO2 emissions. We therefore support draft Policy SD2.2 and its encouragement of higher density development to make the provision of public transport services easier and improve the population's access to services and facilities and encourage more walking, cycling and public transport use.	Support	Support welcomed.	No change.
Policy SD2.2 Achieving Sustainable Development	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1406 This policy is unnecessary. Development that accords with the policies in the plan should, if the plan has been prepared properly, be sustainable. However, this policy inserts an element of ambiguity within the local plan as to what the Council considers to be sustainable development by providing a non-exclusive list of issues that developments should be able to demonstrate. This policy has the potential to create confusion for decision makers as to what they should be considering with regard to the sustainability of an individual scheme. We would therefore consider this policy not to be in accordance with paragraph 16(d) of the NPPF which requires the local plan to contain policies that are “clearly written and unambiguous”.	Object	Comments noted. Agree the draft Plan could provide more clarity through revised text in relation to the housing strategy.	Policy SD2.2 'Achieving Sustainable Development' has been revised and now forms part of Policy SS1.1 'Spatial Strategy'. The introduction has been revised to provide more clarity about sustainability objectives in the Local Plan.
Policy SD2.2 Achieving Sustainable Development	Telereal Trillium (Telereal Trillium) [3915]	1531 The Council's objective to achieve sustainable development is supported and is accordance with the objectives of the NPPF (2019). Development proposals at the Site will therefore seek to address the criterion detailed in the policy, including that relating to good design, making efficient use of land, provision of new homes and reducing car dominated areas.	Support	Support welcomed.	No change.
6.3 Flooding and Drainage	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1077 Policy CC6.2 Flooding and Resilience Page 77. You state that: "Land that maybe subject to OTHER SOURCES of flooding, where it's development would introduce a more vulnerable use". According to the Campaign To Protect Rural England- paved front gardens are adding to the flooding crisis and overwhelming drainage systems caused by the excessive run off into the road. Planning permission should therefore be refused for paved front gardens and permeable surfaces should be prioritised. SUDS and urban drainage systems should be prioritised across Watford, particularly in high flood risk areas.	Object	Concerns noted. New policy will be added to ensure SuDS and drainage are fully discussed. Policy moved to natural environment chapter to further discuss impact.	Addition of SuDS language in the natural environment chapter and link in with green infrastructure to promote multi functional approach.
Policy SD2.2 Achieving Sustainable Development	Hertfordshire County Council (Martin Wells) [3559]	1563 Highways & Transport. This is a criteria-based policy that aims to achieve sustainable development through a list of key priorities; one of which is to reduce car dominated areas. Whilst from a transport perspective this is supported in principle, it is suggested that the following is re-worded, along with the third paragraph within this policy, in order to make it clearer that planning applications will need to take into account these priorities that are contained within this policy: "Development proposals should demonstrate how the following have achieved sustainable development will not be supported including:" • Prioritising sustainable mobility, reducing car dependency and reducing car dominated streets and spaces	Comment	Agree, the draft Plan would benefit from the suggestion.	Text amended as suggested.
Policy SD2.2 Achieving Sustainable Development	Hertfordshire County Council (Martin Wells) [3559]	1712 Policy SD2.2 Achieving Sustainable Development and its accompanying paragraphs do not refer to the historic environment	Comment	Comments noted. Reference to the historic environment will be made.	Text added to clarify the historic environment is an integral part of sustainable development.

2.4 Making Effective Use of Land	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1099 Density should be prioritised in the right way. It should be creatively implemented rather than just cramming as many detached homes on to a plot. Additionally residents should be encouraged/incentivised to downsize.	Comment	Comments noted and agree the greater flexibility would benefit the policy. The policy aims to make efficient uses of land, but also to guide higher densities to accessible parts of the town to encourage active and sustainable travel. The design policies (Chapter 6) and supporting design guidance will be critical to ensure that new high density development is well designed. The Local Plan does not have the remit to encourage downsizing directly, although Policy HO3.2 Housing Mix, Density and Optimising Use of Land requires a range of housing types to be provided which includes smaller units as well as family housing. Well designed homes that provide facilities to encourage people to downsize is recognised.	Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
2.4 Making Effective Use of Land	Hertfordshire County Council (Martin Wells) [3559]	1564 Paragraph 2.4.1 Highways & Transport It is considered that greater density can also help make bus services more sustainable and commercially viable and therefore has a role in creating the conditions for better levels of public transport service (alongside suitable bus infrastructure). Greater density, mixed uses and clustering of activity can also help support and enable shared transport solutions (such as car clubs and bike share).	Comment	Comments noted	No change.
Policy SD2.3 Making Effective Use of Land	Claire Jones [3435]	954 Whilst it can be helpful to set an indicative benchmark for housing density, ultimately density needs to be informed by the character of the site. In the absence of an urban characterisation study to inform the housing density standards it is considered too prescriptive to state 'Only where it is clearly demonstrated that there are site specific or exceptional circumstances will proposals which deviate from the set out housing densities, be supported.' All sites will have site specific circumstances and therefore are arguably exceptions.	Object	Comments noted and agree the greater flexibility would benefit the policy.	Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
Policy SD2.3 Making Effective Use of Land	Wenta . [3738]	1036 Wenta are fully supportive of this policy, which is in accordance with the Framework. It is essential to maximise the use of land on employment sites across the Borough and where possible create mixed use schemes on existing employment land, creating communities for people to live and work. Paragraph 2.4.7 says that plot ratios should be used as a starting point, we are of the view that this should be re-iterated within the policy text itself for complete clarity. Wenta support higher density development on existing employment land to provide mixed-use developments within existing urban areas.	Support	Comments noted. The policy will be revised to give further clarity on mixed use schemes that include employment.	The policy has been revised to place emphasis on making effective use of land and ensuring a design-led approach is applied.
Policy SD2.3 Making Effective Use of Land	Mr Mark Nichols [3724]	1175 No maximum dwellings per hectare is set for High Sustainability Zones	Object	Comment noted. The approach is to be design led and proposals are to reflect site specific constraints and opportunities. Further work has been undertaken to understand high density development in the borough. This is set out in the Tall Buildings Study.	No change.
Policy SD2.3 Making Effective Use of Land	Mr Mark Nichols [3724]	1181 There is no maximum dwellings per hectare for High Sustainability Zones	Object	Comment noted. The approach is to be design led and proposals are to reflect site specific constraints and opportunities. Further work has been undertaken to understand high density development in the borough. This is set out in the Tall Buildings Study.	No change.
Policy CC6.2 Flooding and Resilience	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1079 Once again this policy doesn't clearly identify how Watford is preparing for the future and increased risks of flooding this could bring. While it is important to prioritise new development in lower flood risk areas, the policy needs to be more detailed than this. It should clearly set out measures which mitigate the risk of flooding, and measures which adapt Watford to planning.	Object	Concerns noted. Policy CC6.2 will be split into two and added detail to. Policy CC6.2 can be revised and split into policies to provide more detail about flood mitigation requirements. This has been informed by a detailed strategic flood risk assessment (level 2).	Policy CC6.2 has been revised and split into policies NE9.4 and NE9.5 to provide more detail about flood mitigation requirements.
Policy SD2.3 Making Effective Use of Land	APG Portfolio Management Ltd [3843]	1214 We support the identification of 101 – 107 High Street as falling within the 'High Sustainability Zone', with a corresponding minimum density for new residential development of 95+ dwellings per hectares. The policy also states: Only where it is clearly demonstrated that there are site specific or exceptional circumstances will proposals which deviate from the set-out housing densities, be supported. As per the Revised NPPF, the density of sites should be optimised to make efficient use of land, therefore the policy should retain sufficient flexibility to ensure that sites are optimised, which may mean substantially exceeding the prescribed density ranges.	Support	Comment noted and agree that policy could provide more flexibility. The strategic approach of using Sustainability Zones has been revised to place more focus on the Core Development Area and areas outside of this designation.	Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
Policy SD2.3 Making Effective Use of Land	Cortland Partners (Cortland Partners) [3870]	1311 Draft Policy SD2.3 sets out standards for housing densities, with development in Low and Medium Sustainability Zones being held to maximum recommended densities. It is acknowledged that a departure from these ranges may be supported subject to provision of infrastructure on-site or location within a Strategic Development Area and this flexible approach is supported.	Support	Support welcomed.	No change.
Policy SD2.3 Making Effective Use of Land	Dacorum Borough Council (Strategic Planning and Regeneration Officer - Mr Stephen Mendham) [3853]	1334 We would like further clarification on the current approach to defining the Sustainability and Accessibility Zones in the Plan and further explanation on how the proposed density targets have been set. We would like to understand whether further opportunities exist to provide further development as part of the identified sites and whether accessibility boundaries can be extended.	Comment	The Sustainability Zones were calculated based on access to public transport, retail facilities, employment areas and schools with a weighting given to each. Combined, these gave a single overall score.. In the final draft Plan the approach has been revised to focus on two areas; the Core Development Area and areas outside of this. This is considered a better reflection of site allocations in the borough. Additional work related to building heights has been undertaken. In conjunction with further work on the Housing and Employment Land Availability Assessment the revised Plan proposes to meet the housing target calculated using the government standard methodology.	The strategy has been refined to identify two primary areas in the borough; the Core Development Area where most development will be concentrated and areas outside of this designation. This is set out in Chapter 1 'A Spatial Strategy for Watford' and elaborated on in Chapter 2 'Core Development Area'.

Policy SD2.3 Making Effective Use of Land	S Hille & Co (Holdings) Ltd (Mr Ian Scheer) [3404]	1344 In relation to the spatial strategy, our client supports draft Policy SD2.3 on making effective use of land, including the use of Sustainability Zones to encourage increased density levels in sustainable locations across the borough to meet identified local needs. The Hille Business Centre is identified on the proposals map as within the Medium Sustainability Zone with an appropriate density of between 55 and 95 dwellings per hectare. The inclusion of the site in the Medium Sustainability Zone is welcomed but it is considered that, given the changing nature of the surrounding context and its sustainable location, the site presents should be designated as a High Sustainability Zone and/or treated in the same manner as land designated within MXD05.	Support	Comments noted. The approach based on sustainability zones has been refined and is now based on two areas, the Core Development Area and areas outside of this. The Hille Business Centre lies outside of the newly designed Core Development Area, albeit close to the boundary. The policy can be revised to place greater emphasis on a design led approach to provide more flexibility.	Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
Policy SD2.3 Making Effective Use of Land	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1347 Draft Policy SD2.3 states that all proposals are to make the efficient use of land based on the area it is located and its level of sustainability. The density ranges given for employment uses requires further justification to ensure that the policy is correctly interpreted and can be applied.	Comment	Agree. Further clarification about employment densities as part of mixed use development would benefit the policy.	As part of Chapter 4 'A Strong Economy', text has been revised to provide more clarity about employment density. Further clarifications have also been set out for appropriate site allocations (as part of the development considerations) in Chapter 13 'Site Allocations and New Development'.
Policy SD2.3 Making Effective Use of Land	IDA Plymouth Holdings Ltd. [3888]	1356 Draft Policy SD2.3 states that all proposals are to make the efficient use of land based on the area it is located and its level of sustainability. For residential density, this policy prescribes that in high sustainability zones a minimum of 95 dwellings per hectare should be achieved and where densities are above 350 dwellings this should be within the Strategic Development Areas and have access to mass transit systems. This policy for higher densities and the associated foot note for strategic development areas, which includes the town centre, is supported. The density ranges given for employment uses requires further justification to ensure that the policy is correctly interpreted and applied.	Comment	Agree. Further clarification about employment densities as part of mixed use development would benefit the policy.	As part of Chapter 4 'A Strong Economy', text has been revised to provide more clarity about employment density. Further clarifications have also been set out for appropriate site allocations (as part of the development considerations) in Chapter 13 'Site Allocations and New Development'.
Policy SD2.3 Making Effective Use of Land	Berkeley Homes (Berkeley Homes) [3891]	1368 We recognise and support the Council's ambitions to deliver new homes in the Borough along with employment, retail and social infrastructure to achieve sustainable development. Given the land constraints that the Borough faces, there is a requirement to maximise and make the most effective use of land as possible. Policy SD2.3 seeks to deliver this through setting housing densities in the respective Sustainability Zones; however, the density ranges for Medium and High Sustainability Zones should be more ambitious given that these are the most sustainable locations in the Borough. For example, at 94-98 St Albans Road, applying the same density targets would have yielded between 138 and 237 homes, which is circa 1,000 homes less than has been demonstrated can be feasibly and acceptably delivered and the draft Watford Junction SPA Development Brief (2016) had a more ambitious density target. On this basis, we would encourage the Council to review and increase the density ranges set out in Policy SD2.3.	Comment	Comment noted and agree that policy could provide more flexibility.	Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
Policy SD2.3 Making Effective Use of Land	Cassio Watford Ltd. (Cassio Watford Ltd) [3903]	1421 Policy SD2.3 Making Effective use of Land sets out densities to encourage more efficient use of land in more sustainable locations. We support this approach.	Support	Support welcomed.	No change.
Policy SD2.3 Making Effective Use of Land	Telereal Trillium (Telereal Trillium) [3915]	1532 The Council's overarching objective to ensure the most effective use of land, in line with para. 117 of the NPPF (2019) which requires planning policies to seek to make as much use as possible of previously developed land, is strongly supported. The wording of this policy is also broadly supported, including the minimum density of 95+ dph in the High Sustainability Zone. However, the draft wording of footnote '2' restricting densities above 350 dph dependent on access to a 'mass transit system' is not considered to be justified as the term is not defined nor is evidence provided to support such an approach. However, the Council's acknowledgement that there are some circumstances where development will exceed 350 dph is supported and it is Agree that these highest densities should be in the most sustainable locations. In order for the Council to achieve their housing and wider development objectives it is imperative that sites are encouraged rather than hindered in maximising their development potential. It is Agree that the High Sustainability Zone is the correct place for higher densities to be located but density restrictions should not be applied mechanically and instead each proposal be assessed on its own merits with consideration given to the other factors which influence suitable density levels, including design quality, impact on townscape and immediate site context.	Support	Support welcomed and comments noted. Agree that policy could provide more flexibility.	Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
Policy SD2.3 Making Effective Use of Land	Hertfordshire County Council (Martin Wells) [3559]	1565 Environment Resource Planning (Lead Local Flood Authority) The first sentence refers to the need for proposals to make efficient use of land. It should be noted that SuDS should be incorporated into schemes where necessary, as such measures are on the surface and may not always contribute to designated open space areas.	Comment	Comment noted. The incorporation of SuDs into schemes is referred to in Chapters 8 and 9. Further clarity will be provided in those respective sections.	Chapter 9 'Conserving and Enhancing the Environment' has been revised to provide greater clarity about how SuDs should be integrated in a scheme.

Policy SD2.3 Making Effective Use of Land	Three Rivers District Council (Ms Claire May) [2389]	1740 We welcome this policy and the approach taken to increase densities based upon sustainability levels in respective zones, however it may be worth clarifying how the different density ranges were calculated. It is noted that employment densities for office space are significantly higher than those used for calculating Watford's needs in the Economic Study (2019). TRDC recognise Watford's unique position in SW Herts in terms of land constraints, however some additional explanation of the increase in plot ratio may be useful.	Support	The Economic Study Update states that: <i>"As noted in the previous study, plot ratios vary considerably from site to site. For example some of the office developments close to Watford train station achieve a much higher plot ratio than 1.0. This means the land required to deliver a given quantity of floor space can be significantly reduced in some parts of the FEMA. The plot ratios below should therefore only be used as broad guidance. The authorities should not apply the plot ratios in a mechanistic way, but should consider the circumstances of each location separately when deciding what plot ratios to apply" (page 85)</i> The plot ratios given in the study are therefore not fixed assumptions. The council considers higher plot ratios are suitable in Watford to support new employment floor space provision and to reflect current delivery trends. A plot ratio of 1.0 for office development represents a two storey block with ample car parking, which is not suitable nor sustainable for a regional economic centre which offers 18 minute rail journeys to London Euston. It is considered by the council that our approach complies with Chapter 11 of the NPPF (Making Effective Use of Land).	No change.
2.5 Safeguarding Strategic Infrastructure	Hertfordshire County Council (Martin Wells) [3559]	1566 Paragraph 2.5.2 Highways & Transport The first sentence which states: "Existing key infrastructure should be retained and enhanced where necessary to meet the needs of those who live, work and visit in the area" is strongly supported. In particular it is important that transport interchanges are protected and the county council would encourage a stronger policy around this point, especially as there is the policy driver to bring forward more development around transport hubs. The Local Plan must set a clear policy foundation for retention and improvement of existing sustainable transport interchanges, facilities, services and access to them by sustainable modes, so that the interchange meets the travel needs of a growing town and supports LTP4 policies. Development proposals that risk undermining the function of an existing transport interchange or which would not allow for future improvements to meet growing demand, should be refused by the borough council.	Support	Comments noted. References to the importance of strategic infrastructure and safeguarding of key transport interchanges will be set out in the Plan.	A strategic policy related to transport and infrastructure has been added in Chapter 11 'A Sustainable transport Town'. Transport interchanges such as Watford Junction have been identified for safeguarding on the Policies Map.
2.5 Safeguarding Strategic Infrastructure	Hertfordshire County Council (Martin Wells) [3559]	1567 Paragraph 2.5.3 Highways & Transport This paragraph is supported, particularly in relation to its emphasis of facilitating a shift towards more people using public transport' and the recognition of the need to safeguard potential routes for future transport projects. However, it is suggested that the last sentence within this paragraph should not just refer to only public transport use and other more sustainable alternatives to single occupancy car travel should be referred to.	Support	Agree, this contributes towards the issue and text should be amended.	Amended text to refer to buses, cycling, walking, multi-occupant vehicles. Single occupancy vehicle use has also been referenced in the draft Plan.
2.5 Safeguarding Strategic Infrastructure	Hertfordshire County Council (Martin Wells) [3559]	1568 Paragraph 2.5.5 Highways & Transport It is suggested that the following wording is added to this sentence in paragraph 2.2.5, in order to reflect Policy SD2.4 and to ensure that transport interchanges within the borough are also given the same protection: "The main rail lines, transport interchanges, cycle ways and pedestrian routes need to be protected when future schemes come forward." Schemes should also show links to the public transport network (bus routes and access routes to rail stations) or through bus service diversion/extension.	Comment	Agree, this would benefit the Plan.	Text amended as suggested.
2.5 Safeguarding Strategic Infrastructure	Hertfordshire County Council (Martin Wells) [3559]	1569 Paragraph 2.5.6 Highways & Transport In the light of options for the former Croxley branch rail line having been examined, but with the acknowledgement that further work is needed to understand exactly what these might look like, it is suggested that the first sentence within this paragraph is re-worded to reflect this: "Specific transport improvements opportunities have been identified in the borough including the creation of a mass transit system along the disused railway line to the Lower High Street station." It is also suggested that the fourth paragraph is re-worded as follows, as this better advocates service enhancement. "Road widening may be possible for bus route improvements priority measures to reduce journey times between destinations. While there is limited capacity to achieve this in the borough, Hempstead Road does have an amenity strip that needs to be protected from development." It should also be noted that bus priority measures do not necessarily require road widening and support for other forms where appropriate would be welcomed. There needs to be recognition that the capacity for delivering bus priority measures partly depends on the appetite for radical solutions to current transport issues, the feasibility of such interventions, and impact on other vehicle movements.	Comment	Agree, this would benefit the Plan.	Text amended as suggested. Further revisions have been made to Chapter 11 'A Sustainable transport Town' to highlight the importance of sustainable travel modes in the Plan.

Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Wenta . [3738]	1037 Wenta agrees with the policy that strategic transport infrastructure should be supported and protected for the Borough to grow and flourish. It is essential that employment land is within close proximity of rail and road networks to ensure maximum productivity and sustainable forms of development.	Support	Support welcomed.	No change.
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Herts County Council (Planning Officer - Mrs faye Wells) [3752]	1061 HCC owns a site that has not been allocated in the emerging Local Plan but is washed over by policy SD2.4 within Ascot Road which is also within an employment area. The requirements of this policy are noted by HCC. We do not want this policy however to prevent the delivery of much needed employment on this site.	Comment	The site in question, referred to as Land to the West Of And Parallel To Ascot Road in the HELAA, is not within a designated employment site in the current or emerging development plan. In both plans, the site is safeguarded as Strategic Transport Infrastructure which should continue to ensure that the proposed mixed use development does not prejudice the future provision of a mass transit route and station.	No change.
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Friends of the Earth (Anna Addison) [3407]	1193 This policy should clearly state that all proposals MUST contain a Travel Plan that clearly lays out how they will enhance the connectivity - there is DfT guidance on this (using the planning process to secure travel plans, much of which is relevant).	Comment	Comments Noted. Requirement for Travel Plans to be included within Policy.	Policy has been amended to set out the parameters for when Travel Plans are required through policy in Chapter 11 'A Sustainable Transport Town'.
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Cortland Partners (Cortland Partners) [3870]	1306 The First Draft Watford Local Plan 2020-2036 Policies Map allocates the disused Watford and Rickmansworth railway line between Croxley Green and Watford High Street as well as part of the Site (the Lozenge), as an 'Other Safeguarded Route'. Draft Policy SD2.4 states that any proposal that could compromise strategic transport infrastructure will not be supported. Cortland is encouraged by the safeguarding of the disused rail line as it demonstrates the Borough's continued aspiration for re-use of the line for strategic transport infrastructure. However, we would recommend a flexible approach to safeguarded land, including the Lozenge, which sits adjacent to the disused line. Safeguarding at this location may be necessary to provide for station infrastructure, however potential for integration between infrastructure and new residential development should be explored in order to maximise the housing delivery output of brownfield land in the Borough. However, supports the policy's encouragement of higher density development to make the provision of public transport services easier and improve the population's access to services and facilities and encourage more walking, cycling and public transport use.	Comment	The site can be assessed through the second iteration of the Housing and Economic Land Availability Assessment.	The site has been assessed through the second iteration of the Housing and Economic Land Availability Assessment and consequently has been included in the Plan.
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Berkeley Homes (Berkeley Homes) [3891]	1379 We agree that the Council should promote sustainable modes of travel and encourage lower levels of car parking in areas which benefit from good access to public transport, cycling and walking routes. This has the potential to increase wellbeing and help reduce CO2 emissions. We therefore support draft Policy SD2.4 and its encouragement of higher density development to make the provision of public transport services easier and improve the population's access to services and facilities and encourage more walking, cycling and public transport use.	Support	Support welcomed.	No change.
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Canal and River Trust (Area Planner - Tessa Craig) [3892]	1384 We support proposals encouraging walking and cycling and connections to the wider pedestrian and cycle network. Towpaths are an excellent off-road walking and cycling route. Improving the quality and continuity of the towpath as a walking and cycling route is key to encouraging people to use the route. Improvements to the surface, the towpath width and wayfinding along the route are the main ways of supporting more people to walk and cycle on our network. We recommend the towpath be considered as a route to be connected with other walking and cycling infrastructure in Watford.	Support	Support welcomed.	No change.
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Transport for London (Principal Planner - Mr Richard Carr) [2980]	1493 TfL supports the intention to safeguard the disused rail line from Croxley Green to Watford High Street station for a potential mass transit link in place of the former proposals for the Metropolitan Line Extension (MLX). Although powers to construct the MLX have now lapsed and it will not be going ahead in the original form, TfL has worked with partners including Watford Borough Council and Hertfordshire County Council to explore alternatives and we will be happy to continue to provide advice should this be requested. Safeguarding of the route will enable the Councils to take forward these options in the future.	Support	Support noted and the Council welcome further discussions with Transport for London to explore alternatives to the Metropolitan Line Extension.	No change.

Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Hertfordshire County Council (Martin Wells) [3559]	1570 Highways & Transport	Comment	<p>The specific assets, land areas and extents are identified on the policies map as identified in this policy. The areas can be referred to of clarify alongside text as to the justification for this approach. This can be added to the supporting text to the policy.</p> <p>The disused metropolitan line route is identified for the creation of a mass transit system which will be critical to obtaining modal shift and supporting the growth identified in the plan. The lozenge site is safeguarded as part of this route, as plans for the mass transit system progress discussions will be had with landowners.</p> <p>The Ebury Way will be added to the policies map.</p> <p>The areas identified for safeguarding are considered necessary to support large scale transport improvements. Sites are safeguarded to ensure that future improvements and innovation are not compromised. However, identifying specific locations for specific infrastructure without land ownership or identification within the Local Transport Plan is not considered appropriate. In this sense, the safeguarded areas are supportive in principle albeit generic.</p> <p>WBC look forward to continued working positively and collaboratively to support HCC as they develop sustainable transport proposals.</p>	<p>Provided clarification in the supporting text to the policy and identify routes as part of the policy.</p> <p>Clarified mapping of safeguarded routes on the policies map.</p> <p>The area safeguarded referred to as the lozenge site has been amended.</p>
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Hertfordshire County Council (Martin Wells) [3559]	1571 Minerals & Waste Planning	Comment	<p>Comments noted. The policy has since been revised to refer to transport infrastructure. However, the Watford Gateway text has been revised to include reference to the concrete batching plant and rail aggregates depot and its safeguarded status.</p>	<p>Safeguarding of the concrete batching plant and rail aggregates depot has been added to Policy CDA2.1: 'Watford Gateway Strategic Development Area'.</p>
Policy SD2.4 Safeguarding and Connecting to Strategic Transport Infrastructure	Three Rivers District Council (Ms Claire May) [2389]	1741 We welcome this policy, particularly due to the importance of safeguarding strategic transport infrastructure to support future development across South West Herts and its neighbouring authorities.	Support	Support welcomed.	No change.
2.6 Protecting Green Belt Land	Dacorum Borough Council (Strategic Planning and Regeneration Officer - Mr Stephen Mendham) [3853]	1332 We would like to understand the timing for the preparation of key parts of the evidence base. In particular, we note that Watford Borough Council has not published a review of its Green Belt. Without this, it is not possible to examine the role and function of the Green Belt and whether targeted releases could be made to meet more of your Borough's development needs in the short term.	Comment	The Green Belt Review Stages One and Two will be published to support the Final Draft Local Plan (Reg. 19).	No change.
Policy SD2.5 Protecting Green Belt Land	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1100 The Green Belt must be protected at all cost as it serves as a vital environmental service.	Support	Paragraph 137 of the NPPF states that " Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". As Watford has demonstrated through the first iteration of the HELAA that it cannot meet its objectively assessed need on previously developed land. Therefore, a review of the performance of the Green Belt is required, in line with national policy.	No change.
Policy SD2.5 Protecting Green Belt Land	Charlotte Ashton [3425]	1159 I support this policy and the commitment to reviewing the Green Belt within Watford.	Support	Support welcomed.	No change.

Policy SD2.5 Protecting Green Belt Land	Friends of the Earth (Anna Addison) [3407]	1194 The South East of England's green belt land is being eroded, all land within the green belt - whether currently performing against the wider objectives acts as a buffer for wildlife, absorption of pollutants/ green house gases and therefore has a wider benefit than allowing individual boroughs to meet their Housing/ employment targets. The green belt land could support in Watford's work to become carbon neutral through increasing tree cover/ mixed wildlife land use etc.	Object	Green Belt is not an environmental designation and its main purpose is to ' prevent urban sprawl by keeping land permanently open' (NPPF, 2019). Paragraph 137 of the NPPF states that "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". As Watford has demonstrated through the first iteration of the HELAA that it cannot meet its objectively assessed need on previously developed land, a review of the performance of the Green Belt is essential, in line with national policy. Green Belt which is considered to not be performing its function as an urban containment zone risks being released (although this does not imply that development is appropriate).Policy NE9.8 Biodiversity can be used to ensure that the biodiversity of any Green Belt sites developed can be enhanced. The Green Belt Planning Practice Guidance also sets out guidance related to compensatory enhancements.	No change.
Policy SD2.5 Protecting Green Belt Land	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1407 All this policy does is state that the Council will apply national policy. As such it is not consistent with paragraph 16(f) of the NPPF which requires of policies in local plans that they should "serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area". There is no clear purpose to this policy which adds nothing to the approach to Green Belt already established in national policy.	Object	Comments noted. The policy has been revised and incorporated as part of the spatial strategy (see Policy SS1.1 Spatial Strategy)	No change.
Policy SD2.5 Protecting Green Belt Land	Three Rivers District Council (Ms Claire May) [2389]	1742 We support the protection of Green Belt Land, however feel the last sentence is a little confusing. "Removal of a site from Green Belt does not imply that development is appropriate". If Green Belt boundaries are changed through the Local Plan process and a potential site is no longer in the Green Belt then Green Belt policies will no longer apply. As such, whether development on that site is appropriate in Green Belt terms is no longer something that needs to be considered. An alternative interpretation of the sentence could be that if a site is no longer in the Green Belt, it does not necessarily mean that development on that site would be appropriate (for other reasons not relating to Green Belt policy). In this case we do not feel this needs to be stated. We would suggest the removal of this sentence as we do not feel it adds to the policy.	Comment	Comments noted. The policy has been revised and incorporated as part of the spatial strategy (see Policy SS1.1 Spatial Strategy).	No change.
2.7 Delivering the Strategy: Development Contributions	Watford Health Campus Partnership LLP (Watford Health Campus Partnership LLP) [3896]	1396 We understand that at present, no revisions to the Council's CIL Charging Schedule (2015) are proposed. The adopted Charging Schedule currently allocates the Watford Riverwell site within Charging Zone 2 'Major Developed Area, where there is no CIL charge for new development. We would like to confirm that the changes to the Local Plan will not impact on the sites allocation within the Charging Schedule. The Watford Riverwell site will deliver a range of social benefits and new social infrastructure through other mechanisms, including affordable housing, a new community centre, a new school, additional parking for the hospital, a new public square and other public realm improvements.	Comment	The CIL charge is not currently being reviewed, however a review is likely after adoption of the plan to account for the new policy requirements.	No change.
2.7 Delivering the Strategy: Development Contributions	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	1431 In light of the emerging site allocations identified in the Plan, DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information.6 Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.	Comment	Thank you for sharing this information, Hertfordshire County Council are responsible for education in Watford.	No change.
2.7 Delivering the Strategy: Development Contributions	Hertfordshire County Council (Martin Wells) [3559]	1572 Paragraph 2.7.2 Highways & Transport The county council supports this paragraph in terms of the cumulative impacts of development on infrastructure and the need for development to address it. Further work will be needed with HCC to understand infrastructure needs associated with the plan and resulting needs and implications in terms of provision and securing funding both from developers (Section 106, the Community Infrastructure Levy (CIL), developer delivery) and other sources.	Support	Discussions are ongoing with HCC to identify infrastructure required to support the Plan. Additional work has been undertaken to identify infrastructure needs as part of the Infrastructure Delivery Plan. WBC is a CIL charging authority. S106 contributions will be sought to deliver identified onsite infrastructure where appropriate and inline with the CIL legislation but this is likely to be limited.	Further clarification has been added to the plan about infrastructure to support new development, particularly in the Chapter 2 'Core Development Area', chapter 10 'Infrastructure' and Chapter 11 'A Sustainable Transport Town. Consideration of cumulative development has been set out in the infrastructure policy in Chapter 10.
2.7 Delivering the Strategy: Development Contributions	Hertfordshire County Council (Martin Wells) [3559]	1573 Paragraph 2.7.6 Highways & Transport It is considered that the wording within this paragraph needs to be made clearer, as there is still a need to adhere to the CIL Regulations (2010 and amended in 2019) when seeking S.106, so the contribution does need to be directly related, as well as fairly and reasonably related in scale and kind. However, it is recognised that infrastructure is often funded by pooling pots.	Comment	Agree, this paragraph will be clarified.	Amended text to provide clarity.

2.7 Delivering the Strategy: Development Contributions	Hertfordshire County Council (Martin Wells) [3559]	1574 Paragraph 2.7.7 Highways & Transport Bus service improvements should be added to the list of sustainable transport infrastructure/initiatives that are often provided offsite. It is also noted that in some cases (particularly larger sites and developments) it may be appropriate for car clubs and car club spaces to be accommodated on site - for example the developer would have to enter into an agreement with a provider, pay for the service and provide the car club spaces. The borough council may prefer this to be an existing scheme/provider operating in the town.	Comment	Text to be amended as suggested to make reference to bus services. Policy included specifying requirements relating to car clubs.	Added reference to bus services to the list. Policies in Chapter 11 'A Sustainable Transport Town' clarified on how car club schemes can be provided for on site and how these will be operated using planning conditions.
2.7 Delivering the Strategy: Development Contributions	Hertfordshire County Council (Martin Wells) [3559]	1705 Waste Management Unit It is noted that waste management infrastructure is included on the borough council's Community Infrastructure Levy (CIL) Regulation 123 List as being funded in whole or in part by CIL. The county council would therefore continue to expect relevant developments within Watford to contribute to improvements to the Waterdale HWRC (via CIL) as and where it is felt necessary.	Comment	Waste management infrastructure was included on the Regulation 123 list, however this is now redundant under the latest CIL legislation. CIL spending will be prioritised in line with the adopted governance published on our website which identifies the following priorities: -Education -GI -Sustainable transport -Communications infrastructure -Wayfinding (please note this is a simplified list) Improvements to the Waterdale site should be identified and HCC should ensure they are on the Council's Infrastructure Delivery Plan in order to feed into the process of bidding for CIL funds. It is of note that the Waterdale HWRC has received no CIL funding to date.	No change.
Policy SD2.6 Development Contributions	Sport England (Planning Manager - Mr Roy Warren) [3671]	975 It is requested that the reasoned justification to the policy is amended to include sports facilities as another example of where off-site provision/contributions may be acceptable.	Comment	This section has been extensively redrafted and the suggested changes are no longer appropriate. However the policy does provide a framework for requiring financial contributions. The playing pitch strategy is reflected in the Infrastructure Delivery Plan where it is acknowledged that due to Watford's constraints contributions towards improvements are likely to be more appropriate than new pitch provision. While the policy sets the framework for collecting developer contributions, the detail is in the Infrastructure Delivery Plan and will be explored further in the forthcoming Development Contributions SPD.	Chapter 10 'Infrastructure' section redrafted to provide clarity about infrastructure requirements, cumulative development and developer contributions.
Policy SD2.6 Development Contributions	Wenta . [3738]	1038 Wenta recognises that new development increases the demand on social and physical infrastructure. S106 Developer Contributions alongside the CIL will allow both the Borough and developers to manage the phasing of infrastructure, as well as the costs of development. Wenta support the provision of infrastructure in future development proposals to ensure attractive living and working environments are created that also function well.	Support	Support welcomed.	No change.
Policy SD2.6 Development Contributions	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1348 Draft Policy SD2.6 sets out that new infrastructure will be sought from developments where a specific need is generated firstly on site but where this is demonstrated to not be possible, then financial contributions will be sought. This policy, as currently worded, does not allow for any financial contributions to be provided subject to viability testing. It is requested that wording to this effect is added to this policy to ensure that it remains viable alongside other policies within the emerging Local Plan.	Comment	The whole plan has been viability tested to account for the cumulative impact of requirements and the types of proposed development where found to be viable. It is acknowledged that there may be exceptional costs on some sites and these require detailed site specific viability analysis as part of the Development Management process. However, the suggested text is not considered appropriate as the Local Plan has been subject to a viability assessment. The NPPF provides for site specific viability consideration as part of the Development Management process where exceptional circumstances can be demonstrated.	No change.
Policy SD2.6 Development Contributions	IDA Plymouth Holdings Ltd. [3888]	1357 Draft Policy SD2.6 sets out that new infrastructure will be sought from developments where a specific need is generated firstly on site but where this is demonstrated to not be possible, then financial contributions will be sought. This policy, as currently worded, does not allow for any financial contributions to be provided subject to viability testing. It is requested that wording to this effect is added to this policy to ensure that it remains viable alongside other policies within the emerging Local Plan, particularly affordable housing.	Comment	The whole plan has been viability tested to account for the cumulative impact of requirements and the types of proposed development where found to be viable. It is acknowledged that there may be exceptional costs on some sites and these require detailed site specific viability analysis as part of the Development Management process. However, the suggested text is not considered appropriate as the Local Plan has been subject to a viability assessment. The NPPF provides for site specific viability consideration as part of the Development Management process where exceptional circumstances can be demonstrated.	No change.

Policy SD2.6 Development Contributions	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	1434 One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. DfE notes that WBC will review CIL rates to ensure appropriate rates are levied and the right infrastructure is secured across the borough. DfE supports policy SD2.6 on Developer Contributions in relation to both the direct delivery of, and financial contributions towards infrastructure. Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations. We also request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This helps to demonstrate that the plan is positively prepared and deliverable over its period.	Support	Support welcomed. WBC will work with HCC in order to secure future school places. We will take guidance from HCC's Education Strategy to identify sites and funding for future school provision. Where appropriate on larger sites education provision will be highlighted as a development consideration. It is agreed that Section 106 agreements will be necessary to secure land transfer in order to deliver schools.	Strategic Development Area policies in Chapter 2 '@Core Development Area' and supporting text have been revised to provide more detail for education provision required on larger sites. Chapter 2 'Infrastructure' and supporting Infrastructure Delivery Plan also set out more detail to support education provision.
Policy SD2.7 Watford Junction Strategic Development Area	Melanie Mack [3412]	1080 Need total ground floor internal and external rethink - BUT needs to take into account passenger, car and cycle flows as current design does not.	Support	Support welcomed.	No change.
Policy SD2.2 Achieving Sustainable Development	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1098 This should also mention that to achieve sustainable development all developments must be able to demonstrate that they contribute to the mitigation of, and adaption to, climate change - in line with the Planning and Compulsory purchase act (2004).	Comment	Agree. Climate change mitigation and adaptation will be included in the sustainability statement, more details on climate change requirements will be found in revised policy.	No change.
2.8 Strategic Development Areas	Cortland Partners (Cortland Partners) [3870]	1305 Considers that the Western Gateway should be reinstated as a Strategic Development Area due to potential for residential-led, high density regeneration and the strategic transport opportunities.	Comment	The area of Ascot Road has planning permission for a significant number of new homes with some development already commenced. The strategy has been revised to place more focus on the Core Development Area and areas outside of this designation. This better reflect site allocations and provides an approach that is simpler to implement. As such, the site will not be a designated Strategic Development Area.	No change.
2.8 Strategic Development Areas	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1511 We understand that the Strategic Development Areas are considered to be key locations in the borough that can contribute towards achieving sustainable development by making effective use of land, and taking advantage of strategic transport infrastructure. These areas primarily focus on their regeneration, and cover larger land areas relative to other site allocations in the Plan. Indeed we note that a number of the site allocations fall within these Strategic Development Areas. What is unclear is how much further development is anticipated to come forward in the land outside the site allocations but within the Strategic Development Areas – are these in effect strategic scale allocations in their own right? On a general point, the scale that the Strategic Development Areas are drawn on the policies map makes them quite difficult to read, especially where designations overlap it would be helpful if these were clearly illustrated within the body of the Plan (similar to the housing allocations), showing the detailed site boundaries, and any other allocations occurring within these. Suggested change - Amend supporting text to clarify the status and anticipated level of additional development anticipated within the Strategic Development Areas outside the allocated sites for housing delivery. Include plans of the Strategic Development Areas within section 2.8.	Comment	Agree that clarification would benefit the Strategic Development Area policies. Further progress has been made on identifying land for development and proposes to meet its full housing target. This should reduce the risk of large scale sites coming forward that may be inappropriate to their location and setting. The policy text will be revised to provide more clarity. In accordance with national guidance, sites included in the Local Plan need to meet the tests set out for Housing and Economic Land Availability Assessments. The Plan makes provision for the housing required, an element of this is expected to come forward as windfall development. Much of this is likely to come forward in the Core Development Area.	The amount of housing provided for in the final draft Local Plan has been increased. These figures have been set out in Chapter 3 'Homes for a Growing Community'. Maps of the Strategic Development Areas have been added to Chapter 2 'Core Development Area'. The Policies Map has been refined to be easier to interpret.
6.1 Introduction	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1112 The plan needs to be more transparent in how it is approaching carbon. In line UK planning and environmental legislation, local plans must include robust evidence-based carbon targets. For carbon targets to be meaningful, they need to be incorporated into local planning policy as a core objective against which all other policies and decisions will be tested. Local planning authorities also need to monitor performance against local targets at least annually.	Object	Comments noted. There will be an additional policy added dealing directly with carbon emissions. National carbon figures will be used as a baseline for monitoring. Watford Borough Council has established a sustainability forum and encourage participation of any citizen groups.	Policies in Chapter 8 'A Climate Emergency' have been revised to place more emphasis on carbon emissions including a carbon offset fund in Policy CC8.3: Sustainable Construction and Resource Management. The monitoring framework identifies carbon emissions as an issue to be follow up during the plan period.
2.8 Strategic Development Areas	Hertfordshire County Council (Martin Wells) [3559]	1713 Whilst Policies SD2.8 Bushey Station Strategic Development Area, SD2.9 Town Centre Strategic Development Area, SD2.10 Lower High Street Strategic Development Area do all refer to the setting and character of heritage assets, this is not on its own adequate to conserve and enhance the historic environment.	Comment	Comment noted.	More detail on the SDAs including mapping heritage assets has been included in Chapter 7 'The Historic Environment'. The heritage policies have made reference to the need to consider the impacts of cumulative impacts of development.

2.8 Strategic Development Areas	Hertsmere Borough Council (Planning Officer - Oliver Galliford) [3920]	1718 The Draft Local Plan defines a number of Strategic Development Areas, including Bushey Station and Lower High Street. Both of these sites are in close proximity to Hertsmere and in particular Bushey. Whilst Hertsmere recognises that both these sites represent opportunities for growth in accessible and sustainable locations, the council would like for further clarification into the infrastructure provision for both of these sites. Hertsmere supports Watford's proposals for higher density development in sustainable locations and proposals to reduce the reliance on the road network. Nevertheless, the mode of delivery for key services, with particular reference to healthcare and secondary school provision, to support these growing communities needs further explanation given that facilities in Bushey serve a wider catchment. Hertsmere would therefore want to be included as part of the process relating to developer contributions (S106 and CIL) and infrastructure provision.	Comment	Development in the Bushey area has been revised and is included in the Colne Valley Strategic Development Area. Agree that further clarification would benefit the draft Plan. Further work has been undertaken to update the Infrastructure Delivery Plan.	Further detail has been set out in Policy CD2.3 'Colne Valley Strategic Development Area' and policy additions have been made to include developer contributions.
6.1 Introduction	Miss Vanessa Marlowe [3677]	1171 Watford Borough Council has declared a climate emergency and has pledged to make the whole of Watford carbon neutral by 2030. The council should ensure that all current and future developments are sustainable and have good access to an improved sustainable public transport. To discourage high density development and reassess the sustainability and climate impact of current developments. To ensure that new development is sustainable, more energy/water efficient and producing zero carbon emissions. To establish a policy for bus companies to run alternative energy buses and to phase out petrol/diesel run buses. Watford needs to become carbon neutral now.	Comment	Comments noted. Watford is working to ensure new development is sustainable with further requirements and working on plans to retrofit existing buildings for efficiency. Sustainability zones have been created to ensure higher density is placed in appropriate areas with high accessibility. A new policy will be included directly focusing on carbon emissions. Transportation concerns will be passed on to the local Highway Authority.	Amended policies in Chapter 8 A Climate Emergency' and Chapter 9 'Conserving and Enhancing the Environment' to strengthen climate change response and integrate mitigation measures into new development.
Policy SD2.2 Achieving Sustainable Development	Friends of the Earth (Anna Addison) [3407]	1190 This does not cover enough areas to ensure sustainable development (1/2 bullets covering the environment), must include areas in the WBC Climate Change Strategy on adaption/ flood risk/ utilities/ heat/ transport/ waste. OR risk lower priority. WBC has declared a Climate Emergency and has a duty to limit the negative impacts on climate change, a commitment to aggressive reduction targets, and achieve carbon neutrality as quickly as possible. All existing and future social/community/residential/non residential/public housing/business/corporate/municipal developments need to be sustainable in all aspects of their design and construction complying with standards enabling WBC to become carbon neutral by 2030.	Object	Agree. Will add more policies into the climate change and environment chapters to help protect the environment. Also adding sustainability into other sections of the plan and include this as a thread for the totality of the document.	Policies set out in Chapter 8 A Climate Emergency' and Chapter 9 'Conserving and Enhancing the Environment' related to climate change and the environment have been revised to provide more clarity and requirements to mitigate climate change and impact on the environment.
Policy SD2.7 Watford Junction Strategic Development Area	Aggregate Industries UK Ltd [3743]	1135 Please refer to 'Firstplan Response on Behalf of Aggregate Industries UK Ltd to the First Draft Watford Local Plan' dated 07 November 2019 and sent via email to strategy@watford.gov.uk on 07 November 2019.	Object	Comments noted. The wording on the updated Watford Gateway SDA has been updated to reflect the importance of this site and its safeguarded status.	Wording has been amended to reflect the importance of this site and its safeguarded status. The site is included on the map in the Chapter 2 'Core Development Area' to show the depot to highlight its existence.
Policy SD2.7 Watford Junction Strategic Development Area	Celia Rowbotham [3418]	1144 Development of Watford Junction is clearly required to adequately meet current needs. Surely this upgrade should be undertaken before the proposed development of 1200 dwellings on the Range/TKMaxx site adjacent to the railway line.	Comment	The upgrade to Watford Junction Railway Station is the responsibility of Network Rail and discussions on this are advanced. Most of the changes in the area are in the hands of a variety of organisations.	No change.
Policy SD2.7 Watford Junction Strategic Development Area	Friends of the Earth (Anna Addison) [3407]	1197 Suggest that within the "Proposals for new development are expected to incorporate the following development considerations" there is also: - no or minimal car parking is a requirement. - full cycle provision - including on road network/ integrated into new linkages/ connections between sites, employment developments with XX units/ floor space/ staff incorporate cycle parking and showering facilities, all housing incorporates safe cycle storage with 1 bike per potential resident rather than 1 bike per unit	Comment	No car parking is unrealistic for the busiest railway station in Hertfordshire, although the idea has been suggested and rejected. Cycle provision will be included and negotiations on the wider network and ongoing. The Local Cycling and Walking Infrastructure Plan will be looking at this in more detail this year for incorporation into the Local Plan.	Proposed new and improved cycle routes incorporated into the Local Plan. Polices on cycle parking and car-lite development have been strengthened.
Policy SD2.3 Making Effective Use of Land	Friends of the Earth (Anna Addison) [3407]	1192 The Policy as it stands covers housing mix but needs also to cover car parking ratio's in each of the zones, with less car parking in the High zone to the low zone, where there are strong sustainable transport links.	Comment	Comment noted. Car parking requirements have been set out in the appendices with the planning approach set out in chapter 11.	No change.
Policy SD2.7 Watford Junction Strategic Development Area	Berkeley Homes (Berkeley Homes) [3891]	1369 The Site is designated within the Watford Junction Strategic Development Area ('SDA'), referred to in draft Policy SD2.7. We welcome the Council's proposals for the Watford Junction SDA which include creating a new vibrant mixed-use quarter to provide new homes and jobs in close proximity to Watford Junction station; encouraging high density development with school provision required to make it a fully sustainable location; and supporting greater land use efficiency based on a mix of uses to benefit from the accessibility of the area. As with other SDA policies in the Plan, the supporting introductory text or an additional bullet should be added which set out that the Watford Junction SDA should seek to achieve "high density development". Equally, bullet 9 which states that "where necessary, Compulsory Purchase Orders may be applied" should be removed as this goes beyond planning policy. With an ever-increasing population and the associated demand for homes, it is important that the Council prioritise residential-led, high density regeneration focused on sustainable sites within close proximity to key transport nodes and residential amenities. 94-98 St Albans Road and the wider Watford Junction SDA is ideally located adjacent to Watford Junction railway station and in proximity to retail clusters in North Watford and the Town Centre. The submitted application for the Site will help to kick-start these aspirations.	Support	The area has been included in the Core Development Area and the Watford Gateway SDA. This sets out the principles of develop include high density and sustainable development. Bullets setting out development consideration will be revised.	Policy has been revised to provide more clarity about development and objectives.
Policy SD2.7 Watford Junction Strategic Development Area	Solum (Solum Regeneration) [3895]	1391 With regards to complying to the wider objectives for the Watford Junction Strategic Development Area, we note that Part 3 of draft Policy SD2.7 requires proposals to reduce severance created by the railway lines and improve connectively between different parts of the site and the wider area. In order to do this this is likely to involve new links over and / or under the railway lines. This would be in addition to any other infrastructure that is required for railway operations. The Council should give serious consideration to sources of funding to secure the delivery of any infrastructure that is required at the site, and the potential provision of this infrastructure should be included as a key development consideration as part of the site allocation.	Comment	Noted, the Council is pursuing a number of funding opportunities with partner organisations.	No change.

Policy SD2.7 Watford Junction Strategic Development Area	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	<p>1510 This area covers an area of 19 hectares, and is adjacent to, and encroaches into the Nascot Conservation Area in the North West. It also falls within the wider setting of a number of Listed Buildings, including Benskin’s House (Grade II), the Former London Orphan Asylum (Grade II), and Chapel of the Former London Orphan Asylum (Grade II).</p> <p>The site also contains or is immediately adjacent to a number of locally listed buildings. Of particular note is Hille House by Ernő Goldfinger, which is currently under assessment for Listing. Born in Budapest in 1902, Ernő Goldfinger was a modernist architect and furniture designer. He is perhaps best known for Balfron Tower and Trellick Tower in London, which he designed in the mid-1960s. Designed as an office building in 1957 – 58, and built in 1959, Hille House is considered to be Goldfinger’s best surviving unlisted work, externally complete, and including two coloured glass windows, which seem to be the first he realised.</p> <p>Given the number of assets affected we would expect to see a Heritage Impact Assessment prepared to inform the redevelopment of this area. This document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove or mitigate any harm to these assets should then be included in Policy SD2.7. Further information on site allocations can be found in our advice note 3: The Historic Environment and Site Allocations in Local Plan.</p> <p>Finally we welcome the reference in criterion 5 to improving the public realm. Any improvements will need to be properly coordinated, and sensitively designed to ensure that they are in keeping with the Conservation Area. Further information regarding the principles of good urban design can be found in Historic England’s ‘Streets for All East of England’ advice note (https://historicengland.org.uk/images-books/publications/streets-for-all/heag149-sfa-national/).</p> <p>Suggested change - Preparation of a Heritage Impact Assessment (HIA) for the Town Centre Strategic Development Area. Any specific measures required to remove or mitigate any harm to assets identified within the HIA should be included in Policy SD2.7.</p>	Comment Agree a Heritage Impact Assessment would be expected from developers in the Town Centre and this will be set out in Policy in the Local Plan.	Text added to the Strategic Development Area and heritage policies in Chapter 7 ‘The Historic Environment’ to clarify the importance heritage assets and the need for proposals to appropriately consider their potential impact.
Policy SD2.7 Watford Junction Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	<p>1576 Highways & Transport</p> <p>A robust masterplan is required to guide development proposals and ensure transport policy objectives are not compromised. We strongly recommend that the policy refers to a masterplan to guide development proposals for the site, as is the case for Policy SD2.8, even if such a masterplan is still being developed at the point of plan submission.</p> <p>The inclusion of point 1) “Transform Watford Junction Station into a 21st century multi-modal public transport hub” is welcomed. It is critical that the Watford junction development delivers a station and transport interchange that is fit for the future and which supports the transport objectives of the Local Transport Plan and SWHGTP - and indeed the objectives of this First Draft Local Plan. LTP4 and the Rail Strategy (existing and emerging draft) identify and propose further developing Watford Junction as a main transport hub.</p> <p>However, it is considered there is a need for further joint work on the necessary components of the transport interchange hub and what the needs may be in terms of future proofing.</p> <p>Point 3): “Reduce severance created by the railway lines and improve connectivity between different parts of the site and the wider area including the town centre” is strongly supported.</p> <p>The need to highlight further constructive working between HCC and the borough council, in order to understand the opportunities and connectivity needs is important, so that this can be secured as part of an adopted masterplan.</p> <p>Point 4) which states: “Protect or re-provide existing bus related facilities on site” should be made stronger, given the current pressures on this site, and the importance of the station both for rail, major bus interchange and potentially a future MRT hub. Re-provision is not acceptable to the county council if reduces quality or capacity of interchange, including being a less favourable location in relation to the station entrance. Maintaining interchange capacity that is appropriate for the growth envisaged in the town is important and HCC would require a design that reflects the Transport User Hierarchy outlined in LTP4.</p> <p>It is also suggested that the need to recognise and provide flexibility within any development so future public transport and bus needs can be accommodated and served.</p>	<p>Comment</p> <p>The Strategic Development Areas are defined areas where intensification will be support and the related policies set out the framework to guide development. These are being revised. The Strategic Developments Areas include land that is not allocated for development, however, development would be supported in principle. Without the land being allocated in its entirety (land can only be allocated where it meets the tests set out in the Housing and Economic Land Availability Assessment guidance) it is difficult to bring sites together in a coordinated manner and facilitate land value equalisation. In this sense, masterplans will not be set out for the Strategic Development Areas but a concept plans will be included in the Local Plan to support the policies.</p> <p>Agree, the Plan could make stronger references to sustainable transport modes and how these will contribute towards the objectives set out in the Local Plan and the Local Transport Plan.</p> <p>Continued collaborative working with HCC has taken place in determining the specific requirements for Watford Junction's role as a transport hub.</p>	<p>Transport requirements for infrastructure have been added in the policies in Chapter 2 ‘Core Development Area’.</p> <p>Additional references to the Local Transport Plan and supporting strategies have been set out in Chapter 11 ‘A Sustainable Transport Town. Further clarity provided about facilitating transport infrastructure as part of the revised Strategic Development Area policies in Chapter 2 ‘Core Development Area’.</p>
Policy SD2.7 Watford Junction Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	<p>1577 Minerals & Waste Planning</p> <p>The Orphanage Road Rail Aggregates Depot is not mentioned within the list of criteria under Policy SD2.7 that should be taken into account when determining proposals within this strategic development area (SDA). This is considered to be a serious omission, as the rail aggregates depot is located within this SDA and it is important mineral infrastructure that is safeguarded for its contribution to the long-distance movement of aggregates. Specifically, the rail aggregates depot falls within Mixed use Development Area: ‘MXD06 Land at Watford Junction’ which forms part of the overall Watford Junction SDA.</p> <p>SDAs are considered to be sustainable locations for potential regeneration to support effective land use for strategic transport infrastructure. The presence of the rail aggregates depot must therefore be given due regard when considering future developments at this location. The Agent of Change principle that is outlined in paragraph 182 of the 2019 NPPF, must be applied to development proposals in and around the railway station site/area, so as not to compromise the continued operation of the rail aggregates depot.</p> <p>The rail aggregates depot is safeguarded under national and local policy, specifically Minerals Policy 10: Railheads and Wharves in the adopted Minerals Local Plan (March 2007) and Minerals Policy 9: Safeguarding Bulk Transport and Bulk Handling and Processing Sites in the Proposed Submission Minerals Local Plan (January 2019). The 2019 NPPF also outlines the importance of safeguarding minerals infrastructure.</p> <p>In the light of the above, the Minerals Planning Authority requests that the following text is added to the list of criteria within Policy SD2.7:</p> <p>“10. The existing rail aggregates depot at Orphanage Road is a safeguarded site within the adopted Minerals Local Plan. Its operation should be taken into account when considering development proposals within this Strategic Development Area.”</p>	Comment Comments noted. The Orphanage Road Rail Aggregates Depot will be added to the map being prepared for the Watford Gateway SDA and reference will be made to its status in the policy.	Amended the map of the Watford Junction SDA and policy text in Chapter 2 ‘Core Development Area’.

Policy SD2.8 Bushey Station Strategic Development Area	Mrs Kellie Morley [3640]	943 More housing in a already busy and congested area is crazy, already the flats going up are causing additional traffic issues with part lane closures. Where are the kids living in these houses expected to go as both infant, junior a d secondary schools are at breaking point, with cuts to budgets and no space to expand	Comment	<p>Concerns noted. Planning for the new housing that Watford needs is a requirement set out in national guidance. The shortage of potential development sites and the Local Plan's focus on previously developed land means that many parts of the town will experience urban intensification to provide much needed housing. Bushey Station falls into the revised Core Development Area, which is considered an area of high sustainability. Based on this, the area has been considered more appropriate for higher density development with car free and car lite schemes. This should support new residents using sustainable and active travel modes.</p> <p>Engagement is ongoing with Hertfordshire County Council, the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means minimise impacts in the area.</p> <p>Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p>	No change.
Policy SD2.8 Bushey Station Strategic Development Area	Claire Jones [3435]	<p>955 Whilst in terms of public transport accessibility this area in theory is suitable for medium to high density mixed use development, this is just one factor to be considered. The area includes two storey terraced housing, and is within an area characterised by two storey housing and contains or adjoins heritage assets. Density needs to be informed by an analysis of the local context.</p> <p>Support the principle of robust pedestrian and cyclist connectivity. Should explicitly state pedestrian and cyclist connectivity should be improved from the area to Watford Town Centre via lower high street.</p>	Comment	<p>Comments noted. Using sustainability zones to guide density expectations has been superseded by the Core Development Area as a strategy. Further work has been undertaken to identify appropriate building heights, and where taller buildings might be considered appropriate. This study takes character into account.</p> <p>Agree that pedestrian and cyclist connectivity should be looked at more holistically. A Local Cycling and Walking Implementation Plan is being undertaken, which will identify opportunities to improve connectivity.</p>	<p>Amendments made to the Strategic Development Areas in Chapter 2 'Core Development Area' to cross-reference a new policy QD6 'Building Height' in Chapter 6 'An Attractive Town'.</p> <p>Additional has been added to Policy CDA2.3 'Colne Valley Strategic Development Area' to clarify objectives along the Lower High Street. This is complemented by revisions to Chapter 11 'Sustainable Travel Town' which provides more detail about transport infrastructure during the plan period.</p>
Policy SD2.8 Bushey Station Strategic Development Area	RDI REIT (RDI REIT) [3872]	<p>1320 'Consideration 6' of Policy SD2.8 Bushey Station SDA seeks to 'bring more vitality to the existing local neighbourhood centre with no additional land use being provided'. For the reasons below, we consider that this policy would be backward step in terms of the direction of retail policy drafted in the Core Strategy and that advocated by the NPPF which seeks to allow networks to grow and diversify in a way that can respond to rapid changes in the retail market (paragraph 85)</p> <p>The Bushey Station SDA is characterised by a number of bulky goods retail units, including those found at Watford Arches. By setting a moratorium on retail development (and only allowing retail growth in the existing local neighbourhood centre), the Council will not only fail to deliver its forecasted retail growth in Watford (see Paragraph 3.7 above) but it will harm the vitality and viability of the SDA, and by virtue of its links with Watford town centre (see Paragraph 2.1-2.4 above), also harm the regional centre.</p> <p>Despite its strong attraction to the comparison market, Watford Arches has not been immune to the impacts of the retail market. Indeed the retail park will soon see the closure of Mothercare, leaving a large 1,360 sq. m unit vacant in a prominent location of the SDA. This is unfortunately typical of how the retail market has fared recently, which has seen numerous examples of occupiers reducing their store portfolios, including as part of national store disposal programmes and through the Company Voluntary Arrangement process. In addition, the CBI reported on 25 June 2019 that UK Retail Sales in June 2019 fell at its fastest pace for ten years.</p> <p>Accordingly, it is crucial for policies within the emerging plan to enable Landlords to act decisively to meet opportunities to contribute to the vitality and viability of their assets. Such an approach is required by the NPPF, for example at Paragraph 91, and critically at Paragraph 85 (a). Paragraph 85 to enable centre to grow and diversify in a way that can respond to rapid changes in the retail industry.</p> <p>Restricting further development at Watford Arches does not accord with the strategic policies of the emerging Local Plan or the NPPF if it can be demonstrated that it accords with policy. Instead the ability to undertake a balanced consideration of applications at the time they are proposed, where this accords with policy and does not harm the vitality and viability of centres, is the correct approach.</p> <p>For the reasons above, we strongly object to Consideration 6 of Policy SD2.8 Bushey Station SDA and request that this is deleted in the next iteration of the emerging Local Plan.</p>	Object	<p>Comments. The area is dominated by retail shed development and the draft Plan is trying to place more emphasis on the town centre as a shopping area that is accessible by sustainable transport modes, contrary to these types of car trip generating uses. There is limited need for retail development in the Watford area as suggested in the 2018 SW Herts Retail Study. The Bushey SDA has been merged into the Colne Valley SDA to ensure that proposals will contribute towards the sustainability objectives, including vitality, in the area.</p>	No change.

Policy SD2.8 Bushey Station Strategic Development Area	Mercedes Benz Retail Group UK Ltd. (Mercedes Benz Retail Group UK) [3880]	1329 The Watford Mercedes-Benz dealership sits within the Bushey Station Strategic Development Area (Policy SD2.8), which supports the redevelopment of sites for higher density mixed uses. Mercedes-Benz supports this policy.	Support	Support welcomed.	No change.
Policy SD2.8 Bushey Station Strategic Development Area	Wood Plc (acting on behalf of National Grid) (Lucy Bartley) [3393]	1397 The SDA is crossed by a National Grid high voltage electricity transmission overhead line (ZC Route - 275Kv two circuit route from Elstree substation in Hertsmere to Watford South substation in Watford). The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Over Head Lines here: https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf UK Power Networks owns and operates the local electricity distribution network in Watford Borough Council. Contact details can be found at: www.energynetworks.org.uk . National Grid seeks to encourage high quality and well-planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which provide detail on how to develop near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. Potential developers of these sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government. National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave our existing transmission pipelines in situ. Please refer to the Health and Safety Executive (HSE) in the first instance. National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required	Comment	Overhead powerlines were considered through the HELLA and sites have not been allocated where this was an issue. To ensure that overhead lines are also considered for windfall development sites wording to this effect will be added to the policy on managing impacts of development.	Wording to ensure overhead lines are considered in proposals to be added to the policy on managing impacts of development in Chapter 9 'Conserving and Enhancing the Environment'.
Policy SD2.8 Bushey Station Strategic Development Area	Transport For London Property Development t (Planning Advisor - Mr Luke Burroughs) [3819]	1402 TfL is supportive of this policy and believe that it provides a positive framework to enable appropriate levels of development to come forward in this area of high public transport accessibility. We particularly support the council's objective to encourage "medium to high-density mixed-use development in the vicinity of the train station and the surrounding area." We are keen to work with the borough and network rail to bring forward development on site allocation H35 Land at Bushey Station.	Support	Support welcomed.	No change.
Policy SD2.8 Bushey Station Strategic Development Area	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1512 The Bushey Station Strategic Development Area covers an area of 18 hectares, with the central focus on the area around the railway station. As with Watford Junction, it has the potential to affect a large number of heritage assets – both designated (listed buildings and conservation areas), and non-designated (locally listed buildings). The area adjoins the Oxhey Conservation Area on its eastern boundary, contains the Grade II Listed Bushey Arches Railway Viaduct, and falls within the wider setting of a number of other assets, including Frogmore House (Grade II* Listed, and Heritage at Risk), and Sparrows Herne Trust Turnpike Marker (Grade II Listed). Development will need to preserve and where possible enhance these assets and their settings, and these requirements should be included in the policy and supporting text. Given the number of assets affected we would expect to see a Heritage Impact Assessment prepared to inform the redevelopment of this area. This document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove or mitigate any harm to these assets should then be included in Policy SD2.8. Further information on site allocations can be found in our advice note 3: The Historic Environment and Site Allocations in Local Plan. Suggested change - Preparation of a Heritage Impact Assessment (HIA) for the Town Centre Strategic Development Area. Any specific measures required to remove or mitigate any harm to assets identified within the HIA should be included in Policy SD2.8.	Comment	We have reviewed the Strategic Development Areas and the area around Bushey station is now part of the Colne Valley SDA. There is still land allocated for development close to the station and development proposals should include a heritage statement and show how they have considered relevant heritage assets and their settings.	Policy HE7.1 requires all development affecting heritage assets or their setting to be supported by a Heritage Impact Assessment. Reference to heritage assets is set out within the SDA policy and supporting text.

Policy SD2.8 Bushey Station Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	1578 Highways & Transport The county council recognises the opportunity to provide development around Bushey station and that this location should enable reduced parking provision. There is significant bus flow through this area, and therefore the policy should include reference to buses. A Bus Priority Study is currently looking at the potential for a bus lane on the A4008 through this area. It is suggested the policy wording should give support for making the use of sustainable modes (including buses) more attractive in this area. Although points 3 and 4 that refer to providing robust pedestrian and cyclist connectivity to destinations, improving air quality and reducing traffic at Bushey Arches are welcome, it is nonetheless important to recognise that this will be a challenge and not easily achieved. As well as the more local connectivity and environmental improvements mentioned, improved bus connectivity and bus priority measures, coherent and connected cycle routes and an improved environment for people walking, are required in the Lower High Street, Bushey Arches and Bushey Station vicinity. This is in order to provide the necessary sustainable transport links to central Watford and due to its location on the corridor connecting Watford to Harrow/north London. It should be noted the needed infrastructure and environmental improvements relate to potential development in the wider area, including but not solely the Bushey Station site. As this area has been less of a focus previously than other strategic sites, it will be necessary to build a stronger understanding of the scale of development likely and what the transport needs and opportunities are in this area and how that relates to the strategy for the wider network.	Comment	It is recognised this area has strategic importance a part of the transport network and that improvements will not be without its challenges. Further consideration of this area as part of the next iteration of the Local Transport Plan will be welcomed. This could be done as part of an overall scheme or be set out as a step wise approach that come together over time as part of a long term and phased project. This would need to be in conjunction with other transport route considerations relate to the Lower High Street and Ring Road which are all interrelated. It is important for this to be recognised as part of the Local Plan and the aspiration to improve this area to ensure it becomes an integral part of future transport strategies. The scale of development proposed in the area along with the Lower High Street is being revised with information being shared with the County Council to support transport modelling and identifying the needs for other types of infrastructure. Continued collaborative working with the County Council will be welcomed.	Concept plans for the Lower High Street and Bushey Arches area have been included in Chapter 2 'Core Development Area' supported with policies setting out design principles in Chapter 6 'An Attractive Town' and development considerations in Chapter 13 'Site Allocations and New Development' encouraging holistic development south of the town centre.
Policy SD2.8 Bushey Station Strategic Development Area	Three Rivers District Council (Ms Claire May) [2389]	1743 Despite the area's accessibility to a station and other public transport routes, the car-dominated environment of the Bushey Station area is recognised as a concern and it is considered that the objectives set out in Policy SD2.8 will help to address this issue.	Support	Support welcomed.	No change.
2.11 Town Centre Strategic Development Area	Heather Sword [3411]	1721 Watford is a victim of its own success. The Intu Centre, the clubs and restaurants are all situated in the town centre but with totally inadequate links and constant traffic nightmares. The dilemma is pedestrians don't want cars in the centre of town but Intu shoppers do. A larger supermarket in the Albert Road area is a must for the potential population increase from additional high rise buildings; as too, the infrastructure such as gaps, schools, clinics etc. I hope there is something in the pipeline to address the ugly eyesore known as the flyover which does nothing to decorate the High Street area. Perhaps a vehicle underpass instead (!!!).	Comment	Comments noted, The Local Cycling and Walking Infrastructure Plan will be looking at the conflict between pedestrians/cyclists and the car in more detail this year for incorporation into the Local Plan. There are discussions to incorporate more bus priority in the Town Centre on the Ring Road. The County Council are the Highways Authority and have no plans to remove the flyover.	No change.
2.11 Town Centre Strategic Development Area	Heather Sword [3411]	1722 1. The demolition of the Rickmansworth Road pedestrian underpass/subway is scheduled under Phase 1 but there appears to be a time lag between that and the introduction of the Phase 3 Rickmansworth Road replacement crossing. My note: We use this many times a week for access into the town and the only other viable crossing is situated at the end of Essex Road and under St Albans Road; this underpass is thoroughly unpleasant with very strong urine smells, it is extremely quiet and intimidating and hence I don't like using it on my own. Pedestrian underpasses are disliked by most.	Comment	These comments relate to the Watford High Street (North) and Cultural Hub Draft Master Plan, which is currently being reviewed after a 8 week consultation between July and September 2019.	No change.
2.11 Town Centre Strategic Development Area	Mr Michael Daglish [3917]	1723 Owing to being away for some time, I did not have the opportunity to comment on the above. However, I see in the latest Watford magazine that the underpass proposal was unpopular. I would just like to say that I agree with these comments. Although the underpass results in traffic build up further down Rickmansworth Road towards Watford Grammar and at the Langley Road lights, it does remove this traffic from the Town Hall roundabout. The amount of additional congestion that its closure would cause in busy times, particularly in Hempstead Road, requires, in my opinion, that it remains open.	Comment	These comments relate to the Watford High Street (North) and Cultural Hub Draft Master Plan, which is currently being reviewed after a 8 week consultation between July and September 2019.	No change.
2.11 Town Centre Strategic Development Area	Adrian Cox [3926]	1729 From reading the Watford Observer recently, I came across an article relating to proposed changes to the town centre. I was surprised that such radical changes were being thought about and seemingly not particularly well advertised so I decided to check the 'master plan' at the Town Hall. While I am all in favour of investment in our town, I am very concerned with the proposal to replace the subway under Rickmansworth Road with a surface level crossing. I regularly walk or cycle into the town centre from my home in Cassiobury and use the subway which is the most convenient route in. The master plan states that a surface level crossing 'would give a much safer and more pleasant route for pedestrians and cyclists from Hempstead Road to the Parade'. How can this be? Currently a pedestrian or cyclist has a free unobstructed route across (or rather under) the road, under the proposals, they would have to wait at a crossing therefore delaying their journey. The subway is straight without any 'doglegs' so can hardly be seen as unsafe! It is also divided sensibly between pedestrian and cyclists. It is used by a significant number of people including hundreds of students from West Herts college who often stroll into the centre to get some lunch etc. At the moment there is no chance of an accident between a car and pedestrian/cyclist, however, should the subway be closed this risk will increase significantly as drivers and pedestrians or cyclists come into 'conflict' with each other. Secondly, by having a crossing on Rickmansworth Road, this will inevitably lead to more congestion and increased pollution with cars stopping for pedestrians. I fear that this proposal has not been fully thought through and would be detrimental to the town as such. I am also concerned that few people seem to be aware of the potential loss of this subway and feel that local people (who regularly use it) have not been consulted. Please give this some serious reconsideration before you make what I believe to be a serious error.	Comment	These comments relate to the Watford High Street (North) and Cultural Hub Draft Master Plan, which is currently being reviewed after a 8 week consultation between July and September 2019.	No change.
Policy SD2.9 Town Centre Strategic Development Area	Mrs Vix Moore [3600]	924 I object to the infilling of the underpass near the parade. Many sites needing to be accessed by school children will become more difficult to access. Walking a whole class to the park, library, leisure centre and museum will become more difficult without the underpass. The underpass is currently well used. I would prefer my child to use the underpass than a surface crossing on her way to school. The public toilets are essential to those of us with young children and to the elderly or others who may be caught sorry whilst out in the town centre.	Object	These comments relate to the Watford High Street (North) and Cultural Hub Draft Master Plan, which is currently being reviewed after a 8 week consultation between July and September 2019.	No change.

Policy SD2.9 Town Centre Strategic Development Area	Mrs Mary Bowen [3829]	1156 I have seen the proposed plan for the Town Hall Area in the Watford Observer. It showed that the pedestrian subway would be removed. I remember when this was first built and think it has aided traffic flow and promoted road safety. I am against its abolition. Traffic flow looks considerably restricted around the Avenue Car Park area of the Hempstead Road.	Object	These comments relate to the Watford High Street (North) and Cultural Hub Draft Master Plan, which is currently being reviewed after a 8 week consultation between July and September 2019.	No change.
Policy SD2.9 Town Centre Strategic Development Area	Friends of the Earth (Anna Addison) [3407]	1200 The policy needs to set out more on how this SDA will manage the associated transport network which is greater than "Ensure movement corridors are attractive, easy to follow and are well integrated into the transport network for pedestrians and cyclists and to connect key destinations". This includes limitation of car parking in residential developments/ increasing cycle provision not only connectivity but secure/ covered cycle locking points within the public realm, see comments against Policy SD2.7 re cycle provision.	Comment	Transport policy set out greater detail on transport infrastructure in town centre SDA, including encouraging car-lite development, high quality cycle parking. However, further clarification would benefit the Plan. Further work on transport infrastructure has been undertaken to inform the Plan.	Increased detail on transport infrastructure in town centre has been set out in Chapter 11 'A Sustainable Transport Town' and the policy requirements and SDA map have been revised to provide more clarity.
Policy SD2.9 Town Centre Strategic Development Area	APG Portfolio Management Ltd [3843]	1215 We support Policy SD2.9, insofar as it seeks to encourage medium to high density mixed-use development by making more effective use of land for infill and underutilised sites, consistent with the Revised NPPF. Whilst the policy supports bringing residential uses back into the town centre where these are not located along primary frontages, this policy should be reworded to allow flexibility for residential uses above primary retail frontages within the town centre, which make efficient use of land as per the Revised NPPF.	Support	Residential uses are appropriate above first floor level. This will be reflected in the policy.	Text added to clarify that residential uses are appropriate above first floor level in the Town Centre.
Policy SD2.9 Town Centre Strategic Development Area	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1349 The principles of emerging Policy SD2.9 are supported. The drive to maximise the potential of underutilised land within the town centre area is positive to encourage medium and high density mixed use developments, including flexible work spaces. This policy also seeks to enhance the perceptions of place through works to the public realm and movement corridors throughout the town centre which is welcomed. This policy should also include reference to visitor accommodation as being suitable for the Strategic Development Area given it is highly accessible by a number of methods of public transport. It is also an area where the NPPF specifically directs hotel uses towards and the plan is not in conformity on this point as it is currently drafted. Reference to hotels in this policy would also support the Council's vision set out in paragraph 1.17.3 which seeks to create an improved destination to visit. The policy could therefore indicate that hotels may be acceptable in the town centre where they can be shown to help with the Council's aspirations for the town centre. The policy is welcomed in principle and thought to be in line with chapter 11 of the NPPF although there is no specific reference to visitor accommodation within the Strategic Development Area and this should be included.	Support	Support welcomed. Proposals for new visitor accommodation are welcomed (in the right locations), and agree it would be useful to clarify the types of uses that would be acceptable. This particular issues will be covered by other policies an applications considered on their own merits.	Policy amended to provide more clarification about the types of uses that would be appropriate.
Policy SD2.9 Town Centre Strategic Development Area	IDA Plymouth Holdings Ltd. [3888]	1358 The principles of emerging Policy SD2.9 are supported. The drive to maximise the potential of underutilised land within the town centre area is positive to encourage medium and high density mixed use developments, including flexible work spaces. 3 Point 7 of the draft policy refers to the enhancement of heritage assets within the Strategic Development Areas. Point 5 and 6 of the same policy aims to improve the perception of plan through improvements to public realm and movement throughout the Strategic Development Area. It should be recognised that these two objectives may present conflicts and the strict protection of non-designated heritage assets should be viewed flexibly in order to realise the potential to significantly enhance pedestrian movement and flow through an area. Point 9 of the draft policy requires large scale residential schemes to consider infrastructure requirements including educational and open space facilities. It is not clear here what "large scale residential schemes" would equate to in a development. Clarification should be added to this effect. It is also reminded that the Council have drafted a Development Contributions Policy SD2.6 which would also apply to large scale developments for infrastructure provision and it is questioned whether specific reference here is required as repetition. If it is deemed appropriate, then any infrastructure requirement that is triggered will need to be subject to viability testing to ensure developments continue to be viably brought forward testing to ensure developments continue to be viably brought forward having regard to policy requirements in the Local Plan and a CIL liability.	Support	Support welcomed. Possible conflict with Point 7 and 5 and 6 noted. The area is within the Core Development and the principles of high density development should be established in the policy. Further work about taller buildings and their suitability has been undertaken and published alongside the Regulation 19 consultation document.	Policy has been revised to provide more clarity about development in the area and suitability of taller buildings. This is complemented by amendments in other policies related to high density development and building height.
Policy SD2.9 Town Centre Strategic Development Area	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1513 It is not clear from the information provided on the Policies Map where the Town Centre Strategic Development Area ends, and the Lower High Street Development Area begins, but for the purposes of this response we are assuming that it is the area covered by the Town Centre inset map. Given its location, and the size of the area, this site has the potential to impact on a large number of heritage assets – both designated (listed buildings and conservation areas) and non-designated (locally listed buildings). These include the High Street and King Street, and St Mary's Conservation Areas, as well as numerous Listed Buildings including the Church of St Mary (Grade I Listed), the Bedford and Essex Almshouses (Grade II Listed), the Mrs Elizabeth Fuller Free School (Grade II Listed), and 133, 135, 137, 139, 141, 145, 149, 151, 160, and 174 High Street (9 x Grade II Listed). Given the number of assets affected we would expect to see a Heritage Impact Assessment prepared to inform the redevelopment of this area. This document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. These assessments should guide development so that all effort is made to avoid harm to the historic environment through the master planning and design of the site and, where this is not possible, mitigation measures are put in place. Any specific measures required to remove or mitigate any harm to these assets should then be included in Policy SD2.9. Further information on site allocations can be found in our advice note 3: The Historic Environment and Site Allocations in Local Plan which can be accessed at https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/ . Suggested change - Preparation of a Heritage Impact Assessment (HIA) for the Town Centre Strategic Development Area. Any specific measures required to remove or mitigate any harm to assets identified within the HIA should be included in Policy SD2.9.	Comment	Boundaries have been clearly defined and the CDA area split to provide clearer and more specific polices; this enables specific reference to heritage assets to be included. Approach to building heights is based on assessing the sensitivity of the whole CDA to building height including heritage assets. Details of the study are provided as part of the evidence base. Map is provided identifying the location of all assets in the Heritage chapter.	New map defining the CDA and Map showing Heritage assets in Chapter 7 'An Attractive Town'. Policy HE7.1 requires all development affecting heritage assets or their setting to be supported by a Heritage Impact Assessment.

Policy CC6.2 Flooding and Resilience	The Woodland Trust (Regional External Affairs Officer - Mr nick sandford) [3850]	1202 It is disappointing that there is no reference in this policy to the role which trees can play in helping to prevent or minimise surface water flooding in urban areas. Trees can intercept rainfall and slow down the rate at which water reaches the drainage system by as much as 60%, which can be of crucial importance during times of heavy rainfall. Trees can also play an important role as part of sustainable urban drainage systems.	Object	Concerns noted. Policy around tree specific benefits will be added to the Local Plan. Trees are an important part of SUDs and this will be mentioned as such.	Addition of information relating to the role of trees is set out in Chapter 6 'An Attractive Town' and Chapter 9 'Conserving and Enhancing the Environment'.
Policy SD2.9 Town Centre Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	1579 Highways & Transport It is considered that point 6 within this policy could be worded more strongly. All strategic sites and other developments should be planned in accordance with the transport user hierarchy. Pedestrians and cyclists should be prioritised and we agree there should be attractive, easy to follow and well-integrated pedestrian and cycle routes. However, as a major destination and a hub for public transport, consideration is also needed to bus access and priority infrastructure in and around the town centre to facilitate good and attractive bus services. The policy should have specific wording around providing for and facilitating bus services. The county council would like reassurance that proposals for this area will not adversely affect bus accessibility. It is important for social inclusion that those who are less able to walk/cycle are still able to access the town centre and its services. It is noted that this policy refers in point 8 to the Masterplan for Watford High Street (North) and Cultural Hub. Masterplans are needed for other strategic development sites in this draft Local Plan and there should be similar reference to these (including those that are planned or in preparation) in all of the Strategic Development site policies.	Comment	The transport hierarchy will be given more prominence as part of the Local Plan. This will be set out in the supporting text to a new strategic policy on transport or infrastructure. This will be complemented outside of the Local Plan with the undertaking of a Local Cycling and Walking Implementation Plan which should help support the identification of routes and infrastructure required to meet the objectives set out in the Local Plan and the Local Transport Plan. Public transport is integral to any successful place. In Watford this will become increasingly important as it seeks to intensify the town centre including the provision of community facilities, reinforce its role as a regional retail centre and continues to grow as an employment centre. Accessible public transport is also important to reduce the high proportion of short journeys (less than 5km) made within Watford. Including public transport and improving transport interchanges will be important to Watford's success as it continues to grow. The Strategic Development Areas are defined areas where intensification will be supported and the related policies set out the framework to guide development. These are being revised. The Strategic Development Areas include land that is not allocated for development, however, development would be supported in principle. Ideally, these areas would have masterplans, however, without the land being allocated in its entirety (land can only be allocated where it meets the tests set out in the Housing and Economic Land Availability Assessment guidance) and in multiple ownerships it is difficult to bring sites together in a coordinated manner and facilitate land value equalisation. In this sense, masterplans will not be set out for the Strategic Development Areas but a concept plan will be included in the Local Plan to support the policies.	Chapter 11 'A Sustainable transport Town' has been revised to provide more clarity and the SDA policy and SDA map in Chapter 2 'Core Development Area' revised to emphasise the importance of sustainable transport and public realm.
6.1 Introduction	The Woodland Trust (Regional External Affairs Officer - Mr nick sandford) [3850]	1203 It is disappointing that your policy on climate change does not contain any reference to the important role which trees can play both in removing carbon dioxide from the atmosphere and in enabling adaptation to the impacts of climate change. The recent IPCC report and the UK Government's Climate Change Committee have advocated a large scale increase in tree planting and woodland creation as part of a response to the climate emergency. Councils across the country are setting themselves significant tree planting targets to help them get to net zero carbon as quickly as possible.	Object	Concerns noted. Mention of tree specific benefits will be added to the Plan. Trees are an important part of SUDs and this will be more thoroughly discussed.	Policies strengthened to place greater emphasis on tree planting and climate change mitigation. This includes policies in the Chapter 6 'An Attractive Town', Chapter 8 'A Climate Change Emergency' and Chapter 9 'Conserving and Enhancing the Environment'.
Policy H4.8 Residential Conversions	Friends of the Earth (Anna Addison) [3407]	1270 All conversions should include the retrofitting of better insulation and sustainable heating solutions in existing properties.	Comment	Details on energy efficiency and overheating can be found in chapter 6. There will also be reference to carbon offset fund established which can be used to reduce carbon emissions.	Chapter 8 'A Climate Emergency' amended to include reference to a carbon offset fund in Policy CC8.3: Sustainable Construction and Resource Management.
2.12 Lower High Street Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	1582 Paragraph 2.12.4 Highways & Transport It is considered that bus connectivity and bus priority measures equally need to feature within the Lower High Street SDA. The area is an important bus corridor and could also potentially have a future role in connecting a sustainable transport route along the former Croxley Branch Line to the town centre. Mixed use and higher density development would help build the case and increase the potential demand for any such service, so it needs to be central to the thinking with regard to this SDA. More consideration is needed as to the potential scale of development and future scenarios for the Lower High Street area and what implications and opportunities that creates for sustainable transport and the transport network. As per the comments for Bushey Station SDA, less work has been undertaken to date on these areas.	Comment	WBC appreciate the support in this approach. In the next iteration of the Plan concept maps will be presented for each of the SDAs, these will identify key transport routes and desire lines where appropriate. Drafts of these will be provided to HCC for discussion. WBC are happy to incorporate specific transport improvements, where these are identified by HCC, into site considerations for development sites where appropriate.	SDA concept maps and detailed policies revised and amended.

Policy SD2.10 Lower High Street Strategic Development Area	Friends of the Earth (Anna Addison) [3407]	1205 Considerations 2-5 in the policy below reflect the text in the outline of the area above and are supported. However consideration 1 should be reworded as it currently stands this does not support "the land is considered to be ineffectively used. The area is characterised by single use large retail outlets, which are predominantly car based destinations. The retail uses provide competition for the town centre rather than complementing it. " and "As such, a transformative approach to development in this area is supported". Consideration 1 will not improve the SDA's transport challenges, only increase them. See SD2.7 comments	Comment	Support welcomed. The intention is that intensification of these uses will allow for consolidation to free up other sites in the vicinity, not to provide sufficient additional large retail floor space. The policy will be reworded to reflect this more clearly. The transformative approach to development in this area will reduce car dominance. It is considered appropriate for some large retail use to remain in the area where the uses complement the town centre. The intention is that customers will be able to combine trips .	The supporting text within the SDA section has been revised to highlight consolidation of large retail units to release other sites for mixed use development. The intention is not to provide significant additional floor space for large retail uses.
Policy SD2.10 Lower High Street Strategic Development Area	Nuveen Real Estate (Mark Cruddas) [3878]	1327 Our client objects to the wording of draft Policy SD10, which includes the following: 'Proposals which intensify the existing land use through mixed-use redevelopment and intensification of large retail and car sales sites will be supported.' It would be unduly restrictive to limit development options to mixed-use redevelopment and it would be better to allow also for residential development as in the following proposed alternative text: Proposals which intensify the existing land use through residential and/or mixed-use redevelopment and intensification of large retail and car sales sites will be supported.'	Object	The intention is to provide further clarity through the final policy and associated concept mapping as to which areas are appropriate for mixed use or residential development. It is agreed that parts of this area are appropriate for residential development.	The final policy and supporting text has been significantly redrafted to provide greater clarity around the types of development appropriate.
Policy SD2.10 Lower High Street Strategic Development Area	Wood Plc (acting on behalf of National Grid) (Lucy Bartley) [3393]	1398 The SDA is crossed by a National Grid high voltage electricity transmission overhead line (ZC Route - 275Kv two circuit route from Elstree substation in Hertsmere to Watford South substation in Watford). The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Over Head Lines here: https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf UK Power Networks owns and operates the local electricity distribution network in Watford Borough Council. Contact details can be found at: www.energynetworks.org.uk . National Grid seeks to encourage high quality and well-planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which provide detail on how to develop near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. Potential developers of these sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government. National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave our existing transmission pipelines in situ. Please refer to the Health and Safety Executive (HSE) in the first instance. National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required	Comment	Overhead powerlines were considered through the HEELA and sites have not been allocated where this was an issue. To ensure that overhead lines are also considered for windfall development sites wording on this issue has been added to Policy CC8.5 Managing the Environmental Impacts of Development.	Wording to ensure overhead lines are considered in proposals to be added to the policy on managing impacts of development.
Policy SD2.10 Lower High Street Strategic Development Area	LaSalle Investment Management (LaSalle) (n/a - n/a n/a n/a) [3044]	1416 Policy SD2.10 of the First Draft Watford Local Plan identifies the area between Watford High Street and Bushey Station, a 42 hectare area, as the Lower High Street Area Strategic Development Area. Policy SD2.10 states; Proposals in this Strategic Development Area, as defined on the Policies Map, which contribute to achieving successful implementation of development aims will be supported. Proposals for new development are expected to incorporate the following development considerations: 1. Proposals which intensify the existing land use through mixed-use redevelopment and intensification of large retail and car sales sites will be supported; 2. Proposals should create a clearer and more legible public realm, led by a more defined building line along the core streets; 3. High quality design, including an attractive public realm and landscaping scheme that will support the green river corridor, will be essential; 4. Design proposals should enhance the existing heritage assets to protect and enhance their setting and the quality of the street scene; 5. Pedestrian and cycling routes should be enhanced as part of any redevelopment proposals, providing clear and attractive connections that are easy to follow and consider desire lines to local destinations including the High Street and smaller retail outlets, Bushey Station, open spaces and cultural centres; 6. The design parameters of schemes need to ensure that in areas at risk of flooding, mitigation measures are identified. Ideally this should be provision that can support multiple uses and designing buildings that have less sensitive uses on ground floors. La Salle support the Council's objectives to transform the area to include a wide range of uses. La Salle recognise the sustainable location of the area to provide higher density development, and welcome the Council's objectives to intensify the existing land use through mixed-use redevelopment, including the intensification of large retail sites and the provision of new homes. However, it needs to be noted that the Site is fully occupied and provides a range of retailers serving Watford. The potential to intensify the Site, including for alternative uses, will depend upon the future occupation profile of the space which will emerge over the Plan period.	Comment	Support welcomed.	The principles have been retained and the final policy and supporting text has been significantly redrafted to provide greater clarity around the types of development appropriate.

Policy SD2.10 Lower High Street Strategic Development Area	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1514 As with SD2.9 it is not clear from the information provided on the Policies Map where the Lower High Street Development Area ends, and the Bushey Station Strategic Development Area begins, but for the purposes of this response we are assuming that it is the area to the south-east of the 'see Town Centre inset map' box on the policies map. In common with the other Strategic Development Areas given the scale of the area affected, this site has the potential to impact on a large number of heritage assets – both designated (listed buildings and conservation areas) and non-designated (locally listed buildings). These include Frogmore House (Grade II* Listed, and Heritage at Risk), Sparrows Herne Trust Turnpike Marker (Grade II Listed), Watford Museum (Grade II Listed), the Brewery Building (Grade II Listed), and 202, 202A, 212 and 214 High Street (3 X Grade II Listed) within the Development Area, and the Grade II Listed Bushey Arches Railway Viaduct at the south-eastern boundary of the site.	Comment	Boundaries have been clearly defined and the CDA area split to provide clearer and more specific polices; this enables specific reference to heritage assets to be included. Approach to building heights is based on assessing the sensitivity of the whole CDA to building height including heritage assets. Details of the study are provided as part of the evidence base. Map is provided identifying the location of all assets in the Heritage chapter.	New map defining the CDA and Map showing Heritage assets in Chapter 7 'An Attractive Town'. Policy HE7.1 requires all development affecting heritage assets or their setting to be supported by a Heritage Impact Assessment.
		Development will need to preserve and where possible enhance these assets and their settings. Given the number of assets affected we would expect to see a Heritage Impact Assessment prepared to inform the redevelopment of this area. As with the Town Centre Strategic Development Area, this document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove or mitigate any harm to these assets should then be included in Policy SD2.10. Further information on site allocations can be found in our advice note 3: The Historic Environment and Site Allocations in Local Plan.			
		Suggested change - Preparation of a Heritage Impact Assessment (HIA) for the Lower High Street Strategic Development Area. Any specific measures required to remove or mitigate any harm to assets identified within the HIA should be included in Policy SD2.10.			
Policy SD2.10 Lower High Street Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	1580 Highways & Transport There is no mention of buses in this policy and the wider Section 2.12. the Lower High Street is a key interurban bus corridor with high frequency services and a bus priority study is currently looking at the potential for a bus lane on the A4008 through this area. Would be good to have support for making use of sustainable modes including buses more attractive in this area.	Comment	Text to support the provision of public transport facilities including buses will be added to the detailed SDA policy. It would be helpful to incorporate specific projects here and in the Infrastructure Delivery Plan if they are identified. Support for increased sustainable transport use is a key thread running through the Plan. The next draft of the Plan will identify where policies link into these key objectives to make it more explicit.	Lower High Street SDA policy revised to include reference to buses. Identified that this policy meets the sustainable transport objective.
Policy CC6.1 Sustainable Construction and Design	Friends of the Earth (Anna Addison) [3407]	1279 WBC has declared a climate emergency and pledged to do everything in it's power to be carbon neutral by 2030. This is fantastic. We would like the Local Plan to go further in light of this pledge. WBC aims: 'To deliver high quality, energy efficient homes and employment premises (\$1.18.4).' This is great. However: S.6.1 stating: 'proposals provide a sustainability statement.' Great to change so that every proposal had to provide a sustainability statement. CC6.1 states: ".....energy performance standard equivalent at least 19%". Extending this aim to all proposed building and aim higher in carbon emission reduction.	Comment	Agree. Sustainability statements are required for all significant developments. Policies will be strengthened and further sustainability requirements will be added.	Requirement for a sustainability statement has been set out in the supporting text to Policy CC8.3 'Sustainable Construction and Resource Management'.
Policy SD2.11 Dome Roundabout Strategic Development Area	Friends of the Earth (Anna Addison) [3407]	1206 For High density developments in area - - no or minimal car parking is a requirement. - full cycle provision - including on road network/ integrated into new linkages/ connections between sites, employment developments with XX units/ floor space/ staff incorporate cycle parking and showering facilities, all housing incorporates safe cycle storage with 1 bike per potential resident rather than 1 bike per unit.	Support	A decision has been taken to remove the SDA status of the Dome Roundabout, however the transport issues in the area are recognised and have been discussed with the County Council who are the Highways Authority. These include the need to safeguard public transport priority routes if redevelopment happens and better provision for cyclists and pedestrians, and that will be set out in Policy in the Local Plan. This will be supported by a forthcoming Sustainable Transport Strategy.	Infrastructure requirements have been more clearly set out in the document.
2.8 Strategic Development Areas	Environment Agency (Planning Advsior - Mr Theo Platts-Dunn) [3848]	1280 Lack of flooding and buffer zone provision within SDAs and greater clarity required about mitigation of flood risk.	Comment	Concern notes. Mention of flooding and buffer zones will be prevalent in all relevant SDAs. Detailed flood policies will be within chapter 6 and buffer will be included in biodiversity policy. It will be made clear each SDA must also comply with all other LP policies.	SDA policies, flood risk policy and site allocations revised to reflect findings of the flood risk assessments and require mitigation where risk is identified. The biodiversity net gain requirement has been clarified in the Environment chapter which applies to all sites.
Policy SD2.11 Dome Roundabout Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	1584 Highways & Transport Point 5 within this policy is welcomed in terms of seeking to provide stronger links to North Watford station and the surrounding area is needed and would be positive in terms of sustainable transport. However, without having a clear understanding of scenarios for future development within this SDA, or if an incremental approach is taken, it is difficult to plan the future transport needs and harness opportunities. It should be noted that the St Albans Road is a key bus corridor, and congestion in the area of the Dome roundabout affects the quality and reliability of bus services. This could continue to hamper modal shift objectives, so recognition in the policy of the need to facilitate bus service improvements including through improved bus priority and infrastructure, would be welcome. This is consistent with LTP4's Policy 1 and Policy 9. A bus priority study is currently looking at the potential for bus priority at the roundabout and on A412 into town. This would encourage use of buses to/from the site. Support in the policy for encouraging bus use as well as pedestrian and cycle from this site would be welcomed.	Comment	In the next iteration of the Plan concept maps will be presented for each of the SDAs, these will identify key transport routes and desire lines where appropriate. Support for increased sustainable transport use is a key thread running through the plan. The next draft of the plan will identify where policies link into these key objectives to make it more explicit. Work to prioritise bus services is welcomed, particularly how schemes at locations such as the dome roundabout relate to other parts of the transport network to provide well connected routes across the borough.	SDA concept maps and detailed policies added to Chapter 2 'Core Development Area'. Further clarification is set out in the transport chapter.

Policy SD2.11 Dome Roundabout Strategic Development Area	Hertfordshire County Council (Martin Wells) [3559]	1585 Minerals & Waste Planning In order to ensure sufficient waste capacity within the county, the Waste Planning Authority seeks to safeguard operational waste sites with the implementation of Waste Core Strategy Policy 5: Safeguarding of Sites. At present (and to the best of our knowledge), an existing waste transfer station at Colne Way (operated by PB Donaghue Ltd) is situated within this SDA. This site is safeguarded under the above policy; the requirements of which ensure that waste management facilities are safeguarded to contribute to the strategic network of waste management provision in the county. Therefore, any redevelopment opportunities that come about in this SDA, will need to take into account this safeguarded waste site. This SDA is also adjacent to the Employment Land Areas of Search (ELAS) at Odhams & Sandown (ELAS213) and Greycaine (ELAS214), as shown in the adopted Waste Site Allocations DPD. ELAS are predominantly located on existing employment land that is used for general industry (Use Class B2) and storage and distribution (Use Class B8). Whilst there are currently no safeguarded waste management uses located within these two ELAS, it should be noted that these are areas that are considered compatible with waste management uses.	Comment	Comment noted.	No change.
Chapter 3: Supporting Sustainable Transport	Greater London Authority (Jorn Peters) [3466]	1337 Watford is located within the new London Plan's Strategic Infrastructure Priority called 'Midlands and West Coast Mainline (London – Luton – Bedford / Milton Keynes)' (see Policy SD3 and Figure 2.15). We support in principle the South West Hertfordshire Growth and Transport Plan measures for the Watford area. Although the Metropolitan Line Extension (MLX) project in its original form is not currently being progressed and the powers granted by the Transport and Works Act Order are no longer in place, Transport for London is supporting Hertfordshire County Council's and Watford Borough Council's assessment of potential alternatives and we look forward to continuing to work with you on this. In the light of Watford's proximity to London, we would be grateful, if you would consider extending some of the Mayor's strategic transport policy objectives set out in the Mayor's Transport Strategy to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.	Comment	Support welcomed. Many of the sustainable transport principles set out in the Mayor's Transport Strategy have been included in policy, such as commitment to high quality walking and cycling network, reducing car parking supply and support both the provision of and access to public transport.	Chapter 11 'A Sustainable Transport Town' has been revised to strengthen reference to walking and cycling and Chapter 6 'An Attractive Town' revised to improve public realm requirements, including a new policy 'Public Realm'.
Chapter 3: Supporting Sustainable Transport	Canal and River Trust (Area Planner - Tessa Craig) [3892]	1385 Of Watford's resident population of 90,000, over 20,000 (23%) live within 1km of the canal, i.e. within easy reach for walking and cycling, either as part of a commute or utility journey or for leisure and recreation. The Canal is on the west side of the Watford plan area, in and around the Greenbelt. The canal is well linked with stations at Rickmansworth, Watford (Metropolitan Line) and Croxley. The canal is within 2km of Watford Town Centre and Watford General Hospital by road routes, and neighbours the commercial/employment areas of Holywell and Watford Business Park. Towpaths make excellent places for people to walk and cycle considerably. The towpath in Watford has a variety of loose gravel, bound aggregate, and tarmac surfacing, with some grass/rough tracks in places further north. It provides a rural, flat, quiet, traffic-free route suitable for most cyclists and walkers and is an excellent option for those learning to ride or with lower confidence of cycling in traffic. It provides attractive leisure and recreational routes both close to Watford and with access further afield for longer rides. In places the towpath surface has been upgraded to provide facilities for 365-day access. In places the network would benefit from further investment/ improvements to the surface making it accessible all year round. There is potential in Watford for local people to improve their wellbeing by using the Grand Union Canal towpath for active travel as part of their daily routines, particularly due to the link with stations at Rickmansworth and Croxley. The Grand Union Canal also plays a strong recreational role and links Watford with SSIs of Whippendell Wood and Croxley Common Moor as well as Cassiobury Park and the Colne Valley Regional Park and the wider Hertfordshire countryside. Improved access, wayfinding and relatively simple improvements to the towpath can have a big impact on people's propensity to use it for walking and cycling as part of their daily routine. We recommend reference to the towpath within this chapter. We are keen to work with key stakeholders in Watford (including the Council) to better link the towpath to the strategic East and West routes and would welcome further engagement on how we could achieve this.	Comment	Comment noted. Agree the blue infrastructure network is important for people and biodiversity. Greater references can be made in the plan to highlight this.	Chapter 9 'Conserving and Enhancing the Environment' has more references to green and blue infrastructure, the Colne Valley in Chapter 2 'Core Development Area' proposes a new linear park whilst requiring new development to connect into this network.
Chapter 3: Supporting Sustainable Transport	Transport for London (Principal Planner - Mr Richard Carr) [2980]	1491 The Mayor's Transport Strategy was published in March 2019 and the Panel Report for the new draft London Plan has now been received following its Examination in Public. We would be grateful, given the amount of cross boundary travel if you would consider extending some of the Mayor's strategic transport policy objectives to Watford including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger	Comment	Agree. Strategic transport policy reflects many of the same ambitions as the Mayor's Transport Strategy and New London Plan	Strategic transport policy setting out commitment to sustainable transport and creating a better environment encouraging people to be more active. This is set out in chapters 6 'An Attractive Town' and 11 'A Sustainable transport Town'.
Chapter 3: Supporting Sustainable Transport	Hertfordshire County Council (Martin Wells) [3559]	1586 Highways & Transport This chapter has no section on bus or rail, which is disappointing given the initiatives and aspirations for these modes across the Local Plan area. Paragraph 1.18.1 mentioned aspirations for transport provision on the former rail alignment but this is not mentioned here, nor A414 Strategy/MRT proposals, nor Watford Junction (other than in the previous chapter re the SDA), nor the Abbey Line, nor recent proposals for transport hubs at the pyramid building and High St North/Cultural Hub locations. Support for the initiatives of the Intalink Bus Strategy and Enhanced Partnership and potential schemes for bus priority coming out of the bus priority study would also be welcomed.	Comment	Agree. The draft Plan was heavily orientated towards walking and cycling at the expense of bus transport other measures to an extent. Revisions to be made to make reference to bus and transport interchange infrastructure in terms of provision and protection. Additional references to be made to the Local Transport Plan and supporting strategies that will support new growth and achieve the objectives set out in the Local Plan and Local Transport Strategy.	Amend text to include reference to buses in supporting infrastructure.

Chapter 3: Supporting Sustainable Transport	Hertfordshire County Council (Martin Wells) [3559]	1587 Public Health This section should also include a policy regarding the need for pedestrian and cycle links being constructed, prior to first occupancy, where viable. This should also include provisions that require developments to provide sustainable and active travel wayfinding to link the new development to existing pedestrian and cycle routes. This should also be in place from the outset to encourage early adoption of sustainable travel behaviours.	Comment	Agree. Clarity about the requirements to support travel habits based on active transport modes will be added. The relevance to travel plans will also be cross referenced.	Added policy requirement and explanation in supporting text to reference wayfinding infrastructure and providing infrastructure that will connect into any existing off infrastructure adjacent the site. No change.
Chapter 3: Supporting Sustainable Transport	Heather Sword [3411]	1720 Watford Junction improvements. May they herald the way for the reinstatement of the much-loved airport bus to Luton, Heathrow etc? As a very large town Watford should have better and much improved links. The airport bus removed Watford from its' route because of traffic chaos in the Watford Junction area. These traffic problems need adequately addressing: out of town car parks(?) with shuttle buses/trams/trains?	Comment	Comment noted.	No change.
Chapter 3: Supporting Sustainable Transport	Adele Batten [3924]	1727 How about a fly over or underpass for the growing number of vehicles jamming the roads in and around Watford? Park and ride schemes would also help keep traffic jams and pollution down as long as they were regular and low cost.	Comment	Comment noted. New roads are not in line with commitment to Climate Change Emergency and sustainable transport. Park and Ride remains a long term consideration, as identified in South West Herts Growth and Transport Plan.	No change.
3.1 Introduction	Miss Hannah Jilani [3633]	939 As this document mentions there is already severe traffic in Watford. Increasing the number of cars will only make this worse. Are the proposals to increase infrastructure to support this? Why is there not an option to not include car parking in new developments, but for example, provide those residents who don't register a car with a discounted travel card. Travel by car is not sustainable for the environment or by the infrastructure in Watford.	Comment	Comment noted. Strategic transport policy can be added to support mode shift to sustainable travel.	Addition of a strategic transport Policy (ST11.1) and revised text in Chapter 11 'A Sustainable Transport Town'.
3.1 Introduction	Mr Xavier Moruno Gilabert [3684]	1005 Storage and parking facilities for bicycles can encourage bicycle use, which is good. However, it is currently not safe to cycle in most of the area's roads due to a lack of proper cycle lanes, intense motor traffic and potholes. In all new developments new safe cycle lanes should be created, so that cyclists can feel safe and not risk their lives. Additionally, current roads should be redesigned to include safe cycle lanes. New developments should have local shops and buses to shopping centres. Shopping accounts for a lot of traffic.	Comment	Agree. Policy can be strengthened to include commitment to high quality cycle routes at new developments as well as prioritisation of network via Local Cycling and Walking Infrastructure Plan.	Strengthened commitment to high quality cycling infrastructure.
3.1 Introduction	Miss Vanessa Marlowe [3677]	1169 Watford Borough Council has declared a Climate Emergency and is to become carbon neutral by 2030. Watford Borough Council needs to drastically reduce air pollution caused by petrol/diesel run road vehicles. To work with transport companies and ensure sustainable, energy efficient buses replace petrol/diesel run buses. To encourage cycling by improving cycle routes connecting home and work in and around Watford town centre. Watford Borough Council should consider banning diesel run vehicles in the centre of town setting up a Clean Air Zone to reduce air pollution in heavily polluted areas.	Comment	Agree. A Strategic transport policy can be added to support mode shift to sustainable travel.	Addition of a strategic transport Policy (ST11.1) and revised text in Chapter 11 'A Sustainable Transport Town'.
3.1 Introduction	Friends of the Earth (Anna Addison) [3407]	1239 To meet the objectives of the Climate Emergency include by 2030: •Target of commuters walking, cycling or using public transport – 60% •Major employers have 40% of their staff lift-sharing •at least 61 Electric vehicle charging stations Currently not safe to cycle on roads as lack of proper cycle lanes, intense motor traffic, potholes. New safe cycle lanes created in all new developments. Current roads redesigned to include safe cycle lanes. New developments include local shops and buses to shopping centres. Bus lanes created to make bus travel faster than private transport.	Comment	Agree. A Strategic transport policy added to support mode shift to sustainable travel. Policy can be strengthened to include commitment to high quality cycle routes at new developments as well as prioritisation of network via Local Cycling and Walking Infrastructure Plan.	Addition of a strategic transport Policy (ST11.1) and revised text in Chapter 11 'A Sustainable Transport Town'. Strengthened commitment to high quality cycling and walking infrastructure
3.1 Introduction	Hertfordshire County Council (Martin Wells) [3559]	1588 Paragraph 3.1.2 Highways & Transport It is suggested that the following amendments are made to the wording within this paragraph: “The document seeks an integrated approach to transport and land-use planning by moving away from car dependency to more sustainable transport options including walking and cycling, public transport and improving connectivity between neighbouring towns. To support the Local Transport Plan 4 strategy, a set of supporting documents is being produced including the South West Herts Growth and Transport Plan Prospectus (2019) which identifies a number of sustainable transport interventions and packages in and around Watford.”	Comment	Agree, this would benefit the Plan.	Text amended as suggested.
3.1 Introduction	Hertfordshire County Council (Martin Wells) [3559]	1589 Paragraph 3.1.3 Highways & Transport With regard to the first sentence in this paragraph, it is considered that the Local Plan (through its general and site-specific policies, associated master plans and Infrastructure Delivery Plan) has a greater role in supporting and delivering the transport goals and policies of LTP4 and its supporting strategies than paragraph 3.1.3 suggests. It is not just infrastructure but enabling/facilitating land use planning that encourages an uptake of sustainable modes. For instance, mixed land use, designing walkable neighbourhoods and planning and delivering quality walking/cycling networks, development at higher densities in areas with good access to sustainable transport. The Local Plan as a whole has to embed LTP4 policy, seek to create enabling conditions for achievement of LTP objectives, and also create the policy foundation for development to deliver and/or contribute suitably to transport infrastructure improvements. It is therefore considered that point 3 should be amended as follows: “Ensuring proposals for new development are supported with Transport Assessments and Travel Plans as appropriate which encourage use of sustainable modes of transport use and help mitigate the highways impacts of development proposals.”	Comment	Reference to the Local Transport Plan and supporting strategies will given greater exposure in the Local Plan to ensure the objectives set out in the Local Plan and Local Transport Pan can be achieved. If successful, the measures, in addition to those considered at a more strategic level outside the borough will have supported a long term modal shift towards sustainable development and mitigating the impact new development in Watford has had on the transport network.	New strategic transport and revised transport infrastructure policies included. Increased referencing of the Local Transport Plan and supporting strategies in the Local Plan as well as reference to the travel hierarchy included.

3.2 Cycle Parking and Storage	Hertfordshire County Council (Martin Wells) [3559]	1590 Paragraph 3.2.5 Highways & Transport. The use of an SPD for cycle parking to allow more detailed requirements to be set and future updates of the standard and guidance is supported. Updated guidance on cycle parking design is expected to be incorporated in HCC's updated Highway Design Guidance (Roads in Herts). The county council would encourage a reference to it should this be finalised prior to the Local Plan submission.	Comment	Comments noted. The cycle parking standards are set out within the Local Plan (or an appendix). The Cycle Parking SPD currently adopted will be merged into the Watford Design Guide that is currently being revised. Further information about the design guidance being prepared by HCC would be welcomed to align the approaches being set out. This includes the aspirational levels of cycle parking set out in the emerging Local Plan which require supporting infrastructure and good design to adequately support a long term modal shift and increase of cycling and walking in Watford and Hertfordshire more widely. Further work has been undertaken to support the Plan.	No change.
Policy ST3.1 Cycle Parking Storage	Sport England (Planning Manager - Mr Roy Warren) [3671]	976 The policy is supported as it will encourage people to cycle from home for travel or leisure purposes and encourage active travel to work, school etc. The policy would be consistent with Sport England/Public Health England's Active Design Guidance which considers the role of cycle storage in providing opportunities through the design of developments for people to be active – see https://www.sportengland.org/facilities-and-planning/active-design/ for further advice.	Support	Support welcomed.	No change.
Policy ST3.1 Cycle Parking Storage	Wenta . [3738]	1040 Wenta support the provision of cycle parking to encourage people to be able to cycle to work. Point 7 in the policy is currently confusing with regards to a financial contribution and who will use this to enhance existing facilities. If there is a net increase in development on a site where there are already facilities, would it not be better to condition the additional amount required? If a site can provide cycle parking as per the requirements then would a contribution still be sought? Overall, Wenta have no objections to the proposed standards set out in Figure 4.	Support	Support welcomed. Agree the wording in point 'G' can be made clearer who is responsible for making this contribution. If there is an agreement in place as part of the planning conditions then an additional contribution would not be needed, this will be clarified.	Wording on cycle parking updated.
Policy ST3.1 Cycle Parking Storage	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1102 Cyclist facilities e.g. showers etc must also be considered in non-domestic buildings. Conversions to homes must also comply with requirement and provide space for bike storage through Bike Hangar initiative or similar.	Comment	Comments noted. Agree that the need for cyclists to have showers is needed and it will be added to the Policy. Permitted Development Rights produce development we do not have a lot of control over, and cannot get contributions to community infrastructure as a result of the development.	Requirement for showers and changing facilities at workplaces included in policy.
Policy ST3.1 Cycle Parking Storage	Friends of the Earth (Anna Addison) [3407]	1208 Support- but need to reduce the number of units before which cycle storage should be provided to development of 5 units or more should provide cycle storage within the footprint of the building. Point 7 - existing cycle facilities do need to be enhanced including the provision of covered cycle storage within retail and city centre areas	Support	Support welcomed. Agree to reduce the units size to cover large house conversions. Existing cycle facilities do need to be improved in the town centre and a policy for that is needed, either here or within the SDA.	Minimum threshold removed. Improvements to cycle parking required at all locations.
Policy ST3.1 Cycle Parking Storage	APG Portfolio Management Ltd [3843]	1221 We support the general approach to requiring on-site cycle parking facilities in new developments, however the cycle parking standards set out in Figure 4 for a site falling within a 'High Sustainability Zone' are excessively high without sufficient justification. In the absence of a robust evidence base, APG Portfolio Management Ltd consider the policy to be unsound.	Object	Comment Noted. Cycle parking standards refined to align with core development area. Volume of cycle parking set to meet ambitions for future mode share, acknowledging that an absence of cycle parking can be a significant barrier to this mode.	No change.
Policy ST3.1 Cycle Parking Storage	Castle Homes (Mr Alfie Yeatman) [3769]	1298 We support the requirement to provide on-site cycle parking facilities in new residential development and the sustainable transport benefits that such provision provides. However, the requirement of residential development of 20 units or more to provide cycle storage within the building's footprint is not suitably flexible. The policy needs to recognise that, in some instances, it may be more desirable to provide as much residential accommodation at ground floor as possible. This may be necessary in order to provide active frontages, townscape benefits, and/or more efficient layouts. In such instances cycle parking could be provided elsewhere within the site, providing that is conveniently located.	Object	Support welcomed. Policy to be modified to allow greater flexibility in location of cycle parking.	Cycle parking policy modified to be less prescriptive.
Policy ST3.1 Cycle Parking Storage	Berkeley Homes (Berkeley Homes) [3891]	1380 We support the Council's ambition to promote cycle parking at Policy ST3.1 as an alternative to the use of the private car. There does, however, need to be a balance between promoting cycle parking and the space requirements which will be needed to meet the minimum cycle parking standards set out in Figure 4 for developments in Medium and High Sustainability Zones. These locations are the most sustainable with good access to public transport and facilities. They are also likely to be high density development. The cycle parking requirements as proposed, would require significant cycle storage space which could compromise ground floor uses and active frontages. We would suggest that a standard of 1 space per 1 bed, 1.5 spaces per 2 bed and 2 spaces per 3 bed home would still provide generous provision of cycle parking within these Zones. At Policy ST.1 the Council could consider the additional requirement for large scale developments or those within a SPA to allocate space for the Council's Beryl bikes scheme (or similar) to offset the requirement for high residential cycle parking standards set out in Figure 4.	Comment	Support welcomed. Cycle parking standards to be refined to align with core development area. Volume of cycle parking set to meet ambitions for future mode share, acknowledging that an absence of cycle parking can be a significant barrier to this mode. Allowance will also be made to offset requirements through provision of bike share spaces in larger developments.	Cycle parking policy modified to include option for off set via bike share parking.
Policy ST3.1 Cycle Parking Storage	Transport for London (Principal Planner - Mr Richard Carr) [2980]	1494 Given the number of cross boundary journeys between London and Watford, many of which are relatively short and capable of being cycled, we welcome the setting of minimum cycle parking standards for new developments	Support	Support welcomed.	No change.
Policy ST3.1 Cycle Parking Storage	Hertfordshire County Council (Martin Wells) [3559]	1591 Highways & Transport The county council strongly agrees with the necessity for cycle parking at origin and destination and welcomes the inclusion of a strong and aspirational policy on this subject. It should be noted that in addition to cycle storage, other facilities at workplace destinations particularly (such as lockers, changing facilities, showers) can also enable and promote cycle use (and indeed other active travel). It is mentioned in Point F of this policy which is welcome, but it could also be mentioned in the supporting text.	Comment	Support welcomed. Agree with suggestion.	Text amended to make clearer reference to cycle infrastructure as part of new developments when the come forward.
Policy ST3.1 Cycle Parking Storage	Three Rivers District Council (Ms Claire May) [2389]	1745 What is the basis of the 20 dwelling and 50 dwelling thresholds?	Comment	Comment noted. Thresholds to be removed.	Reference to thresholds removed from policy.
3.3 Figure 4 Cycle Parking Standards	Mr Mark Nichols [3724]	1177 Provision of these levels of cycle storage is a useful step in encouraging cycling which I think is key to reducing impact on climate change and local quality	Support	Support welcomed.	No change.

3.3 Figure 4 Cycle Parking Standards	Mr Mark Nichols [3724]	1178 Requirement for cycle storage in hotels should be much higher. We are close to London and should be encouraging visitors to cycle.	Object	Comment noted. Standard for cycle parking at hotels are the same as those in new London Draft Plan.	No change.
3.3 Figure 4 Cycle Parking Standards	Friends of the Earth (Anna Addison) [3407]	1210 Figures do not go far enough to support the journey to carbon neutrality. Cycle storage needs to be increased all development types i.e. All C3: 1 bed= 1.5 spaces per unit, 2 bed = 2.5 spaces per unit, 3 bed = 4 spaces per unit A1-A5 = 1 space per 75sqm All B = increase to 1.5 spaces per sqm below Schools and nurseries - separate out nurseries and infant schools, then primary and junior schools, then secondary schools - increasing cycle provision across each group All D = double provision + provide requirement for spaces per peak users	Object	Comments noted. Cycle parking standards set to meet ambitions for future mode share, acknowledging that an absence of cycle parking can be a significant barrier to this mode, whilst also being viable for developers. Significant distinction to be made in requirements across all land use types.	Cycle parking standards appendix updated.
3.4 Car Parking, Car Clubs and Electric Vehicles	Friends of the Earth (Anna Addison) [3407]	1216 3.4.3: Some of the plan state there are two ADMA and other parts, such as here, state 4 AQMA. Needs to be clarified. 3.4.4: We appreciate that it is recognise "Electric vehicles still require space and continued generous provision for car infrastructure ". It should also be noted that although electric cars are better than fossil fuel powered cars, electric cars still use electricity, while renewable energy (solar, wind, etc), is not widespread. Therefore the use of private cars needs to be discouraged until enough renewable energy becomes available to cover the high energy demands of private transport.	Comment	Comments noted. Text will be amended to reflect that there are 2 AQMAs in Watford.	The document has been amended to state that there are two Air Quality Management Areas in Watford.
3.4 Car Parking, Car Clubs and Electric Vehicles	Transport For London Property Development (Planning Advisor - Mr Luke Burroughs) [3819]	1401 We welcome to the approach to residential car parking which can enable car free development to be located in High Sustainability Zones. The Mayors Transport Strategy (which applies as guidance to all local authorities which are served by Transport for London services, not just London boroughs) sets are target for 80% of to be made on foot, by cycle or using public transport by 2041. Providing car free development in appropriate locations is important in helping to achieve this target.	Support	Support welcomed.	No change.
3.4 Car Parking, Car Clubs and Electric Vehicles	Hertfordshire County Council (Martin Wells) [3559]	1592 Highways & Transport The points made in paragraphs 3.4.1 to 3.4.5 on car parking, car clubs and electric vehicles are supported and are consistent with LTP4 and their inclusion is welcomed. It is suggested that the last sentence in paragraph 3.4.4 is re-worded to state the following: "As identified within the Hertfordshire Local Transport Plan, traffic demand management is needed to achieve modal shift and improve sustainable travel provision, currently parking restrictions are likely to be one of the most effective way of addressing this."	Comment	Comments noted. Agree with the suggestion.	Text amended as suggested.
3.4 Car Parking, Car Clubs and Electric Vehicles	Hertfordshire County Council (Martin Wells) [3559]	1593 Paragraph 3.4.9 Highways & Transport The borough council's commitment to an ongoing review of Controlled Parking Zones and on-street restrictions as a necessary supporting measure for reduced car parking provision for new developments, as outlined in the paragraph is supported.	Support	Support welcomed	No change.
3.4 Car Parking, Car Clubs and Electric Vehicles	Three Rivers District Council (Ms Claire May) [2389]	1746 The link between private car use and accessibility to public transport is recognised and subsequently the approach used in basing car parking standards on Sustainability Zones is supported.	Support	Support welcomed.	No change.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Wenta . [3738]	1041 As per ST3.1 Wenta support the proposed car policies. We would recommend that within the policy text, reference is made to whether the policy relates to all forms of development or just employment uses as it is set out in Policy ST3.1.	Support	Agree clarity is needed	Policy related to car clubs clarified.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1107 Great to promote electric car use but must go hand in hand with approach to clean/green energy approach which is not currently ambitious enough.	Object	Support welcome. Green energy is supported but not through allocations in the Plan. However, agree more ambitious energy efficiency aspirations could be included.	Energy efficiency target of 19% above Building Regulations (2013) included as this has been shown to be viable in residential development. Reference to a carbon off-set fund included in Policy CC8.3: Sustainable Construction and Resource Management.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Charlotte Ashton [3425]	1157 I particularly support the increasing of parking spaces dedicated to car club use only. Watford needs more of these to be available in order for such schemes to be attractive.	Support	Support welcomed.	No change.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	APG Portfolio Management Ltd [3843]	1220 Policy ST3.2 requires development proposals to accord with minimum and maximum car parking standards, which are set out in Figure 5 of the policy. As a point of principle, this is at odds with the Revised NPPF, which discourages the setting of maximum car parking standards. On this basis, we consider the policy to be unsound. Notwithstanding this, if the minimum and maximum standards are to remain, the minimum car parking standard for new residential developments (C3) within the 'High Sustainability Zone' should be amended to be 'Car free', to reflect the high public transport accessibility levels in these locations.	Object	The NPPF actually states that; <i>106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.</i> There is a clear and compelling justification for this in Watford, especially in the High Sustainability Zones	No change required

Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1352 Draft Policy ST3.2 and associated Figure 5 sets out the emerging standards for parking based on the sustainability zone that a site is located in. For hotel related development, this would be required to be car free which is welcomed however an allowance for disabled parking or taxi pick up / drop off should be included.	Comment	Agree, there is a need for disabled parking and a taxi pick up	Standards with respect to hotel car parking modified.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Berkeley Homes (Berkeley Homes) [3891]	1381 The Plan's approach taken to minimise on-site car parking to avoid building at low densities, help alleviate pressure on the road network and encourage greater use of public transport is fully endorsed. At Policy ST3.2 we support the requirement to promote car club and electric vehicles but consider that Part B which stipulates that 10% of spaces should be dedicated for car club use is too onerous. Car club operators work on a demand and supply basis depending on the number of potential users and existing supply within the catchment of a development. We would suggest that Part B is amended to state that car club provision should be provided on a site-by-site basis. Further, Part D should be amended to state that "For schemes of 10 units or more, ensure that at least one designated disabled persons parking bay is provided for every 10 wheelchair accessible dwellings". Figure 5 of the Draft Local Plan sets out car parking standards for proposed development in the Borough. We note that a minimum car parking standard of 0.3 spaces per unit is prescribed for development within the Medium Sustainability Zone. It is considered that minimum standards should not be required for development in the Medium and High Sustainability Zones as this may deter car-free development on appropriate sites in accessible locations, contrary to the objective of this policy. We consider a flexible approach should be taken to determine appropriate car parking provision.	Comment	Support welcomed. Car clubs parking standards to be refined to be more flexible, with reduced space requirement. Similarly disabled parking standards to be amended in a manner similar to that proposed. Minimum standards to be removed from the policy.	Modification to approach to car clubs, disabled parking within car parking standards appendix. Removal of minimum standards in all areas.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1409 If the use of electric and hybrid vehicles is to be encouraged, the HBF support a national standardised approach which should be implemented through the Building Regulations. Any Option for the inclusion of a policy requirement for electric vehicle charging should be clearly written and specify the quantum and type of provision sought at either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) Electric Vehicle Charging Point (EVCP) or other alternatives. The requirement should be supported by evidence demonstrating technical feasibility and financial viability. There may be practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking. Any requirement should be fully justified by the Council including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all or a proportion of dwellings have EVCPs. If re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary Recommendation That the Council ensure the appropriate consideration is given to the provision of electric vehicle charging points in the Infrastructure Delivery Plan and Viability Study	Comment	Agree that electric charging points would benefit the plan, particularly given the Government's ambitions that have been set out in 2019 which has brought the demands to the energy sector to the fore. A balanced approach to provision is justified with a focus on future proofing through more passive charging infrastructure than active, however, the requirements are more likely to be driven by government requirements in the long term.	No change.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Cassio Watford Ltd. (Cassio Watford Ltd) [3903]	1422 Policy ST3.2 Car parking, Car clubs and Electric Vehicles seeks to set limits on car parking by location within the defined sustainability zones. We support this in principle however raise concerns with the maximum levels of parking suggested. We consider 0.5 spaces per 100 sqm for commercial floorspace in the high sustainability zone is far too low. We anticipate that these will significantly affect the desirability of new commercial floorspace to potential tenants and suggest a more flexible approach to be taken to this issue to reflect how businesses operate in this location. We also raise concerns with all new hotels requiring to be car free, we anticipate this will also significantly inhibit potential operators from locating in the Borough. We request a more flexible approach to create a balance to allow Watford to remain competitive and attractive to tenants and operators.	Comment	Support welcomed. The requirement for hotels to be car-free have been removed, but the parking standard for commercial land uses in the Core Development Area has been maintained. This area has the highest accessibility by public transport in the borough, and therefore the need to travel to the sites by car is considered to be low. Limiting parking within the core development area is considered to be an essential requirement for achieving our transport and environmental objectives including reducing congestion, improving the borough's air quality and reducing carbon emissions.	Car parking standards for hotels modified.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Transport for London (Principal Planner - Mr Richard Carr) [2980]	1495 Given the number of cross boundary car journeys between London and Watford, TfL has an interest in ensuring that car parking at new developments is limited. We welcome the setting of maximum car parking standards that vary according to the sustainability zone and support car free development in the high sustainability zone. We also welcome the requirement to provide for electric vehicles at all developments	Support	Support welcomed.	No change.
Policy ST3.2 Car Parking, Car Clubs and Electric Vehicles	Three Rivers District Council (Ms Claire May) [2389]	1747 Is there evidence supporting the provision of unallocated parking spaces? How much do unallocated spaces contribute to the reduction of time that spaces are left vacant?	Comment	Comment noted. Provision of unallocated spaces is recommended, for example http://www.spacetopark.org/go/research/conclusions .	No change.
3.5 Figure 5: Car Parking Standards	Charlotte Ashton [3425]	1158 It is not clear what the sustainability zones are based on. Instead, the parking standards could have a relationship with the indicators assessed under the SA objectives in Table 2.6 (e.g proximity to a train station), similar to the PTAL system used in London, rather than the proposed sustainability zones. The policy should also refer to the possibility of conditions being attached to certain permissions which restrict future occupiers' entitlements to residents' permits, should the development result in unacceptable pressure on parking spaces in the local CPZ.	Object	Comment noted. For simplicity sustainability zones will be replaced with a two-zone system (Core Development Area and Other Areas). Core being the area with highest Public transport accessibility with parking standards reflecting this. Restricting provision of new residents' parking permits can be included in Policy.	Inclusion of limit on resident parking permit for new development in policy.
3.5 Figure 5: Car Parking Standards	Mr Mark Nichols [3724]	1179 The levels of car parking required are ridiculously low. I understand the aim is to discourage car ownership and usage, but the reality is that people continue to use cars and park them in unacceptable places particularly on pavements.	Object	The levels of car parking work in similar areas and if necessary Controlled Parking Zones can be introduced, however, this is outside of the planning remit.	No change required
3.5 Figure 5: Car Parking Standards	Friends of the Earth (Anna Addison) [3407]	1222 Given the land limitations in Watford I would suggest that across all zones maximum numbers need to be included per sqm to ensure best use of land available and ensure a focus within developments of the use of strong travel plans and connections with and encouragement of sustainable transport.	Object	Comments noted. Standards have been devised to be most appropriate to development type, whether per sqm, per unit or other. Policy includes commitment to Travel Plans and sustainable transport.	No change required
3.5 Figure 5: Car Parking Standards	Cortland Partners (Cortland Partners) [3870]	1318 Figure 5 of the Draft Local Plan sets out car parking standards for proposed development in the Borough. We note that a minimum car parking standard of 0.3 spaces per unit is prescribed for development within the Medium Sustainability Zone. It is considered that minimum standards should not be required for development in the Medium and High Sustainability Zones as this may deter car-free development on appropriate sites in accessible locations, contrary to the objective of this policy. We consider a flexible approach should be taken to determine appropriate car parking provision.	Comment	Comment noted. Agree that minimums are not required.	Minimum car parking standards removed from car parking policy
3.5 Figure 5: Car Parking Standards	Telereal Trillium (Telereal Trillium) [3915]	1536 The parking standards are also supported, and future development proposals for MXD09 will seek to reflect the sustainable location of the Site.	Support	Support welcomed.	No change.

3.6 Travel Plans and Transport Assessments	R Kowalewski [965]	929 Watford needs a much better public transport service ahead of any other measures / transport plans.	Comment	Comments noted., The Plan seeks to provide transport infrastructure that will enable people to have choices by providing infrastructure for different modes that encourage safe travel.	The policies in Chapter 11 'A Sustainable Transport Town' have been revised placing more emphasis on walking, cycling and public transport infrastructure. In Chapter 6 'An Attractive Town', design policies, including public realm policy added to include creating safe environments.
3.6 Travel Plans and Transport Assessments	Miss Hannah Jilani [3633]	938 When will the travel plan be ready to view. There is no impact assessment available of the new developments on traffic.	Comment	Travel Plans are a requirement (as stated in the Policy) for developers to prepare to support their applications. There is work ongoing to 'model' the impacts of new homes and jobs on the road network.	No change required
3.6 Travel Plans and Transport Assessments	Mr Xavier Moruno Gilabert [3684]	1006 Although better than fossil fuel powered cars, electric cars still use electricity, while renewable energy (solar, wind, etc) is not widespread. Therefore the use of private cars needs to be discouraged until enough renewable energy becomes available to cover the high energy demands of private transport. Public transport should be much cheaper and could be free and paid for by taxing the most polluting current forms of transport (aeroplanes, diesel vehicles, etc). Bus lanes should be created to make bus travel faster than private transport.	Comment	There are only 55,000 electric vehicles in the UK (2018 figures). The Council cannot tax anyone, that is a function of Government. Priority bus lanes are being discussed with the Highways Authority, the County Council.	Transport infrastructure requirements in Chapter 11 'A Sustainable Transport Town' strengthened in the draft Plan.
3.6 Travel Plans and Transport Assessments	Mr Mark Nichols [3724]	1180 Pedestrians and non-powered cyclists should be considered as separate classes of vulnerable road users with different needs	Object	The Royal Society for the Prevention of Accidents classes cyclists and pedestrians amongst the category of vulnerable road users. The Highway Code categorises them as road users requiring extra care.	No change required
3.6 Travel Plans and Transport Assessments	Hertfordshire County Council (Martin Wells) [3559]	1595 Paragraph 3.6.3 Highways & Transport This paragraph should also refer to HCC's Travel Plan guidance: www.hertfordshire.gov.uk/travelplans. This is in the process of being updated and will be going out to consultation shortly, but includes criteria for the production of a travel plan as well as other guidance on content.	Comment	Agree with suggestion.	Text revised to refer to HCC guidance.
Policy ST3.3 Access, Travel Plans and Transport Assessments	Wenta . [3738]	1042 Wenta supports the need for robust Transport Assessments for developments that are likely to increase additional traffic movements or change existing transport patterns. It would be useful to set out any minimum thresholds where these will be sought or provide text to demonstrate that it will be decided on a case by case basis.	Support	Agree with suggestion.	Thresholds have been set out in the travel plan supporting text.
Policy ST3.3 Access, Travel Plans and Transport Assessments	Friends of the Earth (Anna Addison) [3407]	1226 we agree with this.	Support	Support welcomed.	No change.
Policy ST3.3 Access, Travel Plans and Transport Assessments	Hertfordshire County Council (Martin Wells) [3559]	1594 Highways & Transport This policy should make reference to Roads In Hertfordshire: A Design Guide which sets out the requirements for Transport Assessments and Transport Statements including use class thresholds for when a TA or TS is required. Reference should be made to HCC's Travel Plan guidance: www.hertfordshire.gov.uk/travelplans. This is in the process of being updated and will be going out to consultation shortly, but includes criteria for the production of a travel plan as well as other guidance on content. The county council suggests that the second bullet point within the policy is re-worded as follows: • How the development has been designed to facilitate greater use of public sustainable modes of transport	Comment	Suggestion noted.	Reference to HCC guidance included
Chapter 4: Housing	National Federation of Gypsy Liaison Groups (Planning Officer - A.R. Yarwood) [2687]	1353 I submit these comments relating to the Watford Local Plan consultation. The consultation arrangements are unsound because there is no opportunity to offer comment for those unable to go online. The Local Plan itself is unsound because there is no policy to deal with the needs of Gypsies.	Object	Paper and written consultations were accepted by the Council and this was set out in the Public Notice. A study has been carried out into the needs of Travellers in Watford identifying the need for two pitches to 2036. While not considered significant enough to warrant an allocation, a policy can be added should future applications be submitted.	New policy added in the Housing chapter 'Homes for a Growing Community'.
4.1 Introduction	Friends of the Earth (Anna Addison) [3407]	1262 There have been some publicised developments which have been built around the country to be carbon neutral, if Watford is going to achieve its aim of being carbon neutral by 2030, then new buildings will have to aim to be as carbon neutral as possible. It would be great to see a requirement that all developments aim to achieve a BREEAM excellent or outstanding standard within this section, incorporating the sustainability points as this level. And/ or set out the requirements below of the housing developments i.e. insulation, water efficiency etc.	Comment	Noted. This issue is dealt with in Chapter 8.	No change.
4.2 Allocated Sites for Housing Delivery	Mr Mike Leslie [3145]	942 With the amount of houses destined to be built within Watford's boundaries on brown-lands & every bit of "hanky" sized land we have elsewhere in our boundaries, I can't see how we are going to fit those houses in Watford without touching greenbelt land	Comment	A Housing and Economic Land Availability Assessment was undertaken to inform Watford's capacity to meet its housing targets. The first iteration of the study demonstrated that there was a shortfall of suitable housing sites in Watford and so a review of the Green Belt must be undertaken in line with national policy (para 137 of the NPPF). This has been covered in the evidence base.	No change.
4.2 Allocated Sites for Housing Delivery	Herts County Council (Planning Officer - Mrs faye Wells) [3752]	1059 Herts County Council notes that 6 sites listed in Table 4.1, as shown on the Policies Map, are allocated for housing (Use Class C3) or mixed-use development including housing and other specified uses are within the ownership of HCC. We continue to support these allocations.	Comment	Support welcomed.	No change.

4.2 Allocated Sites for Housing Delivery	Highways England (SE Spatial Planning Team - Heather Archer) [3163]	<p>1399 Thank you for consulting us on the Regulation 18 consultation for the First Draft Watford Local Plan Consultation 2020-36.</p> <p>On behalf of the Secretary of State for Transport, Highways England is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in Department for Transport (DfT) Circular 02/2013 (Planning and The Strategic Road Network).</p> <p>We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.</p> <p>We wish to draw your attention to Highways England's document 'The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters' (September 2015). This document sets out how Highways England intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that Highways England will review and provide comments on local plans proposed by local planning authorities that have the potential to affect any part of the SRN.</p> <p>We do not consider it appropriate to state our support or objection to particular proposals, therefore instead this letter clarifies our views on a number of aspects of the Local Plan primarily focused on the potential impacts of all sites on the SRN and highlights junctions which may experience significant increases in traffic. This letter will also consider the evidence base used to understand the impact of development and the potential funding of any infrastructure schemes that are required. Our interest in local plans is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. Given that a key SRN mainline runs through Watford Borough (M1 and Junction 5, with the M25 in close proximity to the north), we are keen to understand what impact the Watford Local Plan will have on the SRN for which we are responsible. We note that whilst "the road network is well connected to strategic road corridors including the A41, M1 and M25", it is accepted that "traffic congestion is an issue</p>	Comment	<p>Comment noted, and support for measures to encourage more sustainable transport behaviour are welcomed.</p> <p>Revision of transport policies will be included that demonstrate Watford's commitment to sustainable travel throughout. This includes safeguarding land for future public transport routes, a requirement for new development to provide and contribute to high quality walking and cycling infrastructure plus access to public transport and bus prioritisation measures. Parking standards will also be designed to limit car ownership, particularly in areas of high public transport accessibility.</p> <p>The transport impact of the SDAs will be assessed via use of outputs from the HCC COMET model, and local Paramic modelling as appropriate with transport principles for each key development area set out within the policy. This analysis has been expanded upon to inform the Infrastructure Delivery Plan, which considers both costs and funding for proposed schemes.</p> <p>The commitment to sustainable travel with identification of supporting infrastructure will be set out within the Local Plan to react the Climate Emergency, reduce transport's impacts on air quality as well as maintaining the viability of both Watford and Highways England's road networks.</p>	Enhanced commitment to sustainable travel measures, detailed infrastructure commitments and development of the Infrastructure Delivery Plan.
4.2 Allocated Sites for Housing Delivery	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	<p>1405 As the Council are no doubt aware, they will need to include a housing trajectory within the local plan as required by paragraph 73 of the NPPF. This trajectory should ensure that the Council have sufficient sites to show that on adoption the Council will have a five years' worth of deliverable sites. However, on reading the Council's latest Housing and Employment Land Availability Assessment (HELAA) we noted that the Council at footnote 12 to paragraph 4.2 refers to the definition of deliverable contained within the 2012 NPPF. This definition is different to the one contained in the Glossary to the 2019 NPPF. One significant difference with the new definition is that allocated sites or sites with an outline planning permission should only be considered deliverable where there is "clear evidence that housing completions will begin within 5 years". This change places the burden of proof that the sites will be delivered on to the Council. Paragraph 68-007 of Planning Practice Guidance provides further detail as to the type of evidence required to prove deliverability and we would recommend that the Council revisits its HELAA prior to submission to ensure it has the relevant evidence to support any assessment of Watford's five-year housing land supply.</p>	Comment	<p>The Council has undertaken a significant amount of work to identify land for development that will meet its development need. The approach is set out in the Housing and Economic Land Availability Assessment.</p> <p>A housing trajectory has been created based on feedback from stakeholders will be added as an appendix to the final draft.</p>	A housing trajectory has been added as an appendix.
4.2 Allocated Sites for Housing Delivery	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	<p>1516 The Council is proposing the allocation of a number sites for housing and mixed-use development. The Plan advises that these were identified through the Housing and Economic Land Availability Assessment. While the Council considers all to be suitable, available and achievable we are concerned by the apparent lack of evidence or consideration for the historic environment underpinning this assertion.</p> <p>There are a number of sites, listed below, which require further consideration. Their inclusion on the list does not automatically mean that they should not be allocated, rather we consider that further evidence is needed to support these allocations.</p> <p>Suggested change - Preparation of further evidence regarding the potential impact on heritage assets is required.</p> <p>a) Identify any heritage assets that may be affected by the potential site allocations;</p> <p>b) Understand what contribution the site makes to the significance of the asset/s;</p> <p>c) Identify what impact the allocation might have on that significance;</p> <p>d) Consider maximising enhancements and avoiding harm;</p> <p>e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness;</p> <p>If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.</p>	Comment	<p>Comment noted. Development considerations will be updated to reflect the sites which specifically require Heritage Impact Assessments. All the site allocations will need to comply with other policies in the Plan, including Chapter 7 which includes policies setting out how heritage assets and their settings will be conserved and enhanced.</p>	The development considerations in Chapter 13 'Site Allocations and New Development' have been updated to require specified sites to undertake a Heritage Impact Assessment.

4.2 Allocated Sites for Housing Delivery	Chiltern and South Bucks District Councils (Principal Planner - Robert Davy) [3919]	<p>1541 Paragraph 4.2.2 - it is stated that 'the administrative area of Watford has a capacity for providing between 7,000 and 8,000 units over the plan period, with current estimates indicating a 410 units per annum requirement, with unmet need to be dealt with through the Duty to Cooperate'. CSB has two observations on this point: firstly, who would Watford look to work with to discharge any unmet needs? CSB is aware that Watford forms part of the same housing market as its neighbours Dacorum, St Albans, Three Rivers and Hertsmere. The London Borough of Harrow, immediately south of Watford, forms part of the London Housing Market Area, while the districts of Chiltern and South Bucks are in different housing market areas to Watford.</p> <p>Secondly, it is our understanding that the Government Standard Housing Needs methodology sets a housing target for Watford of 364 homes per annum, while Watford's average completion rates are slightly higher at 378 per annum. In spite of the First Draft plan looking to set a higher delivery target than would be required under national policy, should Watford anticipate that its target of 410 homes a year will be insufficient to meet its needs, this may raise questions as to the soundness and accuracy of Watford's target, especially as the HELAA suggests that Watford has capacity to provide a higher number of units per annum (463) over the lifetime of the plan¹ than the first draft Local Plan proposes to deliver (410). The Government intends that housing targets should be exceeded and do not function as 'caps'. If 410 homes a year proves inadequate, such a level of housing provision means there would be a significant difference between Watford delivering a figure closer to 7000 or one closer to 8000 homes over the Local Plan period². One district failing to hit its delivery targets will increase the strain on other London fringe areas, which face our own needs and development constraints.</p> <p>Some 88% of Chiltern district and 87% South Bucks district (respectively) is comprised of land designated as Green Belt, while 72% of Chiltern district falls within the Chilterns Outstanding Area of Natural Beauty. These restrictions mean that, as part of our draft Local Plan 2036 which has recently been submitted to the Secretary of State, 5,725 homes will be built in the neighbouring Aylesbury Vale district council area and we have signed a Memorandum of Understanding with them to this effect. As a local planning authority, CSB acknowledges and agrees that the challenge of providing housing, especially new family housing, is significant. However, we must also point out that CSB is not in a position to assist Watford in discharging of its any unmet housing needs in our area.</p>	Comment	The Council has undertaken a significant amount of work to identify land for development that will meet its development need. The final draft Local Plan proposes to meet the housing target calculated using the Government standard method. The Council will continue to discussions authorities in SW Herts to resolve strategic planning issues. The capacity of Chiltern and South Bucks District Councils is noted.	No change.
4.2 Allocated Sites for Housing Delivery	Hertfordshire County Council (Martin Wells) [3559]	<p>1597 Children's Services (School Place Planning).</p> <p>The proposed number of additional dwellings that aim to be delivered through the identified allocated housing sites, mixed-use development sites and predicted windfall, yields 15 forms of entry (15f.e) of additional primary and secondary education need, when using the county council's current strategic overview of 500 dwellings equating to 1f.e.</p> <p>These comments may need to be updated following the recent Pupil Yield Survey being undertaken by the county council and are caveated accordingly. Similarly, any increase in dwelling numbers beyond the approximate 7500 new homes included in this analysis would result in the need to identify additional new provision or school sites.</p> <p>The majority of the proposed allocations are concentrated in the central and southern areas of the borough and currently there are few options for expansion potential within the existing primary schools that are located within Watford. Orchard Primary has the potential to expand by 1f.e and whilst Holywell JMI reduced its PAN from 3f.e to 2f.e in September 2019, this could potentially be increased back up to 3f.e. These schools may not be particularly well located to serve all the proposed smaller housing developments but could contribute to the overall capacity in the town.</p> <p>Primary School Need</p> <p>With few options for expansion and with a high-level estimate of need from the known proposed allocation, it is considered that six new primary school sites, at a mix of 2f.e and 3f.e, (or equivalent) should be identified, in order to plan prudently for future demand.</p> <p>The allocated sites within the plan that could accommodate new primary school sites, due to their potential to accommodate the greatest number of dwellings are:</p> <ul style="list-style-type: none"> • Watford Junction Strategic Development Area (Sites MXD06 and MXD07). • Lower High Street Strategic Development Area (specifically sites H24, H29 and MXD10, as these include land at Waterfields Retail Park and the existing Tesco site. • Land at Riverwell (Site MXD12). 	Comment	<p>Additional 2x3fe sites to be identified (WJ and Lower High Street)</p> <p>Useful update provided by HCC, discussions are ongoing to identify sites to meet these requirements. These are likely to be in the SDAs and will be identified in the next iteration of the plan.</p> <p>It will be useful for WBC to see the pupil yield work that HCC have undertaken in order to inform this.</p> <p>Further clarification from the education authority will be required to understand the approach being taken to deliver new education facilities within the borough and surrounding area outside of its administrative boundary given the land constraints facing the borough and the growth required. The Council is in dialogue with the education authority and this will continue to ensure the required infrastructure is provided as development comes forward.</p>	<p>The Watford Gateway and Colne Valley SDAs clarify that school provision will be necessary. In addition text has been added to the Infrastructure chapter to require sites delivering more than 1,000 dwellings to provide a school onsite.</p>
4.2 Allocated Sites for Housing Delivery	Hertfordshire County Council (Martin Wells) [3559]	<p>1598 Environment Resource Planning (Historic Environment).</p> <p>It is recommended that these sites are subject to archaeological assessment at the appropriate time. This should be carried out in consultation with the borough council and the borough's archaeological advisors at the Natural, Historic & Built Environment Advisory Team at the county council.</p> <p>Based on current knowledge, the county council has no objection to any of the sites being allocated. However, it is recommended that some of the sites are subject to pre-application archaeological assessment. These will include sites over 1ha in size and those situated in areas which the historic environment record suggests have archaeological potential, for example close to the High Street. The archaeological assessments should include discussion of historic buildings, surviving historic street plans, landscape and other historic features as well as below ground archaeological potential.</p>	Comment	<p>Comment noted. The site allocations will need to comply with other policies in the Local Plan including Policy HE7.4 Archaeology. The need for applicants to consider the historic environment will be set out in the supporting text and policy related to archaeology.</p>	No change.

4.2 Allocated Sites for Housing Delivery	Woolf Bond Planning (Mr Douglas Bond) [2603]	1724 I am writing to respond to the ongoing consultation to the Council's First Iteration of the HELAA and its implications for the First Draft Watford Local Plan. In replacing the Part 1 Plan - Core Strategy, the New Watford Local Plan will establish the strategy and quantum of development (housing, employment, retail, etc) required within the Borough through to 2036. This therefore results in an extended plan period compared to the April 2006 to March 2031 timeframe of the current Part 1 Plan - Core Strategy (which implemented the then requirements of the East of England Plan). It is recognised that the planning policies of Watford require updating to ensure that they are consistent with latest Government guidance and evidence, including those associated with the revised National Planning Policy Framework (published February 2019). The changes in Government policy associated with these documents are accepted to be key factors which must inform the new Local Plan for the Borough. Our clients have land interests in the borough which are suitable, available and deliverable to meet important land use/plan objectives. Our comments are set out under a number of separate headings below which reflect our concerns over the assessment of sites and the consequential implications for the First Draft Local Plan. Response on the First Iteration of the HELAA The Table on Page 9 of the First Iteration of the HELAA states that sites within the Green Belt within Watford have been: Surveyed but not brought forward beyond Stage 1. It is methodologically unsound to assess the availability and achievability of greenbelt sites until a clearer view on each site's potential for de-designation is identified through the Greenbelt Review. The HELAA will undergo a reassessment of greenbelt sites which are released as part of the review and any respective site will then be assessed further for development potential in the Second Iteration of the HELAA. Whilst acknowledging that Green Belt status of sites does affect land around Watford Borough (including that promoted by our clients in the earlier Call for Site response), the failure to review them at this stage highlights a clear inconsistency of the document with the Government Guidance. The PPG (ID ref 3-10-20910722) is clear that that all sites (including those within the Green Belt) must be assessed within the HELAA. From a review of the HELAA, it is clear that the site previously promoted (as illustrated below) has not been appraised, although this is a clear obligation upon	Object	It is considered to be methodologically unsound to assess Green Belt sites as being deliverable without having undertaken a Green Belt Review to inform the value of each parcel. Paragraph 137 of the NPPF states that: "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground." The Housing and Economic Land Availability Assessment (HELAA) is considered the avenue for assessing the borough's development potential and whether the borough is able to meet its Objectively Assessed Need (OAN) on brownfield land before turning to the Green Belt. As the first iteration of the HELAA provides the evidence that the Council is meet its OAN on brownfield land first, this is considered to be the exceptional circumstance to consider releasing Green Belt. The HELAA guidance states that "It may be concluded that insufficient sites/broad locations have been identified against objectively assessed needs. Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements" As stated in the first iteration of the HELAA on pages 21, Green Belt sites which are considered as low value by the Green Belt Review will be assessed as part of the second iteration of the HELAA.	Green Belt Review Stages 1 and 2 has since been completed and low performing sites assessed through the Housing and Economic Land Availability Assessment.
4.2 Allocated Sites for Housing Delivery	Paul Atkins [3927]	1730 firstly it is Watford not Waterford .according to the football ground name .secondly you covered the ford up years ago .i am sick to the back teeth of this over development .Watford is a tip now with all the new sites going up .all most all at the same time .how many bars and food places to we need for goodness sake .seems like all the councils and government are just out to make a fast buck at the expense of everyone else .take Dorothy Thorn hill .she got caught back handers to the Muslim centre the power and water in tolputs lane west Watford .and the demise of a great indoor market .as for housing .i hope you take the water and power supplies into consideration .you can't even afford more than one fountain in the pond .or the water to fill it properly .no wonder it gone green and most of the fish have gone .i will be extremely annoyed if we loose another allotment ie the one on vicarage road .i will be demonstrating on mass over this as will many others .enough is enough /and i suppose the tax payer foots the bill .were you lot reap the rewards no doubt	Comment	Comment noted.	No change.
Policy H4.1 Allocated Housing Sites for Delivery	Mr Eddie Page [3665]	967 Apart from 1 site (LangleyWay) all those identified are in the poorer parts of the town where there is high density already. There are three AB socio-economic groups living in Cassiobury, Nascot Wood and Oxhey - in this plan they are untouched by future development yet all are very close to public transport - Watford Met station and Watford Junction. You want to take away the only pub on the Meridan, The Badger, why not The Southern Cross,Langley Rd (Nascot, 4 mins to Watford junction) or the Essex Arms Cassiobury (15 min walk to Watford junction/Watford Met).	Object	The process of selecting development sites is set out in the Housing and Economic Land Availability Assessment (HELAA). A broad range of sites were considered suitable for redevelopment across the borough, although national guidance requires the site owner's explicit intention to develop to include as a development site in the Local Plan. This has meant that the final sites included in the Local Plan reflect purely the locations in which development was considered suitable, achievable and most importantly, available. The vast locations of sites surveyed at different stages of the HELAA can be seen in Appendix C of the HELAA. The Badger Pub was assessed as part of the HELAA due to its location adjacent to a major redevelopment site and the amount of ancillary land. However, Policy HC12.3: Built Cultural and Community Facilities can be strengthened to incorporate protection for pubs. This would require reposition of the facility unless demonstrated unviable. Further marketing evidence requirements are also being drafted to support this policy.	Policy HC12.3: 'Built Cultural and Community Facilities' has been strengthened to incorporate reference to pubs.
Policy H4.1 Allocated Housing Sites for Delivery	Wenta . [3738]	1043 Wenta is supportive of the sites allocated for housing and mixed-use development, however they are of the view that more such sites could be included; with particular focus on existing employment land that could be redeveloped to make more efficient use of land, creating mixed use communities. It would make the policy clearer if there was reference to the type of development the Council would be seeking on each of the sites with the quantum of development stated. Any additional homes will need to have access to employment opportunities so mixed-use developments should be welcomed.	Support	Comment noted. The Council considers that the Housing and Economic Availability Assessment has been proactive and thorough in assessing for suitable development sites. The critical shortage of employment floor space has meant that policies have been drafted with the intention of protecting employment floor space in employment areas. The plan will be amended to give further clarity regarding cases where non-employment uses may be appropriate.	Further clarity on supporting uses has been added to Chapter 4 'A Strong Economy'.
Policy H4.1 Allocated Housing Sites for Delivery	Mr John Kelly [3812]	1131 I am extremely concerned to hear that the garages to the rear of 2-24 Elfrida Road have been highlighted as a possible site for a housing development. My concerns are multiple but primarily: - The compromise to the integrity of the existing Victorian houses built on old-style pyramid foundations. Is the local authority prepared to cover the liability of potential damage? The area designated is a shale dry river-bed. This is to say nothing of the loss of daylight and privacy. I hope the council will take the correct decision and refuse this submission.	Comment	Concerns noted. Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues has been added to Policy CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document. Loss of privacy and loss of daylight are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.	Policy wording has been added to Policy CC8.5 Managing the Impacts of Development on land stability issues.

Policy H4.1 Allocated Housing Sites for Delivery	Aggregate Industries UK Ltd [3743]	1136 Please refer to 'Firstplan Response on Behalf of Aggregate Industries UK Ltd to the First Draft Watford Local Plan' dated 07 November 2019 and sent via email to strategy@watford.gov.uk on 07 November 2019.	Object	Comments noted.	No change.
Policy H4.1 Allocated Housing Sites for Delivery	APG Portfolio Management Ltd [3843]	1217 The land at 101 – 107 High Street is available and accessible brownfield land, which should be allocated for mixed-use, residential-led development. It is anticipated that the site will be able to deliver circa 100 residential units with new retail floorspace at ground floor within the first five years of the Plan period. Table 4.1 should therefore be updated to include 101-107 High Street.	Comment	Site will be assessed through the second iteration of the Housing and Economic Land Availability Assessment.	Site has been assessed through the Housing and Economic Land Availability Assessment and was not deemed to be suitable or available.
Policy H4.1 Allocated Housing Sites for Delivery	Castle Homes (Mr Alfie Yeatman) [3769]	1299 We object to the lack of inclusion of the Mothercare Headquarters located on Cherry Tree Road as an Allocated Housing Site. Prior approval to change the use of the office building to residential use has been granted and positive pre-application discussions have been held on the potential for further residential development on the wider site. It is anticipated that the site will be able to deliver a total of c. 215 - 225 residential units within the next five years on this sustainable, brownfield site. There are no specific designations nearby and no identified constraints to development. This provision will contribute to the Borough's capacity to meet housing need and allow for a meaningful reduction to the amount of unmet need required to be dealt with through the Duty to Cooperate. This could result in less pressure on housing delivery on greenfield or Green Belt land. The opportunity that this brownfield site provides in terms of delivering a meaningful contribution towards the housing target should be recognised through the draft Local Plan with a housing allocation. A more detailed comment has been provided in response to the First Draft Plan Policies Map.	Object	Comments noted. The employment allocation can be removed due to prior approval.	The Mothercare site has been removed from the Policies Map as an allocated employment site and allocated as a housing site instead based on the prior approval.
Policy H4.1 Allocated Housing Sites for Delivery	Cortland Partners (Cortland Partners) [3870]	1307 Suggests the Lozenge site (see attachments for map) should be allocated because it is a brownfield site that would assist in regenerating the Western Gateway while making best use of transport infrastructure opportunities in a sustainable location. This allocation will allow Cortland to continue to assist in achieving and exceeding Watford's housing target.	Comment	Site will be assessed through the second iteration of the Housing and Economic Land Availability Assessment.	Site has been assessed through the Housing and Economic Land Availability Assessment and has been added as a mixed use allocation to the next iteration of the Plan.
Policy H4.1 Allocated Housing Sites for Delivery	S Hille & Co (Holdings) Ltd (Mr Ian Scheer) [3404]	1341 Our client supports the designation of mixed-use sites in the First Draft Local Plan and the stated rationale for doing so. However, our client objects to the fact that the Hille Business Centre isn't designated as one of these sites when it is clear that it should be so designated. In paragraphs 5.4.1 – 5.4.4 of the First Draft Local Plan it sets out why the Council considers a mixed-use policy is needed. This rationale sets out a compelling case as to why a site such as Hille Business Centre should be designated as such a site. It's as if the case had been written specifically with the Business Centre in mind. It refers to intensifying land uses to address critical shortages of land for new homes and employment uses. In light of this, it is clear that a mixed-use designation for the site would assist the Council in delivering new employment and jobs on the site and also much needed new homes. It would provide flexibility in this regard so that the needs of the community and market demand for different uses can be considered when determining the redevelopment potential of the site in the future. The size and location of the site close to existing homes means that it can never accommodate any type of heavy industry; and its location in the heart of a district centre means its ideally suited to providing flexible workspaces and co-located residential uses that are a common feature of mixed-use schemes. The First Draft Local Plan acknowledges at paragraph 2.2.2 that land available for housing, employment and community facilities is 'very limited' in the borough with capacity for between 7,000 and 8,000 homes. It goes on to state that this shortfall will increase competition between different land uses. The latest evidence base commenting on the Borough's need is the Housing Employment Land Availability Assessment (HELAA, September 2019) which refers to a Draft Local Housing Need Assessment (LHNA, 2019) which has not been published as part of the public consultation. This LHNA is referenced as identifying an Objectively Assessed Need of 793 homes per annum or 12,688 homes across the plan period. Paragraph 2.2.16 of the First Draft Local Plan states that the HELAA has demonstrated that 'there remains a shortfall of land available to meet Watford's growth needs.' Accordingly, a mixed-use allocation on our client's site would make an effective use of land (in line with emerging Policy SD2.3 and the national policy). Our client is aware of the need to ensure future employment needs of the borough are met as well as its housing needs. A mixed-use designation would contribute to both objectives being met, whereas its designation as an employment site will only contribute to one and inevitably mean the site's potential is not optimised.	Object	This site was assessed through the HELAA and was not included in the first draft Local Plan as "The site use promoted conflicts with policy aspiration". After reviewing the site, it is considered the site is not suitable for mixed use development in line with the HELAA methodology and emerging policy. Key constraints are the designated industrial area and the listed buildings on site.	No change.
Policy H4.1 Allocated Housing Sites for Delivery	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1354 Makes representations for their site, 19-21 Clarendon Road, to be allocated in the Local Plan.	Comment	Site will be assessed through the second iteration of the Housing and Economic Land Availability Assessment.	Site has been assessed through the Housing and Economic Land Availability Assessment and has been added as a mixed use allocation to the next iteration of the Plan.
Policy H4.1 Allocated Housing Sites for Delivery	Solum (Solum Regeneration) [3895]	1392 In addition to the above, we note that Part 7 of draft Policy SD2.7 encourages high density development. Whilst this is supported in principle, we do not think that the First Draft Local Plan goes far enough in the context of the 'Land at Watford Junction' site. We note that the site has been identified as a 'High Sustainability Zone' site where, in line with Policy H4.1 and its supporting table, residential densities of 95+ dwellings per hectare are considered acceptable. However, Footnote 4 of the supporting table goes on to state that densities above 350 dwellings per hectare will be considered on sites within Strategic Development Areas with a mainline mass transit connection. This is true for the 'Land at Watford Junction' site. Rather than being included as a footnote to a supporting table of a policy, this higher density allowance should be written into the allocation for the site to ensure that effective use is made of this highly accessible and suitable brownfield site. This would ensure accordance with the guiding principles of the NPPF and Part 8 of draft Policy SD2.7 which supports greater land use efficiency.	Comment	Comments noted. The Plan's approach to density has since been revised.	No change.

Policy H4.1 Allocated Housing Sites for Delivery	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	1430 The proposed inclusion of schools within specific site allocations identified in the Plan is supported in principle by DfE. It is essential that site allocations incorporate social infrastructure requirements, including the requirements for the delivery of new schools, when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. These site allocations should be evidence-based, to ensure that sufficient school places are planned within the short, medium and long term within the Plan period. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough/district. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities. While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.	Comment	Support for the inclusion of schools within the site allocations is welcomed. A robust viability assessment has been undertaken to support the plan. Given the limited sites available in Watford we have had to identify all possible sites for schools however these sites are subject to robust viability assessments in consultation with HCC to ensure the demand is able to be met. It is agreed that flexibility is required and the infrastructure required to meet the school place demand will be subject to review in updated versions of the Infrastructure Delivery Plan.	Text has been added to ensure that developers engage with the education authority early on in order to understand the school place requirements. Existing requirements are reflected in the Infrastructure Delivery Plan.
Policy H4.1 Allocated Housing Sites for Delivery	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1437 Thames Water have undertaken a high level assessment of the potential impact of development on the proposed allocated sites on their wastewater networks based on the details of unit numbers contained within the HELAA. Comments on the potential impacts are appended to this letter for your information. The impacts will depend on the final scale and timing of any development and we would encourage developers to engage with us ahead of the submission of any application to discuss their proposals and the infrastructure requirements.	Comment	Comments noted.	No change.
Policy H4.1 Allocated Housing Sites for Delivery	Hertfordshire County Council (Martin Wells) [3559]	1599 Highways & Transport. Further work is needed on the transport and traffic impacts of the sites proposed and acceptability in transport terms to ensure the soundness of the plan. The borough council should continue to work with HCC as the plan preparation continues to better understand the potential impacts of individual sites and cumulatively, site access requirements and transport and highways mitigation needs. As has been undertaken for other Hertfordshire LPAs, to support the borough council in its plan development, HCC can undertake a high-level assessment of the more significant sites to highlight alignment or points of issue with respect to LTP4 Policies. The assessment can be carried out at a basic level with site allocations, and subsequently in greater detail on provision of a site masterplan and other supporting information	Comment	Comments noted. WBC agree and further work on infrastructure needed to support new development has been undertaken. WBC would welcome HCC undertaking a high-level assessment of the more significant sites to highlight alignment or points of issue with respect to LTP4 Policies with feedback used to inform development considerations and policy content related to transport. Site data has been provided to HCC for this work.	Chapter 11 'A Sustainable Travel Town' revised to reflect findings of the transport infrastructure work.
Policy H4.1 Allocated Housing Sites for Delivery	Hertfordshire County Council (Martin Wells) [3559]	1600 Public Health Public Health have not provided site specific comments, although it is noted that a number of the proposed sites are within close proximity to main roads. This raises a number of public health concerns, particularly in the context of ensuring that future development does not worsen health inequalities. Public Health therefore seek assurance that the Local Plan will effectively cross-reference and signpost to relevant policies within the Local Plan that demonstrate appropriate consideration of: <ul style="list-style-type: none"> • Road safety issues • Encouraging walking and cycling as a first choice of travel • Making sustainable travel choices • Exposure to poor air quality 	Comment	Although health is implicit in the Draft Local Plan, there is scope to make health objectives clearer and with a specific policy. A policy related to health, either a specific policy as part of an existing policy, will look at (amongst other issues) road safety issues, air pollution, encouraging a more active population walking and cycling and sustainable transport options and Health Impact Assessments will also be included.	A new health chapter has been added and includes reference to Health Impact Assessments.
Policy H4.1 Allocated Housing Sites for Delivery	Hertfordshire County Council (Martin Wells) [3559]	1704 Waste Management Unit There are no Household Waste Recycling Centres (HWRCs) located within the borough. The nearest centres are situated at Waterdale to the north and Rickmansworth to the west, both of which are within Three Rivers District. The county council's adopted Local Authority Collected Waste Spatial Strategy, Household Waste Recycling Centre Annex (Updated in April 2019) states that both centres are fit for purpose into the future and do not require relocation or replacement. The Waterdale site (which also contains a waste transfer station, alongside the HWRC), is the closest HWRC to Watford, being located approximately 700m to the north of the district boundary with Three Rivers. There are no proposed housing and mixed-use allocations identified within the First Draft Watford Local Plan and the accompanying Policies Map that are likely to be affected by the operation of both the HWRC and waste transfer station within the existing Waterdale site.	Comment	Comments noted.	No change.
Policy H4.1 Allocated Housing Sites for Delivery	Hertsmere Borough Council (Planning Officer - Oliver Galliford) [3920]	1716 In light of the above, we welcome the focus on optimising the use land and recognise that Watford has insufficient land to meet its level of need. However, we would suggest that Policy H4.1 is clearer about how densities will be maximised outside of allocated sites, given that the lower end of high sustainability zones (other than SDAs) is relatively modest at 95 dwellings per hectare. Although this is a minimum standard, it may invariably become the default acceptable density in high sustainability locations.	Comment	The final draft Local Plan places more emphasis on a design led approach and sets out indicative minimum densities that are to be treated as a starting point. Agree greater clarity about density and flexibility would benefit the Plan.	Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.

4.3 Figure 6: Site Specific Development Parameters and Consideration	Mr Frank Neale [3589]	923 If a service station can be proposed on the green belt at J20 of the M25 perhaps WBC should be campaigning for a low rise housing development between Hunton Bridge and the M25. Flat dwellers will eventually want a house and where will that be?	Comment	Watford Borough Council does not have the authority to allocate land outside of its borough boundary.	No change.
4.3 Figure 6: Site Specific Development Parameters and Consideration	R Kowalewski [965]	931 Watford is not London, we do not have 10 buses every five minutes. A far greater proportion of people will still own cars. A lot of these developments will not sustain car ownership. Allowed to be built will result in car parking in local area being overloaded. I do not see anywhere that with these proposed high density developments any mention of covenants prohibiting the ownership of a car by anyone living in those developments. What about infrastructure to serve these new high density developments. No mention of that other than Watford is going to be water stressed.	Comment	Concerns noted. The Local Plan cannot legally provide covenants. All new development within the Core Development Area should be car-lite. Although the Council does not directly provide new infrastructure, such as water, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.	No change required
4.3 Figure 6: Site Specific Development Parameters and Consideration	Miss Viv Gurney [3815]	1133 As local residential area around Dome Roundabout is already very congested & added more housing would make the roads horrific, as well as look 'over crowded' we do need to see space. Also the development in West Watford, especially Liverpool Road (ref H27) & Vicarage Road is going to over shadow the small terraced streets that are a heart of community where also wildlife has been established. They are already being over shadowed by the 'hospital' building plan. Don't make it any worse with these 'higher' housed living please. If you think people won't use cars you are so wrong!!!	Comment	Concerns noted. Loss of daylight is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future. The policy on tall buildings will also be revised to give further clarity about where tall buildings are considered acceptable based on further work. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.	No change.
4.3 Figure 6: Site Specific Development Parameters and Consideration	Hertfordshire County Council (Martin Wells) [3559]	1596 Highways & Transport The figures contained in this table appear to be slightly different from the car parking standards in Figure 5 for C3 Use Class for the Medium and Low Sustainability Zone.	Comment	Comments noted. This has since been revised.	The car parking standards have been revised and moved to the appendices.
4.4 Housing Mix	Chiltern and South Bucks District Councils (Principal Planner - Robert Davy) [3919]	1542 Paragraph 4.4.1 – CSB fully agrees that addressing housing needs is not only a matter of 'numbers'. As has been the case in many other parts of the South East (including London boroughs) over recent years, the oversupply of smaller units has helped Local Planning Authorities to deliver against high housing targets and making better use of land, but is questionable how much progress has been made regarding satisfying actual 'need' in this respect. Watford will be aware that one of the key arguments raised during the London Plan EIP hearings earlier this year related to the GLA's SHMA methodology, and the suggested lower demand for family housing going forwards (which attempted to justify the draft London Plan approach of concentrating on numbers). In practice, the SHMA level of 3 bedroom need was only demonstrably shown to be lower when physical affordability was taken into account – but such an approach cannot address the 'need' of families requiring a home of 3 bedrooms (or larger) who are simply unable to afford such property due to the high cost of housing, and must then 'make do' with buying or renting a smaller home. The net result is upward movement of overcrowding figures in London, or outward migration into the Shires by families in search of slightly cheaper, larger housing, creating additional competition for school places in areas such as Buckinghamshire and Hertfordshire.	Comment	Comments noted. Agree that the provision of family sized homes to meet demand will be challenging, particularly when considering affordability and the limited amount of land available for development in the borough. The housing mix policy would benefit from setting a requirement for family sized housing that is achievable.	Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' in the final draft Local Plan sets out a requirement for 20% of new homes to be family sized. This can be met as either the affordable housing requirement of the market element of a scheme. Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have also been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
4.4 Housing Mix	Chiltern and South Bucks District Councils (Principal Planner - Robert Davy) [3919]	1543 Paragraph 4.4.3 - CSB agrees that '...should an under provision of 3 bed family units in urban areas continue, including in high density schemes, an undue demand for urban expansion will be created. This often results in low density housing profiles not conducive to sustainable development'. Such schemes would, of course, then require additional public transport access to be provided, increasing the land take from development (if car use is not to occur), further pressurizing the Green Belt.	Comment	Comments noted.	No change.
4.5 Figure 7: Housing Mix Needs (based on current occupancy trends) for Watford	Ms Di Lewis [3695]	1003 4.5.3. I disagree with this statement. By including it developers could use it as an argument for converting/subdividing larger houses into flats/bedsits. In Central Ward numerous larger houses have been converted leaving a shortage of large family homes. Many more adult children are now having to live with their parents as they cannot even afford to rent, let alone buy. This will only get worse in the future. Also, there is a requirement for space as elderly grandparents, in need of care are moving in with their adult children resulting in three generations living in same house.	Object	The statement is there to set out strategic objectives for household growth, mainly new development. Larger houses can make a contribution towards housing need in Watford but agree it needs to be managed. The Government in 'Houses in Multiple Occupation and residential licensing reform' in 2018 stated HMOs form a vital part of the private rented sector in the UK. Policy H4.8 in the Local Plan does state HMOs must not exceed 10% in any of the Sustainability Zones (i.e. anywhere in the Borough).	The policy has been revised to provide more clarity about locations where this type of conversion would be acceptable based on sustainability principles whilst retaining the 10% threshold.
4.5 Figure 7: Housing Mix Needs (based on current occupancy trends) for Watford	APG Portfolio Management Ltd [3843]	1218 We support the flexibility allowed by draft Policy H4.2 in terms of allowing a suitable housing mix that is appropriate in particular circumstances and doesn't depend on a particular requirement. It is noted that Figure 9 does not show the mix by sustainability zone as referenced, therefore we request that this is updated as appropriate.	Support	Support welcomed.	No change required
4.6 Figure 8: Housing Mix Needs (Redistribution Mix) for Watford Local Plan 2020-2036	Three Rivers District Council (Ms Claire May) [2389]	1752 This figure is located in the Housing Mix section, it would fit better in the Affordable Housing section.	Comment	Agree, this relates more to affordable housing.	Figure has been revised and is included in the affordable housing section.

4.7 Figure 9: Affordable Housing	APG Portfolio Management Ltd [3843]	1219 It is noted that Figure 9 does not show the mix by sustainability zone as referenced, therefore we request that this is updated as appropriate.	Comment	Agree, the figure is unclear.	The figure has been removed.
4.7 Figure 9: Affordable Housing	Castle Homes (Mr Alfie Yeatman) [3769]	1300 We object to the increased requirement to provide affordable housing and the lack of evidence that is used to underpin the suggested figure. The Council is aware that a number of recent residential planning applications have been forced to provide an assessment demonstrating that the existing 35% provision requirement is unviable. In the majority of instances, this position has been accepted by the Council's advisors, which suggests that the current policy requirement is already too high. Relying on an artificially high and unviable affordable housing requirement will result in additional costs and time in the determination of planning applications for both developers and the Council. It is contrary to the requirements of Planning Practice Guidance which states affordable housing provision "...should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106." This is particularly concerning given the changes adopted by the 2018/19 NPPF whereby it is now up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage (paragraph 57).	Object	Objection noted. The figure in the first draft Local Plan has since been subject to a viability assessment which found that an affordable housing requirement of 35% would be achievable.	Policy HO3.3 'Affordable housing' sets out an affordable housing requirement of 35%.
Policy H4.3 Affordable Housing	Mr Juan Llobell [3568]	920 10% affordable housing is sufficient	Object	There is a shortage of affordable homes. Requirement has been subject to a viability assessment and demonstrated that a 35% requirement would be viable.	Requirement revised to 35%.
Policy H4.3 Affordable Housing	Wenta . [3738]	1045 Affordable housing is an important requirement in today's housing market. It allows the young population as well as those on lower incomes to be able to get onto the housing ladder or allows them to rent at lower rates. The Proposed 40% requirement is supported and where this cannot be provided, on site contributions should be sought, unless this is not viable and this can then be lowered to allow viable development. In terms of affordable housing in Watford, the greatest need is for 1 bedroom properties, which again can be provided as part of mixed use flat developments.	Support	Support noted. The figure in the first draft Local Plan has since been subject to a viability assessment which found that an affordable housing requirement of 35% would be achievable. The SW Herts Local Housing Needs Assessment has been completed since the first draft Local Plan consultation and is available on the Council website.	No change.
Policy H4.3 Affordable Housing	Cortland Partners (Cortland Partners) [3870]	1310 Whilst we support the Council's requirement for affordable housing as per Draft Policy H4.3, we believe that provision should be determined on a case by case basis, relating to the viability of the site in question. We would encourage the Council to review its approach to affordable housing by providing greater flexibility including taking other infrastructure requirements into consideration in terms of the benefits delivered by developments. Therefore, whilst we support the provision of affordable housing, we believe a balanced approach should be taken, ensuring all the required infrastructure is delivered.	Comment	Comments noted. To provide certainty the first draft Local Plan has since been subject to a viability assessment which found that an affordable housing requirement of 35% would be achievable. This approach is consistent with national guidance which suggests a single figure for the Plan should be set out and this should be achieved on sites given that a viability assessment of the local Plan has been completed. However, it is recognised that a variety of development requirements need to be taken into account to ensure development comes forward.	Further clarity has been set out in Chapter 10 'Infrastructure' provides a policy for delivering new infrastructure and covers developer contributions. Additionally, text has been added to Policy HO3.3 'Affordable Housing' setting out a 'review' which enables viability to be taken into account over a period of time reflecting potential changes in circumstances at the time of the granting of planning permission and the completion of the development.
Policy H4.3 Affordable Housing	IDA Plymouth Holdings Ltd. [3888]	1361 The Council's affordable housing policy is proposed to change to now require residential developments of 10 or more homes to deliver 40% affordable housing opposed to the current policy requirement for 35%. It is welcomed that this policy allows for viability testing to provide the maximum reasonable contribution. The proposed affordable housing mix is provided in this policy which would require 10% shared ownership products and the remaining 30% to be made up of an equal split of affordable rent and social rent products. Again this will need to be applied flexibly and through viability testing to ensure that the scheme can be delivered. This mix will also have to be subject to discussions with Registered Providers to see if the percentage breakdown would actually be of interest to them in managing units on site.	Comment	Comments noted. Agree a flexible approach to the tenure mix would benefit implementation of the policy.	Policy HO3.3 'Affordable housing' sets out a 35% requirement for affordable housing a mix requiring the Government set shared ownership requirement and 60% social rent with the remaining to be provided being determined by the developer.
Policy H4.3 Affordable Housing	Berkeley Homes (Berkeley Homes) [3891]	1372 Whilst we support the Council's requirement for affordable housing as per draft Policy H4.3, provision should be determined on a case by case basis, relating to the viability of the site in question. We would encourage the Council to review its approach to affordable housing by providing greater flexibility in the policy including taking other infrastructure requirements into consideration in terms of the benefits delivered by developments. In particular, educational facilities, community spaces and high-quality employment floorspace. Therefore, whilst we support the provision of affordable housing, we believe a balanced approach should be taken, ensuring the approach to affordable housing also considers infrastructure delivery.	Comment	Comments noted. To provide certainty the first draft Local Plan has since been subject to a viability assessment which found that an affordable housing requirement of 35% would be achievable. This approach is consistent with national guidance which suggests a single figure for the Plan should be set out and this should be achieved on sites given that a viability assessment of the local Plan has been completed. However, it is recognised that a variety of development requirements need to be taken into account to ensure development comes forward.	Further clarity has been set out in Chapter 10 'Infrastructure' which covers infrastructure and developer contributions. Additionally, text has been added to Policy HO3.3 'Affordable Housing' setting out a 'review' which enables viability to be taken into account over a period of time reflecting potential changes in circumstances at the time of the granting of planning permission and the completion of the development.

Policy H4.3 Affordable Housing	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1411 As outlined above without the necessary viability assessment, we cannot comment in detail as to the soundness of this policy. It will be important for this work to be undertaken prior to the preparation of the submission local plan to ensure that the policy is informed by the evidence. In particular the Council may need to consider whether a more nuanced approach is required to its affordable housing policy to ensure that it is consistent with paragraph 57 of the NPPF which states that it should be expected that development that complies with these policies that can be assumed to be viable. This in effect limits the opportunities for negotiation on individual planning applications and may require the Council to set variable policies on the basis of where a development is located or the nature of the site. We would also recommend that more flexibility is provided within the policy for changes in the tenure mix where this would ensure the viability of a site or allow it to provide an improved mix of homes within a site that better meets the needs of the area. The second paragraph outlines that the Council will assess the provision of affordable units on the number of habitable rooms. We disagree with this approach which causes confusion regarding the number of affordable units that are required and as such is inconsistent with paragraph 16 of the NPPF. The Council should state in H4.3 the proportion of affordable units required in this policy not habitable rooms. The mix of homes can be considered through policy H4.2. We would recommend that the following amendments: • Amend wording of the fourth paragraph to read: “Consideration will be given to alternative tenure mix for affordable housing where this will ensure the viability of a development or provide a more appropriate mix of homes with a development.” • Delete second paragraph	Comment	Comments noted. To provide certainty the first draft Local Plan has since been subject to a viability assessment which found that an affordable housing requirement of 35% would be achievable. This approach is consistent with national guidance which suggests a single figure for the Plan should be set out and this should be achieved on sites given that a viability assessment of the local Plan has been completed. However, it is recognised that a variety of development requirements need to be taken into account to ensure development comes forward.	Policy HO3.3 'Affordable housing' sets out a 35% requirement for affordable housing a mix requiring the Government set shared ownership requirement and 60% social rent with the remaining to be provided being determined by the developer to provide flexibility.
Policy H4.3 Affordable Housing	Rentplus UK Ltd. (Rentplus UK Ltd) [3905]	1426 We welcome the clear recognition within the policy that, 10% of all dwellings on site should be 'affordable home ownership products' to be provided as part of the overall 40% affordable housing requirement. This is consistent with the Framework, paragraph 64 of which explains that "Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership", Footnote 29 explains that this is "as part of the overall affordable housing contribution from the site". Policy H4.3 as drafted provides firm support for products such as rent-to-buy and therefore positively addresses the needs of households in Watford. The Council should consider whether the 10% provision of affordable home ownership products is enough to meet identified local needs. In this context, we note that the Strategic Housing Market Assessment January 2016 pre-dates the 2019 version of the Framework and does not seek to identify the need in the Borough for affordable housing products such as rent-to-buy. The SHMA will be five years old by the time the Local Plan reaches Examination ³ and we recommend that the SHMA is updated before the Regulation 19 version of the Plan is prepared. This will provide an up-to-date picture of housing needs in the Borough, including for rent-to-buy products. It may indicate that more than 10% provision is necessary in order to best meet local needs, which can be reflected through policy. To add clarity for applicants and decision-takers through the development management process, we recommend that a paragraph should be added to the supporting text to explain the kinds of tenure which constitute 'affordable home ownership products', which should include the rent-to-buy model. Glossary The Glossary definition of affordable housing, as drafted, is not consistent with the Framework. It does not currently refer to the four categories of affordable housing as listed within the Framework, including 'other affordable routes to home ownership' of which Rentplus is part of. We recommend that the definition of affordable housing is amended to: Housing for sale or for rent for those whose needs are not being met by the market. This includes social rented housing, affordable rented housing, and intermediate housing, and other affordable routes to home ownership.	Comment	Comments noted. To provide certainty the first draft Local Plan has since been subject to a viability assessment which found that an affordable housing requirement of 35% would be achievable. This approach is consistent with national guidance which suggests a single figure for the Plan should be set out and this should be achieved on sites given that a viability assessment of the local Plan has been completed. However, it is recognised that a variety of development requirements need to be taken into account to ensure development comes forward. The SW Herts Local Housing Needs Assessment has been completed and is available on the Council's website. This supersedes information set out in the previous Strategic Housing Market Assessment dated 2016.	Policy HO3.3 'Affordable housing' sets out a 35% requirement for affordable housing a mix requiring the Government set shared ownership requirement and 60% social rent with the remaining to be provided being determined by the developer to provide flexibility.
Policy H4.3 Affordable Housing	Telereal Trillium (Telereal Trillium) [3915]	1538 The future development proposals for the site will include an appropriate affordable housing contribution which considers the Council's targets as set out in the draft policy. The reference to viability is supported as this will need to be a key consideration in the delivery of residential development sites.	Comment	Support welcomed.	No change.
Policy H4.3 Affordable Housing	Three Rivers District Council (Ms Claire May) [2389]	1754 We are supportive of the 40% requirement for affordable housing provision and the content of the policy, given the mutual significant need for affordable housing across Three Rivers and the other South West Herts authorities. There may be scope to go higher if viable. Clarification on the split of Affordable Housing for Rent being 50% Affordable Rent and 50% Social rent would be helpful as this is not in line with the recommended split in the draft Local Housing Needs Assessment.	Support	Comments noted and support welcomed. To provide certainty the first draft Local Plan has since been subject to a viability assessment which found that an affordable housing requirement of 35% would be achievable. The affordable housing policy has been amended to reflect this.	No change.
4.9 Redevelopment of Garage Sites	Mr simon frost [3795]	1105 Garage sites in areas such as Victorian terraced housing are essential for storage for local residents. These are in high demand (though we have heard that waiting lists have been closed - which is concerning if this is being used to falsely represent demand). Safe storage for motorbikes and for local tradespeople's tools is essential and their loss will drive people out of communities for limited gain in terms of housing compared to some of the massive developments proposed nearby. Loss of garages in areas with no off street parking will also limit peoples ability to charge electric cars.	Object	Concerns noted. Although the policy hasn't been carried forward to the final draft Local Plan, the spatial strategy prioritises development on brownfield land and seeks to optimise use of land. Therefore, it is likely that is the garage use ceases, that the land is made more efficient by contributing to Watford's housing targets. To ensure that any new development minimises impact on parking in the area, Policy ST11.6 Managing the Transport Impacts of Development requires applicants to submit a transport assessment. This assessment identifies the potential impact on the transport network and sets out how this will be mitigated. It can also be added to the development considerations of allocated garage sites and car parks that a parking survey will be required to ensure there will be no significant effects on parking in the area.	Garage sites allocated as development sites in Chapter 13 'Site Allocations and New Development' will be required to undertake a parking survey. This has been added to the development considerations.

Policy H4.4 Garage Site Development	Mr Veeru Jain [3765]	1073 Not enough parking in street, after 8 pm it's not possible to park car. Street is narrow - some time not enough space for car to come to side to let other car go. In match days it's impossible to find space to let car go - causing congestion and not easy to reverse long distance to give space to the car. Development will increase pollution to the locality. Admission to school already a problem to existing community.	Object	<p>Concerns noted. Although the policy hasn't been carried forward to the final draft Local Plan, the spatial strategy prioritises development on brownfield land and seeks to optimise use of land. Therefore, it is likely that if the garage use ceases, that the land is made more efficient by contributing to Watford's housing targets. To ensure that any new development does not have a significant impact on parking in the area, Policy ST11.6 Managing the Transport Impacts of Development requires applicants to submit a transport assessment. This assessment identifies the potential impact on the transport network and sets out how this will be mitigated. It can also be added to the development considerations of allocated garage sites and car parks that a parking survey will be required to ensure there will be no significant effects on parking in the area.</p> <p>Policy CC8.5 Managing the Environmental Impacts of Development seeks to address any pollution that could be caused by new development.</p> <p>Although the Council does not directly provide new infrastructure, such as schools, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p>	Garage sites allocated as development sites in Chapter 13 'Site Allocations and New Development' will be required to undertake a parking survey. This has been added to the development considerations.
Policy H4.4 Garage Site Development	Mr simon frost [3795]	1106 There should be a presumption to keep garages in areas without off street parking such as Victorian terraced street areas.	Object	<p>Concerns noted. Although the policy hasn't been carried forward to the final draft Local Plan, the spatial strategy prioritises development on brownfield land and seeks to optimise use of land. Therefore, it is likely that is the garage use ceases, that the land is made more efficient by contributing to Watford's housing targets. To ensure that new development minimises impact on parking in the area, Policy ST11.6 Managing the Transport Impacts of Development requires applicants to submit a transport assessment. This assessment identifies the potential impact on the transport network and sets out how this will be mitigated. It can also be added to the development considerations of allocated garage sites and car parks that a parking survey will be required to ensure there will be no significant effects on parking in the area.</p>	Garage sites allocated as development sites in Chapter 13 'Site Allocations and New Development' will be required to undertake a parking survey. This has been added to the development considerations.
Policy H4.4 Garage Site Development	Three Rivers District Council (Ms Claire May) [2389]	1755 It is mutually understood that many small brownfield sites have insufficient capacity to be proposed as site allocations; subsequently, the policy is welcomed in its specific encouragement for the delivery of these sites as windfall.	Comment	Support welcomed.	No change.
4.10 The Aging Population	Chiltern and South Bucks District Councils (Principal Planner - Robert Davy) [3919]	1544 Paragraph 4.10 & 4.11 - As the number of elderly people is predicted to increase significantly during the 2020s and 2030s, CSB also agree with Watford that it is important to ensure homes are designed to be easily adaptable and include provision for wheelchair access (paragraphs 4.10, 4.11, 4.12 and 4.13).	Comment	Agree, more detail on disability and wheelchair access will be in the next version of the Local Plan	Policy requirements set out in Chapter 4 'Homes for a Growing Community'.
4.12 People with Dementia	Environment Agency (Planning Advisor - Mr Theo Platts- Dunn) [3848]	1282 There is new evidence of the benefits of green infrastructure (especially) rivers with regard to dementia.	Comment	The section on dementia friendly development would benefit from greater reference to issues that support health like green infrastructure.	Diagram has been added to highlight issues that form part of dementia friendly design and a new health chapter has been added.
4.13 Figure 10: Key Principles of Good Design	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1109 While it is great to see you have a policy on good design, many aspects of design are very subjective. Applying standards such as the Home Quality Mark or Passivhaus reduces this uncertainty, by providing a robust and industry recognised interpretation of what good design is. This policy could therefore be strengthened by making developers build to recognised quality standards, rather than your own benchmarks.	Comment	<p>Figure 10 is about broader urban design principles than those that look at health and environmental footprints, and while some of it may be subjective, some of these principles are not always welcome by the development industry and need to be set out. Further detail will come out in the new urban design guide.</p> <p>Passivhaus and the Home Quality Mark by BRE are not recognised as a national standard by Government, or they would be in the National Planning Policy Framework. As they are commercial schemes by competing companies we can't choose one above the other, we could only ask for a recognised standard.</p> <p>Some of these issues are set out in Building Regulations, and do not in the Council's view push the envelope in terms of sustainability and climate change enough. The Council is hoping to put a stronger case for higher environmental standards in the updated plan.</p>	Stronger emphasis on sustainability in design added.

Policy H4.5 Accessible and Adaptable Homes	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1412 The HBF recognises the need for some homes to be built to part M4(2) and M4(3) however it is important that the Council has the necessary evidence to support its policies requirements as required in footnote 46 to paragraph 127 of the NPPF. The Council should also amend part 2 regarding the provision of M4(3) homes. Only homes that are wheelchair adaptable under M4(3) can be required in market housing as paragraph 56-009 of PPG states that wheelchair accessible homes as defined in part M4(3) can only be required where the local authority is responsible for nominating the person to live in that property. However, in addition to requiring Council's to only use the optional technical standard where there is a need for such homes the Written Ministerial Statement of March 2015 also emphasises that no other technical standards should be introduced through local planning policies. As such the requirement for 4% of homes to be designed to dementia friendly principles cannot be considered sound and this aspect of H4.5 should be deleted.	Comment	The Local Housing Needs Assessment 2020 sets out the evidence for our requirements (and the rest of South West Hertfordshire). Dementia is becoming increasingly important for many people and the NPPF requires local plans to address issues related to the elderly and caring for people in need. This requirement reflects this requirement.	Section on dementia friendly design updated to provide more clarity and requirement for wheelchair access revised.
		<p>Recommendation</p> <ul style="list-style-type: none"> Amend part 2 to reflect Planning Practice Guidance Delete part 3 		4% of homes to be designed to dementia friendly principles is based on projections of disability and will be retained or updated.	
Policy H4.5 Accessible and Adaptable Homes	Hertfordshir e County Council (Martin Wells) [3559]	1673 Adult Care Services. The projected demand for specialist older persons housing (all tenures) that are required in Watford to 2030, are outlined in the table below. Residential (all): 299 Residential (HCC placements): 166 Nursing/Dementia (all): 143 Nursing/Dementia (HCC placements): 84 Extra Care (all): 444 Extra Care (HCC Demand): 105 Extra Care The older population of Watford (over 65s) is predicted to increase by 45% by 2035 (POPPI data, accessed November 2019). Of these 2,341 of people aged between 65 and 74, and 3,831 of people aged over 75 will be living alone. Projections also show an increase of 58% of people living in a residential care home with or without nursing care during the same period. Research shows that social isolation and inappropriate housing are key determinants of poor health outcomes in all people, but especially for those who have disabilities or over 65. Extra care housing, specifically designed to improve health and social connection and built in areas that strengthen local communities and place shaping activities, can help alleviate stress on public services, allow local communities to remain intergenerational, and can help release under-occupied housing back into the general market helping to balance housing need across the borough. Current demand projections for extra care housing in Watford show an additional need of 444 extra care homes (equating to around 4-5 new schemes depending on location and facilities) of which 105 should be affordable for people who have fully funded care packages form HCC. Additionally, the Office of National Statistics has published data showing that Alzheimer's and dementia are leading causes of death in England, with almost one in eight people dying as a result in 2018; this proportion has been increasing for four consecutive years. Planning policy guidance calls for Local planning authorities to consider design principles when developing new housing in context with the wider built environment, especially housing aimed at people with dementia.	Comment	Comments welcomed. Watford like many areas will experience an ageing population in the years to come. The Local Plan incudes design criteria to encourage new homes designed for people with dementia, and requires a proportion of new homes to be designed so they are adaptable for people as they get older or have disabilities. The policy related to meeting the needs of an ageing population will be amended to include greater clarity about the need to protect housing designed for these with disability or special needs. If land is put forward for inclusion in the Local Plan to meet the needs of an ageing population or those with special needs this will be supported. The useful information provided can be used to support the justification for these policies and ensure they are consistent with national guidance.	Policy 4.6 and supporting text amended to provide greater clarity about protecting properties designed for people with special needs and clarify support for development where these are proposed in the appropriate locations.
Policy H4.5 Accessible and Adaptable Homes	Three Rivers District Council (Ms Claire May) [2389]	1756 We do not feel that the 4% M4(3) in point 2. of this policy can be applied to all new dwellings. The PPG states that Local Plan policies for wheelchair accessible homes M4(3) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. As such, we feel this can only be applied to affordable housing.	Comment	Agree with inconsistency. Policy to be revised.	Policy revised to reflect national guidance.
4.14 Specialist and Supported Living Accommodatio n	Chiltern and South Bucks District Councils (Principal Planner - Robert Davy) [3919]	1545 Paragraph 4.14.3 – Although we agree with paragraphs 4.10-4.13, CSB must question the intended outcomes of the stated approach of paragraph 4.14.3 'Provision of sheltered and specialist housing units or bed space equivalent units will be considered in lieu of affordable housing' at a time of public sector cut-backs. As drafted, the text appears to suggest that if a developer were to choose to build a new care home off-site instead of providing on-site affordable housing, they would have met their 'obligation' under S106 to provide a facility. If this is the case, it would raise a series of questions to which Watford will need to give further consideration as you move towards Regulation 19. For example: - It is unclear how the number of bed spaces required in a care facility/ the number of sheltered/specialist units required in lieu of on-site provision of affordable housing would be calculated from the proposed number of self-contained units in a planning application. There would need to be a link to the threshold-based Policy H4.3 'Affordable Housing' if a developer will have the option of building 'specialist housing' units or a care facility, instead of affordable housing. - Would the approach require that a care facility is fully equipped with necessary machinery and lifts, beds, kitchens, leisure equipment at the developer's expense? If not, Watford should be mindful that it may prove considerably cheaper for a developer to build a care/nursing facility off-site than to provide the affordable housing on-site, or to make an in-lieu payment which is equivalent to the cost of constructing the affordable housing. - Once the care facilities are constructed, who would run and maintain them on a day-to-day basis going forward? We note that the Council would not be responsible for this. Does Herts Valleys CCG have sufficient funding to expand its estate? If they do not, then private operators would be required to step in. What actions would Watford then take to ensure that bed space fees or tenancies for a unit remain affordable for an intended occupier? - Is there not a risk that the approach could result in an excessive number of care facilities being developed? Also, what would happen if any of the care homes/units are vacant for a significant period of time? This would risk causing tensions between the described 'need' for care facilities as per the supporting text, and the long-established 'need' for affordable housing. - How would this approach link to the outcomes of an identified healthcare strategy, e.g. the CCG's joint strategic needs assessment? Such documents tend to inform the CCGs and Councils when setting priorities for future years. The links between health and housing are well documented.	Comment	Comments noted and agree that further clarity about the approach would benefit the policy and its implementation. More specifically, where specialist housing is provided at market value, this will be required to provided affordable housing rather than in lieu of it. The policy can be revised to reflect this.	Amended Policy HO3.5 'Specialist Housing and Care Homes' text to clarify that market value specialist housing will be required to provide affordable housing.

Policy H4.6 Specialist Housing	Three Rivers District Council (Ms Claire May) [2389]	1757 This policy is welcomed. If available, an addition to the text which states the need for this type of housing in numerical form would be helpful.	Support	Support welcomed. A requirement would benefit the policy, however, this will be challenging given the nature of development likely to come forward in the borough.	Numerical requirement set out in policy.
Policy H4.7 Self-build and Custom Housebuilding	Three Rivers District Council (Ms Claire May) [2389]	1758 Are any of the allocated sites for houses rather than flatted development? If they are, they may also be able to contribute to self-build and custom housing within the allocation.	Comment	The plan allocates sites for a range of suitable densities and not houses/flatted development to achieve a balanced range of tenure mix in schemes that are design-led in nature.	No change.
4.16 Residential Conversions	Ms Di Lewis [3695]	1095 4.16.4 Parking is not the only issue/problem created. Anti social behaviour eg, Bins left on pavements 365 days of year, noisy residents and friends returning from town centre in early hours of morning, drug activity. Also instances of criminal behaviour eg vehicle crime, burglary and theft.	Comment	Residential conversions are supported by Government and in their document House in Multiple Occupation and residential property licensing reform they state the private rented sector is an important part of our housing market and HMOS form a vital part of this. It is recognised that management is an important issue, however, this lies outside of the planning system.	No change.
4.16 Residential Conversions	Ms Di Lewis [3695]	1096 4.16.5 and 4.16.6 How can the Council 'manage' this when any house can be converted into a 6 person bedsit without needing permission, even in areas where statistically it is well over saturation point. The 10% rule is useless. Meaning a whole street could be turned into bedsits. Something stronger needs to be implemented, eg Article 4, to help prevent destruction of any community left in an area. In some areas close to the Town Centre change has already happened and is already causing a significant adverse impact.	Comment	Residential conversions are supported by Government and in their document House in Multiple Occupation and residential property licensing reform they state the private rented sector is an important part of our housing market and HMOS form a vital part of this. The existing conversion policy will be carried forward but with greater emphasis on being located in sustainable locations.	No change.
Policy H4.8 Residential Conversions	Ms Di Lewis [3695]	1097 10% ruling is not effective and does not apply to conversions into 6 person bedsit. Something stronger needs to be implemented.	Comment	Residential conversions are supported by Government and in their document House in Multiple Occupation and residential property licensing reform they state the private rented sector is an important part of our housing market and HMOS form a vital part of this. Much of the issues relate to management of these properties and this is outside of the planning system.	No change.
Policy CC6.1 Sustainable Construction and Design	Environment Agency (Planning Advsiior - Mr Theo Platts-Dunn) [3848]	1283 See proposed amendments	Comment	Agree with statement and will amend CC6.1. BREEAM standards has been found viable on major non-residential developments and will be included. Retrofitting buildings is more complicated and is not considered necessary in the draft Plan at present, however, the benefit is recognised.	In Chapter 8 'A Climate Emergency' policy requirements revised to include BREEAM excellent standard.
5.2 Designated Employment Sites	R Kowalewski [965]	930 A lot of words talking about need for employment areas, but behind in a lot of the writing is the undertow of "but can be converted to housing if..." Now it seem that office building on the corner of the ring road and Place theatre is to be converted to probably cheap nasty flats as there is a loophole in the law for converting offices into miniature studios. Watford needs to sort themselves out and stop allowing employment space to be converted into flats etc. Watford needs more higher level employment opportunities.	Comment	The Local Plan cannot control permitted development rights as it is national policy. However we have installed Article 4 Directions on the key employment areas preventing these being converted to residential uses.	No change.
5.2 Designated Employment Sites	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1209 To create a sustainable town, the council must prioritise job creation across the whole borough. Employment areas should be evenly distributed across the borough and should be prioritised in new development areas so there are work opportunities near housing areas. Watford should reject PDR on commercial-resi uses where possible and maintain necessary stock of employment areas to create prosperous local economy. Vacant shops on creation should be used to support young entrepreneurs/ artists etc.. and contribute to creating sense of place. Homelessness issue must be resolved.	Comment	The intention of the policy is to protect and intensify existing employment land to protect jobs and create new opportunities for employment. The Employment Land Review (2019) has shown Watford to have low vacancy rates and a shortage of employment floor space across the Borough has been identified by the Economic Study (2019). The Local Plan cannot influence permitted development rights. Reducing the number of homeless people and rough sleepers is a key priority for the council and a draft Homelessness and Rough Sleeper Strategy 2020-25 has recently been published for consultation. The Local Plan aims to support this strategy by ensuring that new homes are provided for social rent (see Policy HO3.3: Affordable Housing).	No change.
Policy E5.1 Designated Employment Sites	Wenta . [3738]	1046 Wenta support the protection of these uses as it ensures that there is no loss of employment floorspace without robust justification. With regards to the policy text, the need for an 'up to date evidence base that demonstrates the site is no longer required for employment uses' is supported but no details are provided as to what this evidence base should be. Wenta are fully supportive of the designated employment sites, however they believe that the employment uses on these sites should be intensified where possible by creating mixed use development at such locations.	Support	Comments noted. Marketing evidence to justify loss of B class floor space will be set out in an appendix to support the final draft Plan. Intensification of employment land is supported in the Plan (Policy EM4.1: Providing New Employment).	Marketing requirements have been added to the Plan as Appendix F.
Policy E5.1 Designated Employment Sites	Jane Wakelin [3410]	1108 The DDD Ltd. site is located within a residential area, in a sustainable location which is within a short walk of the Watford Metropolitan Railway Station. The Council wishes to see the employment use of this site continued by designating it as a protected employment site; however should the existing use cease it is unlikely that the site would be used by another employment use. The site is more suited to a residential use. Please see the attached document prepared by Wakelin Associates, which expands upon this summary.	Object	Comments noted.	The site has been removed as a designated employment area based on the location and site size.
Policy E5.1 Designated Employment Sites	Castle Homes (Mr Alfie Yeatman) [3769]	1301 We support the intention of draft Policy E5.1 to strengthen the employment offer within Watford. However, we object to the inclusion of the Mothercare Headquarters located on Cherry Tree Road as a Designated Employment Site. Employment use on this site is set to cease shortly. Prior approval to change the use of the office building to residential use has been granted and positive pre-application discussions have been held on the potential for further residential development on the wider site. A more detailed comment has been provided in response to the First Draft Plan Policies Map.	Object	Site has been removed as an allocated employment site on the basis of its extant planning consent.	The Mothercare site has been removed as an allocated employment site and instead has been allocated for residential development.

Policy E5.1 Designated Employment Sites	S Hille & Co (Holdings) Ltd (Mr Ian Scheer) [3404]	1340 Our client objects to the allocation of the Hille Business Centre as a Designated Employment Site. Such a designation will constrain the realisation of the full potential of this site in planning terms. It is not a sustainable use of the site because it has the potential to support a mix of uses including new employment uses and new homes. Indeed, greater flexibility with regard to the development of new homes on the site could reinforce its potential to deliver new employment uses and create more jobs. Notwithstanding the comments above it is clear from an analysis of the site in its surrounding context that it's future would be more appropriately provided for within a mixed-use policy context. The Hille Business Centre site is bounded to the north by the terraced housing and to the south by the TK Maxx and The Range retail warehouses, the latter which is referred to as the 94-114 St Albans Road in the First Draft Local Plan. The 94 – 114 St Albans Road site is allocated as a Mixed-Use Development site MXD05 and is currently the subject of a planning application for a major mixed-use development by Berkeley Homes (ref.19/00507/FULM) which will shortly be considered by the Council by the Development Management Committee. The Hille Business Centre site is a relatively small and isolated employment site sandwiched between this large proposed 'mixed-use' area to the south and the established residential uses to the north. It is entirely logical, indeed preferable in planning terms, to extend the mixed-use designation across the Hille Business Centre site to the northern boundary of the Strategic Development Area in order that the entirety of this part of North Watford can be brought forward as a new vibrant mixed-use quarter, in line with policy objectives. To designate the site for employment uses in the manner proposed fails to recognise its full potential and is not a sustainable use of land in a location such as this.	Object	Comments noted. Site was promoted as a residential allocation. This would result in a large loss of B class floor space. Evidence such as the Economic Study Update (2019) and the Employment Land Review (2019) have shown there have been large losses of industrial land over the past few years across the borough. The Housing and Economic Land Availability Assessment has also shown that there will be a large deficit of industrial floor space provision over the plan period. The employment policies take a no net loss approach to stop any further losses in response to this issue. Allocating this site for residential development would therefore be contrary to the other policies in the Plan and recent evidence.	No change.
Policy E5.1 Designated Employment Sites	IDA Plymouth Holdings Ltd. [3888]	1362 Draft Policy 5.1 which supports the provision of employment floorspace is welcomed.	Support	Support welcomed.	No change.
Policy E5.1 Designated Employment Sites	Cassio Watford Ltd. (Cassio Watford Ltd) [3903]	1423 Policy E5.1 Designated Employment Sites seeks to ensure that a net provision of employment use on designated sites is maintained. We support the Policy as it supports redevelopment for proposals that do not result in a net loss of B Class use.	Support	Support welcomed.	No change.
Policy E5.1 Designated Employment Sites	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1524 We understand that the Designated Employment Sites are existing (employment) sites, and that the justification for their designation in the Plan is to protect B-class (employment) floor space, and to support opportunities for intensification of these uses. We have been unable to check these sites in detail, but as with the allocations and Strategic Development Areas we would expect any development to have regard to any heritage assets which could be affected by the intensification of uses. As with the Strategic Development Areas, it is quite difficult to read the Policies Map. Again it would be helpful if the Designated Employment Sites were clearly illustrated within the body of the Plan (similar to the allocated housing sites for delivery), showing the detailed site boundaries, and labelled.	Comment	Comments noted. Any development proposal will be required to conform with the policies in Chapter 7 which seek to protect heritage assets from inappropriate development. For the Regulation 19 version of the Plan, the Policies Map will be interactive so that the viewer will be able to switch layers on and off and zoom into specific sites.	No change.
Policy E5.1 Designated Employment Sites	Hertfordshire County Council (Martin Wells) [3559]	1674 Minerals & Waste Planning In principle, this policy is supported, in particular the requirement for new development to not compromise industrial or other employment activities. The protection of existing employment areas is therefore supported, as the following ELAS are located within Watford: <ul style="list-style-type: none"> • ELAS221 Watford Business Park • ELAS213 Odhams and Sandown • ELAS214 Greycaine These ELAS were identified as having potential compatibility with waste management uses. Whilst the Waste Local Plan does not rely on the need for all land within ELAS across the county for the delivery of waste capacity, the cumulative loss of ELAS to non-waste uses reduces the likelihood of such sites coming forward. Given that there are very few existing waste sites in Watford and very few opportunities for new sites to come forward in the area, the county council supports the continued identification of these ELAS as employment land under this policy within the Watford First Draft Local Plan and would fully support the use of Article 4 Directions to prevent the loss of identified employment land.	Support	Comments noted. Reference to Employment Land Areas of Search can be added to the Plan.	Referenced to Employment Land Areas of Search has been added to the supporting text of Policy EM4.2: Designated Industrial Areas.
Policy E5.1 Designated Employment Sites	Three Rivers District Council (Ms Claire May) [2389]	1759 This policy is supported, particularly in its objective to protect and provide B class floorspace, of which there is a strategic need across South West Herts. Whilst the value of supporting uses within employment sites is recognised, it is necessary to ensure that these uses remain as only supporting/complementary to the dominant B use class. A restriction on the amount of supporting uses may be appropriate to ensure that this remains the case; for example, two gyms (a supporting use) within the same employment area would likely justify a restriction on this type of use.	Support	Comments noted. To ensure supporting uses are ancillary to the employment uses, the size of the premises have been limited to under 100sqm. Wording has also been included to ensure that the supporting uses do not undermine the employment activity on site.	No change.
Policy E5.2 Economic Development Outside of Designated Employment Locations	Wenta . [3738]	1047 As set out in our representation to policy E5.1, Wenta supports the protection of designated employment locations, but welcomes mixed use redevelopment, where suitable and sustainable, to facilitate opportunities to increase employment. This policy actually sets out what the evidence-based is/what is needed to justify the loss of any B use floorspace. The same principles should be applied to designated employment sites if there is no demand for the floorspace or where it is more sustainable to allow mixed use development which may involve a net loss of B use floorspace.	Support	Agree. Marketing evidence to justify loss of B class floor space will be set out in an appendix.	Marketing requirements has been added to Appendix F.
Policy E5.2 Economic Development Outside of Designated Employment Locations	Mercedes Benz Retail Group UK Ltd. (Mercedes Benz Retail Group UK) [3880]	1330 Policy E5.2 (Economic development outside of designated employment locations) outlines that development of new non-designated employment sites will be supported and that any proposals for new Use Class B floor space will need to be compatible with existing uses in the surrounding area. Mercedes-Benz is supportive of this; however, it is important to ensure that new employment locations don't impact the vitality of existing ones and that there is an acknowledgement of the employment benefits that can also accrue from some Sui Generis uses.	Support	Comment noted. Ensuring that new development does not negatively impact adjacent land uses is dealt with through the 'agent of change' principle set out in national policy and Policy CC8.5 Managing the Impacts of Development. The importance of supporting uses is acknowledged in Policies EM4.2: Designated Industrial Areas and EM4.3: Office development.	No change.

Policy E5.2 Economic Development Outside of Designated Employment Locations	IDA Plymouth Holdings Ltd. [3888]	1363 Draft Policy 5.2 which supports the provision of employment floorspace is welcomed.	Support	Support welcomed.	No change.
Policy E5.2 Economic Development Outside of Designated Employment Locations	Three Rivers District Council (Ms Claire May) [2389]	1760 The principle of this policy is supported as the need to retain B class employment space across South West Hertfordshire is recognised. It perhaps should be noted that this policy can only apply where planning permission is required and there may be loss of employment uses through permitted development.	Support	Support welcomed.	No change.
Policy E5.3 Mixed Use Development	Wenta . [3738]	1048 Wenta fully support additional mixed-use development across the borough where uses are compatible. Residential uses on top of retail units has been a long-established mixed use, especially in town centres, as well as on top of large supermarkets. In addition to this Wenta support residential land uses above existing employment land uses to create communities in which people can live and work. Wenta support mixed use development that would maximise the use of existing employment designations. They support the redevelopment of sites to accommodate additional uses that are integrated, alongside or below residential development in highly sustainable locations.	Support	Support welcomed.	No change.
Policy E5.3 Mixed Use Development	Mercedes Benz Retail Group UK Ltd. (Mercedes Benz Retail Group UK) [3880]	1331 Policy E5.3 (Mixed Use Development) further outlines that mixed use development will be supported in principle where the development is complementary to employment uses and would not undermine any existing employment function on or adjacent to the site. It further outlines that mixed use developments where one of the uses falls into the Sui Generis category should be assessed on a case by case basis. This policy is supported as Mercedes- Benz considers it important to have regard to existing uses when proposing new development and wishes to safeguard its own site and its potential future uses.	Support	Support welcomed.	No change.
Policy E5.3 Mixed Use Development	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1350 The in principle support for mixed use development is welcomed in draft policy E5.3 particularly its reference to C1 uses in appropriate locations.	Support	Support welcomed.	No change.
Policy E5.3 Mixed Use Development	IDA Plymouth Holdings Ltd. [3888]	1364 The in principle support for mixed use development is welcomed in draft policy E5.3.	Support	Support welcomed.	No change.
Policy E5.3 Mixed Use Development	Cassio Watford Ltd. (Cassio Watford Ltd) [3903]	1424 Policy E5.3 Mixed Use Development supports development that is complementary to the employment use. We support this flexible approach.	Support	Support welcomed.	No change.
6.2 Sustainable Construction and Design	Environment Agency (Planning Advsior - Mr Theo Platts- Dunn) [3848]	1284 Water quality, Waste water, buffer zones and flood zone 3b	Comment	Thank you for the information. WBC will liaise with infrastructure providers further on this topic.	No change.
6.3 Flooding and Drainage	Environment Agency (Planning Advsior - Mr Theo Platts- Dunn) [3848]	1289 We note in paragraph 6.3.5 that SuDS will be used to mitigate against surface water flooding. However, we would strongly recommend that these SuDS are multifunctional in their approach towards mitigating against water quality pollution. Therefore reducing the pressures of flooding and water contamination associated with urban water runoff. We would also encourage more integrated thinking into how SuDS could help Watford Borough Council contribute to their other strategic objectives such as the promotion of innovative green spaces.	Comment	Comment noted. New policy will be added to provide more detail on SuDS and abilities to be multifunctional. Wording will reflect this comment.	Amend wording in policy to incorporate multi-functional aspects of SUDs.
6.1 Introduction of the Earth (Anna Addison) [3407]	Friends of the Earth (Anna Addison) [3407]	1290 WBC has declared a climate emergency, pledging to aim for carbon neutrality by 2030, BUT the aim should be carbon neutrality ASAP. Sections of the Plan include elements that support this pledge, great sustainability and climate change cross cut across all sections. Great to summarised WBC direction of travel here. Plus state that: - all current and future developments are sustainable: =having good access to an improved sustainable public transport. = more energy/water efficient and producing zero carbon emissions. - WBC will work to establish a policy for bus companies to run alternative energy buses, phasing out petrol/diesel buses.	Comment	Comment noted. Watford Borough Council is committed to becoming carbon neutral as soon as possible and the urgent need to address climate change is the golden thread that runs throughout the Plan. 87% of development is located within the Core Development Area, which is viewed as an area of high sustainability for its walkable access to facilities and services. This includes access to public transport. Aims to improve sustainable transport modes are set out in Chapter 11: Sustainable Travel Town. Although the council does not have direct authority over bus types, we liaise with bus companies to seek to achieve sustainable services. To seek to accelerate carbon neutrality, Policy CC8.3 Sustainable Construction and Resource Management includes ambitious standards for water and energy efficiency, with a Carbon Offset Fund also being introduced. In addition, developers will have to provide a sustainability statement to accompany all planning applications which sets out how the scheme will contribute towards the borough becoming carbon neutral and reducing the overall environmental impact. This is required in Policy CC8.1: Mitigating Climate Change and Reducing Carbon Emissions.	Policy CC8.1: Mitigating Climate Change and Reducing Carbon Emissions has been included which requires Sustainability Statements. Policy CC8.3 Sustainable Construction and Resource Management has been revised and now includes a Carbon Offset Fund as a mechanism to achieve carbon neutrality.

6.2 Sustainable Construction and Design	Friends of the Earth (Anna Addison) [3407]	1292 6.2.1 - this mixes mitigation and adaption, i.e. reducing risks from overheating does not tackle climate change but the effects of it. We suggest three clear sections under 6.2: - how the Local Plan will be supporting the reduction of negative impacts on our climate, - how the Local Plan will ensure new developments reflect and adapt to the changing environment, and - how WBC and the Plan can offset that development Development, while necessary, will have a negative impact on the env. and needs to be done in the most sustainable way possible across all these 3 areas.	Comment	Comment noted. The Local Plan seeks to support the council's ambitions to be carbon neutral. How new development is adapted and mitigated will be critical to achieving this. The chapter has been significantly revised from the first draft consulted on in late 2019 to give greater clarity on what is expected from future development. Policy CC8.1: Mitigating Climate Change and Reducing Carbon Emissions offers the strategic approach to how the Local Plan seeks to address climate change. This includes a requirement for new development to provide a sustainability statement to accompany all planning applications which sets out how the scheme will contribute towards the borough becoming carbon neutral and reducing any negative environmental impact. In addition, Policy CC8.3 Sustainable Construction and Resource Management includes ambitious and phased standards to make new development energy efficient, as well as include revised standards for water efficiency. A Carbon Offset Fund has also been introduced for developments that do not achieve the required efficiency targets to Materials used are also important and the council will require the re-use of materials, in line with the Waste Local Plan.	Policy CC8.1: Mitigating Climate Change and Reducing Carbon Emissions has been included which requires Sustainability Statements. Policy CC8.3 Sustainable Construction and Resource Management has been revised and now includes a Carbon Offset Fund as a mechanism to achieve carbon neutrality.
Policy CC6.1 Sustainable Construction and Design	Friends of the Earth (Anna Addison) [3407]	1293 There have been some publicised developments which have been built around the country to be carbon neutral, if Watford is going to achieve its aim of being carbon neutral by 2030, then new buildings will have to aim to be as carbon neutral as possible. The plan states that: Non-residential development of 1000 sqm or more should achieve BREEAM Very Good standard. It would be great to see a requirement that all developments aim to achieve a BREEAM excellent or outstanding standard. Suggest all development provide a sustainability statement and Plan aims higher in carbon emission reduction.	Support	Support welcomed. The Plan has been amended to give further emphasis on carbon neutral development. Policy CC8.2: Sustainable Construction Standards for Non-residential Development now requires BREEAM 'excellent' standard. This was the highest standard considered to be viable (see Viability Study 2021 for further detail). It is agreed a sustainability statement will be critical in supporting net carbon zero development. A requirement for new development to provide a sustainability statement will be added to Policy CC8.3: Sustainable Construction and Resource Management.	BREEAM Standard has been amended to 'excellent' and a requirement for Sustainability Statements has been added to Policy CC8.2: Mitigating Climate Change and Reducing Carbon Emissions.
Policy CC6.1 Sustainable Construction and Design	Friends of the Earth (Anna Addison) [3407]	1295 This focuses on living with the effects of climate change rather than trying to combat it. Obviously very important but we would like to also see more of a focus on combating climate change! It is great that new-builds must meet sustainability requirements, however there is a loophole '..... minimum unless it can be demonstrated that it would make the scheme unviable' . What would it take to demonstrate that following the requirements is unviable? Would construction be allowed to go ahead even so? Financial viability should not overshadow the sustainability principle , climate change has the greater implication	Comment	Concerns noted. The council are committed to ensuring that development is net carbon zero from the outset. However, in cases that this can't be achieved, A carbon offset fund has been introduced in Policy CC8.3: Sustainable Construction and Resource Management. The exceptional circumstances to justify this would need to be set out in a planning application.	Carbon offset fund added as a requirement to address concerns where it is not viable to meet sustainability standards in exceptional circumstances.
Policy SD2.7 Watford Junction Strategic Development Area	S Hille & Co (Holdings) Ltd (Mr Ian Scheer) [3404]	1339 Our client supports the designation of the Strategic Development Area and the inclusion of the Hille Business Centre within this area. Our client also generally supports the nine development considerations set out in policy SD2.7. The Hille Business Centre can play an important part in forming a new vibrant mixed-use quarter to provide new homes and creating jobs in close proximity to Watford Junction Station, in line with the second stated development consideration.	Support	Support welcomed.	No change.
Policy CC6.1 Sustainable Construction and Design	Canal and River Trust (Area Planner - Tessa Craig) [3892]	1386 We are supportive of accessible, green networks that connect important economic hubs with communities. This provides positive areas for growth alongside sustainable and accessible routes with great health and wellbeing benefits. Potentially links could be improved to Watford Business Park, local greenspace, Rickmansworth, Kings Langley and beyond to Hemel Hemstead. Greater 'cleaner' access brings economic benefits to Dacorum, Three River and Kings Langley alongside employee benefits from a healthier lifestyle. We support the use of renewable energies in new development/ existing developments. The canal water can be used for heating and cooling of buildings, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. We would therefore request that the Local Plan include reference for this for developers who may wish to explore this technology.	Support	Support welcomed.	No change.
Policy CC6.2 Flooding and Resilience	Canal and River Trust (Area Planner - Tessa Craig) [3892]	1387 With careful design and assessment, our waterways may be able to receive runoff from future development sites, providing sustainable options for site drainage (although mitigation works to the canal infrastructure may be necessary to cope with this.) The Trust is not however a land drainage authority and any such discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.	Comment	Comment noted.	No change.
Policy CC6.1 Sustainable Construction and Design	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1438 Although we do not supply potable water within Watford we support the requirement for residential development to be designed to achieve water consumption rates of 110 litres or less per person per day.	Support	Support is welcomed.	No change.

Policy CC6.2 Flooding and Resilience	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1439 We support the references within the policy to Sustainable Drainage. SuDS provide opportunities to reduce the causes and impacts of flooding, remove pollutants and provide amenity, recreation and wildlife benefit. In particular developers should ensure that surface water run-off is managed as close to source as possible and should aim to achieve greenfield run-off rates. It is considered that the policy and supporting text should be expanded to make reference to the need for development to follow a drainage hierarchy such as that set out within Policy 5.13 of the London Plan. In addition, it is suggested that policy wording should support the retrofitting of SuDS which can assist with providing capacity within the wastewater network which can help to address the impacts of growth and climate change. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground or watercourse. It is only when all options have been exhausted and there is not practical reason for using sustainable drainage,(documented evidence will be required to support this position) that developers should seek connection to the public network. Where the proposal is to discharge to a combined network it is important to minimise the quantity of surface water entering the network in order to maximise the capacity for foul sewage conveyance and to reduce the risk of sewer flooding.	Support	Support welcomed. Policy CC6.2 will be revised and results of the SFRA Level 2 incorporated.	Policy has been revised to reflect the proposed changes.
Policy SD2.11 Dome Roundabout Strategic Development Area	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1515 The Dome Roundabout Strategic Development Area appears to contain two locally listed buildings. Development will need to preserve and where possible enhance these assets and their settings, and any specific measures required to remove or mitigate any harm to these assets should then be included in Policy SD2.11.	Comment	The policy approach to Strategic Development Areas has been revised to focus on the Core Development Area, located in the centre of Watford. The Dome Roundabout is therefore no longer an SDA but heritage in this area will be covered under a separate heritage chapter (Chapter 7).	No change.
Policy SD2.6 Development Contributions	Telereal Trillium (Telereal Trillium) [3915]	1533 The draft wording is broadly supported however when considering future development proposals, the Council should provide evidenced justification which clearly demonstrates that it is the respective development which is creating 'specific need' for infrastructure.	Support	Support welcomed. The Infrastructure Delivery Plan has been updated.	No change.
Policy SD2.9 Town Centre Strategic Development Area	Telereal Trillium (Telereal Trillium) [3915]	1534 The draft policy wording is broadly supported. It is agreed that all development proposals in this location should make effective use of land and for high densities to be encouraged. The Town Centre SDA is the most appropriate location for this type of development which is required if the Council are to achieve their housing delivery targets as well ensuring that Watford thrives as a place where people want to live, work and visit. As is referenced in para. 2.11.1, town centres are changing in their nature and it is the responsibility of local planning policy to ensure that sufficient flexibility is included to allow for an increased variety of uses which includes residential. As the retail market becomes increasingly digital, the requirement for retail property is reducing and therefore town centres need to ensure that they develop other reasons for people to continue to visit, contribute to the local economy and therefore ensure future vitality and viability is maintained. This includes the need to diversify in uses which offer increased 'dwell time', such as those which contribute to the night-time economy as well as housing. It is also important for town centres to make better use of existing land as set out in para. 2.11.1 which is especially relevant to bringing forward development at the Site. The draft policy requirement for greater land use efficiency including a mix of uses and the re-introduction of residential uses into the Town Centre is supported and development proposals for the Site will assist in contributing to this. Proposals for the Site could also include non-residential uses if appropriate on the ground floor in line with the Council's aspirations to maintain and enhance ground floor active frontages.	Support	Support welcomed.	No change.
1.14 Environment	Hertfordshire County Council (Martin Wells) [3559]	1547 Paragraph 1.14.5 Environment Resource Planning (Lead Local Flood Authority). It is requested that the following wording is added to this sentence within this paragraph: "To address the issue successfully as part of the Local Plan, there is a need for the council, development partners and infrastructure providers to work collaboratively to deliver measures such as more energy and water efficient buildings, quality green infrastructure (including sustainable drainage) and alternative travel options to reduce car dependency, all of which are key elements of sustainable development."	Comment	The text has been revised since the first draft Local Plan but these elements will all be included as part of the environmental objectives in Chapter One.	The objectives have been amended to reflect the proposed changes.
1.17 Vision	Hertfordshire County Council (Martin Wells) [3559]	1548 Paragraph 1.17.4 Environment Resource Planning (Lead Local Flood Authority). It is requested that the following wording is added to the final sentence in this paragraph, which deals with the environmental vision for Watford: "New development designed to minimise their impact on the environment including the reduction of air pollution will have taken significant steps to mitigate and adapt to the impacts associated with climate change including predicted changes in rainfall patterns."	Comment	Noted. The vision will be revised to combine environmental, economic and social objectives for clarity, however, have not included the recommended text as this duplicates other points in the objectives and vision.	The vision has been since revised to provide more context about the environment and its importance to the overall Plan.
1.18 Strategic objectives	Hertfordshire County Council (Martin Wells) [3559]	1552 Climate Change Strategic Objective (1.18.4) Environment Resource Planning (Lead Local Flood Authority) The mitigation of flood risk is welcomed, although this needs to be stated more clearly within the draft plan, specifically Policy C67.2, where separate comments have been made.	Comment	Support welcomed. Amendments will be made to the Plan to highlight the importance of flood risk.	Text added to policy 13.1 'Site Allocations and New Development' to require mitigations measures to be included where identified by an assessment. Flood risk policy revised to provide more clarity about mitigating flood risk.
2.3 Achieving Sustainable Development	Hertfordshire County Council (Martin Wells) [3559]	1561 Paragraph 2.3.5 Highways & Transport The general approach of pursuing a more sustainable development pattern and making effective use of land i.e. focusing development on more accessible and sustainable locations (as per earlier comments) is supported.	Support	Support welcomed.	No change.

Policy SD2.2 Achieving Sustainable Development	Hertfordshire County Council (Martin Wells) [3559]	1562 Environment Resource Planning (Lead Local Flood Authority). It is requested that sustainable management of drainage and flood risk is included as part of the measures that are designed to not have an adverse effect on the environment, when assessing development proposals against this policy.	Comment	Comment noted. Sustainable drainage and other flood prevention systems will be mentioned in this policy, emphasising the environmental impact.	Amended text in the flood risk section, refer to guidance provided by the Lead Local Flood Risk Authority in the supporting text to the policy and make connections about the value for early consideration in the design process including multi-functional use of open space.
2.8 Strategic Development Areas	Hertfordshire County Council (Martin Wells) [3559]	1575 Environment Resource Planning (Lead Local Flood Authority). These Strategic Development Areas have been assessed in the South West Hertfordshire Level 1 SFRA, as it provides additional guidance and information in terms of flood risk to developers. It will also allow a better preparedness when coming into the planning process for these areas. As part of the county council's role as Lead Local Flood Authority, it undertakes assessment of local flood risk through Surface Water Management Plans (SWMPs). SWMPs are used to have a better understanding of surface water flood risk at a district level and to agree the most effective ways of managing it. The main purpose of SWMPs is to identify, prioritise, and develop options for managing local flood risk. SWMPs covering Watford have been produced in 2015 where the surface water flood map is analysed. Improved hydraulic modelling for a number of areas Watford is currently being developed and this is expected to be concluded in the second trimester of 2020. These evolving sources of information are recognised in the SFRA. Including reference to the SFRA in relevant policies would help to ensure that the most relevant information on local flood risk is considered as part of the development process.	Comment	Comment noted. In addition to the level 1 SFRA already completed, a level 2 assessment is being undertaken on sites identified as being located, either completely or partially, in flood zones 2 and 3. Agree the flood risk section could further emphasise the SFRA level 1 study and the findings to be a development consideration in chapters 6 and 8.	Amended text in chapters 6 'An Attractive Town' and 9 'Conserving and Enhancing the Environment' to include reference to the SFRA (2019) and the need for development to consider how this needs to be addressed on sites where fluvial and/or surface water flood risk is an issue.
2.12 Lower High Street Development Area	Hertfordshire County Council (Martin Wells) [3559]	1581 Paragraph 2.12.3 Highways & Transport The county council agrees with the wording in this paragraph that the road network in the area around the Lower High Street SDA is a barrier to sustainable travel, and redevelopment should be seen as an opportunity to address these issues that have strategic as well as local impacts.	Support	Support welcomed.	No change.
Policy SD2.10 Lower High Street Development Area	Hertfordshire County Council (Martin Wells) [3559]	1583 Environment Resource Planning (Lead Local Flood Authority) Point 6 refers to the design parameters of schemes needing to ensure that in areas at risk of flooding, mitigation measures are identified. It is considered that this should only be where flood risk cannot be managed and to deal with residual flood risk rather than promoting a default approach simply of mitigation.	Comment	Comment noted. Policy will be strengthened to note importance of on site water management and flood risk.	Policy revised to provide clarity about the need for proposals to mitigate flood risk where a risk is identified.
6.1 Introduction	Hertfordshire County Council (Martin Wells) [3559]	1675 Paragraph 6.1.4 Highways & Transport It is suggested that the fourth bullet point in this paragraph is amended as follows: • supporting new infrastructure to encourage walking, and cycling and public transport use to reduce reliance on private vehicles for local journeys	Comment	Text to be amended as suggested.	Amend text as suggested. Chapter 11 'A Sustainable Transport Town' has been revised to place more emphasis on the issue.
Policy CC6.1 Sustainable Construction and Design	Hertfordshire County Council (Martin Wells) [3559]	1676 Minerals & Waste Planning This policy is fully supported and could be strengthened to include the need to produce a circular economy statement (or similar) regarding waste – covering construction, demolition and occupancy phases.	Support	Support is welcomed.	No change.
Policy CC6.2 Flooding and Resilience	Hertfordshire County Council (Martin Wells) [3559]	1677 Environment Resource Planning Unit (Lead Local Flood Authority). This policy solely states the elements for compliance with the approach recommended by the 2019 NPPF in terms of guidance on development and flood risk. The focus is implicitly on flood risk associated with rivers, which means that as currently worded, it is inadequate, as the policy does not promote management of flooding from all sources and does not fulfil a long term perspective adaptation strategy to take into consideration the impacts of climate change on flood risk. A Strategic Flood Risk Assessment (SFRA) Report, Level 1, for South West Hertfordshire was produced and published in the beginning of 2019. This report included a thorough investigation in terms of potential sources of flooding, including overall fluvial flooding (Main River and ordinary watercourses), surface water, groundwater, sewer flooding, for the districts of Watford and also for Dacorum, St. Albans and Three Rivers. The SFRA also carried out an assessment of the potential increase of the flood risk due to climate change. The First Draft Watford Local Plan does not reflect at all the outcomes of the SFRA, nor includes the recommendations from the SFRA. It would be expected that the information provided by the SFRA and inherent recommendations, should be extensively used to support and to make a strong and robust policy regarding flooding and flood risk management. It is considered that Policy CC6.2 should be an opportunity to go beyond and to approach, in an integrated way, planning for flood risk, sustainable drainage (SuDS), green infrastructures, water quality, Water Framework Directive (WFD), biodiversity and amenity. It is recommended that apart from the NPPF's recommendations for Flood Risk Assessment, Policy CC6.2 should reflect, or include the following in terms of development considerations: • Use the information in the SFRA and the main recommendations when deciding which development sites to take forward in the respective Local Plan. Apart from the sequential approach to development, it should be highlighted the other main recommendations stated in the SFRA such as: • Development considerations;	Comment	Concerns noted. Policy CC6.2 will be revised to include detail on all types of flooding. SFRA Level 1 has been completed and is being actively incorporated into the Plan where applicable. A SFRA Level 2 study is currently being progressed and will further inform site consideration where flood risk is an issue from fluvial and surface sources. There will be additional text on SUDs, water quality, green spaces and biodiversity within other chapters and policies.	Addition of the following in Chapter 9 'Conserving and Enhancing the Environment': - Points on all types of flood risk including surface flooding issues - SFRA level 1 and level 2 recommendations where applicable - Implementation of more details SUDs policy

Policy DC7.1 Strategic Principles for High Quality Design	Hertfordshire County Council (Martin Wells) [3559]	1678 Environment Resource Planning Unit (Lead Local Flood Authority) SuDS should be a consideration within the 'Optimising the use of land' and 'Creating mixed and equitable communities' paragraphs.	Comment	Comments noted. Agree with the intention and appropriate parts of the Plan in the flood and environment sections will be amended.	Chapter 9 'Conserving and Enhancing the Environment' has been revised to provide greater clarity about how SuDs should be integrated in a scheme.
Policy DC7.2 Quality of Place	Hertfordshire County Council (Martin Wells) [3559]	1679 Environment Resource Planning Unit (Lead Local Flood Authority). SuDS should be a consideration within the 'Public realm and amenity space' paragraph. The 'Active frontages' paragraph within this policy encourages all ground floor units to have access to the street through a front door. It is suggested that developments consider their vulnerability to surface water flooding, by consulting the Environment Agency's surface water flooding map, as potentially this could make properties vulnerable to surface water flood flows.	Comment	Comments noted. Reference will be made to the SFRA level 1 and 2 studies and information available from the Environment Agency in Chapter 6. Chapter 9 contains a specific section on Surface Water	Amend text in chapter 6 'Conserving and Enhancing the Environment' to make clearer reference to the SFRAs and the Environment Agency guidance. Discuss with Sian. Chapter 9 has been revised to provide greater clarity about how SuDs should be integrated in a scheme.
Chapter 7: Quality Design and Conserving and Enhancing the Historic Environment	Dacorum Borough Council (Strategic Planning and Regeneration Officer - Mr Stephen Mendham) [3853]	1335 We note the Council's other proposed policy requirements in the Plan (particularly the design and place policies and the proposed Revised Residential Design Guide) and would like to understand how these objectives may interact with the aspired density approach. We would welcome further clarification on the compatibility of these.	Comment	Further work has been done regarding the detailed approach to growth in the town and the design polices have been redrafted. The approach to growth varies across the borough with most growth being concentrated in the central part of the borough where accessibility is better allowing higher densities. The Tall buildings Study has assessed the HELAA capacities and approach to building heights necessary to deliver those using good design principles. The detailed study will form part of the Evidence Base for the Plan.	Chapter 6 'An Attractive Town' has been redrafted and the approach is now clearer and more specific.
Chapter 7: Quality Design and Conserving and Enhancing the Historic Environment	Hertfordshire County Council (Martin Wells) [3559]	1682 Paragraphs 7.5.1, 7.6.1 and 7.6.2 Environment Resource Planning (Historic Environment). These paragraphs refer to the historic environment and heritage assets and should be clear as to the definition of heritage, as these can represent all aspects of the historic environment. There should also be an acknowledgement that there can also be unknown heritage assets.	Comment	All the policies relating to the Historic Environment have been reviewed.	Policies in Chapter 7 'The Historic Environment' have been revised to provide more clarity.
Chapter 7: Quality Design and Conserving and Enhancing the Historic Environment	Hertfordshire County Council (Martin Wells) [3559]	1708 Local Authority Collected Waste The borough council will be aware that the Waste Planning Authority encourages all district and borough councils to promote the sustainable management of waste generated by new developments. The issue of waste management is more prominent than ever, with the projected housing growth and population levels of the county set to rise significantly up to the period of 2030/2031. Levels of Local Authority Collected Waste are set to rise considerably as a result. The Waste Planning Authority asks that in the development of policy for the emerging Watford Local Plan, the borough council include the requirement to incorporate areas to store and collect waste into the design of new buildings. This is to encourage and increase recycling levels and the sorting of waste at its source and to contribute towards the initiatives of the Waste Hierarchy, where the re-use and recycling of waste should take precedence wherever possible.	Comment	Comments noted. The Plan will be amended to make reference to the provision of waste facilities.	Text relating to waste management is now provided in the supporting information and Policy QD6.4. More detailed information is found in Waste Management Strategy - Veolia/Environmental Health and in the Design Guidance SPD.
Policy DC7.1 Strategic Principles for High Quality Design	Sport England (Planning Manager - Mr Roy Warren) [3671]	978 The design principles should be amended to include reference to delivering environments that provide the opportunity for people to be healthy and active. To support the implementation of an amended policy, an amendment should be made to the reasoned justification to refer to Sport England's and Public Health England's 'Active Design' guidance.	Object	Comment noted. These topics are set out in Chapter 9 in greater detail. This chapter covers the natural environment including new open spaces. Reference to the Sport England's and Public Health England's 'Active Design' guidance has been explicitly made in the supporting text for Policy NE9.7: Providing New Open Space.	No change.
Policy DC7.1 Strategic Principles for High Quality Design	Wentworth [3738]	1050 Design is a fundamental aspect of development. Inappropriately designed sites/building do not provide inclusive and sustainable developments. Whilst design can be subjective, inappropriate design is something, which can be agreed upon. To achieve the effective use of a limited supply of land within the Borough, high quality design should seek to use land efficiently and take into account the surrounding environment and context.	Support	Support welcomed.	No change.
Policy DC7.1 Strategic Principles for High Quality Design	Cortland Partners (Cortland Partners) [3870]	1312 Design is critical in terms of ensuring that increased density across the Borough does not have a detrimental impact on the urban environment and streetscapes. It is vital that the Council works with developers and homeowners to ensure that a high quality of design is achieved. We agree with Draft Policy DC7.1 stating that, where the most efficient use of land should be achieved, high quality and sensitive design is required to achieve appropriate densities. We agree development should seek to optimise their development footprint, accommodating access, servicing and parking in the most efficient way possible. Where possible, different land uses should be mixed together and where appropriate, residential uses should be located above businesses and community uses. Draft Policy DC7.1 states that, where 3-bed units are proposed in medium and high density schemes, this should be provided by way of terraces, townhouses, ground floor duplexes, or maisonettes. It states that these should be designed to encourage family living and that all ground floor units should have direct access to the street through a front door. Direct street access for all ground floor residential units on all sites may not be feasible due to site constraints and design and should therefore be considered on a site-by-site basis.	Comment	Support welcome for the strategy of the Local Plan, however, disagree that direct street access for all ground floor residential units should be a case by case issue. The Council believes all schemes should comply with this, providing an animated and lively street scene. This does not preclude mixed use schemes with other uses on the ground floor providing they contribute to animating the street. This approach is still a key part of the design policies.	All policies in this chapter have been reviewed. Section in Policy QD6.2 now references the approach required for active and positive frontages as a key element to good quality design. There is a requirement in QD6.4 that ground floor residential units should have direct access on to the street.

Policy DC7.1 Strategic Principles for High Quality Design	Berkeley Homes (Berkeley Homes) [3891]	1373 Design is critical in terms of ensuring that increased density across the Borough does not have a detrimental impact on the urban environment and streetscapes. It is vital that the Council works with developers and homeowners to ensure that a high quality of design is achieved. We agree with draft Policy DC7.1 stating where the most efficient use of land should be achieved, high quality and sensitive design is required to achieve appropriate densities. We agree development should seek to optimise the development footprint, accommodating access, servicing and parking in the most efficient way possible. Different land uses combined together and where appropriate should be encouraged to promote mixed use sustainable development such as residential uses located above commercial and community uses. Draft Policy DC7.1 states where 3-bed units are provided in medium and high density schemes, this should be achieved by terraces, townhouses, ground floor duplexes, or maisonettes. These should be designed to encourage family living and that all ground floor units have direct access to the street through a front door. Direct street access for all ground floor residential units on all sites may not be feasible due to site constraints and as set out above, it will not be possible to achieve the target tenure and mix split set out in Figure 9 if 3-bed homes are restricted to ground floor locations only.	Comment	Support welcomed for the strategy of the Local Plan, however we disagree that direct street access for all ground floor residential units should be a case by case issue. The Council believes all schemes should comply with this, providing an animated and lively street scene. This does not preclude mixed use schemes with other uses on the ground floor providing they contribute to animating the street. This approach is still a key part of the design policies.	All policies in Chapter 6 'An Attractive Town' have been reviewed. Section in Policy QD6.2 references the approach required for active and positive frontages as a key element to good quality design. There is a requirement in QD6.4 that ground floor residential units should have direct access on to the street.
6.2 Sustainable Construction and Design	Hertfordshire County Council (Martin Wells) [3559]	1709 As outlined previously, housing growth levels are set to rise considerably over the next 15 years. This means that the Borough Council should recognise the rising levels of construction; demolition and excavation waste must also be recognised and managed, as they too are set to rise significantly. The need for the effective management of construction, demolition and excavation waste should be recognised within the local plan, particularly for larger development proposals, in order to reduce and reuse these types of waste wherever possible and help to reduce the dependency on primary materials. As mentioned in the county council's previous comments to the Watford Local Plan, Issues and Options consultation (September 2018), the borough council should support sustainable construction through ensuring waste issues are considered in line with the Waste Hierarchy. Local Plan policies could usefully refer to the need for Site Waste Management Plans (SWMP) or Circular Economy Statements so that developers can consider these as early as possible and decisions can be made relating to the management of waste arisings during demolition, construction and subsequent occupancy. Applying such principles enables the efficient use of building materials, including considering the use of recycled and secondary aggregates within the development. The application of a suitable SWMP will help in terms of estimating what types of containers/skips are required for the stages of the project and when segregation would be best implemented for various waste streams. It will also help in determining the costs of removing waste for a project. The total volumes of waste during enabling works (including demolition) and construction works should also be summarised. SWMPs should be passed onto the Waste Planning Authority to collate the data. The county council as Waste Planning Authority would be happy to assess any SWMP that is submitted as part of this development either at this stage or as a requirement by condition and provide comment to the borough council.	Comment	Comment noted. WBC recognises the issue of construction waste. WBC will include specific waste management policies including details on circular economy statements and continue to work closely with HCC on this topic. Reference to be made to the waste hierarchy.	Incorporated policy on waste management and referenced waste hierarchy in Chapter 8 'A Climate Emergency'.
Policy DC7.1 Strategic Principles for High Quality Design	Hertsmere Borough Council (Planning Officer - Oliver Galliford) [3920]	1717 In light of the above, we welcome the focus on optimising the use land and recognise that Watford has insufficient land to meet its level of need. However, we would suggest that Policy DC7.1 is clearer about how densities will be maximised outside of allocated sites, given that the lower end of high sustainability zones (other than SDAs) is relatively modest at 95 dwellings per hectare. Although this is a minimum standard, it may invariably become the default acceptable density in high sustainability locations.	Comment	The design chapter has been reviewed and more clarity provided around the scale and approach to growth in the town. This is set out in Policy QD6.1 and the approach to building height in QD6.5	New policies in revised chapter 6 'An Attractive Town'.
Policy DC7.2 Quality of Place	Claire Jones [3435]	960 Need to clarify what is meant by a 'genuine landmark/node location.' A number of new developments that have come forward in Oxhey have limited amenity open space, or where amenity space is provided it does not provide a welcoming environment residents could reasonably utilise. Policy should require amenity space to be designed to promote social interaction. In addition to setting qualitative criteria for amenity space, consider a quantitative measure is also needed to ensure new developments provide an appropriate level of amenity space e.g. 10 sqm per unit and higher for family units.	Comment	Two different issues here: the use of words like landmark/node - we have revised the text to avoid using terms which are not readily understood and where this cannot be avoided we have a glossary section where terms are defined. In terms of amenity, a minimum standard has been included in the housing chapter and the quality matters are covered in the revised Chapter 6.	Chapter 6 'An Attractive Town' and policies within have been redrafted to avoid use of words which are not clear. Standards relating to the amount of amenity space to be provided is included in Policy HO3.11 in Chapter 3 'Homes for Growing Community' and the quality issues are dealt with in Chapter 6.
Policy DC7.2 Quality of Place	Mr Eddie Page [3665]	970 Good to set the boundaries. My personal plea is to ban the cheap render that developers use because they don't want to pay for a proper façade in brick or timber. The render is fine for a year and then you get the horrible water stains that may a place look ugly and once it starts to look ugly its gets defaced and devalued.	Support	A Local Plan does not cover detailed elements of a building like this, however Policy QD6.4 sets out what is expected in terms of materials to enhance character and identity.	Materials are covered in Policy QD6.4 Building Design: Enhancing Character and Identity d).
Policy DC7.2 Quality of Place	Sport England (Planning Manager - Mr Roy Warren) [3671]	979 It is requested that an additional design objective is added to the policy focused around design to encourage active and healthier lifestyles.	Object	Agree that this is an important issue so the Plan has been strengthened to reflect this. Text to be reviewed to consider if this theme can be made more explicit throughout the Plan and a new chapter to include more specific policies.	Revised Chapter 6 'An Attractive Town' includes references to streets and public realm making provision for activity; the new policy covering the public realm references the need for spaces which allow for a range of uses including fitness and consider health and wellbeing. New chapter 12 'Healthy Communities' which contains more specific and detailed policies on this matter.

Policy DC7.2 Quality of Place	Wenta . [3738]	1051 One suggested amendment would be that the criteria should be tailored towards the type of development and future use. For example, a B8 warehouse development will not necessarily need extensive soft landscaping but a residential development would etc. Setting out this clarification or amendment would make it easier to apply to developments proposals in the future. Wenta feel that more positive consideration should be given to integration of spaces for employment and residential, as these have potential to make more effective use of land and create communities in which people can live and work.	Support	The design section of the local plan has been reviewed. Elements of the previous chapter which were more specific to residential development have been moved to the housing chapter. The revised chapter focusses on creating attractive places throughout the town and for all use types going forwards.	Redrafted Chapter 6 'An Attractive Town' sets out design principles which apply to all areas and buildings. More detailed guidance will be available in Supplementary Planning Documents and Design Guidance.
Policy DC7.2 Quality of Place	Cortland Partners (Cortland Partners) [3870]	1313 With regards to Draft Policy DC7.2, we agree on the importance of active frontage but would note that active frontages can be achieved through other means including provision of units for retail, institutional and community use.	Comment	Support for the importance of active frontages is welcomed. It is agreed that the more traditional uses have active frontages that serve this requirement, the intention of this policy is to highlight that residential units are also required to have main access onto the street at ground floor level. This does not preclude frontages for other uses where these are deemed appropriate by other policies.	Text amended to provide clarity about active frontages for residential uses at ground floor level. This does not preclude frontages for other uses where these are deemed appropriate by other policies. This has also been added to the design chapter.
Policy DC7.2 Quality of Place	Berkeley Homes (Berkeley Homes) [3891]	1375 With regards to draft Policy DC7.2, we agree on the importance of active frontage but would note that active frontages can be achieved through means other than residential front doors including provision of ground floor floorspace for retail, institutional and community use.	Comment	Support for the importance of active frontages is welcomed. It is agreed that the more traditional uses have active frontages that serve this requirement, the intention of this policy is to highlight that residential units are also required to have main access onto the street at ground floor level. This does not preclude frontages for other uses where these are deemed appropriate by other policies.	Text amended to provide clarity about active frontages for residential uses at ground floor level. This does not preclude frontages for other uses where these are deemed appropriate by other policies. This has also been added to Chapter 6 'An Attractive Town'.
Policy DC7.2 Quality of Place	Canal and River Trust (Area Planner - Tessa Craig) [3892]	1388 We welcome designing for pedestrian and cyclist priority and connecting routes to the wider network. New development often brings new people onto the waterways, particularly the towpaths. Improvements to signage and wayfinding is required to help with connectivity of networks.	Support	Support welcomed, will make reference to the towpath as an important cycle and leisure route.	Policy NE9.3 makes reference to this use of towpaths.
Policy SD2.9 Town Centre Strategic Development Area	Three Rivers District Council (Ms Claire May) [2389]	1744 This policy is also supported, although it is considered that point 9. could be strengthened by requiring the provision of infrastructure (as appropriate) instead of requiring the 'consideration' of infrastructure.	Support	Support welcomed. Wording is being changed.	Alter wording. (points are being re-done anyways)
Policy DC7.2 Quality of Place	Hertfordshir e County Council (Martin Wells) [3559]	1680 Highways & Transport This policy is welcomed and includes a number of design objectives. It is considered that the objective titled: 'Design for pedestrian and cyclist priority' should be amended as follows: "All schemes should prioritise access and routes for pedestrians and cyclists ahead of motor vehicles. Internal streets and spaces should be user friendly and connect to the wider strategic pedestrian and cyclist network. This includes walking routes to key public transport nodes."	Comment	Agreed. The prioritisation of pedestrians and cyclists will be included in Policy QD6.2: Design Principles	Policy QD6.2: Design Principles amended to include the prioritisation of non-vehicular travel in the design of new schemes.
Policy DC7.3 Building Design	Sport England (Planning Manager - Mr Roy Warren) [3671]	980 A further building design principle which would support the local plan's vision and strategic objectives is that building should be designed to encourage physical activity. Sport England's Active Design guidance has a principle on Active Buildings which provides advice on how buildings can be designed to support and encourage active lifestyles e.g. access to stairs, informal space in workplaces for sport and activity, facilities to support active travel etc. It is therefore requested that an additional principle is added to encourage and support active and healthier lifestyles and examples of this are provided as set out above.	Object	Design to encourage and support active lifestyles will be key to support a healthy population. This will be a key theme in the Design Chapter.	Chapter to be amended to emphasise design for an active and healthy population.
Policy DC7.3 Building Design	Wenta . [3738]	1052 Wenta fully supports the criteria set out in the policy. The criteria are robust and make reference to a more detailed guidance document, which will need to be read in conjunction with the policy.	Support	Support welcomed, a new design guide for Watford is being prepared.	No change.
Policy DC7.3 Building Design	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1113 Need to consider embodied carbon of materials. Designing for waste management needs to prioritise waste minimisation in line with waste hierarchy and local initiatives for recycling of food waste should also be encouraged.	Comment	Issues related to waste are in the remit of Hertfordshire County Council and are covered in the Waste Local Plan. With regards to the design of waste management into development schemes, the design policies will be supplemented by further guidance on waste storage and urban food growing in the Revised Design Guide. Design guidance for waste storage is also covered in more detail in the council's Waste and Recycling Bin Allocation, Storage and Collection Guidance (2020).	The energy and waste hierarchies included in Chapter 8 'A Climate Emergency'.
Policy DC7.3 Building Design	Cortland Partners (Cortland Partners) [3870]	1314 Draft Policy DC7.3 states that there should be a maximum of six units a floor sharing a core area in order to improve social interaction and cohesion. We consider that this requirement is too restrictive and may come at the detriment of achieving the high-density residential development that the Borough seeks. A more flexible approach to units per core should be taken whilst considering building design and unit size and mix.	Comment	This approach is designed to ensure that multiple cores are used; limiting the number of units will help improve social cohesion and integration, reduce feeling of isolation and so contribute to the health and wellbeing of the community.	Policy has been retained but amended to be in line with similar policies in other urban areas.
Policy DC7.3 Building Design	Berkeley Homes (Berkeley Homes) [3891]	1376 Draft Policy DC7.3 states that there should be a maximum of six units a floor sharing a core area in order to improve social interaction and cohesion. We consider that this requirement is too restrictive and will be to the detriment of achieving the high-density residential development that the Borough seeks in the most sustainable location. A more flexible approach to units per core should be taken whilst considering building design and unit size and mix. As a minimum the policy should be amended to eight units per core.	Comment	This approach is designed to ensure that multiple cores are used; limiting the number of units will help improve social cohesion and integration, reduce feeling of isolation and so contribute to the health and wellbeing of the community.	Policy has been retained but amended to be in line with similar policies in other urban areas.

Policy DC7.3 Building Design	Hertfordshire County Council (Martin Wells) [3559]	1681 Minerals & Waste Planning This policy is fully supported, as it reflects the agent of change principles within the 2019 NPPF and is relevant to existing waste facilities and the rail aggregates facility in particular.	Support	Support welcomed.	No change.
7.4 Taller Buildings	Diana Luheshi [3923]	1726 What about Watford taking up the challenge of building some decent housing like this - which people would actually like to live in - instead of the endless tower blocks? I know there's pressure on land availability, but there has to be a lot more low rise development if we're not going to end up looking like every other over-developed small town in the South East. Please, please look at the traditional housing stock in the borough and think about building more housing to blend with it rather than these awful "statement" blocks (e.g. The Range development, Lloyds Bank on Langley Rd, the proposed housing around the town hall etc. etc) https://www.theguardian.com/artanddesign/2019/oct/08/stirling-prize-architecture-goldsmith-street-norwich-council-houses	Comment	Taller buildings have not been a traditional building type in Watford, however, increasing pressure to provide new homes requires a different approach to meet this need. This is challenging and the draft Plan aims to deliver buildings of higher densities in areas that are appropriate and sustainable. A building height policy will be added and there will be greater emphasis placed on high quality design. The Norwich scheme is relatively low density which may be appropriate in the Norwich area, however, while the scheme has received positive reviews for its quality, such schemes in the Watford Area have limited potential given the limited availability of land and housing need. The reference provided, however, is welcomed.	No change.
Policy DC7.4 Taller Buildings	Mr Eddie Page [3665]	969 High rise isn't good for community or family life, we are ignoring lessons learnt from the past. I say that with personal experience. I grew up in the 50s in North London high rise. High rise is for investors not people. The Watford Junction Berkeley homes site will make a lot of money for a few people - but it won't deliver a development we can be proud of like this year's Stirling prize winner. Where is the aspiration for Watford? We don't have land for traditional houses but can't we lead with good development and not follow others?	Object	Council has undertaken a Building Height Study and used this to inform the approach to building height across the town as set out in the policy. Approach uses the existing heights in the town and sets a baseline acceptable height; proposals for buildings which exceed this base height will be considered to be tall buildings and will have to meet exemplary design standards and deliver public benefit. The base height is in most cases mid-rise rather than high rise. The design chapter has been revised and focusses on achieving design quality and making attractive places.	New Building Height policy has been included in the plan at QD6.5 which sets a base height for all parts of the town which is related to the existing height in the area. Proposals for buildings which exceed this height will be treated as exceptions and will have to demonstrate exceptional design quality and achieve clear public benefit to be acceptable.
Policy DC7.4 Taller Buildings	Wenta [3738]	1053 This policy should make reference to the positive contributions tall buildings can make, rather than just setting out the negatives. The criteria in the policy work to ensure that tall buildings are suitable for their locations. Wenta feels that a blanket threshold of 10 storeys or 6 storeys higher than the surrounding buildings may prove restrictive on certain sites, in allowing additional height to be added to existing development or new developments, to be maximised where suitable, increase employment use and bring best value.	Support	Council has undertaken a Building Height Study and used this to inform the approach to building height across the town as set out in the policy. Approach uses the existing heights in the town and sets a baseline acceptable height; proposals for buildings which exceed this base height will be considered to be tall buildings and will have to meet exemplary design standards and deliver public benefit. The base height is in most cases mid-rise rather than high rise.	New Building Height policy has been included in the plan at QD6.5 which sets a base height for all parts of the town which is related to the existing height in the area. Proposals for buildings which exceed this height will be treated as exceptions and will have to demonstrate exceptional design quality and achieve clear public benefit to be acceptable.
Policy DC7.4 Taller Buildings	Environment Agency (Planning Advisor - Mr Theo Platts-Dunn) [3848]	1288 With regard to policy DC7.4, we would like to see the wording improved to ensure no overshadowing of the river environment which could have adverse impacts on ecology and therefore the WFD status. We suggest the below amendment to policy DC7.4 (bullet point 8) Not harm their surroundings in terms of daylight/sunlight, noise, and overshadowing. Where buildings are adjacent to rivers, they should be set back at an appropriate distance to avoid overshadowing and impacting the ecological conditions of the site.	Comment	Agree. An additional policy has been added to the Plan on watercourses which takes these issues into account.	Policy NE9.3 Blue Infrastructure Network has been added to the Plan, which seeks to address these issues.
Policy DC7.4 Taller Buildings	Cortland Partners (Cortland Partners) [3870]	1315 The approach to the design of tall buildings is supported as stated in Draft Policy DC7.4 as it encourages their development as part of a cohesive group, elegantly designed in node locations and/or near mass transit access. This approach will benefit Watford's skyline and urban environment.	Support	Support welcomed.	No change.
Policy DC7.4 Taller Buildings	IDA London Holdings (IDA London Holdings Ltd.) [3887]	1351 Draft policy DC7.4 sets out that all proposals for tall buildings higher than ten storeys are required to meet key design principles which will also be set out in a design SPD. These principles seem reasonable and in line with the Council's currently adopted skyline SPD. We would welcome the opportunity to review and comment on the forthcoming skyline SPD but generally welcome the Council's acceptance of taller buildings in the right areas.	Comment	Support welcome. Council has undertaken a Building Height Study and used this to inform the approach to building height across the town as set out in the policy. Approach uses the existing heights in the town and sets a baseline acceptable height; proposals for buildings which exceed this base height will be considered to be tall buildings and will have to meet exemplary design standards and deliver public benefit. The base height is in most cases mid-rise rather than high rise.	New Building Height policy has been included in the plan at QD6.5 which sets a base height for all parts of the town which is related to the existing height in the area. Proposals for buildings which exceed this height will be treated as exceptions and will have to demonstrate exceptional design quality and achieve clear public benefit to be acceptable.

Policy DC7.4 Taller Buildings	IDA Plymouth Holdings Ltd. [3888]	1365 Draft policy DC7.4 sets out that all proposals for tall buildings higher than ten storeys are required to meet key design principles which will also be set out in a design SPD. These principles seem reasonable and in line with the Council's currently adopted skyline SPD. We would welcome the opportunity to review and comment on the forthcoming skyline SPD but generally welcome the Council's acceptance of taller buildings in the right areas.	Comment	Support welcome. Council has undertaken a Building Height Study and used this to inform the approach to building height across the town as set out in the policy. Approach uses the existing heights in the town and sets a baseline acceptable height; proposals for buildings which exceed this base height will be considered to be tall buildings and will have to meet exemplary design standards and deliver public benefit . The base height is in most cases mid-rise rather than high rise.	New Building Height policy has been included in the plan at QD6.5 which sets a base height for all parts of the town which is related to the existing height in the area. Proposals for buildings which exceed this height will be treated as exceptions and will have to demonstrate exceptional design quality and achieve clear public benefit to be acceptable.
Policy DC7.4 Taller Buildings	Berkeley Homes (Berkeley Homes) [3891]	1377 The approach to the design of tall buildings is supported as stated in draft Policy DC7.4 as it encourages development as part of a cohesive group, elegantly designed in node locations and/or near mass transit access. This approach will benefit Watford's skyline and urban environment	Support	Support welcomed.	No change.
Policy DC7.4 Taller Buildings	Nascot Grange Residents Association (Mr Kevin Ambrose) [3791]	1501 As we remarked in our earlier submission, we recognise the urgent need for new homes and the need to make best use of limited land to achieve this. We supported the Council's Taller Buildings policy adopted just three years ago. However, we are alarmed about the implications of the new Taller Buildings policy. The new "first draft Local Plan" states "A policy is required to give further expression to the design requirements of taller buildings" (Policy DC7.4 p82). But you already have one - "Skyline – Watford's approach to Taller Buildings" – adopted, following extensive consultation, just over three years ago but not even listed in the Local Plan Background Studies (https://www.watford.gov.uk/info/20168/planning_policy/861/watford_local_plan/4) The previous Taller Building policy concentrated such structures in just three locations (Town Centre, Watford Junction and Ascot Road): "It is considered that the majority of the borough area is unsuitable for taller buildings, with the exception of some central locations which have notable regeneration, and economic development opportunity, and high capacity public transport infrastructure i.e. Watford Junction, sections of Clarendon Road, and Ascot Road." (Skyline para 3.5 p7) The Skyline policy document also stated: New tall buildings should contribute to the quality of the surrounding area and complement the pattern of the area. They should respond positively to surrounding building heights, depths, lines, street frontages, massing, characteristic alignments, setbacks of surrounding buildings, and provide an appropriate scale compatible with their surroundings." (Skyline para. 7.13 p22) We are alarmed that the new "First Draft" does not lay down any conditions or circumstances in which taller buildings are acceptable or suggest which areas they will be concentrated in. Worse, it appears to suggest that 8 storey buildings are acceptable in areas of two-storey houses (i.e. the majority of Watford's roads)! "All proposals for buildings higher than ten storeys, or buildings at least six storeys or more higher than their immediate surroundings, are required to comply with the following objectives and key design principles in the Revised Residential Design Guide (tbc, 2019). (Policy DC7.4 Taller Buildings p82)" So are you are now stating that blocks - such as the appallingly designed and situated "Caledonian House" in St Albans Road, backing onto the Victorian streets of Nascot – are now acceptable everywhere? This new policy gives a carte blanche to developers to erect tall buildings anywhere in the borough. We strongly object to this and suggest the policy set out in the Skyline document be re-adopted.	Comment	Skyline is an adopted guidance document; adding a policy on taller buildings will give the content of the policy more weight in decision making than the current guidance. The standalone Skyline document is still in place until an updated comprehensive design guide is produced so this guidance will not be lost. A new policy setting out the approach to building height across the town and the criteria which taller buildings will be required to meet appears in the redrafted Design chapter. Council has undertaken a Building Height Study and used this to inform the approach to building height across the town as set out in the policy. Approach uses the existing heights in the town and sets a baseline acceptable height; proposals for buildings which exceed this base height will be considered to be tall buildings and will have to meet exemplary design standards and deliver public benefit . The base height is in most cases mid-rise rather than high rise.	New Building Height policy has been included in the plan at QD6.5 which sets a base height for all parts of the town which is related to the existing height in the area. Proposals for buildings which exceed this height will be treated as exceptions and will have to demonstrate exceptional design quality and achieve clear public benefit to be acceptable.
Policy DC7.4 Taller Buildings	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1503 We note that the Council is proposing to rely on a criteria based approach to a taller buildings policy which seeks to establish key considerations for the design of taller buildings, rather than using an evidence-based approach to inform a spatial plan (indicating those areas with potential for taller buildings and those with no potential). We consider that tall building development within the Borough should be "genuinely plan led" as required by the NPPF, and to this end the Plan should identify (spatially) areas where taller buildings might, and might not, be appropriate. In addition, given that the heights of tall buildings vary markedly (a six storey building might be regarded as tall in a two storey neighbourhood), it may be necessary to identify general appropriate building heights in those areas. Applications for development within these areas can then be overlaid with the criteria based policy. The Plan should identify (spatially) areas where taller buildings might, and might not, be appropriate. In addition, given that the heights of tall buildings vary markedly (a six storey building might be regarded as tall in a two storey neighbourhood), it may be necessary to identify general appropriate building heights in those areas. Applications for development within these areas can then be overlaid with the criteria based policy.	Comment	Council has undertaken a Building Height Study and used this to inform the approach to building height across the town as set out in the policy. Approach uses the existing heights in the town and sets a baseline acceptable height; proposals for buildings which exceed this base height will be considered to be tall buildings and will have to meet exemplary design standards and deliver public benefit . The base height is in most cases mid-rise rather than high rise.	New Building Height policy has been included in the plan at QD6.5 which sets a base height for all parts of the town which is related to the existing height in the area. Proposals for buildings which exceed this height will be treated as exceptions and will have to demonstrate exceptional design quality and achieve clear public benefit to be acceptable.

Policy DC7.4 Taller Buildings	Telereal Trillium (Telereal Trillium) [3915]	1539 It is important to recognise the clear link between density and taller buildings, especially in town centre locations. The supported promotion of higher densities in certain locations e.g. the Town Centre goes hand in hand with the acceptance of tall buildings. As has been highlighted above, the Site is appropriately located for higher densities and a tall building (as defined in the draft policy of over 10 storeys). With the above in mind, the proposed wording for the policy is broadly supported as it is important to recognise the importance of quality in design of tall buildings, however some amended wording is proposed so as not to prevent the delivery of tall buildings in appropriate locations and provide further clarity where the policy wording is currently ambiguous. At the third point, amended wording is proposed as follows: 'Where appropriate and where the building meets the ground, active and vibrant frontages should be designed into the development' At the fourth point, the wording is ambiguous and it is difficult to understand what the wording is trying to achieve. The aspiration to seek active ground floor frontages has already been set out in the third point. The policy is also not a residential policy and sufficient requirement for a range of types and mix of residential units is already set out in draft Policy H4.2. It is therefore proposed that this point is removed. At the fifth point, the wording is also ambiguous and it is considered that such stringent wording relating to 'appropriate height to width ratios' is not required. An assessment of the appropriate bulk, scale and massing for a tall building should take into account the specific site context and constraints and this will differ across sites. Therefore it is not appropriate to apply rigid tests such as ratios and the wording should be amended as follows: 'Should consider building heights in terms of their proportion and relation to their specific site context and surroundings' At the ninth point, it should be acknowledged that greening can only be incorporated into certain tall buildings and therefore amended wording is proposed as follows: 'Consider the feasibility of incorporating greening of the building where appropriate in the context of design and location (e.g. green living walls and other energy efficiency measures)'	Comment	Council has undertaken a Building Height Study and used this to inform the approach to building height across the town as set out in the policy. Approach uses the existing heights in the town and sets a baseline acceptable height; proposals for buildings which exceed this base height will be considered to be tall buildings and will have to meet exemplary design standards and deliver public benefit. The base height is in most cases mid-rise rather than high rise.	New Building Height policy has been included in the plan at QD6.5 which sets a base height for all parts of the town which is related to the existing height in the area. Proposals for buildings which exceed this height will be treated as exceptions and will have to demonstrate exceptional design quality and achieve clear public benefit to be acceptable.
Policy DC7.5 Heritage Assets and the Historic Environment	CAMRA (Watford & District Branch) (Mr Andrew Vaughan) [3804]	1119 Within the draft Watford Plan there is no section on pub protection. Section HC7 of the draft London Plan is devoted to protecting public houses. Policies are proposed that would promote and protect pubs if they have heritage, social, cultural or economic value. Applications for redevelopment would require that property be advertised as a functioning pub for at least 2 years, at a price decided by an independent valuation. A policy prevents development that reduces viability by converting some of the pub to other uses. We believe that Watford should include a section on protecting and promoting pubs.	Object	The intention was that public houses would be protected by the Community Facilities policy, specific reference has been added to reflect this.	Reference to public houses as a community facility requiring protection in the policy has been added to the supporting text.
Policy DC7.5 Heritage Assets and the Historic Environment	IDA Plymouth Holdings Ltd. [3888]	1366 Point 4 of Draft policy DC7.5 sets out that where development proposals could lead to harm to or loss of significance of an asset this should be weighed against the public benefits of the proposal which is welcomed.	Support	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.
Policy DC7.5 Heritage Assets and the Historic Environment	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1504 We are pleased to see the term 'historic environment' used in this policy. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. While we support the inclusion of this overarching policy, it would be helpful if it could be amended to clarify whether it relates to all heritage assets (designated and non-designated) or not. Criterion 4 – We welcome the inclusion of this criterion, but recommend the Council review the wording to make sure that it is consistent with the NPPF. As currently drafted the criterion makes reference to mitigating any harm identified, but the NPPF requires that applications should first seek to avoid impacts, and only where this is not possible seek to minimise and mitigate. We suggest the Council amend these policies and supporting text to reflect the hierarchy of avoiding harm before mitigating as per NPPF paragraph 190. Finally, the final sentence of the policy refers to 'adopted Supplementary Planning Documents relating to the historic environment'. It would be helpful if either the policy or supporting text could be amended to identify what these documents are, and their status (i.e. when they were adopted, when it is anticipated when they will be reviewed etc). Suggested change - Amend policy to clarify whether it relates to all heritage assets (designated and non-designated) or not, and to clarify the status of the 'adopted Supplementary Planning Documents relating to the historic environment.'	Comment	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.
Policy DC7.5 Heritage Assets and the Historic Environment	Hertfordshire County Council (Martin Wells) [3559]	1683 Environment Resource Planning (Historic Environment) This policy should be clear about what it is referring to, as its wording suggests that it refers to the historic environment, but parts of the text within the policy suggest that it is referring to historic buildings. It is considered that this should be clarified.	Comment	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.
7.7 Nationally Listed Buildings and Registered Parks and Gardens	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1505 7.7.1. Third sentence reads: "It is important that applications involving listed buildings and registered parks and gardens are clearly justified and necessary and have been designed to minimise the impact on the significance of the asset through appropriate enhancement and conservation measures." Applications should first seek to avoid impacts, and only where this is not possible seek to minimise and mitigate. While we are sure that this is not the Council's intention, the current wording could be interpreted that a degree harm is inevitable, and is accepted by the Council. 7.7.2. Linked to the above, paragraph 7.7.2 jumps straight to minimising harm. We recommend amending the text to read: "The policy seeks to ensure that the significance of the assets and the impact of the proposals on the significance are fully understood and appropriate measures are taken to avoid, and if this is not possible minimise harmful impact to that significance." Suggested change - Amend supporting text to reflect the hierarchy of avoiding harm before mitigating as per NPPF paragraph 190.	Comment	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.

Policy DC7.6 Nationally Listed Buildings Parks and Gardens	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1506 The second paragraph refers to applications which involve substantial harm, but it is not clear from the policy how applications that would involve less than substantial harm would be treated. We suggest the addition of a paragraph to the policy to cover this issue. Similarly, the third paragraph of the policy, 'Registered parks and gardens', states that planning permission will not be granted for proposals that would cause "unacceptable harm". It is not clear how "unacceptable harm" is defined in this context or how you would measure it.	Comment	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.
7.9 Locally Listed Buildings	Nascot Grange Residents Association (Mr Kevin Ambrose) [3791]	1502 Our other major concern is of the cavalier attitude to heritage. The Nascot area includes a significant conservation area as well as statutorily and locally listed buildings. The "First Draft Plan" appears to recognise this: Locally Listed Buildings make an important contribution to the character and identity of the town. It is important to ensure that the features which make these assets distinctive are considered and respected when development is proposed. (7.9.1 p86) The actual policy proposed reinforces this: Substantial weight will be given to preserving and enhancing locally listed buildings. Proposals for development affecting the appearance, character or setting of locally listed buildings should ensure that due regard is paid to safeguarding the relevant features of the building and its setting.Any harm to the significance of the locally listed assets arising from development proposals will be balanced against the public benefits of the scheme. Where demolition is proposed it should be demonstrated that all reasonable attempts have been made to retain and reuse all or part of the building. (DC7.8 p86) However, when planning applications are considered, it seems this will be completely ignored. We refer you to a current application on a locally listed building (the former Lloyds Bank, Langley Road), to demonstrate how the Council actually interprets such policies. Planning permission had already been granted for a scheme involving the retention of much of the existing locally listed building and a four story extension above (approximating to a 6-story building). Now the prospective developers have returned with an application for an 8-storey building in an area of two storey homes and shops, with the complete loss of the locally listed building. And this, it appears, the result of closed door negotiations in which the local community took no part: "The applicant have spent almost 12 months discussing the new scheme with the LPA and Conservation team members, looking at a variety of options that would enhance the site and provide an exciting and invigorating replacement. The final proposal (involved demolition of the locally listed bank building and) is a taller and more elegant scheme that will deliver the necessary density and furthermore will protect the site, in landmark terms, for the foreseeable future." (From the Planning Statement submitted by Fairfield Estates in support of the application for 99 St Albans Road, July 2019) This raises a bigger question, - why should any community organisation bother to respond to consultations on the Council's plans and development briefs when they are regarded as irrelevant by the Council itself?	Comment	This is more relevant to implementation than policy drafting. No change proposed but note the comments made relating to implementation to be followed up with Development Management team.	No change.
7.9 Locally Listed Buildings	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1507 Paragraph 7.9.1 states that the Council has identified a number of buildings and structures which have a local heritage value and have created a local list of buildings to reflect this. While we welcome the reference to the local list, it is not clear what the criteria is for inclusion on the List, or which buildings are included. In responding to this Local Plan consultation we have come across two SPDs pertaining to local listing in Watford, although it is not clear what their current status is. We would recommend that the Policy links to the relevant Local List SPD, and that the SPD is included as an Appendix to the Local Plan / within the evidence base. As with the 'adopted Supplementary Planning Documents relating to the historic environment', we recommend that either the policy or supporting text is amended to identify what these documents are, and their status (i.e. date of adoption, and anticipated review date). We recommend linking policy to the relevant Local List SPD, and including SPD as an Appendix to the Local Plan / within the evidence base.	Comment	References will be added so that it is clear where information on the local list can be found. It would not be appropriate to add them all as Appendices as they are long documents but they re all on the Council's Website.	References is made in Chapter 7 'The Historic Environment' to the documents which support the plan policies.
Policy DC7.8 Locally Listed Buildings	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1508 Paragraph 6 of the policy requires that any harm to the significance of the locally listed assets arising from development proposals will be balanced against the public benefits of the scheme. As above, the NPPF requires that harm should be avoided before seeking to mitigate. We recommended the paragraph is amended to: "Any harm to the significance of the locally listed assets arising from development proposals will be avoided and if this is not possible balanced against the public benefits of the scheme". Suggested change - Amend policy to reflect the avoid before mitigating harm as per NPPF paragraph 190.	Comment	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.
Policy DC7.9 Archaeology	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1509 Again bullet 2 jumps straight to minimising harm, where it should seek first to avoid harm. Again, we recommend that the text is amended to address this. Suggested change - Amend policy to reflect the avoid before mitigating harm as per NPPF paragraph 190.	Comment	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.
Policy DC7.9 Archaeology	Hertfordshire County Council (Martin Wells) [3559]	1684 Environment Resource Planning (Historic Environment) This policy should be clear that archaeological remains (and heritage assets) do not just refer to those below ground, as archaeology can include historic buildings and historic landscapes. Whilst the county council supports the policy's references to archaeological potential, it should go beyond repeating relevant parts of the NPPF. The First Draft Local Plan should be mindful of footnote 63 in the NPPF which states: "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets." It is important that provision is made for the identification and conservation of currently unknown heritage assets.	Comment	The policies in this chapter have been reviewed to take account of comments received and to provide clearer wording.	Heritage policies have been revised and are in Chapter 7 'The Historic Environment' which relates specifically to the historic environment.

8.1 Introduction	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1125 The focus of a local plan should not just be on new development areas. As such why are there no incentives or policies for existing properties to encourage green & blue infrastructure in and within their homes. For example the removal of front gardens with parking - some form of tax alleviation or free parking in other car parks?	Object	The Local Plan can only influence new development and does not have the remit to alleviate taxes.	No change.
8.1 Introduction	The Woodland Trust (Regional External Affairs Officer - Mr Nick Sandford) [3850]	1212 Look to set a target in the local plan for tree cover in new development, recognising the multifunctional benefits provided by trees and woods	Object	The importance of trees is echoed throughout the document, particularly in Chapter 9. Increasing tree cover is considered to be factored into the biodiversity net gain approach (see Policy NE9.8 Biodiversity). Further guidance will also be provided in Supplementary Planning Guidance.	No change.
8.2 The Green and Blue Infrastructure Network	Environment Agency (Planning Advsior - Mr Theo Platts-Dunn) [3848]	1285 Biodiversity of main watercourses needs to be accounted for in more detail as set out in comments	Comment	Agree that the First Draft Local Plan does not go far enough in its treatment of watercourses and the benefits they bring in terms of biodiversity, active travel and leisure. A new policy can be added which takes these comments into account (see Policy NE9.3 Blue Infrastructure Network).	Policy NE9.3 Blue Infrastructure Network has been added to the Plan, which seeks to address these issues.
Policy NE8.1 Green and Blue Infrastructure Networks	Herts & Middlesex Badger Group (Planning and Biodiversity Manager - Mr Matt Dodds) [2332]	928 The simplest way to enhance or compliment the green and blue infrastructure is to ensure that landscaping schemes are native and appropriate to the area. We recommend that this policy is amended to reflect this: 'Applicants must demonstrate how development proposals will conserve, restore or enhance the green and blue infrastructure (as appropriate) and how the site connects with its wider surroundings. Native and appropriate planting will be expected wherever possible to maximise benefits to biodiversity.'	Comment	Comment noted. The policy will be amended to reflect the proposed changes.	The policy has been amended to reflect the proposed changes.
Policy NE8.1 Green and Blue Infrastructure Networks	Canal and River Trust (Area Planner - Tessa Craig) [3892]	1389 We welcome the recognition of the multi-functional nature of the Grand Union Canal and support the desire to protect and enhance the Grand Union Canal, connect open spaces, enable wildlife corridors and provide recreational routes for walking and cycling. We support new development delivering enhancements to the green infrastructure network and improving connectivity. We agree that the "potential impact of landscaping, access, excessive lighting, overshadowing and noise should be considered and appropriate mitigation provided to protect the intrinsic quality of the network". Tall buildings adjacent to our waterways can adversely affect ecology, overshadow moorings and have a negative impact on amenity value for both visiting boats and pedestrians on the towpath. Waterside development should have regard to impact on the water space in terms of potential overshadowing and incorporate variety in terms of heights and breaks in frontage. The quality and use of the towpath and waterspace as an amenity asset, for pedestrians, anglers, and boaters, can also be affected by shading. Therefore, it is important consideration is had to these impacts when tall buildings are proposed adjacent to waterways. Overshadowing can also impact on biodiversity, as the reduced light and cooler temperatures may limit the population growth of phytoplankton and macro plankton food sources in the shaded areas, which could affect fish populations, and in turn bird populations. Regard should be had to the Bat Conservation Trust's "Bats and Lighting" paper which stipulates Lux levels lower than 5 to be bat safe, the spectrum to be 'warm' (2700-300K) and for no external lighting to spill over the water surface from the development. We would welcome emphasis on the interconnectivity between the blue and green network, to support species being able to move more easily through porous habitat i.e. a road is a physical barrier, but adjacent habitat and waterways provide a key network and corridor for species. Secondly, it's about accessibility for people to move across the Watford area through green and blue space providing health benefits.	Comment	Agree that the First Draft Local Plan does not go far enough in its treatment of watercourses and the benefits they bring in terms of biodiversity, active travel and leisure. A new policy can be added which takes these comments into account (see Policy NE9.3 Blue Infrastructure Network).	Policy NE9.3 Blue Infrastructure Network has been added to the Plan, which seeks to address these issues.
Policy NE8.1 Green and Blue Infrastructure Networks	Hertfordshire County Council (Martin Wells) [3559]	1685 Environment Resource Planning Unit (Ecology) This policy is supported and no amendments to the policy wording are necessary.	Support	Support welcomed.	No change.
Policy NE8.1 Green and Blue Infrastructure Networks	Three Rivers District Council (Ms Claire May) [2389]	1761 Networks of green and blue infrastructure are linked between Watford and Three Rivers. It is considered that this policy could go further in its reference to a site's connection to its wider surroundings; a requirement could be made that a development must not have an adverse impact on a site's connection to the network(s) by causing fragmentation or damage to existing green and/or blue infrastructure.	Comment	Comment noted. Wording has been included in Policy NE9.2 Green Infrastructure Network which requires development to demonstrate how the site connects with the wider network.	No change.

8.3 Protecting Open Space	Hertfordshire County Council (Martin Wells) [3559]	1686 Public Health	Comment	Agree that open space and access to play facilities is an essential part of creating places where people and socialise, learn new skills and contribute towards health. Equipped play space is considered as open space under this policy - the policy refers to 'Open space and ancillary facilities used for leisure and recreation'.	No change.
		Nationally, there has been a big decline in the amount of outdoor activity by children, whilst we're seeing increasing levels of child obesity. In Watford itself, 8.5% of Reception age children are obese, and 19.7% are considered to have excess weight; these figures rise dramatically by Year 6, with 18.2% of Year 6 children considered obese and 32.6% in the excess weight category.			
		The Local Plan should be seeking to ensure development is required to provide outdoor play opportunities, particularly child-led free play that is not in a designated space. It is noted that there are no specific policy requirements in the First Draft Local Plan in relation to play space. Whilst play space is governed by national guidance with respect to size, to encourage good utilisation play areas need to be located appropriately. This means good natural or passive surveillance to encourage informal play, reduced antisocial behaviour and increase outdoor physical activity in children and young people.			
Policy NE8.2 Protecting Open Space	Claire Jones [3435]	961 It is unclear how this policy is to be interpreted, as the policy and supporting text do not clarify where open space typologies are defined and how it will be determined if an area is 'served' by an open space. This needs to be clarified and supporting evidence such as an Open Space Study cross-referenced.	Object	The Green Spaces Strategy open space typologies and provide quality and value scores for each space. Maps showing this visually will be published to support the final draft Local Plan (Reg. 19).	No change.
Policy NE8.2 Protecting Open Space	Hertfordshire County Council (Martin Wells) [3559]	1687 Environment Resource Planning Unit (Lead Local Flood Authority)	Comment	Comment noted. The important role that open space and green infrastructure can play in managing flood risk and providing sustainable drainage has been included in the introduction as a strategic overview, which provides the context for each section of the chapter.	No change.
		This policy needs to consider the importance of open space being safeguarded for the management of flood risk, as such areas can potentially contribute towards flood risk management schemes and sustainable drainage.			
8.4 Providing New Open Space	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1122 Where you refer to need for open space to be provided in 8.4.7 this should also add that this space must be functional for people and wildlife. How would minimum 10% biodiversity net gain be achieved if in an artificial landscaped space? The focus should not be on creating open space for the sake of open space. For example Grass lawn monocultures have little ecological value in comparison to a wildflower meadow and require more inputs to maintain.	Comment	Net gain is to be measured using the latest Natural England biodiversity calculator, which takes into account the type of flora and fauna provided in the metric to calculate the gain. Further detail about creating high value open space will be provided in the Residential Design Guide to support the aspirations of the policy.	No change.
Policy NE8.3 Providing New Open Space	Sport England (Planning Manager - Mr Roy Warren) [3671]	981 While the intention and content of the policy are broadly supported, objection is made to the policy on the grounds that the first and third criteria would not fully accord with Government policy and there is a need for an additional criterion to accord with Government policy. There is also a need for the reasoned justification to refer to the emerging Playing Pitch Strategy which will support the application of the policy. Consideration should be given to restricting the policy so that its wording aligns better with Government policy in paragraph 97 of the NPPF.	Object	Comments noted. Plan will be revised to reflect proposed changes.	Policy has been revised to reflect proposed changes.
Policy NE8.3 Providing New Open Space	Sport England (Planning Manager - Mr Roy Warren) [3671]	992 The reasoned justification should refer to the Playing Pitch Strategy as well as the Open Space Assessment as this will inform the application of the policy in relation to the need to make outdoor sports provision and how it should be made. The policy or reasoned justification should confirm that for outdoor sport the Council will usually expect provision to be made in the form of a financial contribution. The reasoned justification should refer to design of sports facilities accounting for the design guidance provided by Sport England and the sports national governing bodies in relation to sports facilities.	Object	Comments noted. The supporting text will be amended to incorporate the proposed changes.	Policy has been revised to reflect the proposed changes.
Policy NE8.3 Providing New Open Space	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1123 Having an open space policy is not enough, the open space must have value to residents and biodiversity. Additionally any spaces created through new development must have a satisfactory management plan in place.	Comment	Development proposals will need to comply with Policy NE9.8 Biodiversity which requires development to improve the net biodiversity value of a site by 10%. Landscaping of new open spaces will be dealt with in the Design Guide.	No change.
Policy NE8.3 Providing New Open Space	Three Rivers District Council (Ms Claire May) [2389]	1762 Paragraph 8.4.4 in the supporting text to this policy states that a development will be expected to provide a set amount of open space per dwelling, where the site does not lie within an open space catchment area. It would be helpful to set a standard requirement of open space per dwelling alongside a statement recognising that such a requirement may be unfeasible due to constraints and site sizes. The aim of the policy in meeting the local need for a specific open space typology is welcomed.	Comment	The policy refers to Fields in Trust guidance 'Planning and Design for Outdoor Sport and Play' and any subsequent updates or replacements to set the appropriate standards. Following comments from Sport England, the reference is being updated to their relevant guidance for size thresholds.	No change.
8.5 Biodiversity Net Gain	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1124 Also to be considered as potential solutions in 8.5.4 are bird boxes (swifts, owls, house martins), roost boxes for bats, ponds with variant depths and marginal habitat (cornered off to reduce disturbance), hedgerows rather than fences, if fences utilised then leave small cut out sections for hedgehogs, put underpasses/tunnels in under new roads, special "wild spaces" which limit the amount of footfall from pedestrians eg. scrubland, wildflower meadows and a sensitive mowing regime of grass verges / amenity grassland borders	Comment	Comment noted. The supporting text has been amended to reflect some of the additional ways new development can support biodiversity. Landscaping will be covered in further detail Revised Design Guide.	The supporting text has been amended to reflect the proposed changes.
8.5 Biodiversity Net Gain	Hertfordshire County Council (Martin Wells) [3559]	1688 Paragraph 8.5.4 It is suggested that the following wording is included after the first sentence in paragraph 8.5.4, in order to ensure that if delivery of biodiversity net gain cannot be achieved within a site, appropriate measures offsite may be required to ensure this policy aim is met accordingly. "The policy aims to encourage the delivery of new wildlife habitats, which can be integrated into the layout and design of sites as well as offsite where this cannot otherwise be achieved."	Comment	Comment noted. The relevant paragraph will be amended to reflect the proposed change.	The supporting text has been amended to reflect the proposed changes.

Policy NE8.4 Biodiversity Net Gain	Herts & Middlesex Badger Group (Planning and Biodiversity Manager - Mr Matt Dodds) [2332]	926 Net gain policy welcomed but needs to be clarified to avoid future dispute or misinterpretation. Protected species wording altered slightly to be more effective.	Comment	Comment noted. The relevant paragraph will be amended to reflect the proposed changes.	The policy has been amended to reflect the proposed changes.
Policy NE8.4 Biodiversity Net Gain	Herts & Middlesex Badger Group (Planning and Biodiversity Manager - Mr Matt Dodds) [2332]	927 HMWT suggest that a statement requiring the integration of nesting and roosting features and to enable development to be permeable to wildlife be put into this policy. A suitable policy is: 'All buildings bordering open space or beneficial habitat must provide integrated bat or bird boxes within the fabric of the building. Gardens must be permeable to hedgehogs by providing hedgehog highways.'	Comment	Comment noted. The supporting text will be amended to reflect the proposed changes.	The supporting text has been amended to reflect the proposed changes.
Policy NE8.4 Biodiversity Net Gain	Herts & Middlesex Badger Group (Planning and Biodiversity Manager - Mr Matt Dodds) [2332]	1092 In order to support the application of a biodiversity net gain policy by using the Defra biodiversity impact calculator you will need an SPD which sets out the process developers and planners will need to go through. HMWT has prepared a template Biodiversity Accounting document for this purpose which you could adapt. We would be willing to help you to do this.	Comment	Comments noted. An SPD will be prepared when the Plan and the Environment Bill are adopted to support the policy.	No change.
Policy NE8.4 Biodiversity Net Gain	Herts & Middlesex Badger Group (Planning and Biodiversity Manager - Mr Matt Dodds) [2332]	1093 You should specify the Defra biodiversity impact calculator (or a locally approved calculator adapted from the Defra calculator) rather than just the biodiversity calculator. Being specific will avoid spurious calculators being proposed.	Comment	Comment noted. The relevant policy will be amended.	Policy NE9.8 Biodiversity has been updated to refer to the latest Natural England biodiversity metric.
Policy NE8.4 Biodiversity Net Gain	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1121 Will the condition of green/blue infrastructure be checked regularly and surveyed by the developer and council in order to ensure continued net biodiversity gain? Where biodiversity calculator states minimum 10% net gain this should be increased to minimum 20% where baseline is already low.	Comment	The 10% gain figure has been adopted to comply with emerging national policy.	No change.
Policy NE8.4 Biodiversity Net Gain	The Woodland Trust (Regional External Affairs Officer - Mr nick sandford) [3850]	1195 We welcome the commitment to biodiversity net gain but we would like to see this policy state explicitly that any irreplaceable habitats such as ancient woodland or ancient/veteran trees should only be damaged by or lost to development in wholly exceptional circumstances. This may be implied but we would like to see it stated in the policy to bring it into line with para 175c of the NPPF.	Object	Comment noted. Protection of irreplaceable habitats is covered in Paragraph 175C of the NPPF and should not be duplicated (as set out in Paragraph 16F of the NPPF). Reference has been made to protected species and habitat in the policy to signpost national policy and guidance.	No change.
Policy NE8.4 Biodiversity Net Gain	Environment Agency (Planning Advsior - Mr Theo Platts-Dunn) [3848]	1286 We support the inclusion of a biodiversity net gain policy. However this should be amended to recommend the most recent version of the Defra Biodiversity Metric which includes a separate River Metric.	Comment	Agree. The relevant policy will be amended to reflect the latest metric.	Policy NE9.8 Biodiversity has been updated to refer to the latest Natural England biodiversity metric.
Policy NE8.4 Biodiversity Net Gain	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1413 The Council will need to ensure the full costs of delivering such improvements are factored into the viability assessment. Our members are concerned that the cost of achieving a 10% improvement on some sites will be prohibitive and when considered against the cumulative costs arising from other policies such as affordable housing, electric vehicle charging points and improved energy standards could have an impact on the deliverability of the plan. As highlighted earlier the Council must ensure that the full costs of this policy, and all the others in the local plan, are included in the viability study. Given that the Government's proposals will require the delivery of bio-diversity net gain from all developments the Council may need to consider whether to reduce other policy requirements to ensure that developments can be considered viable without the need for further negotiation.	Comment	The 10% requirement to improve the biodiversity value of a site is emerging national policy (Environment Bill).	No change.

Policy NE8.4 Biodiversity Net Gain	Hertfordshire County Council (Martin Wells) [3559]	1689 Environment Resource Planning Unit (Ecology) This policy is supported; however, it is noted that the policy applies to major developments. Emerging government policy expects all developments, other than householder or permitted developments to deliver net gain, although a reduced approach is proposed for minor developments consistent with its scale of impact. In order to reflect this, it is suggested that the following wording should be included within the policy: "Major development should seek to achieve an overall net gain for biodiversity, which can be measured through the use of a recognised biodiversity calculator. The biodiversity calculator should aim to demonstrate an improvement of 10% or more from the existing situation. To avoid potential harm, compensation and mitigation measures must offset any losses to achieve a net gain for biodiversity, following the mitigation hierarchy. Where it is not possible to avoid or mitigate all impacts on site, local compensatory habitat or a development contribution should be achieved as a last resort. Net gain will be simplified for small developments but should seek to net gain without creating additional survey burdens."	Support	Comments noted. The policy will be updated to apply to all development, and will not make a distinction between major and minor development.	Policy NE9.8 Biodiversity has been amended to refer to new development.
Policy NE8.5 Managing Air Quality	Claire Jones [3435]	962 Policy states 'Where the Air Quality Assessment indicates that a development would cause harm to air quality, planning permission will not be granted unless appropriate mitigation measures are proposed to reduce the impact to acceptable levels.' The policy needs to define what is an acceptable level for clarity. Given the recognised health impacts of poor quality, it is considered if development can't be made air quality neutral through mitigation then it should not be granted planning permission.	Comment	Acceptable levels are defined in national policy and are referred to in the supporting text of the policy.	No change.
Policy NE8.5 Managing Air Quality	Extinction Rebellion Watford (Group member - Mr Jonathan Gilbert) [3617]	1065 As servants of the people of Watford, the council should be doing more to tackle toxic levels of air pollution in and around Watford. Actions should involve better monitoring of emission levels, implementation of much bolder car use reduction strategy particularly around the Town centre and along major roads, and creation of better public transport and active travel networks.	Comment	The Council monitors air quality at several locations across the borough. On Rickmansworth Road close to the Town Hall, there are 'real-time' analysers that collect nitrogen dioxide, PM10 and PM2.5 particle concentrations every 15 minutes. The Council also collects monthly nitrogen dioxide averages from 17 further sites across the borough. Data collected from this monitoring has evidenced the approach of the Local Plan. Although the Council are supportive of a modal shift, Hertfordshire County Council are the highways authority. These comments will be passed to them to support the growth set out in the Local Plan. Green Belt is not an environmental designation and its main purpose is to 'prevent urban sprawl by keeping land permanently open' (NPPF, 2019). Paragraph 137 of the NPPF states that "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". As Watford has demonstrated through the first iteration of the HELAA that the borough cannot meet its objectively assessed need on previously developed land, a review of the performance of the Green Belt is essential, in line with national policy. Green Belt which is considered to not be performing its function as an urban containment zone risks being released (although this does not imply that development is appropriate).	No change.
Policy NE8.5 Managing Air Quality	The Woodland Trust (Regional External Affairs Officer - Mr Nick Sandford) [3850]	1201 The policy needs to recognise the role of trees in combatting air pollution	Object	Comment noted. Supporting text will be amended to reflect the important role that trees can play.	The supporting text has been amended to reflect the important role trees play in mitigating against poor air quality.
Policy NE8.5 Managing Air Quality	Hertfordshire County Council (Martin Wells) [3559]	1690 Public Health The inclusion of this policy is supported, although it is considered that the wording within it could be strengthened through the inclusion of air quality guidance for development which sets out a clear approach with regards to exposure and introducing receptors (residents) to an area of poor air quality. Such guidance could also: • Provide a broader definition of vulnerable communities • Set the parameters for circumstances where a development results in the need to designate or extend an Air Quality Management Area.	Support	Comment noted. Vulnerable communities are defined in the supporting text. AQMAS are not designated through the Local Plan but by Environmental Health.	No change.
Policy NE8.6 Managing the Impacts of Development	Aggregate Industries UK Ltd [3743]	1140 Please refer to 'Firstplan Response on Behalf of Aggregate Industries UK Ltd to the First Draft Watford Local Plan' dated 07 November 2019 and sent via email to strategy@watford.gov.uk on 07 November 2019.	Comment	Comment noted. The policy will be amended to reflect the proposed changes.	Policy CC8.5 Managing the Impacts of Development has been amended to reflect some of the proposed wording.
Policy NE8.6 Managing the Impacts of Development	The Woodland Trust (Regional External Affairs Officer - Mr Nick Sandford) [3850]	1199 As mentioned previously, trees can have a significant effect in shielding peoples homes from noise pollution, light pollution and air pollution caused by traffic and/or industrial development. Trees also provide a range of other benefits as a bonus, including alleviation of flooding, urban cooling in summer and habitats for wildlife.	Comment	Comment noted.	No change.

Policy NE8.6 Managing the Impacts of Development	Environment Agency (Planning Advisor - Mr Theo Platts- Dunn) [3848]	1287 No reflection of vulnerability of groundwater in the Local Plan draft thus far.	Comment	Comment noted. Text will be amended to reflect proposed changes regarding Groundwater Source Protection Zones.	Policy CC8.5 Managing the Impacts of Development has been amended to include further requirements to avoid contamination of groundwater.
Policy NE8.6 Managing the Impacts of Development	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1440 We support the requirements set out within Policy NE8.6. It will be important to ensure that future occupiers of any development are not affected by existing uses or operations. Where development is being proposed within 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in close proximity to a pumping station.	Support	Noted. Further text will be added to detail issues with noise and vibration.	Further detail on noise pollution and vibration has been added to Policy CC8.5 Managing the Impacts of Development.
Policy NE8.6 Managing the Impacts of Development	Hertfordshir e County Council (Martin Wells) [3559]	1691 Environment Resource Planning Unit (Ecology) This policy is supported, as it seeks to mitigate against various forms of pollution, including light pollution.	Support	Support welcomed.	No change.
Policy NE8.6 Managing the Impacts of Development	Hertfordshir e County Council (Martin Wells) [3559]	1692 Environment Resource Planning Unit (Lead Local Flood Authority) Flooding should be added to the list of bullet points relating to the potential impacts that development may have on existing land uses, as there is the potential for an increased run-off from sealed surfaces. The following wording within the second bullet point of this policy should be amended, in order to ensure that the retrofitting of SuDS to assist with the management of flood risk at a catchment scale is considered.	Comment	This policy is designed to deal with risk of contamination and pollution. Flooding will be discussed in Chapter 9 of the Plan, which includes two policies related to flooding and drainage.	No change.
Policy NE8.6 Managing the Impacts of Development	Hertfordshir e County Council (Martin Wells) [3559]	1693 Minerals & Waste Planning This policy is fully supported and could be strengthened to include the need to produce a circular economy statement (or similar) regarding waste – covering construction, demolition and occupancy phases.	Support	Comment noted. The Council support the emerging Waste Local Plan and the requirement for applicants to produce circular economy statements. To avoid duplication with the Waste Local Plan, Policy CC8.3 Sustainable Construction and Resource Management makes reference to the issue and requires accordance with the Waste Local Plan.	Wording has been added to policy CC8.3 Sustainable Construction and Resource Management regarding circular economy statements to reflect the Waste Local Plan.
Chapter 9: Ensuring the Vitality of Town and Local Centres and Providing Communities with Facilities and Services	Cortland Partners (Cortland Partners) [3870]	1319 We agree that the provision of new infrastructure and improvement of existing facilities is critical to supporting growth. New development can act as the catalyst for both the delivery or funding of new infrastructure through s106 Agreements, on-site delivery and Community Infrastructure Levy. The Council needs to base its infrastructure need on a robust evidence base and then identify suitable locations and funding mechanisms for its delivery in consultation with the County Council, developers and landowners.	Comment	Support for this approach is welcomed. Viability assessment will be published alongside the next draft Local Plan.	No change.
Chapter 9: Ensuring the Vitality of Town and Local Centres and Providing Communities with Facilities and Services	Three Rivers District Council (Ms Claire May) [2389]	1763 The policies in this chapter are supported. The significance of Watford as a regional retail and leisure centre in South West Herts is recognised and it is considered that these policies will help to ensure that role is maintained and its offer to visitors/users enhanced.	Support	Support welcomed.	No change.

Policy V9.1 Vitality of the Town and Local Centres	RDI REIT (RDI REIT) [3872]	1321 Policy V9.1 Vitality of the Town and Local Centres requires all 'town centre use' applications over 350 sq. m (gross) that are not located in a centre or are not in accordance with the policies set out in the emerging Local Plan to undertake an Impact Assessment to demonstrate that there will be no adverse impact on the vitality and viability of the existing centres.	Comment	In light of the changing retail environment, changes to the Use Classes Order and the need for more flexibility this requirement has been removed. The Town Centre remains the focus for comparison shopping, leisure, entertainment, civic and cultural activities. The sequential test will be applied in line with the NPPF.	In light of the changing retail environment, changes to the Use Classes Order and the need for more flexibility this requirement has been removed.
Policy V9.1 Vitality of the Town and Local Centres	Legal & General Property Management (Legal & General Property Management) [3875]	1325 Policy V9.1 Vitality of the Town and Local Centres requires all 'town centre use' applications over 350 sq. m (gross) that are not located in a centre or are not in accordance with the policies set out in the emerging Local Plan to undertake an Impact Assessment to demonstrate that there will be no adverse impact on the vitality and viability of the existing centres.	Comment	In light of the changing retail environment, changes to the Use Classes Order and the need for more flexibility this requirement has been removed. The Town Centre remains the focus for comparison shopping, leisure, entertainment, civic and cultural activities. The sequential test will be applied in line with the NPPF.	In light of the changing retail environment, changes to the Use Classes Order and the need for more flexibility this requirement has been removed.
Policy V9.1 Vitality of the Town and Local Centres	LaSalle Investment Management (LaSalle) (n/a - n/a n/a n/a) [3044]	1418 Policy V9.1 relates to the Vitality of the Town and Local Centres. Below is the final limb of proposed policy V9.1. Proposals for development of town centre uses outside a centre must demonstrate compliance with the Sequential Test. Where these are 350 sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no adverse impact on the vitality and viability of the existing centres, and that good accessibility by walking, cycling and public transport is provided or available. In our opinion, there is potential conflict between Policy V9.1 and the Strategic Development Areas, particularly those on the edge of Watford Town Centre. We propose that Policy V9.1 is revised to acknowledge the role of Strategic Development Sites including for delivering mixed use schemes and intensifying existing uses which could include town centre uses such as retail, food and drink, etc. Our suggested change would be: Proposals for development of town centre uses outside a centre and outside a Strategic Development Area must demonstrate compliance with the Sequential Test. Where these are 350 sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to demonstrate there will be no adverse impact on the vitality and viability of the existing centres, and that good accessibility by walking, cycling and public transport is provided or available.	Comment	While it is acknowledged that some retail will be required in the SDAs this should be small-scale to support the new communities. The Town Centre remains the focus for comparison shopping, leisure, entertainment, civic and cultural activities. The sequential test will be applied in line with the NPPF. Improving connections between the SDAs and to the Town Centre is a key focus for the plan to ensure these uses remain accessible.	This chapter has been extensively redrafted to reflect the major changes to the Use Classes Order. However, the Town Centre remains the focus for comparison shopping, leisure, entertainment, civic and cultural activities. Text has been added to the SDA policies to reflect the importance of improving connections between the SDAs.
Policy V9.1 Vitality of the Town and Local Centres	Cassio Watford Ltd. (Cassio Watford Ltd) [3903]	1425 Policy V9.1 Vitality of the Town and Local Centre seeks to support the development of town centre uses within the defined centres, in accordance with the hierarchy. We support this approach.	Support	Support welcomed.	No change.

Policy V9.1 Vitality of the Town and Local Centres	Hertfordshire County Council (Martin Wells) [3559]	1696 Public Health Public Health is keen to discuss the inclusion of policy provisions which seek to encourage healthy food choices in the town centre and in local centres. Such a policy would look to encourage a balance in the range of, and avoid over-saturation of unhealthy, food outlets and ultimately, to enable individuals to make healthy choices whilst promoting local commercial diversity.	Comment	Noted. Restrictions can be added to hot food takeaways to promote healthy lifestyles.	It has been added to Policy VTS.3: Local Centres: "Applications for new hot food takeaway will be supported where they: a) Are located more than 400m walking distance from the entrance of an existing or permitted primary school; b) Retain a separation of at least four units between each hot food takeaway unit; and c) Protect the amenity of surrounding properties."								
9.5 Approach to Retail in the Town Centre	Hertfordshire County Council (Martin Wells) [3559]	1694 Paragraph 9.5.2 Highways & Transport It is suggested that walking and cycling is referred to in this paragraph as follows: "This need for adaption and diversification, together with good public transport, walking and cycling accessibility, makes the town centre appropriate for residential led or mixed use high density development."	Comment	Agree with this intention, the chapter is being redrafted in response to changes in the Use Classes Order and this paragraph has been removed. However, the importance of walking and cycling within the Town and Local Centres is reflected.	In light of the changing retail environment, changes to the Use Classes Order and the need for more flexibility this requirement has been removed.								
Policy V9.4 District and Local Centres	Claire Jones [3435]	963 The policy to protect local centres is welcomed. Local centres such as Villiers Road in Oxhey are of great importance to creating sustainable communities and promoting social cohesion.	Support	Support welcomed.	No change.								
Policy V9.4 District and Local Centres	S Hille & Co (Holdings) Ltd (Mr Ian Scheer) [3404]	1345 The St Albans Road frontage of the site forms part of the North Watford St Albans Road District Centre. Draft Policy V9.4 sets out requirements for development within the district shopping centre frontage including that the proportion of A1 use should not fall below 40% and the proportion of A Class uses should not fall below 75% of the total number of units. This is an overly prescriptive approach and could restrict the delivery of other main town centre uses to enable the centre to adapt and respond to changing retail trends and customer demands, in turn potentially undermining the competitiveness of the centre.	Comment	Noted. The policy has since been revised to reflect national changes to use classes.	Policy VTS.3 provides for more flexibility within the District Centre whilst also ensuring that new development continues to contribute positively to the function, vitality and viability.								
9.9 Infrastructure Provision	Berkeley Homes (Berkeley Homes) [3891]	1382 We agree that critical to supporting growth is the provision of new infrastructure and improvement of existing facilities where they will service the new development. New development can act as the catalyst for both the delivery or funding of new infrastructure through s106 Agreements, on-site delivery and Community Infrastructure Levy. The Council needs to base its infrastructure need on a robust evidence base and then identify suitable locations and funding mechanisms for its delivery in consultation with the County Council, developers and landowners.	Comment	Comment noted. The Infrastructure Delivery Plan has been prepared in consultation with HCC and will be available alongside the draft Local Plan consultation. In addition further detail will be added to the site allocations where appropriate.	Further detail on infrastructure requirements has been added to the SDA section where appropriate. This is supported by the detail in the Infrastructure Delivery Plan.								
9.9 Infrastructure Provision	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1408 Viability testing of local planning policies The NPPF 2019, at paragraphs 34 and 57, places significant emphasis on the testing of viability during the preparation of the Local Plan and the expectation that the cumulative impact of policies should not make the plan undeliverable and that decision makers can assume that planning applications that comply with all the policies in the local plan are viable. This position is reinforced by PPG which states at paragraph 10-002 that: "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan." The importance to be placed on Plan stage viability has never been more critical. The Government considers that this emphasis on viability at the plan making stage will inevitably mean the need for negotiation on an application by application basis will be reduced and will only occur where there has been a change in circumstance. Given this focus on viability testing at the plan making stage the Government have set out in PPG a recommended approach, including standardised inputs, that should be undertaken to support plan making. This provides a simple methodology to follow where a series of evidenced inputs steered by general parameters lead us to a residual land value where the range of local policy requirements are considered to be viable. If this is wrong or some of the key inputs are inappropriate it simply undermines the entire plan making process casting doubt on the deliverability of chosen allocations, creating further opportunities for speculative proposals, prolonged debate at EIP, delay and poorer planning. We could not find a viability study in the evidence base published alongside the draft local plan. The Council will be fully aware of the need for such a study but it is important that the viability considerations are made early in the preparation of the local plan is that they can inform policy development and ensure that the policy requirements in the plan do not undermine the deliverability of the plan. To assist authorities in understanding the inputs used by the housebuilding industry when considering development viability, the HBF has produced a short briefing paper which is attached to this response.	Comment	It is agreed that the viability assessment is a key consideration in policy development. As the PPG says viability assessments should be used to ensure that policies are realistic and the cumulative cost of policies will not undermine deliverability. As such draft policies are required to inform the viability assessment which then feeds into an iterative process of policy redrafting. The Local Plan viability assessment will be available alongside the next Local Plan consultation. The inputs from the briefing paper are noted, thank you.	Minor changes have been made to reflect the viability assessment which will be available alongside the Final Local Plan consultation.								

9.9 Infrastructure Provision	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	<p>1429 The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).</p> <p>DfE supports the principle of Watford Borough Council ('WBC') safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education. We would be happy to share examples of best practice.</p> <p>WBC should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27)3, DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan.</p> <p>Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools.</p>	Comment	Comment noted. DfE added to consultation database.	No change.
9.9 Infrastructure Provision	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	<p>1432 The latest available Infrastructure Delivery Plan is dated 2017. This includes proposed education requirements. However, it is possible that the position on this will have changed since then, and may change further prior to the adoption of the Plan. Therefore, as suggested in the document, the IDP should be updated with respect to the latest evidence base on need and demand for school places, and to reflect the latest openings and expansions.</p> <p>DfE would be particularly interested in responding to any update to the IDP, viability assessment or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.</p>	Comment	The updated Infrastructure Delivery Plan will be published alongside the draft Local Plan consultation. It will reflect updated education requirements. DfE added to consultation database.	No change.
9.9 Infrastructure Provision	Hertfordshire County Council (Martin Wells) [3559]	<p>1695 Paragraph 9.9.2</p> <p>Highways & Transport</p> <p>The second bullet point titled: 'Physical infrastructure' should be expanded as follows, so that it includes public transport infrastructure:</p> <ul style="list-style-type: none"> • Physical infrastructure: roads, footpaths, cycleways, water provision and treatment, sewerage, flood prevention and drainage, waste disposal, electricity, gas and electronic communications networks, bus interchanges, routes and stops. 	Comment	Agree. The paragraph will be updated as suggested.	Paragraph, now in Chapter 10 'Infrastructure, updated as follows: Physical infrastructure: roads, footpaths, cycleways, water provision and treatment, sewerage, flood prevention and drainage, waste disposal, electricity, gas and electronic communications networks, bus interchanges, routes and stops.
9.9 Infrastructure Provision	Hertfordshire County Council (Martin Wells) [3559]	<p>1710 Community Protection</p> <p>Hertfordshire Fire and Rescue Services (HFRS) has two fire stations within Watford Borough:</p> <ul style="list-style-type: none"> • Watford: a relatively new station which has two permanently crewed fire engines and also houses one HFRS's Aerial Ladder Platforms. • Garston: houses a single fire engine and is crewed on a permanent basis. <p>No changes are anticipated at the present time to the provision of HFRS facilities in the Borough, although the possibility of re-locating stations would be considered, should an opportunity arise in the future that is both economically and operationally viable.</p> <p>HFRS does not consider that there is a need for 'additional' Fire Stations in the borough to support the indicated housing numbers and development locations. However, HFRS requests to be consulted on requirements for the provision of water supplies, e.g. suitable and sufficient water mains and hydrants, and recommend the placement of sprinkler systems in all buildings and new developments to form part of an integrated fire safety provision. This is particularly important, due to the increase in tall buildings that are likely to occur during the plan period.</p>	Comment	Comment noted. This is reflected in the updated Infrastructure Delivery Plan which deals with the provision of water supplies.	No change.

9.9 Infrastructure Provision	Hertfordshire County Council (Martin Wells) [3559]	1714 Children's Services (Early Childhood Services) Current situation and Context Section 6 of the Childcare Act 2006 places a duty on all local authorities to secure sufficient childcare for working parents, or parent, who are studying or training for employment for children aged 0 to 14 (19 years for children with special educational needs and disabilities (SEND)). HCC also has a statutory responsibility to provide universal Free Early Education (FEE) for 3- and 4-year olds. Since September 2013 HCC has had a statutory responsibility to provide 15 hours FEE to eligible vulnerable 2-year-old children across Hertfordshire. In September 2017 a new extended entitlement of an additional 15 hours free childcare was introduced for working parents in Hertfordshire. HCC is currently working on the likely demand across the county linked to the number of places available. Consequently, demand for these services is forecast to increase, in addition to the increasing population of young children in the county. Provision for this new entitlement will be within schools preschools and day nurseries and childminders. In addition to FEE places, HCC has a duty to ensure there are sufficient childcare places for 0 to 14-year-old children (age 19 for children with SEND) in preschools, day nurseries and out of school clubs, which can run either from school locations or other community facilities. Identified Infrastructure requirements Watford is the third most deprived area in the county and the number of working households is significantly higher than other areas of the county. The demand for the new extended childcare entitlement will be high and additional childcare provision will be required in those areas identified as insufficient or near to sufficient to support this new demand. If more private housing is developed than the demand for these places will increase further. Over 40% of the Watford area falls into the lowest 30% deprived area in the County. As the 2-year-old FEE is only available for disadvantaged children, this indicates that the need for these places will be higher in these areas than the rest of the County. Consequently if more social housing is created in Watford the demand for this type of free early education will increase in line with this category of family	Comment	Comment noted, the Council will continue to engage with HCC on this issue in preparation of the Infrastructure Delivery Plan.	No change.
9.9 Infrastructure Provision	Paulett Mcewan [3925]	1728 I understand that the government have said we have to build new houses , I have lived on the Meriden all my life and the school was knocked down to make way for houses . The children were relocated to Berry Grove School. The old factories were also knocked down next to Sainsburys and houses and flats built . The children from these new buildings also go to Berry Grove . There are two local Doctors surgeries that are already straining under the amount of people they have to see . God help you if your ill and cant wait three weeks for an appointment. But its the children - they are supposed be the future - the secondary schools are over subscribed , the juniors and infants fighting for a place . You can build as many houses as you like - they are cash cows for local government - but the future will show how the children have been neglected when no one can pass an exam because there are too many in a class to be able to learn properly. Forward planning is about quality of life and while I understand we all need a place to live , we need to be able to live too.	Comment	Comment noted. The Council will continue to work with HCC and other infrastructure providers to safeguard sites and enable infrastructure provision including for schools and GPs. The Local Plan provides an opportunity to improve quality of life within Watford and guide development to come forward in a coordinated manner making the best and most appropriate use of land to meet the needs of the community. New development will take opportunities to provide infrastructure including education, in addition improved routes will provide better cycling and walking access to services and facilities.	No change.
9.9 Infrastructure Provision	Herts Valleys CCG (Premises and Estates Support Manager - Ms Annely Robinson) [3575]	1731 INTRODUCTION The Health and Social Care Act 2012 introduced significant changes to the way healthcare is provided and to the organisational structure of the NHS in England. On 1 April 2013 commissioning of healthcare became the responsibility of NHS England and 211 Clinical Commissioning Groups who commission health care from providers such as Acute Hospital Trusts, Community Health Trusts, Mental Health Trusts and General Medical Practitioners. Hertfordshire Valleys Clinical Commissioning Group (HVCCG) is the CCG covering healthcare commissioning in the DBC area and following a period of years that it shared a joint commissioning role with NHSE, on 1 April 2017, HVCCG took on fully delegated commissioning from NHSE. PRIMARY CARE Herts Valleys CCG currently has 58 GP Practices across 4 localities covering a population size of circa 652,739; Dacorum, Hertsmere, St Albans and Harpenden and Watford and Three Rivers. The number of GP Practices has reduced over the last few years through practice mergers and the closure of a practice in Dacorum. Since 1 October 2019, the CCG has delivered additional GP and nurse appointments (extended access) every weekday evenings, Saturday, Sundays and Bank Holidays. These services are delivered from existing GP Practices and also the Hemel Hospital Site; further utilising the existing premises infrastructure. The CCG commissions a number of services from general practice in addition to their "core" general medical services which are all delivered at practice level from within their premises. The NHS Long Term Plan sets out a requirement for practices to form Primary Care Networks (PCNs). NHS England have agreed an Enhanced Service to support the formation of PCNs, additional workforce and service delivery models for the next 5 years and CCGs were required to approve all PCNs within their geographical boundary by 30 June 2019. In Herts Valleys CCG there are 16 PCNs across the 4 localities; each covering a population of between circa 30,000 and 76,000 patients. There are 4 PCNs in the Watford district and the practice membership is detailed below: PCN NAME PRACTICE NAME Grand Union • Bridgewater House Surgeries (including branches at Meriden and North Approach)	Comment	Thank you for this useful information, it will be fed into the Infrastructure Delivery Plan (IDP). The IDP is used to prioritise CIL spending in line with the published governance. You will be aware the tariff based section 106 agreements are no longer supported and therefore CIL is the appropriate funding stream. It must be noted however that CIL will not pay for all infrastructure required.	The information provided has been fed into the Infrastructure Delivery Plan.
Policy V9.5 Infrastructure Provision	Sport England (Planning Manager - Mr Roy Warren) [3671]	993 As policy V9.5 was drafted before the Council's emerging Playing Pitch Strategy (which will form part of the Council's evidence base) was completed no reference is made to this strategy and the community sports infrastructure priorities that it is expected to identify. Given the importance of outdoor sports infrastructure for meeting the local plan's broader health and well-being strategic objectives, it is requested that both the policy and paragraph 9.9.2 include community outdoor sports facilities in the examples of priorities and infrastructure as there is currently no reference to outdoor sport.	Comment	The Playing Pitch Strategy forms part of the evidence base and outcomes will be incorporated into the Local Plan and the Infrastructure Delivery plan.	Findings from the Playing Pitch Strategy have been incorporated into the Local Plan chapter 9 "Conserving and Enhancing the Environment" and into the Infrastructure Delivery Plan.

Policy V9.5 Infrastructure Provision	IDA Plymouth Holdings Ltd. [3888]	1367 Draft Policy V9.5 sets out that development proposals will be required to demonstrate that there is sufficient capacity in the infrastructure network for the proposals to come forwards. Again, this relates to draft policy SD2.6 and whether a development is viably able to provide additional infrastructure contributions over and above other policies in the local plan and any CIL liability.	Comment	The Local Plan is subject to viability assessment which includes an assessment of the cumulative impact of policy requirements. It is considered however that sufficient infrastructure must be demonstrated to ensure the deliverability of sites and as such any costs should be considered in the price paid for the land. The viability assessment will be available alongside the draft Local Plan consultation.	No change.
Policy V9.5 Infrastructure Provision	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1414 Whilst we have no objection to public art being provided in agreement with the developer such projects as stated in the last bullet point of policy V9.5 cannot be considered to be consistent with regulation 122 of the CIL regulations 2010 or paragraph 56 of the NPPF. They may be nice to have but they are not required to make a development acceptable in planning terms. Recommendation The final bullet point should be deleted as the provision of public arts projects does not confirm with	Comment	It is considered that such projects may be appropriate for funding by the neighbourhood portion of CIL, however it is not appropriate for the Local Plan to allocate CIL funding. Infrastructure required to support the growth outlined in the Local Plan is set out in the Infrastructure Delivery Plan. Allocation of CIL funding will be in line with updated CIL governance and comply with the CIL regulations.	Policy redrafted as IN10.2 Providing Infrastructure to Support New Development. Infrastructure provision is required to reflect the Infrastructure Delivery Plan which prioritises infrastructure projects to support the growth set out in this Local Plan.
Policy V9.5 Infrastructure Provision	Department for Education (Forward Planning Manager - Phoebe Juggins) [3772]	1427 DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure at Policy V9.5 and the reference to the expectation that developers ensure there is sufficient infrastructure capacity.	Support	Support welcomed.	No change.
Policy V9.5 Infrastructure Provision	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1435 Since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for each new property connected. Wastewater treatment works infrastructure upgrades will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation. In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land and water courses. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme. We therefore support the content of Policy V9.5	Support	Support welcomed.	No change.
Policy V9.5 Infrastructure Provision	Hertfordshire County Council (Martin Wells) [3559]	1697 Environment Resource Planning Unit (Lead Local Flood Authority) The following wording within the second bullet point of this policy should be amended, in order to ensure that the retrofitting of SuDS to assist with the management of flood risk at a catchment scale is considered. • On site green infrastructure and connectivity to the wider network including the retrofitting of SuDS to assist with management of flood risk at a catchment scale;	Comment	Comment noted, this will be reflected in Chapter 9 'Conserving and Enhancing the Environment'.	Chapter 10 'Infrastructure' has been redrafted and while the policy sets the framework for infrastructure provision, detail on surface water management is set out in Policy NE9.5 and supporting text in chapter 9 "Conserving and Enhancing the Environment".
Policy V9.5 Infrastructure Provision	Hertfordshire County Council (Martin Wells) [3559]	1698 Highways & Transport Bullet point 3 is welcomed, which states: 'Sustainable transport using the safeguarded Metropolitan Line Extension route and projects set out in LTP4 and related strategies.' This includes also includes the South West Herts Growth & Transport Plan (GTP, and any future revisions) as a supporting document of LTP4. It would be helpful to confirm that other transport plans and strategies which may come forward and to help to deliver LTP4 policies should have the same status and significance for the IDP on their adoption. This includes the South West Herts Cycling Strategy and any future revisions or replacements, strategies or plans linked to the Bus Strategy which may include bus infrastructure improvements, transport corridor and route strategies, etc.	Support	Support welcomed. Reference will be added to additional transport plans and strategies that may come forward. The Infrastructure Delivery Plan is an evidence base to support the Local Plan directly. While the strategies suggested relate to Hertfordshire County Council they may not have the same weight within Watford's Local Plan, however, the Local Transport Plan is integral to achieving the objectives set out in the Local Plan In this regard, it will be an important consideration although it may not be material unless adopted by Watford Borough Council.	References to transport plans and strategies have been added where appropriate, mainly in Chapter 11 'A Sustainable Transport Town'.. In addition ongoing consultation with HCC in preparing the Infrastructure Delivery Plan supporting evidence document has included references to up-to-date transport strategies and projects wherever possible.

9.10 Quality Communications	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	<p>1436 Since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for each new property connected. Wastewater treatment works infrastructure upgrades will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.</p> <p>Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation. In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land and water courses. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.</p> <p>We therefore support the content of Policies V9.5 and V9.6 and the supporting text in paragraph 9.10.2. Notwithstanding this, there is considered to be a lack of clarity over the infrastructure that the text applies to with the heading in 9.10 referring to 'Quality Communications' and referencing communications technology alongside reference to utility providers. It is considered that the text could make it clearer that the requirements relate to all utilities providers including sewerage undertakers.</p> <p>It is also considered that paragraph 9.10.2 could be expanded as set out below to make it clear that planning conditions will be used where necessary to ensure that development or a relevant stage of development is not occupied ahead of the delivery of any necessary infrastructure.</p> <p>"9. 10. 2. For a scheme to be successful and be able to adapt to future technological changes, developers are expected to engage with utility providers early in design process. This enables all stakeholders to understand as early as possible if, and where, there may be a need for additional capacity in the network. It provides opportunities for development to be designed in such a way as to support the provision of utilities. Where necessary planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades."</p> <p>We would welcome the Council's support in encouraging developers to liaise with us prior to the submission of any planning application to assist with the identification and planning of any necessary infrastructure upgrades. Developers can request information on network infrastructure and access our free pre-planning service by visiting the Thames Water website at:</p>	Comment	<p>Comment noted, the text will be amended to reflect the points made.</p> <p>The Council welcome the commitment for ongoing collaborative working with Thames Water.</p>	<p>Quality Communications is now a sub-heading within the section on providing infrastructure to support new development.</p> <p>Policy IN10.1 requires developers to engage early with infrastructure service providers to understand as early as possible if, and where, there may be a need for additional capacity in the network.</p> <p>Where necessary planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades</p>
9.11 Cultural and Community Facilities	Hertfordshire County Council (Martin Wells) [3559]	<p>1703 Youth Connexions' main venue in Watford is Youth Point, which is considered to be large enough to accommodate the anticipated growth in population of young people in the borough. It would be desirable to have access to other venues suitable for youth work across Watford, but HCC are not looking to operate any other venues for ourselves.</p> <p>Many young people using HCC services cycle to projects. The county council would be keen to see an improvement to the quality and continuity of cycling routes across Watford to encourage this.</p>	Comment	<p>Comment noted. The Council is improving the quality and linkages of cycle route across the borough. This is discussed further in Chapter 11 A Sustainable Transport Town. The council is preparing a Local Cycling and Walking Implementation Plan which will assist with identifying local routes and infrastructure required to support these. This is being reflected in the Infrastructure Delivery Plan.</p>	No change.
9.11 Cultural and Community Facilities	Hertfordshire County Council (Martin Wells) [3559]	<p>1706 Library Services</p> <p>Provision of public libraries is a statutory requirement. HCC is committed to maintaining and modernising libraries across the Borough to continue to meet the changing needs of service users and to cope with additional demand brought about by new development.</p> <p>In 2016 the Libraries Taskforce, which was set up by the Department for Culture, Media and Sport and the Local Government Association, published "Libraries Deliver: Ambition for Public Libraries in England, 2016–2021." The report recognises that libraries enrich communities and change lives for the better and that they have a critical role in helping people to realise their potential, especially those from disadvantaged backgrounds.</p> <p>Libraries across the Borough function as community hubs offering services and facilities to cater for a range of community needs including those of children, students, job seekers, and the elderly. They offer free, authoritative, non-judgemental information services and supported access to online resources and services, as well as providing access to books, DVDs, magazines, community language material, computers and the internet, an online reference service, ICT-based and other learning opportunities. They are neutral places that promote community health and wellbeing.</p> <p>HCC's Strategy for Libraries Inspiring Libraries is HCC's strategy for the Library Service up to 2024. The strategy sets out the vision and direction for the service and provides a framework for future decisions about service priorities. The strategy is based on three main themes:</p> <ul style="list-style-type: none"> • The library as a vibrant community asset; • The digital library; and • The library as an enhanced gateway to reading, information and wellbeing. <p>From December 2019 library services will be delivered on behalf of HCC by the charity Libraries for Life. Inspiring Libraries will continue to be the strategy under which Libraries for Life will deliver library services to Hertfordshire communities. Libraries will continue to be promoted in three different tiers to ensure clarity of the services available to communities.</p> <ul style="list-style-type: none"> • Tier 1 libraries will continue to be centrally located in large towns and will offer the broadest range of stock and 	Comment	<p>Comment noted. The additional information provided is appreciated.</p>	No change.

Policy V9.7 Community Facilities	Claire Jones [3435]	964 Given pressure for residential development it is considered an 'agent of change' policy is needed to protect cultural venues and the evening and night time economy. This puts the responsibility of mitigating impacts on new development. Oxhey Village historically has lost many public houses. At Bushey the Royal Oak, which had recently undergone refurbishment, was under threat from conversion to residential. It is not only vacant pubs which are under threat from redevelopment to higher value uses, but viable pubs which are valued by the community. Consistent with many other councils Watford should take forward a public house protection policy.	Object	Support in principle is welcomed, the Council can refer to Watford specific assets. It is agreed that an 'agent of change' principle should be added to the plan. The council appreciate that pubs are going through a turbulent time and acknowledge the very real and important service they provide to many communities. However, there are limitations to what can be done with planning policy. Stretched resources with a host of competing priorities makes it challenging for councils to take action in this one area. The intention is to protect pubs, where they provide significant social infrastructure and community facilities through policy V9.7. The onus will be on potential developers to demonstrate where a facility is no longer needed, or that facilities can be reprovided. Explicit references can be made to pubs as community facilities in this policy.	Policy CC8.5 Managing the Impact of Development requires consideration of the 'agent of change principle'. Robust criteria to justify loss of existing facilities added to Policy HC12.3. This will include evidence of marketing in line with Appendix F and that the facility is no longer needed . Explicit reference to pubs as community facilities has been added to the supporting text of Policy HC12.3.
Policy V9.7 Community Facilities	Mr Eddie Page [3665]	968 I agree with this principal but the plan contradicts this by developing on the site of the Badger pub on the Meriden estate - this pub has been a focal point of community activity for decades.	Comment	The Council appreciate that pubs are going through a turbulent time and acknowledge the very real and important service they provide to many communities. However, there are limitations to what can be done with planning policy. Stretched resources with a host of competing priorities makes it challenging for Councils to take action in this one area. The intention is to protect pubs, where they provide significant social infrastructure and community facilities through revised policy HC12.3. The onus will be on potential developers to demonstrate where a facility is no longer needed, or that facilities can be reprovided. Explicit references can be made to pubs as community facilities in this policy.	Robust criteria to justify loss of existing facilities added to Policy HC12.3. This will include evidence of marketing in line with Appendix F and that the facility is no longer needed . Explicit reference to pubs as community facilities has been added to the supporting text of Policy HC12.3.
Policy V9.7 Community Facilities	Sport England (Planning Manager - Mr Roy Warren) [3671]	994 Policy V9.7 is broadly supported but the wording of the policy should be amended to recognise that enhanced community facilities should be assessed like new sports facilities and the wording on reprovided facilities should be amended for consistency with paragraph 97 of the NPPF.	Object	Support welcomed. Policy HC12.3 Built Cultural and Community Facilities has been amended to include reference to improved facilities. Robust criteria to justify loss of existing facilities added to Policy HC12.3. The onus will be on potential developers to demonstrate, with evidence, where a facility is no longer needed or that facilities can be reprovided. Marketing evidence will be required in line with Appendix F.	Reference to improved facilities added to Policy HC12.3: Built Cultural and Community Facilities. Criteria to justify loss of existing facilities also added to Policy HC12.3. This will include evidence of marketing in line with Appendix F and that the facility is no longer needed.
Policy V9.7 Community Facilities	The Theatres Trust (Mr Ross Anthony) [2388]	1187 We support this policy but encourage the setting out of robust criteria to justify loss.	Support	The Council appreciate that pubs are going through a turbulent time and acknowledge the very real and important service they provide to many communities. However, there are limitations to what can be done with planning policy. Stretched resources with a host of competing priorities makes it challenging for Councils to take action in this one area. The intention is to protect pubs, where they provide significant social infrastructure and community facilities through revised policy HC12.3. The onus will be on potential developers to demonstrate where a facility is no longer needed, or that facilities can be reprovided. Explicit references can be made to pubs as community facilities in this policy.	Robust criteria to justify loss of existing facilities added to Policy HC12.3. This will include evidence of marketing in line with Appendix F and that the facility is no longer needed . Explicit reference to pubs as community facilities has been added to the supporting text of Policy HC12.3.
Appendix A: Monitoring Framework	Hertfordshir e County Council (Martin Wells) [3559]	1699 Environment Resource Planning (Lead Local Flood Authority) With regard to the indicator associated with Policy CC6.2, it should be noted that the Lead Local Flood Authority is a statutory consultee with regard to planning applications. Drainage Strategy reports and Flood Risk Assessments are assessed, and advice is given to the relevant Local Planning Authority (LPA) on surface water management and flood risk arising from new major developments and whether a proposed drainage scheme complies with the relevant technical standards and policies. The Lead Local Flood Authority's technical advice to the LPA is based and supported on data of confirmed and predicted flood risk. The view of the Lead Local Flood Authority is that new developments need to manage surface water without increasing flood risk within the area or to the surrounding vicinity. For this reason, the wording the Monitoring Indicator should be revised as follows: "Number of objections to planning applications granted against the Environment Agency and/or Lead Local Flood Authority advice"	Comment	Comment noted. Text to be amended as suggested.	Monitoring amended to reference the number of objections to planning applications granted against the Environment Agency and/or Lead Local Flood Authority advice.
Policy H4.2 Housing Mix	Wenta . [3738]	1044 The mix of housing in new developments is important; this should be varied across sites to provide new balanced communities. Watford has a higher percentage of flats and maisonettes than other Hertfordshire Authorities and according to the SHMA the highest need is for 2 and three bedroom properties. Mixed Use development can assist in delivering this need with the provision of 2 bedroom flats above employment uses.	Support	Agree that mixed use development can, and should, contribute towards a mix of housing that will meet the needs of the borough.	Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' the final draft Local Plan sets out a requirement for 20% of new homes to be family sized. This can be met as either the affordable housing requirement of the market element of a scheme.

Policy H4.2 Housing Mix	Cortland Partners (Cortland Partners) [3870]	1309 As stated in paragraph 1.15.2, Watford has a relatively young population. This provides a high demand for smaller units for individuals leaving home and young professionals priced out of London. A demand also exists for elderly people downsizing from larger homes. We request that as part of Draft Policy H4.2, the Council delivers a flexible approach to its housing mix taking into account site specific locations and characteristics. Figure 9 of the Draft Local Plan sets out housing mix needs for the entire Borough, without consideration of location. As set out in paragraph 4.7.1, there should be a focus on family accommodation within suburban areas and smaller apartment led developments within higher density sustainable locations in close proximity to public transport opportunities. However, it is imperative to ensure that a balance of accommodation is achieved on all sites and which meets Watford identified demographic housing needs.	Comment	Agree that mixed use development can, and should, contribute towards a mix of housing that will meet the needs of the borough. The draft plan does not seek to be overly prescriptive when it comes to housing mix in specific areas. The strategy for growth is based on two areas, the Core Development Area and areas outside of this. Housing density is lower in areas outside of the Core Development Area which should support more family sized dwellings being delivered.	Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' in the final draft Local Plan sets out a requirement for 20% of new homes to be family sized. This can be met as either the affordable housing requirement of the market element of a scheme. Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have also been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
Policy H4.2 Housing Mix	IDA Plymouth Holdings Ltd. [3888]	1360 Draft Policy H4.2 sets out that proposals are to provide a proportionate mix of homes of different types and sizes. The policy identifies the mix of unit sizes for market, affordable home ownership and affordable rent required across the plan period with the preference for family sized homes. It is thought the town centre could accommodate a wider variety of unit sizes and a greater capacity for smaller 1 and 2 bed homes, particularly in high sustainability areas where there good access to public transport. It is recognised that a level of family sized accommodation is required to create a mixed and balanced community however there is opportunity to create better quality family sized accommodation outside of the town centre where access to private garden space is perhaps better available. Within the high sustainability areas, Policy H4.2 states that 3 bed units should take the form of ground floor duplexes or maisonettes. This is likely to be problematic for a number of reasons including design, retention of an active frontage, defensible space and general accessibility for residential development such as those evolving for 23 – 37 The Parade, where the area at ground floor level is likely to be occupied by commercial uses or fronts busy roads. It is suggested that some flexibility in this policy is provided to allow for the consideration of site specific circumstances that may mean a deviation from this part of the policy.	Comment	Agree that further clarity about housing mix in the town centre would improve the implementation of the policy.	Policy CDA2.2 'Town Centre Strategic Development Area' has been revised along with the supporting text to provide more clarity about the types of development expected in the town centre.
Policy H4.2 Housing Mix	Berkeley Homes (Berkeley Homes) [3891]	1371 As stated in paragraph 1.15.2, Watford has a relatively young population. This provides a high demand for smaller units for individuals leaving home and young professionals priced out of London. A demand also exists for elderly people downsizing from larger homes. We request that as part of draft Policy H4.2, the Council delivers a flexible approach to its housing mix taking into account site specific locations and characteristics. Figure 9 of the Draft Local Plan sets out housing mix needs for the entire Borough, without consideration of location. As set out in paragraph 4.7.1, there should be a focus on family accommodation within suburban areas and smaller apartment led developments within more central locations in close proximity to public transport. However, it is imperative to ensure that a balance of accommodation is achieved on all sites and which meets Watford identified demographic housing needs. We note that Policy H4.2 sets out that in "High Sustainability Zones, 3 bed units should take the form of ground floor duplexes or maisonettes with each having its own ground floor access". To achieve high density, mixed use and tenure developments in these Zones and to meet the targets set out in Figure 3, a more flexible approach is required to the location of 3 bed homes. This paragraph should be deleted from the policy.	Comment	Agree that mixed use development can, and should, contribute towards a mix of housing that will meet the needs of the borough. The draft plan does not seek to be overly prescriptive when it comes to housing mix in specific areas. The strategy for growth is based on two areas, the Core Development Area and areas outside of this. Housing density is lower in areas outside of the Core Development Area which should support more family sized dwellings being delivered. This is complemented with criteria set out in Chapter 6 'An Attractive Town'.	Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' in the final draft Local Plan sets out a requirement for 20% of new homes to be family sized. This can be met as either the affordable housing requirement of the market element of a scheme. Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have also been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.
Policy H4.2 Housing Mix	Home Builders Federation (Planning Manager - Local Plans - Mark Behrendt) [3898]	1410 We recognise and appreciate the need to deliver a mix of new homes to meet the varied needs of an area's population. However, the approach to considering mix is undertaken on an Borough wide basis and as such it is inappropriate to require all sites to deliver that mix regardless of size, location and the more localised need for housing in different sub markets. We would suggest that most effective approach to delivering a mix of homes is the allocation of a wide variety of sites in terms of both size and location. The Council should therefore not seek to require all sites to provide a mix of housing types and sizes that is in line with those set out in table 4.7. Such an approach is too prescriptive and does not provide the necessary flexibility to ensure that sites can come forward with the appropriate types of housing for that specific location. Recommendation That the opening paragraph is amended to read: Major proposals for residential development are required to provide a proportionate mix of home types and size having regard to the type of homes needed in the Borough. Proposals that achieve a well-balanced and proportionate mix of housing will be supported where they also comply with other relevant policies.	Comment	The variety of sites identified in the land reflects facing the Local Authority when allocating land for new development. Agree that mixed use development can, and should, contribute towards a mix of housing that will meet the needs of the borough. The draft plan does not seek to be overly prescriptive when it comes to housing mix in specific areas. The strategy for growth is based on two areas, the Core Development Area and areas outside of this. Housing density is lower in areas outside of the Core Development Area which should support more family sized dwellings being delivered. This is complemented with criteria set out in Chapter 6 'An Attractive Town'.	Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' in the final draft Local Plan sets out a requirement for 20% of new homes to be family sized. This can be met as either the affordable housing requirement of the market element of a scheme. Requirements in Policy HO3.2 "Housing Mix, Density and Optimising Use of Land' have also been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility.

Policy H4.2 Housing Mix	Telereal Trillium (Telereal Trillium) [3915]	1537 The development proposals for the Site will include a suitable mix of housing which is appropriate to the town centre location. The draft policy wording should not include rigorous requirements which could prevent the delivery of development sites. For example, the suggested wording relating to the High Sustainability Zone and the provision of 3 bed units on the ground floor should consider sites such as this where there exists a desire to include non-residential floorspace which would be most appropriate on the ground floor to achieve the aspirations of other draft policies (i.e. SD2.9) to provide active ground floor frontages. Housing mix is impacted by a site's location, context, proximity to amenities and the ultimate need to ensure the viability of the proposed development. The policy should therefore take account of this and therefore, similar to comments relating to density, should include a degree of flexibility to allow for successful delivery of development sites. The Site is located in the Town Centre and considered appropriate for higher densities and therefore smaller units are considered most appropriate initially. It is proposed that the wording of the policy is amended to read: 'All proposals are required to provide a proportionate mix of home types and sizes. Proposals will especially be supported that achieve a well-balanced and proportionate mix of housing which take account of the mix requirements set out in Figure 7 and 9 and also comply with other relevant policies in the Local Plan.'	Comment	when allocating land for new development. Agree that mixed use development can, and should, contribute towards a mix of housing that will meet the needs of the borough. The draft plan does not seek to be overly prescriptive when it comes to housing mix in specific areas. The strategy for growth is based on two areas, the Core Development Area and areas outside of this. Housing density is lower in areas outside of the Core Development Area which should support more family sized dwellings being delivered. This is complemented with criteria set out in Chapter 5 'A Vibrant Town' and Chapter 6 'An Attractive Town' which encourage active and positive frontages that support a variety of uses, both residential and non-residential.	Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' in the final draft Local Plan sets out a requirement for 20% of new homes to be family sized. This can be met as either the affordable housing requirement of the market element of a scheme. Requirements in Policy HO3.2 'Housing Mix, Density and Optimising Use of Land' have also been revised to be a more design led approach and the densities set out are to be treated as a starting point to provide flexibility. Policy CDA2.2 'Town Centre Strategic Development Area' and Policies QD6.2 'Design Principles' and DQ6.4 'Building Design' have been revised to provide more guidance about how different types of uses and how these should be considered as part of a new development.
Policy H4.2 Housing Mix	Three Rivers District Council (Ms Claire May) [2389]	1753 We agree that duplexes and/or maisonettes on the ground floor with their own access would be a good way of delivering family homes in high sustainability areas, however this does not mean that three bed properties may not also be appropriate on other levels.	Comment	Support welcomes and comment noted. A mix of dwelling sizes is encouraged on any storey within a development, not just the ground floor.	No change.
Glossary	Hertfordshire County Council (Martin Wells) [3559]	1700 Travel Plan Highways & Transport With regard to the Travel Plan definition, it is considered that the definition stated within the Glossary, is tallied with the definition in HCC's guidance (www.hertfordshire.gov.uk/travelplans), which states: '...a long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and which is regularly reviewed.' This is based on the Department for Transport's definition. HCC's guidance goes on to say: 'Travel Plans are unique to each development and identify a package of measures to be applied at the specific location to improve accessibility and encourage use of sustainable modes of travel. Travel Plan implementation is an ongoing process requiring regular monitoring, review and adjustment to ensure agreed targets are met.'	Comment	Comment noted. Text to be amended as suggested.	Definition of Travel Plan in Glossary to be changed; 'Travel Plans are unique to each development and identify a package of measures to be applied at the specific location to improve accessibility and encourage use of sustainable modes of travel. Travel Plan implementation is an ongoing process requiring regular monitoring, review and adjustment to ensure agreed targets are met.'
H1 Land and Garages at Lych Gate	Ms susan wilkins [3619]	934 as a resident this is going to cause even more parking misery for those of us who live in lych gate. the garages are all in constant use cars are having to park both sides of the road making it difficult for deliveries, services and emergency vehicles, we already spill into the glebe for parking. with the loss of garages plus new development where are additional vehicles going to park? this land since existing properties built in 1962 was used for parking until sealed off and is clearly marked on the title deeds as PARKING should be reinstated.	Object	Comments noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H1 Land and Garages at Lych Gate	Miss Natalie Walsh [3636]	941 Firstly this plan was not distributed to the residents, thankfully a neighbour advised so I can have my say, which is shocking considering it affects us greatly. I strongly object to these plans for several reasons; Parking, there isn't enough spaces currently, let alone with more houses and less garages. Building work, will cause vast upheaval (dust, mess, rodents etc.) It will greatly affect the value of my house. Significant less air and light. Everyone living on top of each other. Congestion and limited access, which was why the initial plan years ago was declined.	Object	The Council used a broad range of methods to engage the community in the Local Plan. These methods used to publicise this consultation are detailed in the Consultation Statement. Parking issues are noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Loss of light and design issues such as access are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Planning conditions are placed on any planning approval to limit the impacts on construction on residents.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H1 Land and Garages at Lych Gate	Mr andrew wilson [3708]	1010 Illegal land grab Lack of maintenance by LPM Congested parking already No parking for visitors No parking for disabled	Object	Concerns noted. Ongoing maintenance issues with a private contractor are not issues that the Local Plan, or that Watford Borough Council are able to address. Parking issues are noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H1 Land and Garages at Lych Gate	Ms susan wilkins [3619]	1078 PARKING IS ALREADY A PROBLEM IN THIS AREA GARAGES ARE IN CONSTANT USE ACCESS IS ALREADY POOR DELIVERY VEHICLES AND EMERGENCY VEHICLES AND SERVICES AT TIMES UNABLE TO GET ACCESS OTHER PROPERTIES ALONGSIDE AND OPPOSITE WILL BE OVERLOOKED AND WILL ALSO BLOCK AIR AND LIGHT WHEN THE PROPERTIES WERE BUILT IN 1962 THE LAND WHICH IS CLEARLY MARKED ON THE DEEDS AS PARKING SHOULD BE RESTORED BACK TO ITS INTENDED PURPOSE PARKING THE CURB IS ALREADY DROPPED WHICH INDICATES THIS.	Object	<p>Parking issues are noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. There is also a development consideration in the Local Plan which requires access to the existing garages at Lych Gate to be retained.</p> <p>Issues regarding design and access, overlooking and daylight are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Air quality has been considered as Policy CC8.4 Managing Air Quality and requires mitigation from development that would have a negative impact on air quality.</p> <p>Any legal issues will be dealt with through legal avenues.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H1 Land and Garages at Lych Gate	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1223 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H1 Land and Garages at Lych Gate	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1441 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H1 Land and Garages at Lych Gate	Hertfordshire County Council (Martin Wells) [3559]	1601 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site. However, Development on this site should consider simple Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates that could be incorporated into an overall scheme, as there may currently be potential for nesting birds in trees/bushes.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H2 Land and Buildings at 275 Sheepcot Lane	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1224 Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H2 Land and Buildings at 275 Sheepcot Lane	Mr Leigh Tugwood, RIBA [3639]	1233 The Green family own land and operate a business on the land identified H2 at 275 Sheepcot Lane. Land adjacent is also in the same ownership at 277 -279 Sheepcot Lane and 71 Queenswood Crescent. Whilst supportive of wider LP objectives and the inclusion of H2 within it to date medium - long term plans for the re-development have not been made. A Sole Development Agent has, however, been appointed and instructed to undertake the necessary studies ahead of the publication of the Final Draft Local Plan. A Timescale of 0-5 years is not considered deliverable at this stage.	Support	Comments noted. The timescale will be changed to reflect owners' aspirations.	The site time scale has been changed to 6-15 years.
H2 Land and Buildings at 275 Sheepcot Lane	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1451 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H2 Land and Buildings at 275 Sheepcot Lane	Mr Laurence Bernard [3570]	1529 My message from a Campion Close resident is that the development on 275 Sheepcot is a good idea as long as there is no entrance/exit through Campion Close and adequate parking is planned for on the new development.	Comment	<p>Design issues, including access, are material considerations to any planning application, and so any development proposal will be required to adequately address the most appropriate access to the site. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Parking standards are set out in Appendix E of the Plan.</p>	No change.
H2 Land and Buildings at 275 Sheepcot Lane	Hertfordshire County Council (Martin Wells) [3559]	1602 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development on this site should consider simple Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates, Historically, there was a traditional orchard existed to the west of the site boundary and fruit/nut trees may remain beyond the boundary, therefore consider orchard/fruit/nut tree planting.	Comment	Comments noted. The development considerations can be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity	The development considerations have been amended to require a Preliminary Roost Assessment.

H2 Land and Buildings at 275 Sheepcot Lane	Hertfordshire County Council (Martin Wells) [3559]	1603 Minerals & Waste Planning In order to ensure sufficient waste capacity within the county, the Waste Planning Authority seeks to safeguard operational waste sites with the implementation of Waste Core Strategy Policy 5: Safeguarding of Sites. At present (and to the best of our knowledge) Site H2 is an operational waste site that contains a waste transfer station and also deals with waste electrical and electronic recycling. This site is safeguarded under the above policy; the requirements of which ensure that waste management facilities are safeguarded to contribute to the strategic network of waste management provision in the county. Therefore, the borough council must demonstrate that this policy has been sufficiently applied in re-allocating these areas for housing.	Comment	Noted. The development considerations can be amended to provide further clarification regarding the site's safeguarded status.	In agreement with the County Council, the following wording was added to the policy to resolve this issue: "Development proposals should have regard to the waste management facility currently included in the allocation. The county Council, as the Waste Planning Authority, should be consulted on any applications which come forward on this site and the adopted Waste Local Plan safeguarding policy must be taken into account in the consideration of any applications
H3 Land and Garages Adjacent to 1 Lavinia Avenue	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1225 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H3 Land and Garages Adjacent to 1 Lavinia Avenue	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1463 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H3 Land and Garages Adjacent to 1 Lavinia Avenue	Hertfordshire County Council (Martin Wells) [3559]	1604 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity	The development considerations have been amended to require a Preliminary Roost Assessment.
H4 Land and Buildings at 5 Sheepcot Drive	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1227 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H4 Land and Buildings at 5 Sheepcot Drive	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1472 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H4 Land and Buildings at 5 Sheepcot Drive	Hertfordshire County Council (Martin Wells) [3559]	1605 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Ecological Appraisal may be required, as there may be potential for nesting birds in trees/shrubs and roosting bats in mature trees and buildings if suitable roosting features are present. If semi-natural habitats will be lost to development, and cannot be mitigated for within the site boundary, development on this site should consider biodiversity offsetting. Biodiversity Net Gain measures should also be considered such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity	The development considerations have been amended to require a Preliminary Ecological Appraisal.
H5 Land at The Badger Public House	Punch Partnerships (PML) Ltd [3749]	1058 Punch Taverns supports the proposed allocation of the Badger Public House as a housing site, to complement the approved mixed use redevelopment to the south of the site. The suggested density range of between 45 and 70 dwellings per hectare is low, since one option under consideration, utilising similar massing to the consented scheme to the south, is retirement flats, with a potential density in excess of 100dph, and reduced car parking. We would advocate a residential allocation that keeps all potential tenures and unit mixes open.	Support	Comments noted. Any future application for the site would need to be looked at in balance with other policies and requirements in the Local Plan. The need for more specialist and sheltered housing is demonstrated in the Local Plan and its evidence base.	No change.
H5 Land at The Badger Public House	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1228 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.

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H5 Land at The Badger Public House	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1473 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H5 Land at The Badger Public House	Hertfordshire County Council (Martin Wells) [3559]	1606 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity	The development considerations have been amended to require a Preliminary Roost Assessment.
H6 Land and Garages adjacent to 1-7 Heronslea	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1229 Within Source Protection Zone 2 of a public drinking water supply abstraction and close to contaminated land. Affinity Water must be notified of any future development proposed on this site.	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H6 Land and Garages adjacent to 1-7 Heronslea	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1474 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H6 Land and Garages adjacent to 1-7 Heronslea	Hertfordshire County Council (Martin Wells) [3559]	1607 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H7 Land at the Former Meriden School	Sport England (Planning Manager - Mr Roy Warren) [3671]	990 Sport England objects to the allocation of Land at the Former Meriden Primary School playing field for residential development without a key development consideration requiring the loss of the playing field to be mitigated through the provision of an appropriate financial contribution that would be used towards delivering priority playing field projects in the local area.	Object	Agree. The development considerations can be updated to reflect the proposed changes, in line with the Playing Pitch Strategy.	The following wording was added to the development considerations: "Provide appropriate mitigation for the lapsed playing field in line with the Playing Pitch Strategy (2020)"
H7 Land at the Former Meriden School	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1230 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H7 Land at the Former Meriden School	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1475 The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Comment	Comments noted. Development considerations can be amended to address any potential capacity constraints arising from the redevelopment of the site.	The following wording was added to the development considerations: "Development proposals must take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required".
H7 Land at the Former Meriden School	Hertfordshire County Council (Martin Wells) [3559]	1608 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Ecological Appraisal may be required, as there may be potential for nesting birds in trees; and roosting bats in mature trees if suitable roosting features are present. There may also be potential for reptiles if grassland becomes long and unmanaged. Development on this site should aim to retain trees, especially mature trees, and hedgerows. Buffer southern woody boundary from built development. If the whole site or a significant area is lost to development, consider biodiversity offsetting to mitigate for loss of semi-natural habitats. Development on this site should also consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations can be amended to require a Preliminary Ecological Appraisal. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	The development considerations have been amended to require a Preliminary Ecological Appraisal.
H7 Land at the Former Meriden School	Hertfordshire County Council (Martin Wells) [3559]	1609 Highways & Transport Bus stops within 400m are only served by limited bus services and development size is not large enough to contribute to bus service improvements. Garston station is approx. 0.5 miles away which somewhat mitigates for limiting bus services. There is a pedestrian/cycle route that allows access across the railway line to the west, so services at the Dome Roundabout would be accessible, but the A41 to the south limits pedestrian/cycle accessibility.	Comment	Comments noted.	No change.

H8 Land at the Former Bill Everett Community Centre	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1231 Affinity Water must be notified of any future development proposed on this site.	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H8 Land at the Former Bill Everett Community Centre	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1476 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H8 Land at the Former Bill Everett Community Centre	Hertfordshire County Council (Martin Wells) [3559]	1610 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as bats and birds have been recorded in the vicinity and the site is adjacent to a Local Nature Reserve and Local Wildlife Site: Harebreaks Wood/Long Spring and Harebreaks Wood. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H8 Land at the Former Bill Everett Community Centre	Hertfordshire County Council (Martin Wells) [3559]	1611 Highways & Transport This site is within 400m of bus stops on Leggatts Way with regular services available to central Watford and to Watford Junction rail station. The nearest rail station is Watford North on the Abbey Line (1.2 miles).	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H9 Land adjacent to Callowland Allotments	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1232 Affinity Water must be notified of any future development proposed on this site.	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H9 Land adjacent to Callowland Allotments	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1477 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H10 Land at the Longspring Car Park	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1234 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H10 Land at the Longspring Car Park	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1442 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H10 Land at the Longspring Car Park	Hertfordshire County Council (Martin Wells) [3559]	1612 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H11 Land at 420 and 420a St Albans Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1235 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H11 Land at 420 and 420a St Albans Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1443 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.

H11 Land at 420 Albans Road	Hertfordshire County Council (Martin Wells) [3559]	1613 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations can be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
H12 Land to the rear of 53 Langley Way	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1236 Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H12 Land to the rear of 53 Langley Way	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1444 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H12 Land to the rear of 53 Langley Way	Hertfordshire County Council (Martin Wells) [3559]	1614 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for nesting birds in trees; and roosting bats in mature trees and buildings if suitable roosting features are present. If semi-natural habitats will be lost to development, and cannot be mitigated for within the site boundary, consider biodiversity offsetting. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H13 16-18 St Albans Road	Mr Juan Llobell [3568]	918 Saturated area, insufficient infrastructure for transit or parking.	Object	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H13 16-18 St Albans Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1237 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H13 16-18 St Albans Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1462 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H13 16-18 St Albans Road	Hertfordshire County Council (Martin Wells) [3559]	1615 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H13 16-18 St Albans Road	Hertfordshire County Council (Martin Wells) [3559]	1616 Highways & Transport Bus stops available within 400m on A412 and at Town Hall/Beechen Grove. Several routes available, combined service frequency good. Less than 500m from Watford Junction and is within walking/cycling distance of town centre. Potentially a very sustainable site.	Comment	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H14 Land and Garages between 139-149 Queens Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1238 Within Source Protection Zone 2 (SPZ2) and close to SPZ1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H14 Land and Garages between 139-149 Queens Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1445 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H14 Land and Garages between 139-149 Queens Road	Hertfordshire County Council (Martin Wells) [3559]	1617 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations can be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.

H15 Land to the Rear of 125-127 the Parade	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1240 Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H15 Land to the Rear of 125-127 the Parade	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1446 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H15 Land to the Rear of 125-127 the Parade	Hertfordshire County Council (Martin Wells) [3559]	1618 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site. Development on this site should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H15 Land to the Rear of 125-127 the Parade	Hertfordshire County Council (Martin Wells) [3559]	1619 Highways & Transport Bus stops available within 200m on Beechen Grove. Several routes are available, combined service frequency is good. Watford Junction and town centre are within walking/cycling distance. Potentially a very sustainable site.	Comment	Comments noted.	No change.
H16 Land at the Corner of Park Avenue and Rickmansworth Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1241 Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H16 Land at the Corner of Park Avenue and Rickmansworth Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1447 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H16 Land at the Corner of Park Avenue and Rickmansworth Road	Hertfordshire County Council (Martin Wells) [3559]	1620 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for nesting birds in trees. Development should aim to retain trees, especially mature trees, and hedgerows. If semi-natural habitats will be lost to development, and cannot be mitigated for within the site boundary, consider biodiversity offsetting. Development should also consider Biodiversity Net Gain measures such as native planting/ wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H17 Land at 80 Cassio Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1242 Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H17 Land at 80 Cassio Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1448 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H17 Land at 80 Cassio Road	Hertfordshire County Council (Martin Wells) [3559]	1621 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site. However, Development on this site should also consider Biodiversity Net Gain measures such as native planting/ wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H18 Land and Buildings at 87 Cassio Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1243 Affinity Water must be notified of any future development proposed on this site.	Comment	Site removed from Plan as groundworks on the site have commenced.	No change.

H18 Land and Buildings at 87 Cassio Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1449 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H18 Land and Buildings at 87 Cassio Road	Hertfordshire County Council (Martin Wells) [3559]	1622 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present. Development should aim to retain trees and shrubs if possible. Development should also consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H18 Land and Buildings at 87 Cassio Road	Hertfordshire County Council (Martin Wells) [3559]	1623 Highways & Transport Bus stops within 400m on Whippendell Rd and A411 Exchange Rd. Exchange Rd stops better served with various routes available with a high combined service frequency. Approximately 0.7 miles to both Watford Junction and Watford High St stations. Within walking/cycling distance of town centre. Potentially a very sustainable site.	Comment	Site removed from Plan as groundworks on the site have commenced.	Site removed from Plan.
H19 Land and Buildings at 120-122 Exchange Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1244 Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H19 Land and Buildings at 120-122 Exchange Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1450 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H19 Land and Buildings at 120-122 Exchange Road	Hertfordshire County Council (Martin Wells) [3559]	1624 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations can be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
H20 Land at Lower Derby Road	Sport England (Planning Manager - Mr Roy Warren) [3671]	977 The policy is objected to because no provision is made in the 'Development Considerations' for replacing the skate park on this site which is contrary to the Council's previous position on this site when it was allocated in a previous draft local plan document. If no amendment is made an objection would be made as the loss of the skate park without mitigation would be contrary to paragraph 97 of the NPPF and policy NE8.2 of the draft local plan.	Object	Development considerations will be amended to reflect the proposed changes. Construction of a replacement skate park has been completed at Oxhey Park North.	The development considerations have been updated to state that a replacement skate park has been completed at Oxhey Park North.
H20 Land at Lower Derby Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1245 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H20 Land at Lower Derby Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1452 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H20 Land at Lower Derby Road	Hertfordshire County Council (Martin Wells) [3559]	1625 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H20 Land at Lower Derby Road	Hertfordshire County Council (Martin Wells) [3559]	1626 Highways & Transport There are bus stops within 200m of the site with frequent bus services available. Site is also close to Watford High St rail station (approximately 150m). Close to town centre and its services/facilities. Potentially a very sustainable site.	Comment	Comments noted.	No change.

H21 Land and Buildings at 176-186 Rickmansworth Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1246 Within Source Protection Zone 2 (SPZ2) and close to SPZ1 of a public drinking water supply abstraction on former petrol station site. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H21 Land and Buildings at 176-186 Rickmansworth Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1453 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H21 Land and Buildings at 176-186 Rickmansworth Road	Hertfordshire County Council (Martin Wells) [3559]	1627 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H22 Cark Park at Junction of Vicarage Road and Exchange Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1247 Within Source Protection Zone 2 (SPZ2) close to SPZ1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H22 Cark Park at Junction of Vicarage Road and Exchange Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1454 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H22 Cark Park at Junction of Vicarage Road and Exchange Road	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1521 The site is immediately adjacent to the Locally Listed Sikh Community Centre, and across the road from the High Street and King Street Conservation Area. Preparation of further evidence regarding the potential impact on heritage assets is required. a) Identify any heritage assets that may be affected by the potential site allocations; b) Understand what contribution the site makes to the significance of the asset/s; c) Identify what impact the allocation might have on that significance; d) Consider maximising enhancements and avoiding harm; e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness; If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.	Comment	Comments noted. Development considerations can be amended to require a Heritage Impact Assessment. All allocated sites will also need to comply other policies in the Plan, including Chapter 7 which relates to conserving and enhancing the historic environment.	The development considerations have been amended to require a Heritage Impact Assessment.
H22 Cark Park at Junction of Vicarage Road and Exchange Road	Hertfordshire County Council (Martin Wells) [3559]	1628 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H23 Crown Passage Car Park	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1248 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H23 Crown Passage Car Park	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1455 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H24 Land at Waterfields Retail Park	Mrs Emma Staddon [3688]	1000 This is an absurd idea. There is currently not enough parking in this area as it is and on a normal weekend with no football or Christmas traffic, the area comes to a complete standstill. Our infrastructure can simply not cope with more housing. Watford is trying to establish itself as a shopping hub for surrounding areas and the constant development and gridlock is putting people off which will in turn effect our high street.	Object	Concerns noted. Any planning application is required to be accompanied by a Transport Assessment to assess the impact on the road network. Hertfordshire County Council (the highways authority) are also undertaking modelling work to assess the impacts of the site allocations on the network and interventions that may assist.	No change.

H24 Land at Waterfields Retail Park	Mr simon frost [3795]	1103 The shops here are well used and are different to the ones in town - for example the Boots has a 24 hour pharmacy which is not possible for the Intu centre one. The Argos and Smyths toys have large items which are difficult for collection in an in town store.	Object	The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force retailers to remain in certain locations and if the landowner no longer wishes for the shops to operate on the site, it is important that the land is made more efficient by providing much needed housing. The South West Herts Retail and Leisure Study (2018) provides further evidence about out of centre retail locations competing with town centre uses.	No change.
H24 Land at Waterfields Retail Park	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1249 Within Source Protection Zone 1 of a public drinking water supply abstraction and on contaminated land. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H24 Land at Waterfields Retail Park	Nuveen Real Estate (Mark Cruddas) [3878]	1326 Waterfields Retail Park is proposed to be allocated for housing (Site H24) and is identified as being in a highly sustainable location and, given its location within a SDA, densities of 350dph or above may be appropriate. Our client welcomes the inclusion of draft allocation H24 and looks forward to having an opportunity to discuss the future potential of the site through the plan making process.	Support	Support welcomed.	No change.
H24 Land at Waterfields Retail Park	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1456 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H24 Land at Waterfields Retail Park	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1522 The site is within the Lower High Street Strategic Development Area and is immediately adjacent to Brewery Building (Grade II Listed), Watford Museum (Grade II Listed), and 202, 202A, 212 and 214 High Street (3 X Grade II Listed). Preparation of further evidence regarding the potential impact on heritage assets is required. a) Identify any heritage assets that may be affected by the potential site allocations; b) Understand what contribution the site makes to the significance of the asset/s; c) Identify what impact the allocation might have on that significance; d) Consider maximising enhancements and avoiding harm; e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness; If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.	Comment	Comment noted. Development considerations can be amended to require a Heritage Impact Assessment. All allocated sites will also need to comply other policies in the Plan, including Chapter 7 which relates to conserving and enhancing the historic environment.	The development considerations have been amended to require a Heritage Impact Assessment.
H24 Land at Waterfields Retail Park	Hertfordshire County Council (Martin Wells) [3559]	1629 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H24 Land at Waterfields Retail Park	Hertfordshire County Council (Martin Wells) [3559]	1630 Highways & Transport Lower High St is a high frequency bus corridor and there are bus stops within 200m with a variety of services available. Watford High Street Station is close and the town centre is within walking/cycling distance. The pedestrian/cycle route from the site to Lower High St is currently rather indirect. Potentially a very sustainable site.	Comment	Comments noted.	No change.
H25 Land at 18 Watford Field Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1250 Within Source Protection Zone 1 of a public drinking water supply abstraction near contaminated land. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H25 Land at 18 Watford Field Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1457 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H25 Land at 18 Watford Field Road	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1523 H25 Land at 18 Watford Field Road – The site is within the Lower High Street Strategic Development Area and is immediately adjacent to Brewery Building (Grade II Listed), Watford Museum (Grade II Listed), and 202, 202A, 212 and 214 High Street (3 X Grade II Listed). Preparation of further evidence regarding the potential impact on heritage assets is required. a) Identify any heritage assets that may be affected by the potential site allocations; b) Understand what contribution the site makes to the significance of the asset/s; c) Identify what impact the allocation might have on that significance; d) Consider maximising enhancements and avoiding harm; e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness; If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.	Comment	Noted. Development considerations can be amended to require a Heritage Impact Assessment. All allocated sites will also need to comply other policies in the Plan, including Chapter 7 which relates to conserving and enhancing the historic environment.	The development considerations have been amended to require a Heritage Impact Assessment.

H25 Land at 18 Watford Field Road	Hertfordshire County Council (Martin Wells) [3559]	1631 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
H26 Land between 41-61 Brightwell Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1251 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H26 Land between 41-61 Brightwell Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1458 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H26 Land between 41-61 Brightwell Road	Hertfordshire County Council (Martin Wells) [3559]	1632 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Gail Brooks [3576]	921 I VERY STRONGLY OBJECT for the reasons here: 1. Dramatic loss of parking provision for residents (we use a garage out of necessity). By the time my husband returns by car from work (9pm) there are not ANY spaces available in the road or elsewhere. If the garages here are removed it will impact us greatly - we will probably have to move house and change children's schools. Reason 2: Impact on visual outlook and environmental feel of road will be disastrous as the TWO ONLY TREES on Liverpool Road will likely have to be removed.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area. The Council recognises the multifunctional benefits that trees can bring, from improving air quality to supporting wildlife. Tree Preservation Orders have been placed on many of the borough's trees to ensure that they are not felled without the local authority's consent. Policy wording will be added to Chapter 8 of the Local Plan to avoid trees without statutory protection being lost or damaged. National guidance states that a loss of view is not something that local planning authorities are able to take into account when assessing a planning application.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. Policy wording has been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Sarah McMahon [3581]	922 Parking in zone J is at crisis point. Deal with this issue affecting local residents before building any more homes.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Jonathan Presland [3626]	935 These garages are in constant use and are needed due to the lack of on-street parking within the area. In particularly the new approved residential development in Vicarage Road will increase further pressure on parking in the area. An annual audit is carried out by the council to make sure the garages are used for their intended use, so there is no question they are being used inappropriately. Adding further development to this site will only increase on-street parking which is already at capacity! Half the site has mature trees which will have an environment impact if removed.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area. The Council recognises the multifunctional benefits that trees can bring, from improving air quality to supporting wildlife. Tree Preservation Orders have been placed on many of the borough's trees to ensure that they are not felled without the local authority's consent. Policy wording will be added to Chapter 9 of the Local Plan to avoid trees being lost or damaged.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. Policy wording has also been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Rhianon Tomkins [3648]	945 At present parking is already a crisis within our streets. If you add flats/houses this will be even more of a nightmare. Furthermore, that area just needs to be tidied not built up on. Watford is soon going to come to a stand still nowhere to move. As you keep building on every piece of land. Stop and preserve!!	Object	Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

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H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Jackie Uphill [3650]	946 The area currently provides some much needed parking for the locals. Developing the land for residential will overburden the local area regarding parking, and traffic.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Clair Standing [3649]	947 As a resident of St James Road, my house and garden back on to the garages and wild land that the council have decided to develop on. As of today 23/10/19, the council have given permission to clear the wild land without consulting the residents who's own land it may affect if the supposed 20 dwellings are built. What are they building flats? Houses? Utterly disgusted that we were not consulted, the council have gone behind our back as per usual.	Object	On this date, the Council were undertaking maintenance of the site and some preliminary survey work, of which there is no requirement to consult. An Ecological Survey was carried out. Residents will be formally consulted when any planning application is submitted in line with national legislation. The ways which the Council consulted the community on the First Draft Local Plan are set out in the Consultation Statement.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Andrew Staddon [3651]	948 There is a serious lack of parking facilities in the surrounding streets, building another 20 flats is only going to make this issue even worse.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Claire Peregrine [3654]	949 The surrounding area is already too densely populated. The infrastructure can not cope with current levels of occupancy. There is not enough parking available for current occupancy levels, every evening on every corner, double yellow line, cars are parked because there is no where else to park. The garages are sought after and would provide locals with parking options if they were available to be rented, they haven't been for years we tried to get one. The area behind garages is a green space full of trees helping mitigate air pollution and a natural habitat for animals & insects.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. Although the Council does not directly provide new infrastructure, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should support new infrastructure provision.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal. Policy wording has also been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Sophie Colgate [3655]	950 We object to this proposal for the following reasons: 1) loss of habitat for animals such as foxes and badgers. 2) loss of vegetation including a number of established trees. 3) loss of privacy-being overlooked by houses. 4) extra vehicles using the junction of Cardiff Road and Wiggenhall Road. 5) additional vehicles parking on surrounding roads where there is already a lack of space. Also, why was the first we heard of this when small notices appeared at the site? Are you going to let residents know by contacting them directly so everyone has a chance to respond?	Comment	Concerns noted. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. It can also be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area. Loss of privacy is a material considerations to any planning application, and so any development proposal will be required to adequately address the issue. There will be an opportunity to comment should a planning application be submitted in the future. The Council recognises the multifunctional benefits that trees can bring, from improving air quality to supporting wildlife. Tree Preservation Orders have been placed on many of the borough's trees to ensure that they are not felled without the local authority's consent. Policy wording will be added to Chapter 9 of the Local Plan to avoid trees without statutory protection being lost or damaged. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal. Policy wording has also been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Emma Hamilton [3656]	951 I live in this area and it's already a nightmare for residents trying to park. We have one car - I know many neighbours have more in their household - and we cannot go out in the evenings because the parking situation is so terrible. And we pay an annual fee for a residents permit for the privilege. The idea of removing vital parking space in this densely populated area for yet more properties without infrastructure in place for the residents is ludicrous.	Object	Comments noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Susan Romeril [3657]	952 Parking! Destruction of green belt land Overcrowding...	Object	<p>Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford.</p> <p>This site is not in the Green Belt. Areas designated as Green Belt are set out on the Policies Map.</p> <p>It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.</p>	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Helena Breen [3658]	953 Liverpool Road is full. The parking is a nightmare. As it is we do not go out in the evenings unless absolutely necessary as we will not find a place to park on return anywhere locally. We also have the hospital and football stadium traffic to contend with. Adding high density housing will make an already bad situation worse. Leave the space for parking. It's needed.	Object	<p>Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.</p>	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Karen Wesolowski [3663]	965 *The garages are desperately needed and have huge waiting lists *Not enough parking spaces already in our streets and some people park dangerously and block pavements. *A local wildlife habitat will be destroyed *Overlooking/loss of privacy/light to the surrounding homes *33 flats are being built between vicarage road and Clifton Road. Where will these residents and their visitors park? *Hospital staff already using our streets to park in the evenings and proposed car park still has no private generator to build it *Riverwell has added 750 more homes to the local area increasing polluting and demands on local services.	Object	<p>Concerns noted. Watford has been set challenging housing targets by national government and so all areas of the borough will be experiencing new development. Our housing target is almost 14,000 new homes until 2036.</p> <p>It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p> <p>Loss of privacy and loss of daylight are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p>	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Stephen page [3664]	966 Disgusted with this proposed idea of flooding more people into the area which is already hugely overpopulated. If you can build a car park for an extra 100 cars so that we can all park then maybe this could work...but then the traffic wardens won't be able to fine us residents who have to park dangerously in the evening stopping emergency service vehicles being able to attend any incidents in our roads. Beyond ridiculous plans but you will go ahead regardless just as you always do.	Object	<p>Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Providing new infrastructure is not within the remit of the Council. The NHS provide new health facilities and Hertfordshire County Council are the education and highways authority. The Council liaises frequently with the providers to ensure additional infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p> <p>There were five consultation events held across the borough at different times and on different days across a six week period to encourage wider participation with the Local Plan. The different ways the Council consulted the community on the First Draft Local Plan are set out in the Consultation Statement.</p>	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Jane Lambert [3666]	985 I, and my husband, strongly object to the proposed development. This would add significantly to the serious parking problems in this zone. Already it is very difficult to park in the evenings and at weekends. The loss of the garages would result in 35 more cars being parked on the roads and the building of flats would also result in more cars being parked in the evenings and at weekends. We, in Clifton Road, also have the prospect of a new development of 35 flats along Vicarage Road, and the additional cars which will inevitably will be parked here.	Object	<p>Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate e no significant effects on parking in the area.</p>	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr mark dove [3676]	987 Watford people are getting fed up with the congestion, the over building projects and the lack green vision !!! There simply is not the parking or the want for this to go ahead from us residents for the reasons stated above. Why were we not notified about this project by post?? Why is the meeting to discuss this arranged on Halloween night when we are arranging street events for the kids!!!!? Disgusting !!!! We found out about the meeting from a poster on a bollard !!! Is that how the council works now? SHAME ON YOU ALL !!!!	Object	Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government. Watford has been given a target to build 14,000 new homes by 2036. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area. Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Helen Sparksman [3678]	988 Parking in the J zone is terrible and this would add to. T the problems. Hospital staff already park for the night shift in the J zone. Loss of wildlife, badgers. Foxes already relocated from allotments. Lack of services for all the housing that is coming to this area - be new doctors, roads can't cope. Local houses will be overlooked by new development and lose privacy and light. Lack of information provided - no leafleting / posters in local area.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area. Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. There were many different ways the Council consulted with the community on the First Draft Local Plan, which are set out in the Consultation Statement.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Isabelle Perrin [3686]	997 As a disabled resident of Liverpool Road, the parking situation has already meant I'm unable to leave my house past 6pm. This actually goes against human rights to enjoyment, as a community we've really struggled with this. I cannot recurve ambulances down the road as the parking prevents this (people park on curbs just to get spaces). By knocking down the garages and building accommodation, the parking will need to sustain a minimum of 50 more cars. This is not feasible! You will be preventing me from living with a selfish desire for money.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Lisa Hall [3687]	998 This local area comprises narrow residential roads with high car ownership. There is insufficient space to park on or near these roads currently. Cars currently park on double yellow lines and obstruct every corner every evening. There are numerous accidents here caused due to the obstructed views. Should traffic wardens come round after 6 parking tickets are always issued. I have complained continuously about illegally parked cars at the garages earmarked. This is further exacerbated by football traffic which gridlocks the area. Removing garages and replacing them with homes wilfully ignores the problem and deliberately increases it.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Emma Staddon [3688]	999 This is an absurd idea. This area is already an overpopulated area with currently a severe lack of parking spaces in our streets with some people parking dangerously and blocking pavements. By losing the garages, this will increase even more and that is before you even get to these new houses and the parking they will require. There is already a lot of housing development locally putting immense pressure on our roads, schools and services. Also, the local wildlife habitat will be destroyed.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr James Perry [3693]	1001 I'm very concerned about the following issues: privacy for local residents being affected by a high density housing development overlooking the existing properties; about an increase in traffic in the locality around Liverpool Rd and increasing pressure on the already limited availability of local parking; and about the environmental impact of cutting down numerous trees which form a pleasant vista for many local residents. I would like to know whether consideration has been given to more environmentally-friendly and community-focused alternatives for this land such as creating a new allotment or some form of 'guerrilla' or child-friendly vegetable garden.	Object	Concerns noted. Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future. The Council recognises the multifunctional benefits that trees can bring, from improving air quality to supporting wildlife. Tree Preservation Orders have been placed on many of the borough's trees to ensure that they are not felled without the local authority's consent. Policy wording can be added to Chapter 8 of the Local Plan to avoid trees without statutory protection being lost or damaged.	Policy wording has been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Marie Wright [3704]	1009 I strongly object the current parking situation is problematic .I often finish work after 12 hours having to drive around a number of times often having to park streets away from my home . We would not be able to cope with more residents needing to park . Match days are horrible as well . Within our area access to local health services and schools are also stretched which again with be affected by more residents needing to access services which will push these service either further in an already struggling system .	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Amelia Findon [3711]	1011 I strongly object because the proposals do not fulfil the basic requirement of sustainable development: - availability of parking on Liverpool is already at breaking point. The development will introduce more cars to the street , and more illegal parking, creating a significant health and safety risk for pedestrians - existing properties will inevitably be over-looked by the new dwellings, damaging privacy - the disruption during building works will be a risk to health and wellbeing of residents - there will be damage to wildlife habitat - the development of flats is not in keeping with the street	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. Planning conditions are placed on any planning approval to limit the impacts on construction on residents. Loss of privacy and design issues (including character) are material consideration to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Lydia Colgate [3712]	1012 It will put a massive strain on the parking around the area, where people are having to park on double yellow lines anyway. It will massively impact the privacy of the surrounding houses due to it being 4 stories high and right at the end of many gardens. It will destroy natural habitats of lots animals that live in the area, and will remove a beautiful bit of natural land which many local residents will hate to see destroyed. None of this planning was put past residents before the development started. Please listen to what we have to say.	Object	Concerns noted. No planning application for residential uses has been submitted for the site as of March 2020. The site's inclusion in the Local Plan is to establish the potential of the site being used for housing in the future. Residents will be consulted if a planning application is submitted, in line with national guidance. The ways the Council consulted the community on the First Draft Local Plan is set out in the consultation statement. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Tommy Lewis [3713]	1013 If this development goes ahead it will damage local ecosystems and habitats of many animals. Removing the garages will also take away many parking spots for local residents and with 20 dwellings being created this will mean more cars in the area. There is already a problem with parking as cars are having to park on double yellow lines at night due to lack of space, which is very dangerous especially if emergency services are needed. Try to consider the local residents needs before creating plans that won't work. It will also reduce the privacy of the surrounding houses.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. Loss of privacy is material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Shahana Khundmir [3714]	1014 I object due to the already extremely difficult parking conditions on Liverpool, St James and Cardiff Road. We have very little parking, which is extremely difficult to find after 7pm. These flats will bring with them added parking requirements that there is no space for. Many people return home after 6.30pm and parking permits do no go far enough to prevent people owning and parking without permits. loss of the garages also means already available parking will be taken away. Overflow parking on streets will obstruct emergency services and will be dangerous to those living in the area	Object	Comments noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Anwar Hossain [3715]	1015 I object as there is not enough parking in the area. St James, Liverpool and Cardiff Rd do not have enough parking for the cars that are already here. Parking is scarce after 6.30pm overflow parking ends up obstructing emergency services. removing the garages is making the parking issue worse Adding flats will add extra cars that there is no space for This is very ill judges considering the number of times residents have complained about parking	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Martin Biron [3722]	1019 No to change of use of this site! We need more parking in the area not less! We want to keep the small wildlife habitat we have! We want to maintain the privacy we have to the rear of our homes! We don't want to create more traffic and congestion on Liverpool Road!	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. Loss of privacy is material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Madeline Coleman [3725]	1020 I have written and will pass by hand on my Mothers behalf questions relating to draft plans for development behind 9 Liverpool Road? (As my Mother, Mrs Margaret Doherty is an elderly lady who does not use internet). Mrs Madeline Coleman.	Comment	Comments noted.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Barry McCabe [3727]	1021 Overdevelopment in deprived part of borough. Not fair.	Object	Planning for the new housing that Watford needs is a requirement set out by national government. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford. The process of selecting sites has been set out in the Housing and Economic Land Availability Assessment. The majority of the development will take place in the Core Development Area as that is where the most brownfield sites were available.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Jane Dumble [3728]	1022 Very concerned about Increase of noise, difficulty parking (already a nightmare in the evening) loss of wildlife habitat. Noise during construction period. Will make area feel overcrowded.	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. Planning conditions are placed on any planning approval to limit the impacts on construction on residents. There will be an opportunity to comment on this if a planning application is submitted.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Lata Rees [3700]	1023 I would like more information about this plan. It all seems hush hush Residents need to speak to the decision makers at the council not someone just fielding questions and platitudes and then the council just does what it sees fit without really taking residents' views on board. Please don't do this!!! Leave us with much needed green space and a few trees in my locality. Thank you	Object	Concerns noted. However, design issues including access and character are material considerations to any development proposal that may be submitted in the future. There will be an opportunity to comment should a planning application be submitted in the future. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. The Council recognises the multifunctional benefits that trees can bring, from improving air quality to supporting wildlife. Tree Preservation Orders have been placed on many of the borough's trees to ensure that they are not felled without the local authority's consent. Policy wording will be added to Chapter 9 of the Local Plan to avoid trees without statutory protection being lost or damaged. The whole Borough will need to see reasonable uplifts in density to make effective use of land, as per Chapter 11 of the National Planning Policy Framework. The density achieved on site will be informed by Policy HO3.2 Housing Mix, Density and Optimising Use of Land, which seeks to take into account site opportunities and constraints to optimise site densities. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.	The development considerations have been amended to require a Preliminary Ecological Appraisal. Policy wording has been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Eve Toogood [3732]	1025 we already have a very serious problem with parking in and around Liverpool Road. To remove the garages and build more properties in an already congested area would in my opinion be the most ridiculous proposal that has been presented. We are already being faced with flats being built long Vicarage road (Watford printers old site) without any provision for Parking. Please visit Clifton Road and surrounding roads during the evening and you will see the problem. I would be very interested to know when and if this has been done and your findings,	Comment	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Anne Taverson [3736]	1031 Good morning, I very and extremely upset you are even thinking to have some flats on our road . we need this parking are is now getting impossible to park on our road . Has a parent I do think this will become more stressful , having no safety and no privacy at all. I did like Watford but this is now becoming a joke on how you destroying this town .	Object	Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Loss of privacy and daylight are material considerations to any development proposal that may be submitted in the future. There will be an opportunity to comment should a planning application be submitted in the future.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr STUART NORTON [3739]	1054 Privacy will be compromised! Children will be put at risk! Property value jeopardised! Over population! No room for more parking spaces! Wildlife will be threatened! Watford does not need another block of flats squeezed into a site unsuitable for such a development!	Object	Concerns noted. The Local Plan only establishes the principle of the land use and does not contain proposals for what a development proposal might look like in terms of design and heights. However, privacy and daylight are material considerations to any development proposal that may be submitted in the future. There will be an opportunity to comment should a planning application be submitted in the future. The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. It can also be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Joanne Kelly [3744]	1055 Parking is already an issue in this locality - can we afford to lose this garage space and also increase the need for parking at the same time? We do not have capacity to resource that!	Object	Concerns noted. Planning conditions are placed on any planning approval to limit the impacts on construction on residents. There will be an opportunity to comment on this if a planning application is submitted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The whole Borough will need to see reasonable uplifts in density to make effective use of land, as per Chapter 11 of the National Planning Policy Framework. The density achieved on site will be informed by Policy HO3.2 Housing Mix, Density and Optimising Use of Land, which seeks to take into account site opportunities and constraints to optimise site densities. Although the Council does not directly provide new infrastructure, such as schools and health services, the Council liaises with the providers such as the NHS to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support the delivery of new infrastructure.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Patricia Brown [3750]	1057 We presume a large number of flats will be proposed for this site - most worrying is how many and how high? The proposed site is in the middle of an already densely populated area made up entirely of terraced houses - many of which are used as HMO's. We already have a severe parking problem, with vehicles parked on every corner causing obstructions for emergency vehicles and large delivery vehicles - not helped by very narrow roads. Neighbouring houses' privacy and loss of natural light must be taken into account.	Object	Concerns noted. The Local Plan only establishes the principle of the land use and does not contain proposals for what a development proposal might look like in terms of heights or design. However, loss of privacy and daylight are material considerations to any development proposal that may be submitted in the future. There will be an opportunity to comment should a planning application be submitted in the future. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Carla Melim [3753]	1062 I object to any building work or new construction at this site. I am concerned that flats will be built and we already have many issues in this road in regards to lack of parking, safety, privacy will be compromised, wildlife will be destroyed.	Object	<p>Concerns noted. Planning conditions are placed on any planning approval to limit the impacts on construction on residents. Loss of privacy and design (including safety issues) are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment on this if a planning application is submitted.</p> <p>It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it can be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Kishan Rees [3756]	1063 Cramming more houses into an already congested area is not going to be helpful for the well-being of either new nor existing residents. Totally out of keeping with the area. Better to have the area preserved as a green space for the wildlife that lives there. Please don't build 4 storey block that's totally out of keeping with the area. Parking already a nightmare this will make it worse. Let alone blocking light.	Object	<p>Concerns noted. The Local Plan only establishes the principle of the land use (for residential) and does not contain proposals for what a development proposal might look like in terms of design, scale or massing.</p> <p>Loss of daylight is material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Linda Metcalf [3757]	1064 I object as there is limited parking in this area as it is and as a single mum who has to work late it's hard enough to find parking near my house but with extra cars I'll have to walk further in the dark! As we've already had stabbings round this area I feel it would be unsafe! This area is already over populated without enough school places or doctors surgeries and the hospital is stretched as it is!	Object	<p>Concerns noted. It can be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Philip DEACON [3754]	1066 1. OVERLOOKING: because this site is so small and the access to it is limited, any new development will effectively be to the rear of all present nearby dwellings, ie those in Liverpool, Westbury and St James Roads, and would overlook the rear of those properties. If the new development exceeded two storeys the overlooking would be even worse. 2. PARKING: parking round here, especially at night, is already difficult. Those difficulties will be exacerbated by both the loss of the garages and the addition of vehicles belonging to the new development.	Comment	<p>Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address the issue. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Bethan Rutherford [3764]	1068 Don't build here, try and improve parking in the area and only permit developments which provide parking for all residents. Pay a visit to this area in the evenings and experience the congested area already faced by residents.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>This site is in the high sustainability zone where car lite development would be supported. This is because this area scored highly as having access to a range of facilities and services within walking distance</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr John Brennan [3763]	1069 As it stands there is not enough of parking spaces for the people who are already living in this area. So by building 4 storey flats you are adding to the issue with no solutions. There is also a problem with traffic in the area as Liverpool road is a two way street and St James is a one way street, I've already spoken to a councillor about this problem. So as I said your development will only cause more traffic, more problems and not help anyone in this area.	Object	<p>Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Mohammed Munir [3758]	1070 Building any more houses to already overpopulated area will be a nightmare for the residents. Car parking will be major problem. It's very difficult to find car parking after 6pm on any of the roads. People are so fed up with nowhere to park and are forced to park on corners and this is putting lives at risk as emergency services vehicles are not be able to turn corners. (Parking on corners of course is wrong but where should they park ?). There will also be a wildlife destruction. This land could be better used for children play area.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Sean Brennan [3761]	1071 As it stands parking is already an issue in the area so to add these flats would create a bigger problem. Secondly this is a small local community and a 4 storey flat will look completely out of place and invade privacy as the higher flats will look into back gardens. These flats should not go ahead as it will disrupt our living even more so with more traffic and more people in a small area. Overall I am not happy with this plan and hope you come to your senses and stop it from happening.	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Sarah Dorgan [3760]	1072 Development would block out sunlight from back gardens along St James Road and potentially plunge them into darkness. Other issues include but are not limited to the right to privacy; parking; physical/mental wellbeing and the huge impact on the area's conservation. The development will disturb flourishing wildlife which includes established badger setts/fox dugouts sited on nearby scrubland. The council appear to be putting the interest/wellbeing of future residents above those who have lived in these roads for years. Whilst forward thinking is often praised, not all development is positive and should never be to the detriment of current residents.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Eunan White [3766]	1074 Parking is already a very serious issue on the following roads: Liverpool, Clifton, Westbuy and Cardiff. These roads contain the highest concentration of Victorian terraced houses in Watford with many of them being multiple occupant properties. Parking past 6.30pm is impossible and cars often park illegally causing obstructions to larger vehicles used by the emergency services. I have witnessed ambulance drives knocking on residents doors to get them to move cars! The new development would add to the current parking problem, increase pollution and take away what little wildlife we have for our children to enjoy.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant on parking in the area. The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Venu Ayyalasomayajula [3770]	1076 Objection against the proposal to build a four storey block of flats as it leads to further congestion on a severely congested road and stress on school places. Also eats up into the green areas.	Object	Concerns noted. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. Hertfordshire County Council is also the authority responsible for providing new schools. However, the Council liaises with Hertfordshire County Council to ensure new infrastructure is being provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision. New schools are also planned for on large developments (see development considerations of the site allocations). The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.	The development considerations have been amended to require a Preliminary Ecological Appraisal.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Doreen Concha [3774]	1081 Already very crowded area. Parking almost impossible now. Narrow street with cars parked both sides is already dangerous. Council already has plans to build more houses on adjacent Occupation Rd. More people and cars = more pollution and more danger. Would prefer this area to be a car park for residents with access controlled by some sort of barrier. Keep the trees that are there already - plant some more to help remove the pollution. You've done a lovely job in the town centre. Please don't turn West Watford into an over-crowded ghetto.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Francisco Merino [3775]	1082 I most strongly object to losing the garages as it puts more pressure on residents who rely on them to park their vehicles after 1830 hrs when Liverpool/Clifton/St James Road become a free for all parking zone. Working shifts and socialising will become impossible without them. Parking is stretched enough without losing the garages given the added pressure of the proposed flats on Vicarage Road.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Joshua Schaffer [3776]	1083 Its clear none of you have actually visited the area or surrounding area which is disappointing. There is currently not enough parking for J residents as is so adding 65 flats is ridiculous. This would only work if 150 parking spaces were built underneath it. 2per new flat and the rest for J residents. Assuming people will walk or cycle is unrealistic as residents clearly aren't doing that currently. There is no evidence that suggests This will happen so for the sake of the town please stop making this claim. There is no infrastructure for this or more residents.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Jim Hamilton [3777]	<p>1084 I object to this plan as it would impinge on the privacy and personal well-being of the residents of Liverpool Road, and of those passing through the area. A multi-storey residential building would dominate the rows of hundred-year-old terraced houses, and greatly increase noise and existing congestion, parking and road safety issues in an area already neighbouring a football stadium and a hospital.</p> <p>I object to how insidious these land use plans have been since their inception; the discrepancy between how they have been sold (exceptional health campus?) and how they are ostensibly turning out (block of cheap flats?).</p>	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Any noise that could be caused from the new development has been considered as part of Policy CC8.5 Managing the Impacts of Development</p> <p>Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.</p> <p>The Council follows national legislation and the procedures set out in the Statement of Community Involvement when consulting with the community regarding the Local Plan and planning applications and aim to be as transparent as possible.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Diarmuid Brennan [3778]	1085 I strongly object to this as it will have a major negative impact on the area. Parking has become a major issue. We pay for parking but consistently struggle to park. This will remove valuable parking yet add more homes bringing more vehicles. The area at the rear could be opened up to families with parts left to nature helping combating pollution and have a positive impact on mental health. West Watford is massively over populated now with traffic not being able to cope for much longer.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Patrick Brooks [3780]	1086 Liverpool Road is part of an area already seriously challenged by pressures resulting from dense residential living combined with social change that has increased rather than decreased reliance on private car ownership and use. At the moment it is far easier to put in place measures that increase these pressures in the interests of national concerns regarding housing, than it is to start solving the dependency issues resulting from the carbon economy. If the agenda was designed with the interests of the good of people as the guiding principle, then behavioural evolution should come first, therefore enabling other problem solving.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The Council recognises the multifunctional benefits that trees can bring, from improving air quality to supporting wildlife. Tree Preservation Orders have been placed on many of the borough's trees to ensure that they are not felled without the local authority's consent. Policy wording will be added to Chapter 9 of the Local Plan to avoid trees without statutory protection being lost or damaged.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>Policy wording has been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.</p>

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Nikolett Sumi [3788]	1094 I live on Liverpool road. It is a nice quiet area. Building a lot of flats for social housing will change that. Also parking is already an issue which will get worse with new flats. The lack of green areas for wildlife will also be detrimental in the area if flats are built.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr simon frost [3795]	1104 Garages are essential in this area which doesn't have drives or garages for the homes and there is significant parking pressure.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Aubrey Muchamore [3796]	<p>1111 Opposing:-</p> <p>Local area not be able to “manage the impacts” - huge population increase, parking, traffic, light deprivation, air quality, access for the disabled and emergency services, architectural incompatibility, environmental, health, well being and privacy issues.</p> <p>The plan is contrary to the values (clearly stated in WBC’s “Local Plan”) to which the Council claims it is espoused.</p> <p>- decimating a 50 year old wild area, mature trees and the valued fauna and flora therein. - putting 30 garaged cars and the extra ones on the surrounding streets where parking is already unmanageable.</p> <p>Needed are more rational, reasonable and inventive ideas.</p>	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p> <p>Design issues (including access and character), loss of privacy and loss of daylight are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Air quality has been considered as part of Policy CC8.4 Managing Air Quality.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Helen Simon [3762]	1116 Plan fails Council’s objectives to “establish a balanced approach to parking”, “protect air quality”, promote “health and well-being”. Consequences of plan- increase in car use, 30 cars from current garages, 20-40 new residents. Shops and infrastructure are a car ride away. Wardens don’t patrol enough to prevent dangerous parking. Inaccessibility for emergency vehicles- unsafe. Taller buildings diminish light and privacy, need deeper foundations, may compromise the foundations of my home at 25 Liverpool Road yet again. Driving is difficult without trucks delivering building resources and equipment. No environmental considerations - already a high-density residential area. More pollution, congestion, unsustainable planning,	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Stephen Howat [3773]	1117 1) The area already suffers from a chronic shortage of parking. More housing will exasperate the problem. 2) Destruction of wildlife/habitat. A wide variety of birds visit, shelter, nest in gardens/adjoining land. Animal species that are protected und by law are also present. Badgers, sloworms and bats are all visit gardens/adjoining land in the area. The disruption of building and the eventual loss of habitat will have a adverse effect on all wildlife populations. 3) Health and wellbeing. Higher density of housing/ increased population impact on our quality of life, stress, pollution, privacy all being negatively affected.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p> <p>Building at higher densities will be necessary to meet government housing targets and Chapter 11 of the NPPF (Making Effective Use of Land). However, to combat any perceived negative effects of high density development, the Local Plan seeks to control the locations where tall buildings are considered appropriate. The design policies and forthcoming Design Guide have also been strengthened to deal with the challenges of high density living.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Susan Burke [3779]	1118 Vicarage Ward is the most populated ward in the Borough with Watford Football Club and Watford General Hospital. Residents parking during the day is essential and later finish time in the evening should be considered. The garages in Liverpool Road have become essential to us as we are elderly and unable to park too far away from our home. Match days/evening already brings traffic to almost a standstill and just getting home can be a trial. The provision of our Council garage has become a lifeline and prevents us feeling isolated and trapped in our home.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Simon Elliott [3805]	1120 Yet again another development without consideration of parking in an area that is near impossible for residents to park as it is. How is it that this is deemed acceptable? Has anyone from Planning actually driven down vicarage road and the surrounding roads after 7pm at night to see for themselves the situation?	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Steven Howlett [3809]	1129 This area is already under such a strain with parking, so unless you can be 100% sure that you will provide parking for these additional dwellings or enforce some sort of 24 hour parking enforcement this will be a problematic development.	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Helen Slater [3810]	1130 SUMMARY: LOSS OF AMENITIES AND DISRUPTION TO PUBLIC SERVICES. PEOPLES HEALTH AT RISK	Object	<p>Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Protecting functional open spaces has been considered as part of Policy NE9.6 Protecting Open Space.</p> <p>Design issues (including access) are material considerations to any planning application, and so any development proposal will be required to adequately address design issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Although the Council does not directly provide new infrastructure, such as sewerage, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p>	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Sharon James [3813]	1132 There isn't enough parking as it is right now. With the printworks development and the added pressure already, the surrounding area will be absolute chaos. It will be ruined and overwhelmed with vehicles.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Angela Weston [3799]	1141 General impact of proposed 4 story flats, approximated 20 units: Environment-More cars, more Parking difficulties. The Overshadowing/overlooking of existing properties, infringing on existing residents rights to privacy and sunlight. A strain on the water and sewage systems. Increased noise and artificial light pollution. Physical/Mental well-being- Distress caused by large scale demolition and building processes, noise, dust and vibration. Future detrimental effects to health from increased high polluting emissions Conservation-The destruction of the habitat of protected species. Badger territories, feeding ground and Setts, trees for roosting bats, cover for slow-worms and hedgehogs. A full ecological survey needs to be completed	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p> <p>Loss of daylight and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Planning conditions are also placed on any planning approval to limit the impacts on construction on residents. There will be an opportunity to comment on these issues if a planning application is submitted in the future.</p> <p>Managing any pollution caused by new development has been considered as part of Policy CC8.5 Managing the Impacts of Development.</p>	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Debra Crichton [3745]	1142 Objection to the demolishing of garages in Liverpool Road and our concerns regarding exacerbated parking problems	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Gerrard McMahon [3821]	1143 The additional properties will only increase an already very difficult parking situation. Many times have I come home and had to drive round and round the area in order to get a space. Sometimes this can get so serious people park illegally and/or dangerously. In my opinion it is becoming critical.	Object	<p>Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Carole Andrisani [3824]	1148 Object about plan H27 This is not great at all for all streets around , Liverpool road and James road , we cannot get any more cars in this area , parking is already impossible . Plus pollution as cars will go round to look for spaces . Taking away trees and wild life in that area too. The fact that a 3/4 storey block will be over looking all properties around not what anyone will want taking away privacy . Also taking sun light to many garden . Definitely objecting for this plan .	Object	<p>Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of daylight, loss of privacy and design issues (including scale) are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Managing any pollution caused by new development has been considered as part of Policy CC8.5 Managing the Impacts of Development.</p> <p>The Council recognises the multifunctional benefits that trees can bring, from improving air quality to supporting wildlife. Tree Preservation Orders have been placed on many of the borough's trees to ensure that they are not felled without the local authority's consent. Policy wording will be added to Chapter 9 of the Local Plan to avoid trees without statutory protection being lost or damaged.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>Policy wording has been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr verrol Crichton [3823]	1149 INTENSIFIED PARKING PROBLEMS, LACK OF PRIVACY, LOSS OF WILDLIFE, WE HAVE BADGERS, FOXES AND BATS LIVING AMONGST US, ADDED DISTRESS TO DAILY LIFE, LACK OF EMERGENCY ACCESS-THIS IS ALREADY A REAL PROBLEM AS CARS PARK ON THE EDGES OF ROADS AND DOUBLE YELLOW LINES, HIDEOUS DISTURBANCE THAT WILL ENSUE ESPECIALLY DAMAGING TO THE ELDERLY RESIDENTS WHO SURLEY HAVE A RIGHT TO A PEACEABLE LIFE, THEIR WELL BEING IS AT RISK,LIGHT POLLUTION ALREADY BLIGHTS THE NEIGHBOURHOOD DUE TO WATFORD FOOTBALL CLUB, DUST AND DEBRIS WILL ACCOMPANY ANY NEW CONSTRUCTION-WE AS A COMMUNITY DEMAND TO BE HEARD AND LISTENED TO WITH RESPECT!	Object	<p>Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of privacy and design issues (including character) are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>The Council is committed to encouraging wide participation from the community in the planning process. The methods used to engage with the community on the First Draft Local Plan is set out in the consultation statement.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Demelza Slaney [3645]	1150 Strongly object Parking is a nightmare already and the garages are in high demand. No care for the wildlife has been taken into account Vicarage and our surrounding roads are highlighted by you as a location where your air objectives cannot be met. My home will be subject to loss of natural light and I will loose a lot of privacy as i will become overlooked. The noise, light and air pollution will affect my and my young family and I fear for our health and well-being. Loss of value to homes, especially mine. Highway safety is a concern	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p> <p>With regards to the alleged disruption of a badger sett, some light clearance took place in October 2019 to prepare the site for a topographical survey. Although these works do not require planning permission, an ecological survey was undertaken prior to the clearance of the site which found that the works would not have any significant impact on biodiversity. The survey also found no evidence of a badger sett on site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Alistair Noble [3703]	<p>1151 Environment-More cars, more Parking difficulties. The Overshadowing/overlooking of existing properties, infringing on existing residents rights to privacy and sunlight. A strain on the water and sewage systems. Increased noise and artificial light pollution.</p> <p>Physical/Mental well-being- Distress caused by large scale demolition and building processes, noise, dust and vibration. Future detrimental effects to health from increasingly high toxic emissions.</p> <p>Conservation-The destruction of the habitat of protected species. Badger territories, feeding ground and Setts, trees for roosting bats, cover for slow-worms and hedgehogs. A full ecological survey needs to be completed.</p>	Object	<p>Concerns noted. Because this site falls into the High Sustainability Zone, development would be expected to be car lite or car free. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of privacy and daylight are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Planning conditions are also placed on any planning approval to limit the impacts on construction on residents. Any pollution arising from new development has also been considered as part of CC8.5 Managing the Impacts of Development. There will be an opportunity to comment on these issues if a planning application is submitted in the future.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Lucie Watts [3827]	<p>1152 Negative impact of flats - Environment-More cars, even more Parking difficulties. The Overshadowing/overlooking of existing properties, infringing on existing residents rights to privacy and sunlight. A strain on the water and sewage systems. Increased noise and artificial light pollution.</p> <p>Physical/Mental well-being- Distress caused by large scale demolition and building processes, noise, dust and vibration. Future detrimental effects to health from increased high polluting emissions</p> <p>Conservation-The destruction of the habitat of protected species. Badger territories, feeding ground and Setts, trees for roosting bats, cover for slow-worms and hedgehogs. A full ecological survey needs to be completed.</p>	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of daylight is material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Although the Council does not directly provide new infrastructure, such as sewerage systems, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p> <p>Any light pollution arising from new development has been considered as part of CC8.5 Managing the Impacts of Development. Planning conditions are placed on any planning approval to limit the impacts on construction on residents. There will be an opportunity to comment on these issues if a planning application is submitted in the future.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Edward Slaney [3660]	<p>1153 Parking in this area is already far too congested and the garages here provide essential relief to a street it is almost impossible to get a parking space in after 7pm. The current lack of parking means people park across corners and on yellow lines making disabled and pushchair use dangerous or impossible on the street. Adding additional houses in a dense terraced area can only worsen this effect. This land is also home to wildlife including badgers, a protected species.</p>	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Alistair Noble [3703]	1154 General impact of proposed 4 story flats, approximated 20 units: Environment-More cars, more Parking difficulties. The Overshadowing/overlooking of existing properties, infringing on existing residents rights to privacy and sunlight. A strain on the water and sewage systems. Increased noise and artificial light pollution. Physical/Mental well-being- Distress caused by large scale demolition and building processes, noise, dust and vibration. Future detrimental effects to health from increased high polluting emissions Conservation-The destruction of the habitat of protected species. Badger territories, feeding ground and Setts, trees for roosting bats, cover for slow-worms and hedgehogs. A full ecological survey needs to be completed.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. Planning conditions are also placed on any planning approval to limit the impacts on construction on residents. There will be an opportunity to comment should a planning application be submitted in the future. Any additional noise pollution arising from new development has been considered as part of CC8.5 Managing the Impacts of Development.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Aimee Martin [3828]	1155 This is not in keeping with the immediate area this road is home to terraced houses the parking is already a nightmare adding flats would cause even more issues	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Craig Rennie [3830]	1160 It is Unbelievable that you as a Council will remove Garages around the area of Parking Zone J and try and add more vehicles to the already over crowded streets covered by Parking Zone J. People have to already park on Double Yellow Lines as there are not enough parking spaces and then the traffic wardens turn up after people have gotten home from work to apply parking fines to the vehicles. If the Garages are removed and Flats built there are going to be far to many Vehicles in a already over crowded area.	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Charlotte Ashton [3425]	1161 1) The evidence behind the sustainability zones, and this site's RAG rating (as referred to in the SA) has not been shared. It is not clear how these link together. This site would appear to perform poorly against objective SA3. 2) The IDP is out of date and it isn't clear what impact this has on the site's sustainability zone rating. 3) Therefore, increased parking standards should be applied. 4) Future planning permission should be conditioned to restrict parking permit entitlement of future occupiers of the site. 5) Support car club spaces. 6) Infrastructure improvements are critical to this site.	Comment	Concerns noted. The area has been classed as being in the High Sustainability Zone due to its accessibility to a range of services within walking distance. Refinement of the Spatial Strategy has resulted in the site being located outside of the Core Development Area. Parking requirements reflect the location of the site and are set out in the appendices. The approach to car parking in the area will be consistent with the parking strategy implemented in the area. The Sustainability Appraisal is available on the Council website. The Appraisal has been updated from the first draft Local Plan consultation to reflect changes included in the final draft Local Plan. The Infrastructure Delivery Plan has been revised to reflect infrastructure provision required to support delivery of new development to 2036.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs May Wirkola [3831]	1164 This is an already overpopulated area with not enough parking for residents already living in close vicinity to the garages. Removing garages will put 20/30 extra vehicles on the roads that are already overflowing. Houses close to the site will be overlooked and I see no one benefitting except for the developers and the council. A block of flats would not fit within the community. This area is one of the last communities left in Watford where people live happily together.	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. Any development proposal will also need to comply with the design policies set out in Chapter 6 and the Design Guide. This should guide the design of any potential scheme and ensure that development is sensitive to its surroundings in terms of character, scale and massing.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs Clare Crooks-Meredith [3834]	1172 There is no infrastructure to support more housing on Liverpool Road. There is not sufficient parking for existing residents as it currently stands, more housing will increase the problem.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Mark Nichols [3724]	<p>1182 I object to this area being classified as High Sustainability. The area will not support the required levels of dwelling density without unacceptable impact on surrounding properties which are all residential. The minimal standard of parking provision to be provided in High Sustainability Zones will increase impact on parking in adjoining roads which are already full to overflowing.</p> <p>Although partly a Garage Site, parts of the area are currently wild green space with wildlife and trees which contribute to the local environment.</p>	Object	<p>Concerns noted. The area has been classed as being in the High Sustainability Zone due to its accessibility to a range of services within walking distance.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will also be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mrs jo Burrows [3839]	<p>1183 This plan will... increase traffic and therefore parking and pollution in an area already desperately not coping with current parking needs. destroy trees, wildlife, reduce light, invade resident's privacy; this will impact on their well-being and mental health. increase an already highly populated area and therefore put further strain on health and education services. further jeopardise access for the disabled, emergency services and carers for elderly residents. leave residents feeling squashed in between this plan and the current development on what was Farm Terrace Allotments - very depressing! Be Bold Watford Council - rethink!</p>	Object	<p>Concerns noted. Loss of privacy, loss of daylight and design issues such as access are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will also be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p> <p>The Council does not directly provide new infrastructure, such as schools and health practices. However, the Council liaises with the providers, such as the NHS and Hertfordshire County Council to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Kieran Kinsella [3840]	<p>1185 Unsuitable area to add more properties. No infrastructure/space to support the growing needs of new residents. Plans include the destruction of a green space that could be used by local community. Surrounding area already densely populated, parking already a major problem despite permit system and restrictions on vehicles per household. A better plan is to develop a innovative design (possible subterranean) for residents parking on the site of the current garages. Residents willing to consider payment schemes for use. Local schools already oversubscribed, no new schools planned (Riverside development to add to this). Met line extension cancelled? No new links?</p>	Object	<p>Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government and all areas of the town will be experiencing an increase in development. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The Council does not directly provide new infrastructure, such as schools and health practices. However, the Council liaises with the providers, such as the NHS and Hertfordshire County Council to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p> <p>Chapter 6 seeks to achieve higher quality design.</p>	<p>The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Michael Englert [3844]	1189 1 - There is very little off street parking in Liverpool Rd. The loss of the garages will exacerbate the problem of parking. 2 - The new development will overlook my back garden so I will lose privacy. 3 - Trees will be cut down losing a habitat rich in wildlife. 4 -The area is already densely populated and the new development will add to noise and congestion. 5 - The council has failed to stop the spread of unsuitable multi occupancy houses already in the street.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. However, Hertfordshire County Council are the authority responsible for managing the road network, including congestion. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future. It is agreed that the loss of trees should be avoided and some policy text will be added to Chapter 9 of the Plan that requires all trees to be conserved as part of new development schemes unless demonstrated to be unavoidable. In this case, trees should be replanted. Policy HO3.9 Residential Conversions seeks to manage HMOs and Policy CC8.5 Managing the Impacts of Development seeks to address any potential noise issues that could be caused by new development.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. Policy wording has been added Policy NE9.2 Green Infrastructure Network which seeks to protect trees and encourage native planting.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Ed Burrows [3841]	1191 I strongly object to any development on this site as it will exacerbate existing problems. Watford 010A is in the lowest 7% LSOAs for living environment nationally and in a location where the AQMA objectives are unlikely to be met. This will worsen air pollution and access for emergency vehicles. Minor incidents already cause huge problems. Any development here would worsen the current low living environment and is not aspirational for Watford residents. WBC needs to demonstrate it is listening to its residents and look to improve their environment and mental wellbeing, and make a positive impact on biodiversity.	Object	Concerns noted. Although close to an AQMA, the site does not lie within an AQMA. Policy CC8.4 Managing Air Quality has been designed to ensure that new development does not worsen air quality in the borough. Policy NE9.8 Biodiversity also seeks to ensure that development enhances the biodiversity value of a site by 10%. This is national policy under the Environment Bill. Policy CC8.5 Managing the Impacts of Development further seeks to reduce risk of pollution caused by new development, including noise and light pollution. Design issues (such as impact on character of the area and designing a safe environment) and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. This site is currently not considered to be at risk of flooding. However, the relevant stakeholders, such as the Environment Agency and the Flood Authority at Hertfordshire County Council are engaged as part of any planning application who would pay regard to cumulative impacts.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Theo Merino [3851]	1196 In summary, this will just cause chaos between current tenants in the area and new home owners of the planned build with cars will struggle with parking. Leave the garage site as it is to combat parking issues that already exist.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Sally Marchant [3734]	1204 This will put more pressure on parking which is already under extreme pressure. The existing garages provide much needed additional parking for local residents. These plans not only reduce our parking options but add more need for parking for the new occupants. Not to mention destroying an area for wildlife. Over the last 10 years, the parking has become even more difficult around our area. The hospital car park with it's surrounding spiked fence, is empty in the evening whilst residents drive round and round looking for a space, adding to the pollution and traffic danger.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Denise Cox [3846]	1207 I've lived on St James Road for 24 yrs, my mum for 38. I run a local small business & get home at 8 most nights & can't find a parking space as it is. We only have 1 van between 2 households, needed for my mum & husband who can't walk far due to ill health. 65 flats are being built, will there be 65 new parking spaces for these? Mum lives in a house backing onto your site, I'm worried about the lack of privacy a 4-storey building causes. Also worried where the bats will live?	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1252 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Iris Howe [3868]	1303 I still have several concerns regarding the proposed clearing and development of the site, particularly as with regard to sustainability and well being.	Comment	<p>Concerns noted. Although the Government has set Watford ambitious housing targets, there are also employment space targets the Council has to try to meet. Currently in Watford, there is a large shortage of land for industrial uses.</p> <p>The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. The site is considered to be within reasonable walking distance of open space as per the findings of the Green Spaces Strategy.</p> <p>With regards to traffic, Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Planning conditions are also placed on any planning approval to limit the impacts on construction on residents. There will be an opportunity to comment on these issues if a planning application is submitted in the future.</p>	<p>The development considerations have been amended to require a Preliminary Ecological Appraisal.</p>
		<p>This area does not have an abundance of trees or greenery and the destruction of the small wild life area will further deplete the limited natural fauna. Due to the current Riverwell development, swaths of marsh and wild area has been destroyed. A vibrant allotment (and campaign to save it) has also been destroyed. The development on the previous Irish Club site altered an already thriving wild life area. Whilst I appreciate that housing is necessary, destroying wild areas simply does not follow the Town's own sustainability criteria and other areas need to be developed. The new industrial site on Tom Sawyer Way is not at full capacity after 2 years. Was this site perhaps not better used for housing with it's closer proximity to Bushey Station for greener commutes? Considering climate change this is folly. Traffic will also increase as the Riverwell development grows with it's carbon impact adding pressure to an already densely populated area.</p> <p>Well belling</p> <p>I have been a resident here since 2005. A variety of developments have taken place since that time and the consistency of development disruption and noise has an impact on well being. I have on several occasions and over many years, had to contact the environmental department regarding consistent noise from the builders outside of regulated hours. The contractors have always been fully aware of the working hours restrictions and blatantly disregard them; showing a complete disrespect for residents and our community. This area has been literally, subjected to builders noise in one form or other for years! There is traffic disruption from cranes, the pollution from machinery, the noise from heavy goods vehicles. These roads are not able to meet this level of congestion and added parking from contractors.</p> <p>Quality of Life - Parking</p> <p>The parking overflow impacts heavily on this area. Vehicles regularly park in areas which are restricted due to the lack of parking spaces. This has been occurred in the previous 5 + years. As a present parking solution, the garages themselves are being removed! This isn't logical. The level of Houses of Multiple Occupancy has increased tremendously in this area due to the housing crisis. These residents also own and park their vehicles outside their</p>			
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Esta Jacobs [3864]	1304 Re the new build on Liverpool road - obviously no consideration for current or future residents as there is not enough parking for the residents already here...and you want to build more flats? Obviously not doing your jobs as you appear ignorant of the fact that there is a severe parking shortage as you are happy to knock down garages in the pursuit of profit ignoring, health and safety as well as well being	Comment	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1459 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No changes required.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Stephen Collins [3909]	1496 I have just found out about the proposed plans for the demolition of Liverpool Road garages. As I rent one of the garages [and have done so for many years] is why haven't I received any notification about the proposal? Also as I live in Liverpool Road no-one has informed any of the residence about these proposals. I feel the Council has been very underhand over the secrecy of their proposal. I also object to these plans for the following reason: Where are all the vehicles which use these garages going to park? The roads in Liverpool Road and surrounding roads are at saturation point already, especially night and weekends. Vehicles are parking on double yellow lines and across road corners. Vehicles find it difficult to get round corners. How will fire brigade and ambulances cope in an emergency? This is a serious safety issue. Also with these vehicles parked over corners, pedestrians have to walk in the road because of this. Again, a safety issue. The Council obviously has not taken into consideration that by building extra properties would only cause more parking problems and danger to the existing environment with all the additional vehicles in this already overcrowded area.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Design issues, including access for emergency vehicles, are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. The Council is committed to encouraging broad participation from the community in the planning process, including the Local Plan. The wide variety of methods used to engage with the community on the First Draft Local Plan are set out in the consultation statement.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Lisa Wilson [3910]	1497 I would like to protest against a council plan to demolish the garage site on Liverpool Road to build a block of flats, which has been brought to my attention today. I live on St James Road and my garden backs onto these flats. I am appalled that this plan has not been brought to my attention by the council themselves but by a neighbour. My reasons for opposing these plans are as follows: 1 Wildlife: We are fortunate that we have a badger who regularly visits our garden and comes in from the back where these garages are. We also enjoy watching bats in the summer who appear to take flight around the trees at the back of the gardens. Whilst I cannot say for sure where these roost, I would suspect that it is in the trees around the back of these gardens or possibly in the garages themselves. Building flats in this area will undoubtedly disrupt these bats and bats are a protected species. 2. Parking issues. As I have no doubt that the council are aware there is a major shortage of parking in the zone J area. I have personally had numerous occasions where I have got home late at night and driven around for in excess of 25 minutes trying to find a space. Having to pay for a permit, when there is a shortage of spaces infuriates me and I feel the council should be doing more to protect the parking space that exists, not exacerbating the problem! Residents pay for and use these garages, which eases congestion on the surrounding streets. Building more flats with no parking is going to make an already out of control parking problem unmanageable. I would urge members of the council to drive down St James Road at night and see the number of cars parked on double yellow lines and on corners, hindering access of emergency service vehicles, such as fire engines, should a fire arise. I have written to the council regarding this before and been ignored. Does Watford council really want a Grenfell tower type incident on their hands due to failing to address parking issues and fueling the problem with poor planning? People need cars, improving cycling links and public transport won't help as people use cars to get to all sorts of places and can't always cycle or use public transport. 3. These flats will overlook my garden and as a home owner who values my green space and privacy, I oppose this. I am appalled that these plans are being made without consulting local home owners and residents. I would appreciate acknowledgement of my e-mail and would like to be involved in any decision made by the council	Object	Concerns noted. The site has no open space or wildlife designations and there is no evidence that there is a badger on site. However, it will also be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. In light of concerns about parking, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Loss of privacy and design issues (including access for emergency vehicles) are material considerations to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future. The Council is committed to encouraging wide participation from the community in the planning process, including the Local Plan. The variety of methods used to engage with the community on the First Draft Local Plan are set out in the consultation statement.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss G J Pearce [3912]	1525 We object to the plans being submitted for the demolition of the Liverpool Road garage site and the adjoining wild land to build a four storey block of flats. Already it is almost impossible to park close to our house in the evening. We have had a garage on this site for almost 38 years but even this space is being invaded and in an emergency without the people leaving their address we are unable to use our car.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Mr Richard Hunt [3748]	1526 The plan to demolish the garages in Liverpool Road and use the adjacent wild life area for flats is outrageous. We have enough problems with parking without introducing more residents, most with at least one vehicle. The plan does not have any provision to deal with this You have already taken our beloved allotments, of which I was a tenant for over 35 years. You don't seem to care about the views of the residents, which was evident in the way in which the allotments were taken by a series of technological inaccuracies	Comment	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. The site has no open space or wildlife designations. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Preliminary Ecological Appraisal to determine the habitat value of the site. The Council is committed to encouraging wide participation from the community in the planning process, including the Local Plan. The variety of methods used to engage with the community on the First Draft Local Plan are set out in the consultation statement.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. The development considerations have been amended to require a Preliminary Ecological Appraisal.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Miss Ann-Marie Laidley [3730]	1527 I live and have lived on St James Road, WD180DZ for the last 4 years. Our road is over crowded as it is. I already pay over £50 a year parking permit and I 100% object to any development on Liverpool road! Please use my details as an official objection for this plan.	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Ms Marie Wright [3704]	1528 I would like to object to proposal H27 . Currently parking is problematic meaning when I finish work after a 12 hour shift I often park far away from my home streets away . This local area struggles to park one family car how would we manage with more residents needing to park . This also include access to local Gap and schools which is also a problem in our local area often having to wait weeks for appointment and wondering if our children would get a place in a local school . This will all have a impact on the local resident that current live in the area .	Object	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Hertfordshire County Council (Martin Wells) [3559]	1633 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8 Biodiversity.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Hertfordshire County Council (Martin Wells) [3559]	1634 Highways & Transport Nearest bus stops are over 400m away but Watford High St station is only 0.6 miles and site is within walking/cycling distance of the town centre.	Comment	Comment noted.	No change.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Roxanne Cole [3922]	1725 I am so disappointed to find that you plan to squeeze in houses at the garages in Watford fields and build some sort of multi-story housing in Liverpool road. We are a community left to deal with the council's awful housing projects for years and we are absolutely sick of it. I now work less hours starting at 9:30am because the traffic around Watford has become horrendous! The small amendments you have done to the roads such as the "hospital road" does not compensate for the amount of houses and extra cars you are dumping on us. So then you come up with the stupid idea that people should be forced not to drive by building houses with no/little parking. Then trying to force more permits and longer permit hours on the community. The stations see extra commuters but no extra or reasonably-priced parking. You have already taken over one set of garages in Watford fields; forcing my mechanic out of a job. Now you plan to stick more houses on the second set of garages behind my friend's homes. In Liverpool road area; also part of our community due to a shared primary school; you plan on a load of houses overlooking people's gardens. They are fuming and wish to move. They are already dealing with the "hospital houses" and lack of parking. You should have created more parking for these residents with your hospital plans to make their lives more bearable. A piece of this "hospital land" to create 20 extra spaces or so would have really helped and made everyone's lives easier. Instead you plan to put up a monstrosity overlooking their gardens. We are losing our community. My friend's are sick of it and moving away. You are pushing Hertfordshire residents away to make room for Londoners who do not mind cramped conditions and no community. The council is liberal; I want to stay in the EU. Yet all people I know who voted to leave in Watford done so because they are sick of this Housing, parking, forcing permits, traffic situation. It's their shot of hope that something can be done to stop this. You are dividing us and forcing residents to vote harm to the economy in desperation. I don't care that this is coming from central government! Fight it, appeal, plan a new Hertfordshire city. Just stop making our town an unbearable place to live. Stop forcing my daughter's friends to move away! If you live in Watford then you know what I am saying is true deep down.	Comment	Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. However, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Although the garages do not have any employment use, loss of employment land is not supported in the Plan (see Chapter 4).	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Varshese Kochuparampk Dommen [3929]	1732 I am a resident of 57 Liverpool Road. My most concern is parking space in car. After 6.00 o'clock all the places are filled with car. No spaces for getting car park. Ultimately sometimes we are getting parking fine due to staying at DYL. In that present scenario very hard for getting space for car park in the evening. If further houses make without having car park facility situation will get more worse. So in my view demolition of garage and making house should provide car park facility within the premises not in Liverpool Road. Otherwise our life will get more hard and forced to leave this place. I hope council will do right thing.	Comment	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Hidaya Ahamed [3930]	1733 I am writing this with regards to the current proposals to convert the garages located on Liverpool Road into flats. Myself and my family wish to express our concern and disapproval towards the proposition. The parking and the congestion on this residential road is already a big concern. We have paid for parking permits for our vehicles however, we still face increasing difficulties in securing a parking space everyday especially in the evenings and weekends. This is due to the heavy congestion on our road and neighbouring roads caused by neighbouring flats. I urge you to reconsider this proposal as it will not only increase congestion but also create both noise and air pollution during the construction period. In addition to this, the flats will pose as an intrusion of privacy for the neighbouring residents, creating further long-term issues and conflicts in the neighbourhood.	Comment	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Planning conditions are also placed on any planning approval to limit the impacts on construction on residents. There will be an opportunity to comment on these issues if a planning application is submitted in the future. Any pollution that could be caused by the new development has been considered as part of Policy CC8.5 Managing the Impacts of Development.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H27 Land and Garages to the Rear of 5-17 Liverpool Road	Helen Slater [3931]	1734 Ever since the granting of the flats by the football ground, parking along my road has become steadily worse, to a point of being a nightmare! To provide dwellings with no parking is proving to be difficult for people who already live here - some have been here for a very long time! To propose to knock down the garages and build new houses - this must be done with parking in consideration. The thought of dwellings for "key workers" for example - thinking they don't need/have cars is also ludicrous. District nurses need cars to get to patients, police nurses fire people on a night shift can't always use public transport - most people have cars! We do not need parking wardens - we need a solution. I have a small car and when coming home late struggle to find parking. I've lived here for almost 15 years and it has become a shocking problem!	Comment	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	E.J Yates [3932]	1735 I have been advised that you plan to knock down the garages at Liverpool Road and plan to build houses there. The current car parking on Liverpool Road is already a problem and is difficult to find parking spaces in the evening on the road. I work late and only arrive home in the evening - luckily I have a garage and I am able to put my car in the garage in the evening. If you knock down the garages, where are the cars going to park from the garages? 22 cars and the cars from the new houses that you are proposing to build. Please reconsider this decision and cancel the proposal to knock down the garages.	Comment	Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.	The scale of development and development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H27 Land and Garages to the Rear of 5-17 Liverpool Road	Charles Forbes [3933]	1736 Paraphrased - concerned about the social impacts of development, including increases in drug related crime. Also concerned the council did not sufficiently engage with residents over proposals.	Comment	Concerns noted. The Council is committed to encouraging wide participation from the community in the planning process. The methods used to engage with the community on the First Draft Local Plan is set out in the consultation statement.	No change.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Ms Tracey Powell [3628]	936 The houses on Elfrida Road with patio gardens will have no natural light into the houses or gardens, the buildings will block all natural light into the existing houses. As their gardens are small, there will be no room for sunlight into the houses. It is unethical to not have any natural light. The houses are small and have young families in them, it is unethical to take the natural life to their house and gardens. The noise pollution from the train is also not accepted for property in this area.	Object	Concerns noted. Loss of daylight is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. Any development proposal will also need to comply with the Design Guide which sets out the appropriate privacy distances. There will be an opportunity to comment should a planning application be submitted in the future. Issues relating to noise will be dealt with using national guidance and Policy CC8.5 Managing the Impacts of Development. A Noise Impact Assessment would be required to accompany any development proposal to demonstrate that noise is at an acceptable level and to ensure appropriate mitigation (if required).	No change.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Ms Tracey Powell [3628]	937 There are around 15 young families on this section of Elfrida road, many with young babies. To build these new properties would be to affect their quality of life. They would have no natural light into their house, the children's bedrooms would have no natural light. As the gardens are small, it would mean the spaces between the windows of the back of the existing houses and the new property would be extremely close and unethical. How can a child grow up in this environment without affecting them.	Object	Concerns noted. Loss of daylight and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Any development proposal will also need to comply with the Design Guide which sets out the appropriate privacy distances. There will be an opportunity to comment should a planning application be submitted in the future.	No change.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mrs Ann-Marie Harwin [3668]	972 Loss of daylight Directly overlooked, loss of privacy Negative impact on residents mental health Visual amenity Parking Noise and disturbance Close proximity to existing homes Compromise of the existing buildings integrity, our homes are Victorian and built on shallow foundations. We already experience movement, new and close structures have the potential to further disturb and damage our properties. High water table 750 homes being built on the Riverwell Estate less than 0.4 miles from Watford Fields Lack of affordable rental Garage spaces in the local area necessary for both domestic and small business use	Object	Concerns noted. The Council has been set a target from national government to build approximately 14,000 new homes up until 2036. Although the new housing at Riverwell will contribute towards this target, the Council is still required to plan for the rest of the growth expected in Watford. The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force the landowner to provide affordable garage space and if the landowner no longer wishes to run the garages on the site, it is important that the land is made more efficient by providing much needed housing. Loss of daylight and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Any development proposal will also need to comply with the Design Guide which sets out the appropriate privacy distances. There will be an opportunity to comment should a planning application be submitted in the future. National guidance states that a loss of view is not something that local planning authorities are able to take into account when assessing a planning application. Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to Policy CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document. With regards to the high water table, the site has been examined through the Strategic Flood Risk Assessment Part 2. As a result of the findings, it has been added to the development considerations for the site a requirement to undertake a site-specific flood risk assessment and surface water drainage strategy to ensure the flooding issues are addressed.	A requirement to complete a site-specific flood risk assessment and surface water drainage strategy has been added to the development considerations to ensure the surface water and groundwater flooding issues are adequately addressed before development takes place. Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.

H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Ian Powell [3672]	982 This is unethical, the elfrida road houses have small gardens, so any new buildings will block natural daylight into the houses and stop any privacy. The houses mainly have young families and will have a negative impact on their mental health. It is unethical to live with no natural light. With window on window for children's bedrooms and no privacy, it is completely unethical and will cause mental health issues in these families.	Object	Concerns noted. Loss of daylight and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Any development proposal will also need to comply with the Design Guide which sets out the appropriate privacy distances. There will be an opportunity to comment should a planning application be submitted in the future.	No change.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Ian Powell [3672]	983 The existing houses are victorian and fragile on weak foundations. The elfrida road houses have cracks on the outside and inside where they are build on shallow foundations and the houses move with every train. All the houses on Elfrida road experience movement and have cracks because of the shallow ground. A visit to the back of elfrida road will show this, I have attached photos of our living room. Any more buildings will cause existing houses to be damaged. I have recorded this note that i sent you to show i have made you aware of damaging properties.	Object	Concerns noted. Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document.	Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mrs Lisa Knapp [3673]	984 The proposed dwellings will overlook the rear of properties on Elfrida Road and change the view / outlook for us negatively. I'm concerned at the very close proximity of the proposed dwellings. Privacy will be lost. This will devalue our properties and make resale harder. The mental well-being of residents will be compromised. Loss of daylight with properties being built blocking the light entering south facing rear gardens of Elfrida Road properties. Lack of parking for new dwellings. Parking is already an issue. Building so close to Victorian houses could damage our old houses and create movement.	Object	Concerns noted. Loss of daylight and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Any development proposal will also need to comply with the Design Guide which sets out the appropriate privacy distances. There will be an opportunity to comment should a planning application be submitted in the future. National guidance states that a loss of view is not something that local planning authorities are able to take into account when assessing a planning application. In light of concerns about parking, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mrs Rebecca Friend [3675]	986 This proposal smacks of pure greediness. The whole area is already horribly overcrowded. New dwellings will be too close & overlook existing buildings. Loss of daylight, noise & disturbance to existing residents. Parking!!! Existing Victorian homes already suffer from movement with the trains! There are 750 NEW homes being built just down the road. Watford is becoming UNDESIRABLE to live in. Traffic is a nightmare as it is. What kind of 'home' will this really be for anyone? There is a distinct lack of garage units available and now being taken away. Used to be pleasant! NO MORE!	Object	Concerns noted. The Council has been set a target from national government to build approximately 14,000 new homes up until 2036. Although the new housing at Riverwell will contribute towards this target, the Council is still required to plan for the rest of the growth expected in Watford. The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force the landowner to provide affordable garage space and if the landowner no longer wishes to run the garages on the site, it is important that the land is made more efficient by assisting with Watford's shortfall in future housing delivery. The whole Borough will need to see reasonable uplifts in density to make effective use of land, as per Chapter 11 of the National Planning Policy Framework. The density achieved on site will be informed by Policy HO3.2 Housing Mix, Density and Optimising Use of Land, which seeks to take into account site opportunities and constraints to optimise site densities. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. Noise issues related to new development has been considered as part of Policy CC8.5 Managing the Impacts of Development. There is also a development consideration in the Local Plan that raises the site's proximity to the rail network to ensure the issue is mitigated by the developer.	No change.

H28 Land and Garages to the rear of 2-24 Elfrida Road	Mrs Leigh Cavell-Clarke [3679]	989 Loss of daylight. Loss of privacy. Visual amenity. Parking. Noise and disturbance. Close proximity to existing homes. New structures have the potential to further disturb and damage our properties. Lack of affordable rental garage space. Simply not enough room! New houses will be too close to railway track.	Object	<p>Concerns noted. Loss of privacy and loss of daylight are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. However, national guidance states that a loss of view is not something that local planning authorities are able to take into account when assessing a planning application.</p> <p>Mitigating for noise has been considered as part of Policy CC8.5 Managing the Impacts of Development and is written into the development considerations that a Noise Assessment is required to be undertaken as part of any future planning application.</p> <p>The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force the landowner to provide affordable garage space and if the landowner no longer wishes to run the garages on the site, it is important that the land is made more efficient by assisting with Watford's shortfall in future housing delivery.</p>	No change.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Robert Dent [3680]	991 Is there a need with the developments @ Riverwell, Bushey Arches & lower High Street adding close to 1000 units. Will increase parking density, already unsustainable, and heighten danger to children & pedestrian safety attending both schools. Very limited access via a blind junction for construction & contractor vehicles whilst increasing noise and disruption for existing residents, a recent single development on Elfrida caused significant disruption & a development on this scale could bring the area to a standstill on a daily basis. Increases the probability of damage to existing properties. Added pressure to local health and education infrastructure.	Object	<p>Concerns noted. The Council has been set a target from national government to build approximately 14,000 new homes up until 2036. Although the new housing at Riverwell will contribute towards this target, the Council is still required to plan for the rest of the growth expected in Watford.</p> <p>Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p> <p>Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to Policy CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document.</p>	Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Vincent Donald [3685]	996 I have been renting a garage here for the last 29 years and find it despicable that you have to build on every bit of land that you can find. Where will the people park there cars, there is a lack of parking in Watford Fields as it is or store there work materials or tools. If you were to get your application passed what will you be doing for the people that have use of them!!!. Will you be providing alternative premises. Just leave as is and everyone would be happy. I'm sure you care about your constituents NOT!!!!!!!!!!!!	Object	<p>Concerns noted. The government has given Watford challenging housing targets to meet and constraints in land availability has meant that the Council has had to examine a wide range of sites to make more efficient uses of land and to create sustainable land use patterns.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mrs Susan Coldrake [3696]	1002 Parking Close proximity to existing homes Compromise of existing buildings integrity, damage to our fragile foundations Loss of privacy Visual impact Extra traffic and pollution	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future. However, national guidance states that a loss of view is not something that local planning authorities are able to take into account when assessing a planning application.</p> <p>Regarding increases in traffic, Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.</p> <p>Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to Policy CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Peter Hutchinson [3698]	1004 1. The garages are a valuable asset for local people who rent them for storage and parking. It will be impossible to find any replacement as there are no others available in the locality. 2. Vehicles belonging to residents of dwellings on this site, who will probably not be eligible for parking permits, will park in the streets of the adjacent CPZ, in permit bays and on yellow lines, outside the CPZ enforcement hours, namely during the evenings, nights and Sundays . 3. The garages should be retained and the site removed from the list of potential housing sites.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H28 Land and Garages to the rear of 2-24 Elfrida Road	Mrs Sally Dent [3702]	<p>1008 Is this development necessary there are approx 1000 units under construction within a very short distance.</p> <p>Increased traffic in an area with 2 schools Increased pressure on local health & education infrastructure Area is already highlighted as a flood risk by insurance companies Increase of parking problems, already a major inconvenience Loss of already limited garaging spaces for residents and small businesses Major disruption to local residents creating mental health & environmental issues No parking facilities for contractors vehicles during construction again putting pressure on local parking with a very limited and tight access</p>	Object	<p>Concerns noted. The Council has been set a target to build approximately 14,000 new homes up until 2036. Although the new housing at Riverwell will contribute towards this target, the Council is still required to plan for the rest of the growth expected in Watford.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision. Regarding increases in traffic, Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H28 Land and Garages to the rear of 2-24 Elfrida Road	Ms Lucy Houbart [3733]	<p>1030 There are too many apartments being built in this area. The parking and traffic are too congested as it is. We can't take any more in this area.</p>	Object	<p>Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. For instance, the Local Plan includes policies to ensure that new development provides a balanced and proportionate housing mix (houses and apartments and different bedroom sizes).</p> <p>With regards to parking, It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p>
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Brian Knapp [3783]	<p>1087 The proposed dwellings will overlook the rear of properties on Elfrida Road and change the view / outlook for us negatively. I'm concerned at the very close proximity of the proposed dwellings. Privacy will be lost. This will devalue our properties and make resale harder. The mental well-being of residents will be compromised. Loss of daylight with properties being built blocking the light entering south facing rear gardens of Elfrida Road properties. Lack of parking for new dwellings. Parking is already an issue. Building so close to Victorian houses could damage our old houses and create movement.</p>	Object	<p>Concerns noted. Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. National guidance states that a loss of view and loss of value are not issues that local planning authorities are able to take into account when assessing a planning application.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to CC8.5 Managing the Impacts of Development. to ensure that the guidance is clear in the document.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.</p>

H28 Land and Garages to the rear of 2-24 Elfrida Road	Mrs Stella Gordon [3785]	1089 Extra demand on parking in Elfrida Road and Tucker St. Increased traffic. Loss of privacy for households backing onto the garages and railway line. Likely reduction in value of houses backing into railway line as a result of loss of privacy. Loss of use of garages as storage - clearly needed as indicated by the waiting list.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.</p> <p>Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. National guidance states that any potential loss of value is not something that local planning authorities are able to take into account when assessing a planning application.</p> <p>The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force the landowner to provide affordable garage space and if the landowner no longer wishes to run the garages on the site, it is important that the land is made more efficient by assisting with Watford's shortfall in future housing delivery.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Miss Kirsty Trimmer [3786]	1090 Parking pressure! As a resident it is already crammed and hard to get a space during peak times. Object!!	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Dave Sifleet [3787]	1091 1. The garages provide valuable additional amenity to the residents of the local community. Houses have little storage space, and they provide overflow parking. This would not be replaceable. 2. Additional housing will result in additional parking requirement - especially out of existing CPZ hours, parking is already difficult, and will become unviable. 3. Overlooking of property and gardens on Elfrida Road by a new development.	Object	<p>Concerns noted. The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force the landowner to provide affordable garage space and if the landowner no longer wishes to run the garages on the site, it is important that the land is made more efficient by assisting with Watford's shortfall in future housing delivery.</p> <p>Loss of privacy is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. Any development proposal will have to comply with the Design Guide, which sets the required privacy distances.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr simon frost [3795]	1101 These garages are well used by the community who don't have drives or garages. Their loss would increase parking pressure. They are essential for those with motorbikes and tradespeople who live in the area to store tools safely to enable them to maintain their businesses, losing them would impact on the local economy and jobs. It is too close to the existing homes which are over 100 years old, do not have deep foundations and the sewerage system would also not be able to cope with additional homes. It is too close to the railway and has restricted access.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to CC8.5 Managing the Impacts of Development. to ensure that the guidance is clear in the document.</p> <p>Design issues, including access, are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Any development proposal will have to comply with the Design Guide</p> <p>Noise issues related to new development has been considered as part of Draft Policy NE8.6 Managing the Impacts of Development. There is also a development consideration in the Local Plan that raises the site's proximity to the rail network to ensure the issue is mitigated by the developer.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Patrick Gordon [3794]	1110 There will not be sufficient parking in the area to house this new development. Also this would impact on the area in a negative way with traffic and noise, and have a impact on property prices within this area.	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Mark Annison [3808]	<p>1128 Close proximity to homes</p> <p>Close proximity to rail line with threat of vibration to foundations</p> <p>Existence of a foul sewer with potential risk of flooding, blockage and subsequent overflow</p> <p>Increased need for parking in an oversubscribed area</p> <p>Lack of affordable garage spaces for rental</p> <p>Current Victorian houses built on shallow foundations - could result in subsidence risk as cracks are already in evidence on some of the properties</p> <p>Current properties would be overlooked with a significant loss of privacy and light</p> <p>750 homes already being developed on the Riverwell Estate less than half a mile from proposed site.</p>	Object	<p>Concerns noted. The Council has been set a target from national government to build approximately 14,000 new homes up until 2036. Although the new housing at Riverwell will contribute towards this target, the Council is still required to plan for the rest of the growth expected in Watford. The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force the landowner to provide affordable garage space and if the landowner no longer wishes to run the garages on the site, it is important that the land is made more efficient by assisting with Watford's shortfall in future housing delivery.</p> <p>Loss of privacy and loss of daylight are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. Any development proposal will have to comply with the Design Guide, which sets the required privacy distances. Infrastructure providers including those responsible for the sewerage system are also consulted to address any issues relates to sewers. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Noise issues related to new development has been considered as part of Policy CC8.5 Managing the Impacts of Development. There is also a development consideration in the Local Plan that raises the site's proximity to the rail network to ensure the issue is mitigated by the developer.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Miss Madeleine Law [3820]	<p>1147 In summary, this proposal directly impacts my privacy, my light, the value of my property, could cause detriment to the foundations of my garden/home and impact my mental health. It could create further traffic causing issues on an already congested ring road</p>	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of privacy is material considerations to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future. Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to Policy CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document.</p> <p>Although the Council does not directly provide new infrastructure such as schools, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.</p>	<p>The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.</p> <p>Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.</p>
H28 Land and Garages to the rear of 2-24 Elfrida Road	Mr Gregory Hearne [3826]	<p>1167 I reject this proposal due to the following reasons:</p> <p>Our houses are already gloomy as it is - it will cause a loss of daylight.</p> <p>It will disturb the shallow foundations of the current Victorian terrace. Subsidence is already a common issue in this area.</p> <p>High water table with surface flooding a regular occurrence in suggested area.</p> <p>Adjacent houses will be directly overlooked and a loss of privacy as such.</p> <p>Parking is already a big issue in this area, more homes will aggravate and worsen that problem.</p> <p>Small site - a lot of disruption for very little reward.</p>	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area.</p> <p>Loss of daylight and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future.</p> <p>Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues will be added to draft policy NE8.6 Managing the Impacts of Development to ensure that the guidance is clear in the document.</p>	<p>Added:</p> <p>'A parking survey will be required' as a development consideration</p>

H28 Land and Garages to the rear of 2-24 Elfrida Road	WFRA Watford Fields Residents Association (Mr Steve Evans) [3782]	1170 WFRA will strongly opposes any plans to develop this land for housing on the grounds of; Loss of amenity to residents directly adjacent to the site, any development on this site will impact on their privacy and be potentially dominating and overbearing. The garages are a valuable asset for expanding families for extra storage, parking and used by small local businesses. The extra traffic it will generate. The additional parking pressures in the evenings outside of controlled hours to the surrounding roads that are already full to capacity at these times. Steve Evans on behalf of WFRA	Object	Concerns noted. The site selection process as part of the Housing and Economic Land Availability Assessment requires land owners declaring an intention to develop before being included in the Local Plan. The Council cannot force the landowner to provide affordable garage space and if the landowner no longer wishes to run the garages on the site, it is important that the land is made more efficient by assisting with Watford's shortfall in future housing delivery. In light of concerns raised about parking, it will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Design issues and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. Note that garages do not constitute as amenity space under national planning policy.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1253 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H28 Land and Garages to the rear of 2-24 Elfrida Road	R.J. Lafbery [3867]	1297 To whom it may concern, I am writing in reply to Mr Taylor's letter of 7 November 2019 regarding the Council's Draft Local Plan concerning the garage site at the rear of my home. I would like to object to the proposal on the following grounds:- 1) Loss of daylight 2) Loss of privacy 3) Extra noise 4) I have an ongoing subsidence problem and cannot help feeling that further building will be detrimental 5) Parking, especially in the evening, is a huge problem in this area 6) Many new homes are already being built close to Watford Fields on Riverwell Estate I have lived in Elfrida Road for over 40 years and have enjoyed the small open environment at the rear of my house. Having houses built within a few yards from the end of my property will make a large difference to my life. Yours faithfully, R.J. Lafbery	Object	Concerns noted. The Council has been set a target from national government to build approximately 14,000 new homes up until 2036. Although the new housing at Riverwell will contribute towards this target, the Council is still required to plan for the rest of the growth expected in Watford. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate there will be no significant effects on parking in the area. Loss of daylight and loss of privacy are material considerations to any planning application, and so any development proposal will be required to adequately address these issues. There will be an opportunity to comment should a planning application be submitted in the future. Land stability issues are dealt with in the planning system through Building Regulations and planning practice guidance. However, reference to unstable land/subsidence issues has been added to Policy CC8.5 Managing the Impacts of Development to ensure that the guidance is clear in the document. Noise issues related to new development has been considered as part of Policy CC8.5 Managing the Impacts of Development.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development. Guidance on land stability issues has been added to CC8.5 Managing the Impacts of Development.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1460 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H28 Land and Garages to the rear of 2-24 Elfrida Road	Hertfordshire County Council (Martin Wells) [3559]	1635 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity	No change.
H29 Land and Buildings at 247 Lower High Street	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1254 Within Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H29 Land and Buildings at 247 Lower High Street	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1461 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.

H29 Land and Buildings at 247 Lower High Street	Hertfordshire County Council (Martin Wells) [3559]	1636 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity	No change.
H29 Land and Buildings at 247 Lower High Street	Hertfordshire County Council (Martin Wells) [3559]	1637 Highways & Transport Lower High St is a high frequency bus corridor and there are bus stops within 400m with a variety of services available. Watford High Street station is also less than 400m away and town centre is within walking/cycling distance.	Comment	Comments noted.	No change.
H30 Land at Croxley View	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1255 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H30 Land at Croxley View	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1464 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H30 Land at Croxley View	Hertfordshire County Council (Martin Wells) [3559]	1638 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Ecological Appraisal may be required, as there may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present, along with reptiles in rough ground. Development should aim to retain trees, especially mature trees and hedgerows. The north-south green corridor should also be retained. If the whole site, or a significant area is to be developed, biodiversity offsetting to mitigate for loss of semi-natural habitats should be considered.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Ecological Appraisal. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	The development considerations have been amended to require a Preliminary Ecological Appraisal.
H30 Land at Croxley View	Hertfordshire County Council (Martin Wells) [3559]	1639 Highways & Transport The residential area to the east is served by frequent bus services from route 10 which links this estate to central Watford and Watford Junction station. To the west, the business park is served by the W30 bus route. Bus stops for both services are within 400m of the site. Maintenance of pedestrian/cycle links through to Croxley View/Greenhill Crescent is important.	Comment	Comment noted.	No change.
H31 Land at Wiggenhall Road Depot	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1256 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H31 Land at Wiggenhall Road Depot	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1465 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H31 Land at Wiggenhall Road Depot	Hertfordshire County Council (Martin Wells) [3559]	1640 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
H31 Land at Wiggenhall Road Depot	Hertfordshire County Council (Martin Wells) [3559]	1641 Minerals & Waste Planning In order to ensure sufficient waste capacity within the county, the Waste Planning Authority seeks to safeguard operational waste sites with the implementation of Waste Core Strategy Policy 5: Safeguarding of Sites. At present (and to the best of our knowledge) Site H31 is an operational waste site that contains a council depot and waste transfer station. This site is safeguarded under the above policy; the requirements of which ensure that waste management facilities are safeguarded to contribute to the strategic network of waste management provision in the county. Therefore, the borough council must demonstrate that this policy has been sufficiently applied in re-allocating these areas for housing.	Comment	Comments noted. The intention is to reprovide the depot and waste transfer station at a more suitable location. The development considerations will be amended to ensure that development does not commence until the depot and transfer station have suitably been reprovided.	The development considerations have been amended to require the reprovion of the depot and waste transfer station.
H31 Land at Wiggenhall Road Depot	Hertfordshire County Council (Martin Wells) [3559]	1642 Highways & Transport The closest bus stops are served by a schools' service and the W20. W20 is only hourly with limited pm services. Better services are available from stops on A4125 Eastbury Road to the south of the site but these would only be within 400m of some of the site. Development size is not large enough to contribute significantly to bus service improvements or produce patronage that would make such improvements viable in the long term. If a pedestrian route was possible through Oxhey Park to the A4125 this would shorten the distance. The site is approximately 0.6 miles from Bushey Station.	Comment	Comments noted.	No change.

H32 41 Aldenham Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1258 Within Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H32 41 Aldenham Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1466 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H32 41 Aldenham Road	Hertfordshire County Council (Martin Wells) [3559]	1643 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for nesting birds in trees, and roosting bats in mature trees and buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
H33 Land at the Car Park, Chalk Hill	Claire Jones [3435]	956 Support the principle of bringing this vacant site into use. This could help to create a more attractive gateway to Oxhey and Bushey. However, due to the constrained nature of this site there is limited opportunity to create a buffer between any development and the surrounding road network. It will be challenging to mitigate adverse impacts from noise and air pollution from the busy A4008. This site is likely to provide a low quality of amenity for future residential occupants.	Comment	Concerns noted. More detailed design constraints will be taken into account when a development proposal is submitted. There will be an opportunity to comment should a planning application be submitted in the future.	No change.
H33 Land at the Car Park, Chalk Hill	Ms Lucy Houbart [3733]	1027 I don't agree that this is a good site to build more residential dwellings on. We are very overcrowded in this area. We have already had lots of small flats built and we haven't the roads or public amenities such as doctors, schools, parks, libraries to accommodate more people. The roads and public transport are not adequate to have more people living here.	Object	Concerns noted. The whole Borough will need to see reasonable uplifts in density to make effective use of land, as per Chapter 11 of the National Planning Policy Framework. This site falls into the Core Development Area, which makes it suitable for higher densities due to its access to a range of services and facilities within walking distance. Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.	No change.
H33 Land at the Car Park, Chalk Hill	Ms Lucy Houbart [3733]	1029 We have had too many apartments built in this area already. The roads are too congested and the public services are too stretched.	Object	Concerns noted. The whole Borough will need to see reasonable uplifts in density to make effective use of land, as per Chapter 11 of the National Planning Policy Framework. This site falls into the Core Development Area, which makes it suitable for higher densities due to its access to a range of services and facilities within walking distance. Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift.	No change.
H33 Land at the Car Park, Chalk Hill	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1259 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H33 Land at the Car Park, Chalk Hill	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1467 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Noted.	No change.

H33 Land at the Car Park, Chalk Hill	Hertfordshire County Council (Martin Wells) [3559]	1644 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
H34 Land at Car Park adjacent to 1 Chalk Hill	Claire Jones [3435]	957 The car park provides resident parking for properties on Aldenham Road. The loss of this car park will increase on-street parking within Oxhey Village. These streets are already heavily parked and congested. The loss of car parking therefore needs to be considered in the context of a wider parking strategy for Oxhey. A level of resident parking needs to be retained as part of any development to ensure existing parking issues are not exacerbated. Due to the constrained nature of the site it will be challenging to mitigate adverse impacts from noise and air pollution from the busy A4008.	Object	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H34 Land at Car Park adjacent to 1 Chalk Hill	Ms Lucy Houbart [3733]	1028 I don't agree that this is the right place to build more apartments or flats. This area can't take any more people living here. The roads are too busy already. The congestion level is terrible. Also we don't have the doctors, schools, parks and open spaces for more people to live here. We have already had too many new apartments built in this area.	Object	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H34 Land at Car Park adjacent to 1 Chalk Hill	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1260 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H34 Land at Car Park adjacent to 1 Chalk Hill	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1468 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H34 Land at Car Park adjacent to 1 Chalk Hill	Hertfordshire County Council (Martin Wells) [3559]	1645 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H34 Land at Car Park adjacent to 1 Chalk Hill	Hertfordshire County Council (Martin Wells) [3559]	1646 Transport This site is less than 100m from bus stops on A4008 Pinner Rd served by a variety of bus routes with very high combined service frequency. Bushey rail station is less than 200m away. Town centre is less than a mile north so could be walked/cycled.	Comment	Site removed from Plan due to changes in owner's aspirations for the site.	Site removed from Plan.
H35 Land at Bushey Station	Miss Hannah Jilani [3633]	940 Given traffic in this area it might be recommended to make this a 'car zero' development, rather than 'car lite'. To support the increase in commuters is any consideration or discussion taking place with National Rail to increase the frequency of trains (especially during rush hour) in to London? All current rush hour trains are standing room only and very squashed. (Evening return trains included).	Object	Noted. Car zero development would be possible at this location as per Appendix E: Car Parking Standards. However, some parking may be necessary on this site to avoid the loss of all commuter car parking. The Council liaises frequently with infrastructure providers, including train operating companies, to ensure that new infrastructure is provided to support the anticipated growth.	No change.
H35 Land at Bushey Station	Claire Jones [3435]	958 The development will result in the loss of commuter car parking. An increasing number of commuters will park on the surrounding road network which is already heavily parked. The loss of car parking needs to be considered in the context of a wider parking strategy for Oxhey. A level of parking needs to be retained as part of any development to ensure existing parking issues are not exacerbated. If the GFL site remains in its current form it is not considered the site could provide a suitable level of amenity for residents due to noise, dust odour and HGV traffic.	Object	Concerns noted. Policy ST11.6: Managing the Transport Impacts of Development will require transport assessments to be undertaken for development sites. This independent assessment should dictate the level of commuter car parking required on the site. With regards to the adjacent land use, Policy CC8.5 Managing the Impacts of Development seeks to address any issues with pollution, including noise, odour, dust and vibration. The policy follows national guidance in its application of the 'agent of change' principle and puts the onus on new development to provide adequate mitigation.	No change.
H35 Land at Bushey Station	Ms Lucy Houbart [3733]	1026 There has been too much building work in this area already. More buildings and homes will make the area too built up. The traffic is very congested already. There are not enough schools and doctors to service more people living in the area. We need space to breathe. Air quality is terrible as it is.	Object	Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government. Failing to plan for new homes would mean that the Council would have less control over where housing should be located and what this looks like. In a worst case scenario, the Government could write the Local Plan for Watford. Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision. Any impact that development could have on air quality has been considered as part of Policy CC8.4: Managing Air Quality.	No change.

H35 Land at Bushey Station	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1261 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H35 Land at Bushey Station	Network Rail (Elliot Stamp) [3873]	1323 The Department for Communities and Local Government and the Department for Transport have specifically tasked Network Rail with reviewing all land and assets across the entire network in order to determine how many residential units can be delivered. Emphasis has been made on maximising residential provision on development sites as well as identifying any new opportunities. In order to realise this development potential, it is vitally important that opportunities are supported in Development Plan and supporting policy documentation. Network Rail therefore strongly supports the Draft Watford Local Plan's inclusion of its H35 Land at Bushey Station site as a housing development allocation site. Network Rail would welcome further discussion with Watford Borough Council in relation to the potential redevelopment of the H35 Land at Bushey Station site.	Support	Support welcomed.	No change.
H35 Land at Bushey Station	Transport For London Property Development (Planning Advisor - Mr Luke Burroughs) [3819]	1403 TfL supports the allocation of land at Bushey station as suitable for residential lead development. TfL are the leaseholders of Bushey station car park where Network Rail own the freehold. We support the council's identification that a development on the site should come forward as 'car-lite' and believe that a car free scheme (with the exception of blue badge spaces) could be provided in this location given its very high levels of public transport accessibility. The council is correct to identify that mitigations will need to be provided in the design of the development for noise, pollution and flood risk. Development must also take into account the heritage assets which are in close proximity to the site.	Support	Support welcomed.	No change.
H35 Land at Bushey Station	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1469 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H35 Land at Bushey Station	Hertfordshire County Council (Martin Wells) [3559]	1647 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
H35 Land at Bushey Station	Hertfordshire County Council (Martin Wells) [3559]	1648 Highways & Transport Potentially very sustainable site with access to rail station and high frequency bus corridor. The town centre is less than a mile north so could be walked/cycled.	Comment	Comment noted.	No change.
H36 Land at Kingsfield Court Garages	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1263 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H36 Land at Kingsfield Court Garages	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1470 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
H36 Land at Kingsfield Court Garages	Hertfordshire County Council (Martin Wells) [3559]	1649 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
H37 Land and Garages at Riverside Road Garages	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1264 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
H37 Land and Garages at Riverside Road Garages	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1471 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.

H37 Land and Garages at Riverside Road Garages	Hertfordshire County Council (Martin Wells) [3559]	1650 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Ecological Appraisal may be required, as there may be potential for nesting birds in trees, and roosting bats in mature trees and buildings if suitable roosting features are present. If the whole site or a significant area is developed, consideration should be given to biodiversity offsetting to mitigate for loss of semi-natural habitats. Development should also consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Ecological Appraisal. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	The development considerations have been amended to require a Preliminary Ecological Appraisal.
MXD01 Land at Woodside Community Centre	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1265 Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD01 Land at Woodside Community Centre	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1478 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
MXD01 Land at Woodside Community Centre	Hertfordshire County Council (Martin Wells) [3559]	1651 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
MXD02 Land 453 St. Albans Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1266 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD02 Land 453 St. Albans Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1479 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
MXD02 Land 453 St. Albans Road	Hertfordshire County Council (Martin Wells) [3559]	1652 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for nesting birds in trees, and roosting bats in mature trees and buildings if suitable roosting features are present. Development should consider retaining trees and hedgerows and if semi-natural habitats will be developed, and cannot be mitigated for within the site boundary, consideration should be given to biodiversity offsetting. Development should also consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD03 Land at the Lemaire Centre	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1267 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD03 Land at the Lemaire Centre	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1480 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
MXD03 Land at the Lemaire Centre	Hertfordshire County Council (Martin Wells) [3559]	1653 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD04 Land at 501 St. Albans Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1268 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.

MXD04 Land at 501 St. Albans Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1481 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
MXD04 Land at 501 St. Albans Road	Hertfordshire County Council (Martin Wells) [3559]	1654 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for nesting birds in trees, and roosting bats in mature trees and buildings if suitable roosting features are present. Development should consider retaining trees, especially mature trees and hedgerows. Consideration should also be given to Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
MXD05 Land at 94-114 St. Albans Road	Mr Juan Lobell [3568]	919 Overpopulation in this area, highly saturated with transit and lack of parking. Already complicated to drive up leaves den road due to cars parked on both sides of pavement.	Object	Concerns noted. Planning for growth is a national requirement and this area has been considered suitable for high density housing due to its proximity to facilities and services within walking distance. The site is also adjacent to Watford Junction station, which offers 18 minute journey times to London Euston. The site is considered to be appropriate for car-lite development due to its high sustainability. This should ensure that new residents use active and sustainable travel options and no do not further pressurise the road network (including parking).	No change.
MXD05 Land at 94-114 St. Albans Road	Mr Paul Elfick [3618]	933 Please do not build housing where TKMax and the Range are. The reason being is that St. Albans Road is horrendous already in terms of traffic and having more people in an area that is already saturated will be awful. There are new flats being built more or less opposite already. Also, the closure of the BMW garage towards the Dome will probably be an area of interest for further development in terms of housing, so sad.	Comment	Concerns noted. Hertfordshire County Council are the authority responsible for managing the road network. They are undertaking thorough transport modelling to mitigate against the impacts of the new development proposed and to provide the means to encourage a modal shift. The BMW garage referred to has recently received planning permission.	No change.
MXD05 Land at 94-114 St. Albans Road	Aggregate Industries UK Ltd [3743]	1138 Please refer to 'Firstplan Response on Behalf of Aggregate Industries UK Ltd to the First Draft Watford Local Plan' dated 07 November 2019 and sent via email to strategy@watford.gov.uk on 07 November 2019.	Comment	Comments noted The development considerations will be amended to reflect the issues raised.	Text has been amended to reflect the proposed changes.
MXD05 Land at 94-114 St. Albans Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1269 Within Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD05 Land at 94-114 St. Albans Road	Berkeley Homes (Berkeley Homes) [3891]	1374 Draft Policy SD2.3 sets out standards for housing densities, with development in Low and Medium Sustainability Zones being held to maximum recommended densities. It is acknowledged that a departure from these ranges may be supported subject to provision of infrastructure on-site or location within a Strategic Development Area and this flexible approach is supported. The Watford Junction SDA, with Watford Junction Station at its heart, has been allocated to make better use of the underutilised area and its excellent accessibility to provide a high-density mixed-use quarter providing homes and jobs and improving connections, particularly in hopes of reducing the impacts of the severance in urban fabric caused by the rail lines. It is noted that the Site is allocated as a housing delivery site under draft Policy H4.1 (Site MXD05 – Land at 94-114 St. Albans Road). It is acknowledged that while the Site is considered to be located within a Medium Sustainability Zone, high density development is justified on this site, conditional on school provision. The density of the proposed development at 94-98 St Albans Road is 474 homes per hectare and the officer's report to the development management committee is clear that this level of density is supported. On this basis, and given the proximity of the Site to Watford Junction Station, local bus services and infrastructure, the Site should be considered as a High Sustainability Zone. Site MXD05 should be amended accordingly.	Comment	Comments noted. The sustainability zones has been superseded by the Core Development Area. The density achieved on site will be informed by Policy HO3.2 Housing Mix, Density and Optimising Use of Land.	No change.
MXD05 Land at 94-114 St. Albans Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1482 The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	Comment	Comments noted. Development considerations will be amended to address any potential capacity constraints arising from the redevelopment of the site.	It has been added to the development considerations: "Development proposals must take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required".
MXD05 Land at 94-114 St. Albans Road	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1517 This site falls within the Watford Junction Strategic Development Area. Preparation of further evidence regarding the potential impact on heritage assets is required. a) Identify any heritage assets that may be affected by the potential site allocations; b) Understand what contribution the site makes to the significance of the asset/s; c) Identify what impact the allocation might have on that significance; d) Consider maximising enhancements and avoiding harm; e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness; If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.	Comment	Comments noted. The need to protect nearby heritage assets will be referenced in the development considerations. The policies in the Plan must also be read in conjunction with Chapter 7 The Historic Environment which gives further consideration to heritage assets.	The development considerations have been amended to require a Heritage Impact Assessment.

MXD05 Land at 94-114 St. Albans Road	Hertfordshire County Council (Martin Wells) [3559]	1655 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD05 Land at 94-114 St. Albans Road	Hertfordshire County Council (Martin Wells) [3559]	1656 Highways & Transport This is potentially a very sustainable site close to Watford Junction station and with a wide variety of bus services available from stops close to the site on the A412. A School Travel Plan will be required to encourage sustainable transport access to the school and minimise car pick up/drop off.	Comment	Comment noted.	No change.
MXD05 Land at 94-114 St. Albans Road	Three Rivers District Council (Ms Claire May) [2389]	1748 The description text states that school provision is required for the site whilst the density section states that density is a condition on school provision which implies that the site may be acceptable without on-site school provision. This may be worth clarifying.	Comment	Comments noted. That school provision is required is written in the development considerations.	No change.
MXD06 Land at Watford Junction	Aggregate Industries UK Ltd [3743]	1137 Please refer to 'Firstplan Response on Behalf of Aggregate Industries UK Ltd to the First Draft Watford Local Plan' dated 07 November 2019 and sent via email to strategy@watford.gov.uk on 07 November 2019.	Object	Agree. The development considerations should be amended to reflect the proposed changes.	The text has been amended to reflect the proposed changes.
MXD06 Land at Watford Junction	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1271 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD06 Land at Watford Junction	Solum (Solum Regeneration) [3895]	1390 In the first instance we note that the boundary of the proposed allocation for 'Land at Watford Junction' doesn't match up with the full extent of Network Rail's ownership. Please see the enclosed red line plan. It is respectfully requested that the boundary be amended on the Polices Map and within Table 4.1 to reflect the enclosed. The area of the site will also need to be updated within Table 4.1 (see attachment). Notwithstanding the above, the proposed site allocation for mixed-use development is strongly supported in principle. The site is a large brownfield site in a highly accessible location. Best use of such a site should be made to relieve pressure on less suitable sites within the Borough to meet its needs. We note that the Council has set out a number of key development considerations / designations that should be addressed as part of any future proposals at the site. Each of these is addressed within the table below. Proposals will need to comply with the wider objectives for Watford Junction Strategic Development Area - Please see further comments on Policy SD2.7 Development is confined to areas not required for railway operations, although station redevelopment is an objective - The two parts of this consideration are at odds with each other. Future development could well include areas that are required for railway operations, either in a temporary capacity, or in relation to improvements to the railway operations themselves. This consideration should be reworded in the interest of clarity. Nascot Conservation Area is located opposite - no comment Estcourt Road Conservation area is located directly south of the site - no comment Located adjacent to a main train line therefore a noise assessment may be required - The main train line forms part of the proposed site allocation. This consideration	Comment	Comments noted. Site boundary and area has been amended to reflect the ownership extent. Development considerations regarding railway operations and noise assessment will be amended for clarity. The consideration relating to the concrete batching plant and rail aggregates depot will remain at the request of the Minerals and Waste Planning Authority to ensure that any new development does not compromise the activities of the safeguarded site.	Site boundary has been amended, and the developer considerations amended for clarity.
MXD06 Land at Watford Junction	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1483 The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Comment	Comments noted. Development considerations will be amended to address any potential capacity constraints arising from the redevelopment of the site.	It has been added to development considerations: "Development proposals must take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required".
MXD06 Land at Watford Junction	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1518 This site falls within the Watford Junction Strategic Development Area. Preparation of further evidence regarding the potential impact on heritage assets is required. a) Identify any heritage assets that may be affected by the potential site allocations; b) Understand what contribution the site makes to the significance of the asset/s; c) Identify what impact the allocation might have on that significance; d) Consider maximising enhancements and avoiding harm; e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness; If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.	Comment	Comment noted. Development considerations to be amended to require a Heritage Impact Assessment. All allocated sites will also need to comply other policies in the Plan, including Chapter 7 which relates to conserving and enhancing the historic environment.	The development considerations have been amended to require a Heritage Impact Assessment.

MXD06 Land at Watford Junction	Hertfordshire County Council (Martin Wells) [3559]	1657 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although may be potential for roosting bats in buildings if suitable roosting features are present, along with potential for nesting birds in trees. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD06 Land at Watford Junction	Hertfordshire County Council (Martin Wells) [3559]	1658 Highways & Transport Ongoing liaison will be required regarding the development of this site as the station is a major transport hub and the county council would not support proposals that reduce the capacity or quality of interchange. It is important that the site is able to function as an interchange commensurate with the growth envisaged for Watford and key transport projects that we wish to deliver such as cross county Mass Rapid Transit, demand responsive services and high-quality bus routes. The area immediately to the north/east of the site is less well served with buses. Bus service improvements will be needed in order to encourage the use of sustainable modes from those parts of this site over 400m from the station forecourt bus stops or those on St Albans Road. High quality pedestrian/cycle connections within the site and the links from the north side of the site to the south are critical. This is a key area for bus movements both within the station forecourt and immediate vicinity and is also very congested. As such the county council would be supportive of proposals that facilitated bus movements and gave greater priority to buses. Bus operators will need to be consulted on any proposals affecting the bus interchange.	Comment	Comments noted. HCC is involved in meetings with interested parties such as Network Rail on the future of the area, and has made it clear that the bus station and railways station site together. WBC support the need for a multi modal transport hub (as set out in Policy SD2.6) and retention or reprovision of the bus station on its current site.	Texted amended in Chapter 2 'Core Development Area' to provide more clarity about requirements.
MXD06 Land at Watford Junction	Hertfordshire County Council (Martin Wells) [3559]	1659 Minerals & Waste Planning The 'Key Development Considerations/ Designations' text makes no reference to the Orphanage Road Rail Aggregates Depot. It refers only to the concrete batching plant which is on the site, reference should also be made to the hoppers, conveyor, sidings and aggregates facilities at the good yards; all of which fall within the minerals safeguarding policy remit.	Comment	Comment noted. Development considerations to be updated to refer the Rail Aggregates Depot.	References in the Plan to the concrete batching plant have been updated to reflect the concrete batching plant and rail aggregates depot.
MXD06 Land at Watford Junction	Three Rivers District Council (Ms Claire May) [2389]	1749 "Development is confined to areas not required for railway operations, although station redevelopment is an objective" – Is it the Council's objective in general to redevelop the station or as a consequence of this development specifically? Please clarify this in the policy.	Comment	Comments noted. Text will be amended for clarity.	Text has been amended for clarity.
MXD07 Land Colonial Way/Clive Way	Aggregate Industries UK Ltd [3743]	1139 Please refer to 'Firstplan Response on Behalf of Aggregate Industries UK Ltd to the First Draft Watford Local Plan' dated 07 November 2019 and sent via email to strategy@watford.gov.uk on 07 November 2019.	Comment	Comments noted. The development considerations will be amended to reflect the proposed changes.	The text has been amended to reflect the proposed changes.
MXD07 Land Colonial Way/Clive Way	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1272 Within Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD07 Land Colonial Way/Clive Way	LaSalle Investment Management (LaSalle) (n/a - n/a n/a n/a) [3044]	1338 We write on behalf of our client, LaSalle Investment Management (LaSalle), to submit a representation regarding the current Local Plan consultation. LaSalle manages most of the land which is referred to in the document as 'Land Colonial Way / Clive Way MXD07'. LaSalle continue to support the principle of strategic high-density development in the Watford Junction area. However, in terms of this particular site it does continue to have concerns whether it is a suitable and viable location for medium / high-density office led growth. For this reason, LaSalle request that section MXD07 is updated so it is specific that the full range of employment uses, including Classes B1a (offices), B1b (research and development), B1c (light-industrial), B2 (general industry), B8 (storage and distribution) and sui generis employment uses, would continue to be supported at the site.	Comment	Agree. The Housing and Economic Land Availability Assessment identifies an acute shortage land for B1c/B2 and B8 uses. A diverse range of employment uses will continue to be supported on this site to meet the economic growth projections as set out in the Economic Study Update (2019).	The allocation has been amended to a fully employment allocation after further dialogue with the landowner.
MXD07 Land Colonial Way/Clive Way	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1484 The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	Comment	Comments noted. Development considerations will be amended to address any potential capacity constraints arising from the redevelopment of the site.	It has been added to the development considerations: "Development proposals must take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required".
MXD07 Land Colonial Way/Clive Way	Hertfordshire County Council (Martin Wells) [3559]	1660 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.	Comment	Comments noted. Development considerations to be amended to require a Preliminary Roost Assessment. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	The development considerations have been amended to require a Preliminary Roost Assessment.
MXD07 Land Colonial Way/Clive Way	Hertfordshire County Council (Martin Wells) [3559]	1661 Highways & Transport The nearest bus stops are over 400m away on Radlett Road and are poorly served. Would be beneficial for this site to come forward with the neighbouring part of the Watford Junction site (MXD06) and for developer contributions to be sought towards bus service improvements.	Comment	Comment noted.	No change.

MXD08 Land at Centre Point Community Centre	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1273 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Site removed from the Plan as groundworks on the site have begun.	Site has been removed from the Plan.
MXD08 Land at Centre Point Community Centre	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1485 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Site removed from the Plan as groundworks on the site have begun.	Site has been removed from the Plan.
MXD08 Land at Centre Point Community Centre	Hertfordshire County Council (Martin Wells) [3559]	1662 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Roost Assessment may be required, as there may be potential for roosting bats in mature trees and buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates, along with buffering trees and hedgerow to the south.	Comment	Site removed from the Plan as groundworks on the site have begun.	Site has been removed from the Plan.
MXD08 Land at Centre Point Community Centre	Hertfordshire County Council (Martin Wells) [3559]	1663 Highways & Transport There are bus stops within 400m but main bus service only hourly and other route available only limited services. Site is not large enough to contribute to bus service improvements. Site is however 0.5 miles from Watford Junction station and less than a mile from the town centre.	Comment	Site removed from the Plan as groundworks on the site have begun.	Site has been removed from the Plan.
MXD09 Land at the Telephone Exchange Car Park	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1274 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD09 Land at the Telephone Exchange Car Park	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1486 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
MXD09 Land at the Telephone Exchange Car Park	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	1519 This site falls within the Town Centre Strategic Development Area. Given its location, and the size of the area, this site has the potential to impact on a large number of heritage assets – both designated (listed buildings and conservation areas) and non-designated (locally listed buildings). These include the High Street and King Street, and St Mary's Conservation Areas, as well as numerous Listed Buildings including the Church of St Mary (Grade I Listed), the Bedford and Essex Almshouses (Grade II Listed), the Mrs Elizabeth Fuller Free School (Grade II Listed), and 133, 135, 137, 139, 141, 145, 149, 151, 160, and 174 High Street (9 x Grade II Listed). Given the number of assets affected we would expect to see a Heritage Impact Assessment prepared to inform the redevelopment of this area. This document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. These assessments should guide development so that all effort is made to avoid harm to the historic environment through the master planning and design of the site and, where this is not possible, mitigation measures are put in place. Any specific measures required to remove or mitigate any harm to these assets should then be included in Policy SD2.9. Further information on site allocations can be found in our advice note 3: The Historic Environment and Site Allocations in Local Plan which can be accessed at https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/ . Preparation of further evidence regarding the potential impact on heritage assets is required. a) Identify any heritage assets that may be affected by the potential site allocations; b) Understand what contribution the site makes to the significance of the asset/s; c) Identify what impact the allocation might have on that significance; d) Consider maximising enhancements and avoiding harm; e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness; If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.	Comment	Comments noted. Development considerations to be amended to require a Heritage Impact Assessment. All allocated sites will also need to comply other policies in the Plan, including Chapter 7 which relates to conserving and enhancing the historic environment.	The development considerations have been amended to require a Heritage Impact Assessment.

MXD09 Land at the Telephone Exchange Car Park	Telereal Trillium (Telereal Trillium) [3915]	<p>1535 The inclusion of the Site within this policy as an allocation for mixed-use development under reference MXD09 is strongly supported.</p> <p>In terms of the detail of the MXD09 allocation set out in Table 4.1, it is agreed that the site falls within a High Sustainability Zone, given its location within the Town Centre and proximity to Watford High Street Station (8-minute walk) and various local bus routes (2-minute walk). The highly sustainable nature of the Site's location is a significant contributor to its development potential which should be fully realised as part of this allocation.</p> <p>Para. 8 of the NPPF (2019) highlights that achieving sustainable development means that the planning system has three overarching objectives including economic, social and environmental and development of the site will contribute to each of these:</p> <ul style="list-style-type: none"> • Economic – development at the Site for a mix of uses to include residential will encourage people to live in Watford Town Centre in close proximity to a number of amenities which will contribute directly to the local economy. Redevelopment will also generate employment directly from the construction process. • Social – residential uses at the site will bring new residents into the existing town centre community and any development scheme will be of high-quality design so as to positively contribute to the built environment. • Environmental – the Site comprises previously developed land and a sustainably located town centre brownfield site which should be explored for development in the first instance. Redevelopment would greatly improve the existing site condition and contribute to improving the surrounding townscape. Proposals would also include a low level of parking and encourage the use of other forms of sustainable transport. <p>The development parameters set out in Figure 6 for the High Sustainability Zone are broadly supported, however, similar to the above, further clarity is required regarding footnote '4' in relation to the definition of a 'mainline mass transit connection' if this is to be a key factor in considering higher densities. It is also suggested that further evidence to support this approach is provided to ensure that such a restriction does not prevent the delivery of suitable high-density development sites. Irrespective of access to the 'mainline mass transit connection', the Site is able to provide high-quality mixed-use development at high densities which exceed 350 dph and this should be acknowledged in the allocation.</p>	Comment	Support welcomed. The approach for density has been amended as part of Policy HO3.2 Housing Mix, Density and Optimising Use of Land, which does not set upper limits for density in the Core Development Area. However, building heights will be subject to Policy QD6.5: Building Height, which has been evidenced by a Tall Buildings Study.	Approach to taller buildings and density altered to give more clarity to applications.
MXD09 Land at the Telephone Exchange Car Park	Hertfordshire County Council (Martin Wells) [3559]	<p>1664 Environment Resource Planning Unit (Ecology)</p> <p>There are no fundamental ecological constraints on this site, although development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates.</p>	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD10 Land at Tesco Lower High Street	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	<p>1275 Within Source Protection Zone 1 of a public drinking water supply abstraction on contaminated land. Affinity Water must be notified of any future development proposed on this site.</p>	Comment	Comments noted.	No change.
MXD10 Land at Tesco Lower High Street	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	<p>1487 The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	Comment	Noted. Development considerations will be amended to address any potential capacity constraints arising from the redevelopment of the site.	It has been added to the development considerations: "Development proposals must take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required".
MXD10 Land at Tesco Lower High Street	Historic England (Historic Environment Planning Adviser - Andrew Marsh) [3911]	<p>1520 This site falls within the Lower High Street Strategic Development Area.</p> <p>In common with the other Strategic Development Areas given the scale of the area affected, this site has the potential to impact on a large number of heritage assets – both designated (listed buildings and conservation areas) and non-designated (locally listed buildings). These include Frogmore House (Grade II* Listed, and Heritage at Risk), Sparrows Herne Trust Turnpike Marker (Grade II Listed), Watford Museum (Grade II Listed), the Brewery Building (Grade II Listed), and 202, 202A, 212 and 214 High Street (3 X Grade II Listed) within the Development Area, and the Grade II Listed Bushey Arches Railway Viaduct at the south-eastern boundary of the site.</p> <p>Development will need to preserve and where possible enhance these assets and their settings. Given the number of assets affected we would expect to see a Heritage Impact Assessment prepared to inform the redevelopment of this area. As with the Town Centre Strategic Development Area, this document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove or mitigate any harm to these assets should then be included in Policy SD2.10. Further information on site allocations can be found in our advice note 3: The Historic Environment and Site Allocations in Local Plan.</p> <p>Preparation of further evidence regarding the potential impact on heritage assets is required.</p> <ol style="list-style-type: none"> Identify any heritage assets that may be affected by the potential site allocations; Understand what contribution the site makes to the significance of the asset/s; Identify what impact the allocation might have on that significance; Consider maximising enhancements and avoiding harm; Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness; <p>If a site is allocated, we would expect to see reference in policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting/s, the need for high quality design and any other factors relevant to the historic environment and the site in question.</p>	Comment	Comments noted. Development considerations to be amended to require a Heritage Impact Assessment. All allocated sites will also need to comply other policies in the Plan, including Chapter 7 which relates to conserving and enhancing the historic environment.	The development considerations have been amended to require a Heritage Impact Assessment.

MXD10 Land at Tesco Lower High Street	Hertfordshire County Council (Martin Wells) [3559]	1665 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although a Preliminary Ecological Assessment and/or a Preliminary Roost Assessment may be required, as there may be potential for nesting birds in trees and roosting bats in mature trees and buildings if suitable roosting features are present, along with reptiles in rough ground. Development should retain and buffer semi-natural habitats if possible and maintain and enhance the river corridor for the benefit of local wildlife. If semi-natural habitats will be developed and cannot be mitigated for within the site boundary, consideration should be given to biodiversity offsetting. Development should also consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates, along with buffering trees and hedgerow to the south.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD10 Land at Tesco Lower High Street	Hertfordshire County Council (Martin Wells) [3559]	1666 Highways & Transport There are bus stops on Lower High Street within 400m with high frequency bus services. Current pedestrian routes through the site are indirect however and it will be important that quality routes are provided to minimise distance to stops particularly from the eastern part of the site if this is developed. The site is within walking/cycling distance of town centre and High Street rail station.	Comment	Comment noted.	No change.
MXD10 Land at Tesco Lower High Street	Three Rivers District Council (Ms Claire May) [2389]	1750 "some re-provision of retail may be necessary" Some further explanation would be useful.	Comment	Comment noted. The text will be amended for clarity.	It has been added to the development considerations: "Development proposals should provide no additional retail floorspace above the existing on site provision"
MXD11 44-56 Vicarage Road	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1276 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.
MXD11 44-56 Vicarage Road	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1488 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
MXD11 44-56 Vicarage Road	Hertfordshire County Council (Martin Wells) [3559]	1667 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates, along with buffering trees and hedgerow to the south.	Comment	Comment noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD11 44-56 Vicarage Road	Hertfordshire County Council (Martin Wells) [3559]	1668 Highways & Transport There are bus stops on Vicarage Rd within 400m with several bus routes available with a good combined service frequency. The site is within walking/cycling distance of town centre and High Street rail station.	Comment	Comment noted.	No change.
MXD12 Land at Riverwell	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1277 Within Source Protection Zone 1 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.

MXD12 Land at Riverwell	Watford Health Campus Partnership LLP (Watford Health Campus Partnership LLP) [3896]	1393 It appears that part of the Watford Riverwell site is currently allocated for Mixed Use redevelopment, comprising the former FTA site, as well part of the existing hospital car park. Site Allocation ref. MXD12 states: "Considered a residential led scheme, although a school and other appropriate non-residential uses are possible on site. The south of the site is located in Flood Zones 2 and 3 and if a climate change allowance is enabled, the south of the site is in Flood Zone 3. High risk of surface water flooding on part of site". We fully support the allocation of this site for residential-led redevelopment and an application has been submitted relating to the north-eastern part of this site for redevelopment to provide circa. 190 family homes and a new community centre (LPA Ref. 19/00778/FULM). An enabling works application has also been submitted in relation to the proposed site allocation, for site preparation and remediation works, to prepare land for development to provide the new family housing sought above, as well land to the south to provide a new school (LPA Ref. 19/00779/FULM). It is also important to note that Site Allocation MXD12, as shown in the draft Local Plan, also includes part of the existing hospital car park and former FTA site that was granted planning permission in March 2019 for redevelopment to provide a new multi-storey car park (MSCP) with the capacity for up to 1,455 car parking spaces (LPA Ref. 18/01383/FULM). The new MSCP will provide new parking for use by hospital staff and visitors, as well as Watford Football Club, and will help to free up some of the surrounding area currently used as surface level car parking for future development. This will include the provision of a new public square and commercial uses. Accordingly, the wider allocation of this part of the Watford Riverwell site has indicative capacity for significant residential-led redevelopment, as well as new employment and retail floorspace to support the creation of an active and vibrant community supported by a range of uses. Taking into account the above proposals for this phase of the Watford Riverwell site, and considering the development that has already been approved and is underway on the southern phases, we suggest that this mixed-use allocation or a strategic site allocation should extend across the whole area. The draft allocation also makes reference to part of the site being located in Flood Zones 2 and 3 and that there is a high risk of surface water flooding on the site. However, we note that the Environment Agency (EA) are currently updating the Flood Map for Planning. It is anticipated that following the further modelling work undertaken, the Flood Map will	Comment	Comments noted. Site boundary will be altered to reflect the extent of the Riverwell Master Plan area.	The boundary of site MU21 Land at Riverwell has been amended to reflect the extent of the master plan area.
MXD12 Land at Riverwell	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1489 The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	Comment	Comments noted. Development considerations will be amended to address any potential capacity constraints arising from the redevelopment of the site.	It has been added to the development considerations: "Development proposals must take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required".
MXD12 Land at Riverwell	Hertfordshire County Council (Martin Wells) [3559]	1669 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site and ecological surveys have been completed for the site, although badgers have been known to be in the vicinity. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates, along with buffering trees and hedgerow to the south.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD12 Land at Riverwell	Hertfordshire County Council (Martin Wells) [3559]	1670 Highways & Transport Bus stop on Thomas Sawyer Way is within 400m of most of the site although at moment only served by one bus route, the 635 which has an irregular 1-2 hourly timetable.	Comment	Comment noted.	No change.
MXD12 Land at Riverwell	Three Rivers District Council (Ms Claire May) [2389]	1751 "a school and other appropriate non-residential uses are possible on the site" If a school is required in this location then it should be included as part of the allocation.	Comment	Comments noted. Development consideration to be refined to give further clarity.	The text has been amended to specify that a primary school is required on site.
MXD13 23-37 The Parade	Affinity Water (Catchment Officer - Mr Laurence Chalk) [3747]	1278 Within Source Protection Zone 2 of a public drinking water supply abstraction. Affinity Water must be notified of any future development proposed on this site.	Comment	Comments noted.	No change.

MXD13 23-37 The Parade	IDA Plymouth Holdings Ltd. [3888]	1359 Policy H4.1 refers to sites being listed in Table 4.1 however there is no further reference to Table 4.1 and this requires checking. Page 60 sets out that our client's site would be allocated for mixed use redevelopment as shown below. As part of the description for the allocation the policy states that the locally listed shopfront needs to be retained as part of the proposals. During our recent pre-application meeting with planning officers, the potential for the removal of part of the locally listed shopfront was discussed in order to open up the central part of the site and increase pedestrian connectivity from Clarendon Road through to The Parade. It is recognised that the shopfront is locally listed however the viability of the site depends on the delivery of a vibrant retail and commercial offer to the central and rear part of the site. This will require a high level of movement through the site which can only be achieved if the site is opened up and clearly visible for passers-by. As an example, the relocation of the Watford Market to its current site has largely been unsuccessful due to the lack of signage and natural footfall that occurs along this part of the Town Centre. This is partly owing to the narrow entrance to the market from The Parade / High Street and prominence of the flyover.	Comment	Locally and nationally listed buildings were excluded from all site allocations as part of the HELAA methodology. The loss of any locally listed building would also be contrary to Policy HE7.3: Non-Designated Heritage Assets. The site was included in the Plan as an exception as the call for sites form response stated that the intention was to retain the locally listed building frontage as part of any future redevelopment. It is crucial that locally listed buildings are retained in the town centre, especially in the high street and primary shopping area as this contributes greatly to the distinct character of the high street.	No change.
MXD13 23-37 The Parade	Thames Water Utilities Ltd (Town Planning Manager - General Enquiries) [2379]	1490 On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	Comment	Comments noted.	No change.
MXD13 23-37 The Parade	Hertfordshire County Council (Martin Wells) [3559]	1671 Environment Resource Planning Unit (Ecology) There are no fundamental ecological constraints on this site, although there may be potential for roosting bats in buildings if suitable roosting features are present. Development should consider Biodiversity Net Gain measures such as native planting/wildflower sowing and habitat boxes for bats, birds, hedgehogs and invertebrates, along with buffering trees and hedgerow to the south.	Comment	Comments noted. Improvements to the biodiversity value of the site through new development has been considered as part of Policy NE9.8: Biodiversity.	No change.
MXD13 23-37 The Parade	Hertfordshire County Council (Martin Wells) [3559]	1672 Highways & Transport Several bus stops are available within 200m with a variety of routes available. The site is within the town centre area and is within walking/cycling distance of Watford Junction Station.	Comment	Comment noted.	No change.
Supporting Documents, FDLP Sustainability Appraisal Report	Charlotte Ashton [3425]	1162 This is a comment rather than a supporting representation. It is not clear how the RAG ratings in table 2.6 of the SA relate to the proposed sustainability zones. What are the sustainability zones based on and how have they been decided? As the RAG ratings of sites have not been provided (I have not been able to locate them) it is not possible to object to or support the '+' rating against SA Objective 7 of Policy H4.1.	Support	The Sustainability Appraisal is available on the Council website. The Appraisal has been updated from the first draft Local Plan consultation to reflect changes included in the final draft Local Plan.	No change.
Supporting Documents, FDLP Sustainability Appraisal Report	Charlotte Ashton [3425]	1163 This is a comment rather than an objection. It is not clear how the RAG ratings in table 2.6 of the SA relate to the proposed sustainability zones. Presumably some sites will have better RAG ratings than others within the same zone, but could some sites in a medium sustainability zone have a better RAG rating than another site in a high sustainability zone? What are the sustainability zones based on? Policy H4.1 has been given a '+' rating in relation to SA Objective 7. However, when considered against the site allocation on Liverpool Road in particular, it is hard to see how the development of this site would result in a '+' rating in relation to all of the above. As the RAG Ratings aren't available, it's not possible to comment on whether this '+' rating is correct or not. The ratings given against the SA Objectives need to be evidenced against the RAG Ratings for all of the site allocations.	Object	The Sustainability Appraisal has assessed all sites based on a set methodology. All sites are assessed against each criteria and an overall score is provided. Updated appraisals are available on the Council's website.	No change.
Supporting Documents, FDLP Sustainability Appraisal Non Technical Summary	Hertfordshire Constabulary (Design out Crime Officer - Herts Constabulary) [3148]	1257 "The police service places great importance upon the need to build sustainable inclusive communities and to raise awareness of the significant impact that low crime makes to the ongoing and long term sustainability of a development" "SBD Homes 2019 The carbon cost of crime in the UK is estimated to be around 6,000,000 tonnes of CO2 per annum, equivalent to the CO2 output of 6 million UK homes. Research has shown that building developments to Secured by Design will reduce burglary by 87% and vehicle crime by 25% therefore reducing the fear of crime providing substantial carbon cost savings.	Support	Comments on the Sustainability Appraisal noted.	No change
Supporting Documents, FDLP Appendix C-Sustainability Appraisal of Policy Options	Mr Roger Bangs [3807]	1127 Most planning & changes for the last 50 years has been driven by the needs of motorised transport giving both good & bad benefits. Need to reduce the need for long distance transport & cater for sustainable local transport. People should be able to walk or cycle to most of the places they need to visit in a safe & pleasant manner. Domination by the needs of cars needs should cease. Parking on the Highway should only be allowed in authorised places.	Support	Agree, the needs of motorised transport need to be tackled through a variety of initiatives, the Council supports cycling in Local Plan policies and is working with the County Council on options for better public transport, the Council has started to install electric hire bikes and demand responsive buses, and is currently carrying out a new study, a cycle and walking strategy for the town, and bus priority schemes are being looked at. the Local plan sets out parking standard, however, on-street parking is controlled outside of the planning service.	Transport section in the Plan has been revised to place more emphasis on the transport hierarchy.

Supporting Documents	Castle Homes (Mr Alfie Yeatman) [3769]	<p>1302 Summary: we object to the inclusion of the Mothercare Headquarters located on Cherry Tree Road as a Designated Employment Site, it should be identified for residential development. Employment use on this site is set to cease shortly. Prior approval to change the use of the office building to residential use has been granted and positive pre-application discussions have been held on the potential for further residential development on the wider site.</p> <p>We write on behalf of our client, Castle Homes who are joint venture development partners with BYM Capital, the owners of the Mothercare Headquarters site on Cherry Tree Road.</p> <p>The site was purchased with the intention for it to be redeveloped for residential use. As of this week, the Mothercare business has gone into administration and is expected to vacate the site in due course.</p> <p>The site comprises 1.3 ha and is occupied by the Mothercare Headquarters office building, a high-bay warehouse and associated surface level car parking. It is located within a Primary Residential Area, surrounded by neighbouring detached and semi-detached dwellings and has not been the subject of any designations through the Watford District Plan 2000.</p> <p>Given the location of the site and its residential context, the long term commercial use of this scale is neither viable or desirable and would potentially be to the detriment of local residents. The South West Herts Economic Study Update (2019) explains that office demand in the Borough is strongest in Watford Town Centre; due to its connections to London and general supporting high quality town centre amenities. These features are key requirements for attracting high value office occupiers and are not available at the Mothercare Headquarters site.</p> <p>Prior approval for the change of use of the distinctive 'T' shaped building from office to residential use to form 95 residential units was granted on 14 August 2019 (ref: 19/00799/OPD). It is the intention for the warehouse building to be demolished prior to occupation.</p> <p>Pre-application discussions with senior development management officers on the potential for the site to accommodate further residential development have followed. The principle of additional residential development has been accepted, subject to compliance with detailed policy requirements. Initial capacity studies suggest there is an opportunity to provide c. 120-130 additional new build residential units on the site, in addition to the already permitted</p>	Object	Comments noted. Site removed as a designated employment site due to the prior approval.	The Mothercare site has been removed as an allocated employment site and instead has been allocated for mixed use development.
Supporting Documents, First Draft Plan Policies Map	Miss Denise Monaghan [3716]	<p>1016 I object to the building of four story flats on Liverpool road garage site as we are struggling for parking spaces and we are over populated here.</p>	Object	<p>Concerns noted. Planning for the new housing that Watford needs is a requirement set out by national government and all parts of the Borough will be experiencing an increase in development.</p> <p>It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate no significant effects on parking in the area.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
Supporting Documents, First Draft Plan Policies Map	Ms D Carr [3717]	<p>1017 Parking is already a nightmare as it is for people who live here let alone for us to have visitors as well as new tenants, especially when the football is on. Parking in town is also an issue on busy days with our current population. Watford is losing its countryside touch that I used to love, open spaces are lessening and the sounds of sirens are increasing- affecting the wellbeing of the people in our communities. I can only imagine how overloaded our local hospital will be and the stress the staff will experience to cope with the increase.</p>	Object	<p>Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate e no significant effects on parking in the area.</p> <p>Although the Council does not directly provide new infrastructure, such as schools and health practices, the Council liaises with the providers to ensure new infrastructure is provided to support the anticipated growth. Policy IN10.2 Providing Infrastructure to Support New Development should also support new infrastructure provision.</p> <p>Protecting open space and creating opportunities to provide new open space has been considered as part of Chapter 9 The Natural Environment.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
Supporting Documents, First Draft Plan Policies Map	Mr Karim Sumar [3731]	<p>1024 If all this development is to happen how will parking be taken into consideration? Specifically, I draw attention to plan H27. Flats are considered to be built behind Liverpool road but parking hasn't been considered. Liverpool, Cardiff, Clifton, st James and westbury roads are all suffering due to parking issues. The council needs to think of the needs of local residents rather than potential new residents where parking in those streets will definitely become overstretched and overcrowded. The council needs to develop better parking for current residents and resolve this first. Please stop overcrowding West Watford!</p>	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
Supporting Documents, First Draft Plan Policies Map	Wakelin Associates [3692]	<p>1056 The draft Policies Map identifies part of my client's site under a "Priority Habitat" designation. This designation is not legally compliant, since it does not reflect the relevant Regulations. Furthermore, the site is not currently "deciduous woodland" as described in the relevant dataset and, given its size and shape is not likely to become such. The nature of the site severely limits its biodiversity value and it does not form a meaningful link between nearby habitats. On this basis, the "Priority Habitats" designation should be removed from the policies map. See attached for further details.</p>	Object	Priority habitats are designated by national government under the UK Biodiversity Action Plan (UK BAP). The Council does not have the remit to alter the boundaries.	No change.
Supporting Documents, First Draft Plan Policies Map	Mr Jagat Sethi [3784]	<p>1088 safety for kids and women parking overcrowding aggro among the new and current residence. Under developed road and footpath. No street lights after 12 am.</p>	Object	<p>Concerns noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.</p> <p>Design issues, including designing safe environments, is a material consideration to any planning application, and so any development proposal will be required to adequately address this issue. There will be an opportunity to comment should a planning application be submitted in the future.</p>	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.

Supporting Documents, First Draft Plan Policies Map	Mrs Christine Devereux [3768]	1114 I am disabled and can never get parked on my street never mind outside my door, this is the most absurd house plan i have ever heard, so tell me is everyone going to park there cars, I OBJECT TO THIS PLAN	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate that there will be no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
Supporting Documents, First Draft Plan Policies Map	Mr Roger Bangs [3807]	1126 The plan needs to show the way to a sustainable future, accepting that it must not be dominated by motor transport. Develop Watford into a pleasant place to live in & travel too.	Support	Agree, the needs of motorised transport need to be tackled through a variety of initiatives, the Council supports cycling in Local Plan policies and is working with the County Council on options for better public transport, the Council has started to install electric hire bikes and demand responsive buses, and is currently carrying out a new study, a cycle and walking strategy for the town, and bus priority schemes are being looked at.	No change required
Supporting Documents, First Draft Plan Policies Map	Aggregate Industries UK Ltd [3743]	1134 Please refer to 'Firstplan Response on Behalf of Aggregate Industries UK Ltd to the First Draft Watford Local Plan' dated 07 November 2019 and sent via email to strategy@watford.gov.uk on 07 November 2019.	Object	Land being used for the Aggregates Depot and Concrete Batching Plant was included as a mixed use site allocation in a mapping error. It is recognised by the Council that the site is safeguarded in the Minerals Local Plan. The safeguarded area will be removed from the site allocation.	The Rail aggregates Depot and concrete batching plant have been removed from Site MU06.
Supporting Documents, First Draft Plan Policies Map	T Norris [3833]	1165 It is unclear how a decision has been made on deciding whether an area is high or low in terms of sustainability. Green Belt land appears to be considered medium whereas an area where housing is already situated (Bucks Ave/Talbot Road near Oxhey village for example is considered low sustainability) please can evidence be provided on how this decision has been reached	Object	Agree the section setting out the growth strategy would benefit by providing further clarity as to the assumption underpinning sustainability.	The growth strategy has been revised to further refine the sustainability approach into areas within the Core Development Area and areas outside of this.
Supporting Documents, First Draft Plan Policies Map	T Norris [3833]	1166 Oxhey Park has been designated as a priority habitat area yet Attenborough Fields have not! It is incredulous to believe that Kites, Wild Geese, Ducks, Coots, Herons, European Goldfinch, Hedgehogs, Foxes, wild deer, bees, butterflies, native flowers which are seen in Attenborough Fields are not considered as priority habitat! This needs to be re-classified and an area which is part of a wildlife corridor must be protected and designated properly.	Object	Although the site may have biodiversity value, priority habitats are designated by national government under the UK Biodiversity Action Plan (UK BAP). The priority habitats selected were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan .	No change.
Supporting Documents, First Draft Plan Policies Map	Mrs Catharina Wenman [3836]	1173 I object to the proposed building on Bushey car park site. Whilst I recognise that more building is needed the car park is heavily used and it seems unreasonable to have no car parking facilities at Bushey station.	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate e no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
Supporting Documents, First Draft Plan Policies Map	Mrs A Fuller [3837]	1174 Ww	Object	Objection noted.	No change.
Supporting Documents, First Draft Plan Policies Map	Watford Health Campus Partnership LLP (Watford Health Campus Partnership LLP) [3896]	1394 We also note that the First Draft Plan Policies Map shows a Safeguarded Route running east to west across the middle of the Watford Riverwell site. This appears to relate the alignment of the old Cardiff Road. This route is no longer in place and does not form part of the proposals for the redevelopment of the wider site. In December 2013, the Council granted planning permission for Highway Infrastructure Works, required to improve emergency access to the hospital and to serve the wider WHC development. These works included the construction of the permitted new access and link road and new road bridge over the Croxley Rail Link under planning permission (LPA ref. 13/00971/FULM). This has been implemented and Thomas Sawyer Way is operational. This is the primary route running through the site that provides access to both the northern and southern phases, as well as direct access to the Hospital. We have not been made aware of any other Safeguarded Routes across the site and this does not align with the proposals that have been granted planning permission to date. As such, we suggest this should be removed from the draft Policies Map. There is also a Safeguarded Route running along the southern boundary of the Watford Riverwell site. This comprises the disused railway line which was previously safeguarded for use as part of the Croxley Rail Link (Metropolitan Line Extension). However, the proposals for the planned Metropolitan Line Extension were rejected by the Mayor in January 2018 over concerns regarding costs of the works and a lack of funding. The project will no longer be implemented and it is therefore considered that this route no longer needs to be safeguarded as such.	Object	Although the Metropolitan Line Extension is not currently being progressed in its current form, other options are being explored. The Metropolitan Line Extension Alternatives Study was prepared in 2019 and recommends safeguarding of the route, which should ensure no future initiative is compromised.	No change.
Supporting Documents, First Draft Plan Policies Map	Watford Health Campus Partnership LLP (Watford Health Campus Partnership LLP) [3896]	1395 According to the First Draft Plan Policies Map, land to the west of the Watford Riverwell site is currently designated as Open Space / Priority Habitat. According to the draft Plan, the Council would seek to protect these spaces from redevelopment unless it can be demonstrated that they are surplus to requirements. However, this designation does not reflect the historic use of this area of land, previously used as a sewage works / power station / works associated with the former gravel pits previously located to the west of the site. Furthermore, this designation does not reflect the proposed use of this land, comprising redevelopment of the Woodlands and Waterside sites to deliver a significant number of new homes, as well as the Mayfields site which will provide a new care home. These sites have all been granted planning permission for redevelopment and construction is currently underway. As such, we suggest that the Open Space and Priority Habitat designations should be removed from the First Draft Plan Policies Map and these sites should be allocated for housing or form part of a wider strategic allocation of the Watford Riverwell site.	Object	Priority habitats are designated by national government under the UK Biodiversity Action Plan (UK BAP). The priority habitats selected were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan. Therefore, the Council does not have the remit to remove the designations. As the site is adjacent to the Priority Habitat as opposed to within it, this should not affect the development potential of the site.	No change.
Supporting Documents, First Draft Plan Policies Map	LaSalle Investment Management (LaSalle) (n/a - n/a n/a n/a) [3044]	1417 The First Draft Watford Local Plan Policies Map identifies the Colne Valley Retail Park as being located within a Strategic Development Area. It is also noted that the Colne Valley Retail Park is situated south of a Designated Mixed Use Housing and Employment Site. La Salle Support the allocation of the Site as a Strategic Development Area. On the First Draft Watford Local Plan Policies Map a number of Priority Habits areas are proposed to be allocated. The Colne Valley Retail Park is bounded to the east by a proposed Priority Habitat area, which runs along part of the eastern border of the Borough. While La Salle do not object to this proposed designation in principle, it considers that this boundary should be further defined having regards to the physical "markers" on the ground. Specifically, it is suggested that the western boundary of the Priority Habitat area run along the existing fence line of the railway, not the back of pavement of the access road to the Retail Park. The proposed Priority Habitat area allocation extends northwards to encompass the land owned by Watford Borough Council. Given the scale of the Proposals Map it is not possible to fully appreciate the boundary between the proposed Priority Habitat area and the potential development Site, including access to it. We therefore recommend that this boundary is to be reviewed.	Object	Priority habitats are designated by national government under the UK Biodiversity Action Plan (UK BAP). The priority habitats selected were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan. Therefore, the Council does not have the remit to remove the designations. However, the Policies Map will be made interactive to support the Final Draft Plan. This should give more visual clarity with regards to site boundaries.	No change.

Supporting Documents, First Draft Plan Policies Map	Cassio Watford Ltd. (Cassio Watford Ltd) [3903]	1419 We support the inclusion of Clarendon Road and wider area between St Albans Road and the railway line within the Town Centre Boundary. We anticipate the extension of the defined Town Centre to include this area will encourage appropriate development and economic prosperity between the retail core of the Centre and the Watford Junction Strategic Development Area to support the function and development of the Strategic Development Areas.	Support	Support welcomed. Clarendon Road is protected a key employment area for the town. It is recognised that this is key route into town from Watford Junction Station hence the inclusion in the Town Centre Boundary. However, it should be noted that other 'main town centre uses' are not appropriate in this location.	No change.
Supporting Documents, First Draft Plan Policies Map	Warner Bros. (Mr Dan Dark) [3491]	1499 The areas of Studio land that sit within Watford Borough are designated as green belt. Policy SD2.5 of the new local plan seeks to protect green belt land from inappropriate development. In relation to the Three Rivers Local Plan, WBSL has submitted representations with a robust evidence base outlining exceptional circumstances to justify why the Studio land should be removed from the green belt. If this is realised the whole of the Studios site will be removed from the green belt save for the small area of land that lies within Watford Borough. Please see the enclosed plan which illustrates this. At the time of the previous TRDC local plan, an area of Studio land was removed from the green belt and the part of the island site that sits within TRDC area was also removed from the green belt at that time. The green belt boundary now only covers half of the island site. The 2016 hybrid planning permission approved the redevelopment of the whole of the island site for Studio uses. Therefore, in relation to this consultation, we are also requesting that consideration be given to removal of the green belt designation that affects all WBSL land falling within the Borough of Watford. The above economic information and the enclosed Nordicity report highlight the exceptional circumstances necessary to justify the removal of this designation. Further, should TRDC remove the Studio site from the green belt, the Watford green belt boundary would subsequently be contrary to paragraph 139 (e) of the NPPF which states, "when defining green belt boundaries, plans should (e) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent." Altering the green belt and realigning it with the A41 (North Western Avenue), would not only facilitate Studio uses which will bring significant economic benefits, it will also ensure that the plan is sound with respect to NPPF green belt policies.	Object	Comments noted. The Green Belt will be reviewed in light of the findings of the Green Belt Review Stage 2.	The site has been removed from the Green Belt due to the planning permission and future studio expansion.
Supporting Documents, First Draft Plan Policies Map	Hertfordshire County Council (Martin Wells) [3559]	1701 Highways & Transport The Policies Map shows the safeguarded transport infrastructure within the borough as being the Abbey Line, the former Croxley Branch Line, part of Hempstead Road, key cycle routes (unspecified). Consideration should also be given to showing the key transport interchanges/stations within the borough as well (Watford Junction is already shown), which include Watford High Street, Watford Metropolitan Station and Bushey Station.	Comment	Agree. Policies Map to be amended to include key transport infrastructure including transport interchanges.	Amend Policies Map to include key transport interchanges. Amended safeguarding policy to make reference to key transport interchanges.
Supporting Documents, First Draft Plan Policies Map	Hertfordshire County Council (Martin Wells) [3559]	1702 Minerals & Waste Planning It is suggested that the current Policies Map and the site maps provided alongside this First Draft Local Plan should be revisited. At present it is very difficult to identify the Orphanage Road Rail Aggregates Depot and the existing ELAS located within the borough and as such apply the necessary safeguards attributed to these areas. It is also unclear how the references on the map (e.g. EMP1, EMP2, SPA1) relate to the policy numbers in the plan. The Orphanage Road Rail Aggregates Depot and its associated Minerals Infrastructure Consultation Area which extends 250m from the site boundary (as shown on Inset Map 11 of the Proposed Submission Minerals Local Plan) should be identified on the accompanying Policies Map. This is in order to ensure that proposals for non-mineral development which fall within it (other than applications for 'excluded development') are subject to consultation with the Minerals Planning Authority.	Object	Comments noted. The Orphanage Road Rail Aggregates Depot has been added to the safeguarded infrastructure layer of the Policies Map to reflect the Minerals Local Plan. It is considered that inclusion of Minerals Consultation Area and ELAS on the Policies Map are superfluous as they are not Local Plan allocations or policies and adds to the large number of layers already present on the map. Greater reference to the respective Minerals and Waste Local Plans will be made in the document to ensure that designations from the Minerals and Waste Planning Authority are taken into account.	Policies Map amended to represent the Orphanage Road Rail Aggregates Depot as safeguarded infrastructure. The introduction has been amended to identify the Waste and Minerals Plans as part of the Local Plan and are a material consideration.
Supporting Documents, First Draft Local Plan - Printable Version	Miss GEMMA PYEMONT [3721]	1018 Parking will be an even bigger issue.	Object	Comments noted. It will be added to the development considerations that development proposals for this site would be required to be accompanied by a Parking Survey to demonstrate e no significant effects on parking in the area.	The development considerations have been updated to require a parking survey to be undertaken when the site comes forward for development.
Supporting Documents, First Draft Local Plan - Printable Version	Mrs Jenny staines [3797]	1115 I would like to see a greater commitment from Watford Borough Council to promoting the development of carbon neutral or near neutral buildings, and to reducing waste.	Object	Comments noted. The climate change agenda and measures and further clarity about how the Plan can address the issue can be set out. Climate change is a theme throughout the document and is best implemented through the application of a number of planning polices. The Local plan will work in conjunction with other strategies such as those related to transport and improving the quality of existing buildings which lie outside the remit of planning. National guidance supports flexibility rather than being overly prescriptive about new development. While the Council can set higher energy efficiency targets for new builds to achieve, it is considered more appropriate to enable developers to achieve this through the means deemed most appropriate. This should encourage application of the energy hierarchy. The Council has adopted its Sustainability Strategy which sets out a framework for taking steps to address climate change and move towards being net carbon zero in the years ahead. Comments regarding existing buildings and other suggestions will be forwarded to the appropriate team within the Local Authority.	Additional text and clarity has been provided throughout the document. Chapter 1 'A Spatial Strategy for Watford' and policies in Chapter 8 'A Climate Emergency' and flood risk policies in Chapter 9 'Conserving and Enhancing the Environment' have been revised to place more emphasis on addressing climate change. Text added to Policy CC8.3 'Sustainable Construction and Resource Management' to require new residential dwellings to be adaptable to be net zero carbon.

Supporting Documents, First Draft Local Plan - Printable Version

Lichfields (Planner - Anna Vincent)

1198 Intu has outlined concerns with the drafting of town centre policies, which it considers having the potential to undermine rather than support the town centre, consistently throughout the Local Plan process. The prescriptive and restrictive nature of the town centre policies are still of concern, as is particularly the inconsistent policy approach toward Intu Watford and the Charter Place development when compared with the rest of the primary shopping area within Watford town centre. It is important that a consistent and flexible approach is adopted in the New Local Plan.

Object

In response to ongoing discussions with Intu and the recent changes to the use classes order, grouping retail use in with commercial and businesses in class E, the specific policy relating to the indoor shopping centre has been removed. To ensure the long-term vitality and viability of the Town Centre a 'town centre first' approach will continue to be taken to these uses.

The Town Centre policies have been redrafted to provide more flexibility and to reflect the changes to the Use Classes Order. The focus is on maintaining the vitality and viability of the town centre rather than on specific uses.