



**WATFORD  
BOROUGH  
COUNCIL**

## **Watford Final Draft Local Plan**



### **Habitats Regulations Assessment**

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## Executive Summary

This report presents the findings of Habitats Regulations Assessment (HRA) of the Watford Borough Council Local Plan Final Draft version January 2021.

The Watford Local Plan 2018-2036 sets a vision for Watford up to 2036 and will guide planning decisions and new development. It will set out key issues such as how many jobs are needed in the town and where new housing should be located. The Watford Local Plan sets out sites suitable for development and planning policies that will be used to determine planning applications.

The purpose of an HRA is to assess the significance of potential impacts of a plan on relevant European sites. Natural England has confirmed that the three European sites which need to be considered in this HRA are:

- Burnham Beeches SAC;
- Chiltern Beechwoods SAC; and
- Wormley-Hoddesdonpark Woods SAC.

If Likely Significant Effects (LSEs) on European sites are identified in screening, measures must be put in place to avoid them. Further investigation may be necessary to understand how the plan might affect the integrity of European sites.

The First Draft Local Plan (September 2019) and the Final Draft Local Plan have both been screened. The first draft version of the Local Plan was consulted on between 27 September and 8 November 2019. The Final Draft version of the Local Plan is being consulted on between 18<sup>th</sup> January 2021 and 1<sup>st</sup> March 2021.

The screening of the Final Draft Local Plan identified a LSE in relation to air quality on each of the three European sites considered (listed above) resulting from the following policies: Policy SS1.1 Spatial Strategy; HO3.1 Housing Provision; EM4.1 Providing New Employment; EM4.2 Designated Industrial Areas; EM4.3 Office Development and SA13.1 Allocated Sites for Delivery in combination with growth in neighbouring areas.

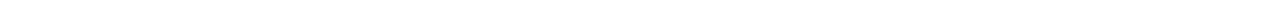
The Appropriate Assessment (AA) has assessed potential air quality impacts on each of the three European sites by examining strategic roads that link the plan area with each SAC and reviewing travel patterns of residents of the plan area.

The actual minimum distances travelled via road between the plan area and the European Sites are at least 19.5km. No strategic routes used by residents of the Plan Area were identified within 200m of the SACs. Any contribution to traffic along roads within 200m of the SACs as a result of the Local Plan would be *de minimis*. It is therefore concluded that the Local Plan would not result in an adverse effect on the integrity of the Burnham Beeches SAC, the Chiltern Beechwoods SAC

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or the Wormley-Hoddesdonpark Woods SAC either alone or in-combination with growth from neighbouring plans.



## **1 Introduction**

ClearLead Consulting has been instructed to undertake a Habitats Regulations Assessment (HRA) of the new Watford Local Plan. This report is the HRA Report which considers the potential affects of the Final Draft Local Plan.

This report will be consulted on with Natural England in order to gain approval of the conclusions prior to the submission of the Local Plan.

### **1.1 Background**

Watford's existing Local Plan, consisting of the Part 1 Core Strategy 2006-31 (2013) and saved policies from the Watford District Plan (2003), are more than five years old. It is therefore out of date and existing planning policies have less weight when making planning decisions. A new Local Plan is required to manage the planning process and deliver the development needed in the area.

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. New information is also available for employment and retail provision that can more accurately reflect changes anticipated with future population growth.

In September-October 2018 the council undertook the Issues and Options (Regulation 18) consultation seeking comments on the key issues facing the borough to 2036. The council has considered the comments received and the Sustainability Appraisal (SA) of options and used this information to prepare a Draft Local Plan in 2019. Between September and November 2019, the Council consulted on the Draft Local Plan and has since considered comments received and also the SA of the draft Local Plan. A revised version of the plan, the Final Draft Local Plan, has been prepared in 2020 and is being consulted on between 18<sup>th</sup> January 2021 and 1<sup>st</sup> March 2021. The Final Draft Local Plan has been subject to HRA screening and appropriate assessment.

### **1.2 Habitats Regulations Assessment**

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats and Species Regulations 2017 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is



commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

The conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 were made on 14 March 2019. The Regulations ensure that the habitat and species protection and standards derived from EU law will continue to apply after Brexit. Amendments to the Habitats Regulations are largely limited to 'operability changes' that will ensure the regulations can continue to have the same working effect as now after the transition period.

The purpose of an HRA is to assess the significance of potential impacts of a plan on relevant European sites. The assessment should determine whether the plan would adversely affect the integrity of the site in terms of its nature conservation objectives. Where negative effects are identified, other options should be examined to avoid any potential for damaging effects.

HRA findings will feed into the parallel SA of the Local Plan which incorporates Strategic Environment Assessment, an integral part of the plan preparation process.

## **2 The Watford Local Plan**

### **2.1 Background to the new Watford Local Plan**

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

The Local Plan Review is needed in order to plan for a significant increase in housing need identified within the South West Hertfordshire Strategic Housing Market Assessment (SHMA). The SHMA was commissioned jointly by Dacorum, Hertsmere, Three Rivers and Watford Councils in 2015 in order to help inform local plans. The SHMA considers housing need arising over the 2013-2036 period. It considers the need for different types of housing and the housing needs of different groups within local communities. The Objectively-Assessed Need (OAN) for housing in Watford has been identified as 793 dwellings per year in 2019. This is a significant increase compared to the target of 260 homes for annum, which is the current target within the Core Strategy.

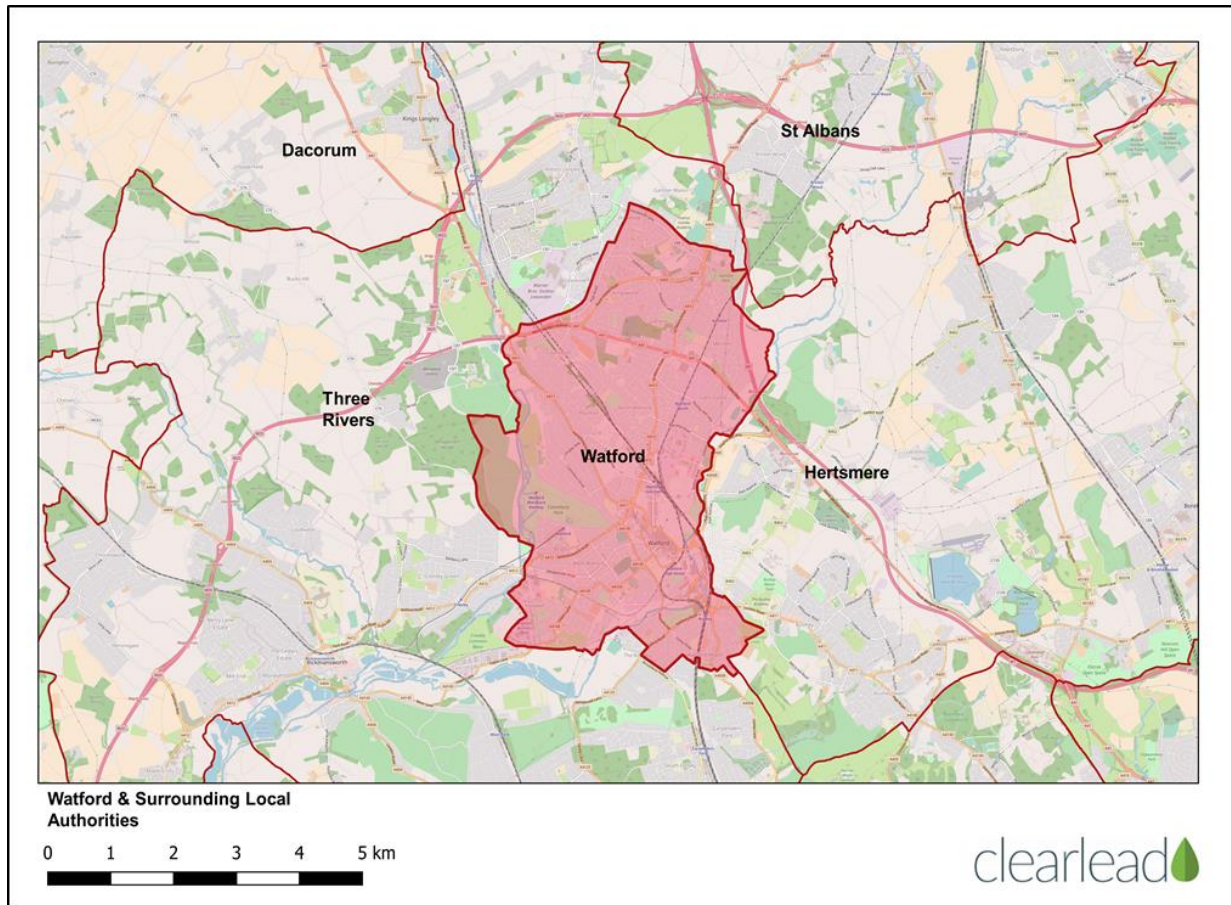
The Local Plan, when adopted, will form the development plan for Watford, along with Hertfordshire County Council Minerals and Waste Local Plans. The role of the Local Plan is to help deliver the Council's Corporate Business Plan and other Council policies and strategies, where relevant. It will set out the growth strategy for the borough during the plan period of 2018 to 2036.

### **2.2 Overview of the Plan Area**

The Watford Local Plan Area is shown in Figure 2.1 (area in red).



**Figure 2.1: Watford Local Plan Area**



Watford is located in Hertfordshire, 17 miles north west of central London and is adjacent to the Greater London Area. The borough has an area of 2,142 hectares (8.3 square miles) and is the only non-metropolitan borough wholly within the M25. The borough is the largest urban area in South West Hertfordshire and supports the highest population density. It also has a strong concentration of services and facilities with considerable employment, retail and leisure opportunities. Formerly a market town, the settlement has grown significantly over time with its core being Watford town centre.

The population of Watford in 2016 was estimated to be 96,773<sup>1</sup> and it has continued to rise over the past 5 years. The borough has a younger than average population with a median age of 36.1 compared to 40 nationally and 39.7 countywide.

<sup>1</sup> Watford Borough Council Monitoring Report, 2016

## **2.3 Content of the Local Plan**

The Final Draft Local Plan sets out the Council's approach to new development up to 2036 and contains a spatial strategy policy in Chapter 1, Strategic Development Areas (SDA) in Chapter 2, site allocations in Chapter 13 and thematic or 'policies to guide development' in Chapters 3-12.

The spatial strategy policy SS1.1 is reproduced in Box 2.1 below.

The policies to guide development are intended to address local issues. In Watford, they ensure that the development is of high quality that will help Watford prosper as development takes place. As a suite of planning policies, together they are used to guide new development that delivers the vision and objectives set out in the Local Plan. They are a material consideration alongside national guidance when determining planning applications.

There are three SDA proposed in the borough with corresponding policies where new development will be supported in principle if it is consistent with the Local Plan. These policies set out key principles to steer development. These are supported by the site allocations within Chapter 13 of the Proposed Local Plan which include development considerations for each site. These SDAS can also be supported through other planning documents such as planning briefs, masterplans and supplementary planning documents.

Site allocations define land that has been identified for new development. These sites are where development would be acceptable in principle for a specified use such as housing, education, employment and community facilities or a mix of uses. The development potential is identified where appropriate and constraints that need to be considered when proposals are prepared. The site allocations are set out in Chapter 13 of the Proposed Local Plan and there are 63 in total.

### **Box 2.1 Final Draft Local Plan Policy SS1.1 Spatial Strategy**

The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs between 2018 and 2036, along with other supporting infrastructure for a growing population. Proposals for new development will be supported, where they demonstrate that they will contribute towards the Local Plan's economic, social and environmental objectives, cumulatively achieving sustainable development.

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, creating a high quality place to live, work and visit by 2036. Heritage assets and areas of green space will continue to be protected.

Development will make the most effective and efficient use of land, support a compatible, mixed-use, high quality design and utilise innovative technology to address climate change and reduce carbon emissions, while also facilitating a modal shift towards greener travel patterns and minimising the impact on the environment. Pedestrian and cycle travel will be prioritised.

These high standards and a positive and integrated approach to development will be expected across the whole of the borough to create attractive and inclusive neighbourhoods, supporting people to be more active, healthy and encourage greater social inclusion as part of a balanced community.

Across the borough, new infrastructure and improvements to existing infrastructure will be delivered to support development and the community. Infrastructure proposals will be progressed collaboratively with relevant stakeholders and providers to maximise the benefits and success of any scheme.

All development will take place on brownfield, or previously developed land and only in exceptional circumstances will development on greenfield land be supported. Development in the Metropolitan Green Belt will not be supported unless it can be demonstrated that exceptional circumstances apply.

#### **The Core Development Area**

The Core Development Area is expected to support 80% of allocated development in the borough and provides opportunities for further redevelopment. Proposals in this area will be supported where they optimise the use of land in this location through mixed-use high-density development, with excellent access to services, facilities and public transport. Development should deliver positive social and environmental impacts, incorporating high quality design and innovation to ensure high environmental standards are achieved.

The scale of change will be transformational in places. Collaboration between development partners and stakeholders on larger sites will be the key to unlocking the potential of the area. Ongoing and effective community engagement will also be required. Proposals should demonstrate a holistic approach to development, optimise opportunities for higher density development, create linkages to adjacent areas and ensure proper infrastructure provision.

#### **Areas outside the Core Development Area**

Outside the Core Development Area, proposals will be supported where they optimise densities to make efficient use of land and manage change with greater regard to the existing context and local character. Development should make the most of its location, such as access to public transport, cycling and walking and seek to provide off-site infrastructure to enhance them, and facilitate access to services and facilities.

High quality connections between people and destinations within the Core Development Area, wider town and locations outside of the borough will be sought.

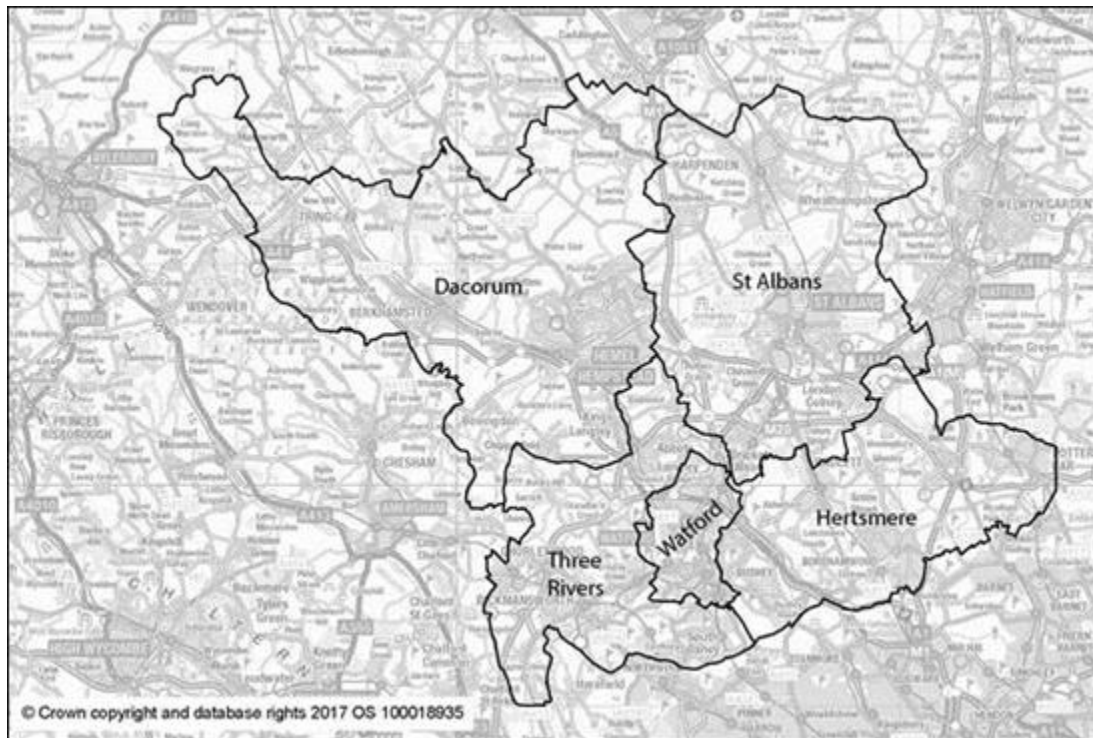
## 2.4 South West Hertfordshire Joint Strategic Plan

Watford Borough Council along with Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council and Hertsmere Borough Council have begun work on a Joint Strategic Plan (JSP) for the South West Hertfordshire area (see map below). This work is also being supported by Hertfordshire County Council.

A key aim will be to ensure that infrastructure – such as transport, schools, health, and utilities (for example, water and sewerage) – are properly co-ordinated and delivered alongside the need for new homes and jobs. All five councils also make up a single housing market area. Each council is responsible for preparing their own Local Plan, but a JSP will set the strategic framework and shared priorities within which individual local plans can be prepared.

All five Councils have agreed a Memorandum of Understanding (MOU) to take the work forward.

**Figure 2.2: Area to be covered by the South West Hertfordshire Joint Strategic Plan**



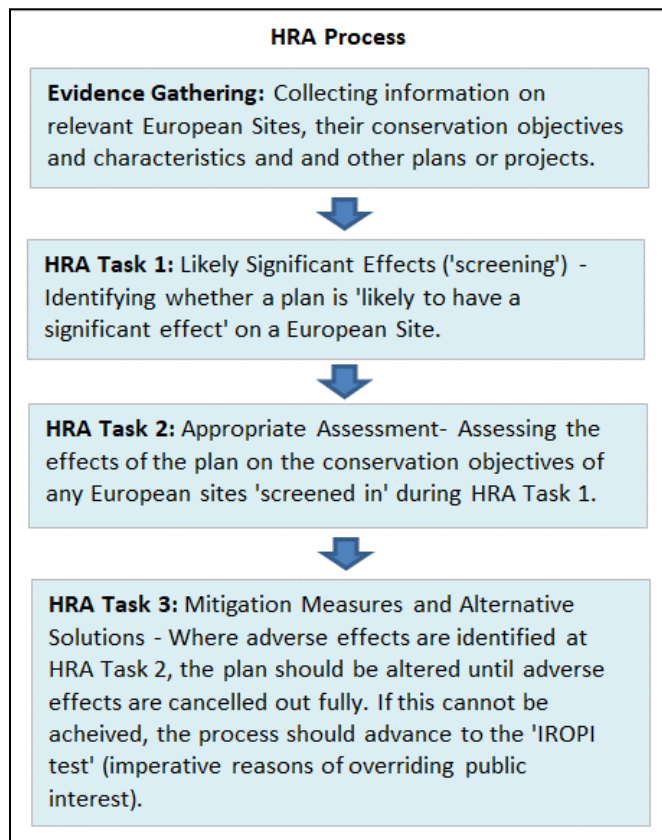
The JSP is at an early stage in development. Initial engagement with the public was undertaken between February and May 2020. The JSP will influence the end phase of the current Local Plans and the direction of travel for the next generation of Local Plans that will follow. It is not a statutory document, however, local authorities that share cross-boundary issues are encouraged by the government to prepare strategic plans as a way of maximising opportunities for growth and create greater benefits for communities.



### 3 Methodology

Figure 3.1 sets out the HRA process.

**Figure 3.1 The HRA Process**



During screening, the 'Precautionary Principle' needs to be applied: if an effect cannot be ruled out based on objective information it has been reported as "likely" or not possible to rule out. Furthermore, a judgement<sup>2</sup> by the Court of Justice of the European Union (People Over Wind) ruled that Article 6(3) of the Habitats Directive<sup>3</sup> must be interpreted as meaning that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the

<sup>2</sup> <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>

<sup>3</sup> Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

plan or project on a European site at the screening stage. The screening exercise must therefore consider elements of the plan without any proposed mitigation.

If Likely Significant Effects (LSEs) on European sites are identified in screening, measures must be put in place to avoid them. Further investigation may be necessary to understand how the plan might affect the integrity of European sites i.e. HRA Task 2 (Appropriate Assessment (AA)) and to develop effective avoidance and mitigation measures (or consider mitigation measures already proposed in relation to projects).

The following guidance has been referred to in undertaking the HRA:

- English Nature (2006) draft Guidance – The Assessment of Regional Spatial Strategies and Sub-regional strategies under the provisions of the Habitats Regulations;
- Scottish Natural Heritage (January 2015) Habitats Regulations Appraisal of Plans Guidance For Plan-Making Bodies In Scotland Version 3.0 originally prepared by David Tyldesley and Associates; and
- Department for Communities and Local Government (August 2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents. Draft.

### 3.1 Evidence Gathering

With reference to Figure 3.1, the evidence gathering task was initially completed in 2017 and updated in 2020.

European sites within a 20km radius of the Watford Borough boundary have been identified. This area of search reflects guidance recommendations as set out in Planning for the Protection of European Sites: Appropriate Assessment<sup>4</sup>. However, the distance itself is not a definitive guide to the likelihood or severity of impacts known to arise from developments and consideration has also been given to whether any other European sites can be linked to development within the Borough through a known 'pathway'<sup>5</sup>. Pathways are routes by which a change in activity within the Local Plan Area can lead to an effect upon a European site.

There are no European sites within the Watford Borough boundary.

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<sup>4</sup> Department for Communities & Local Government: Planning for the Protection of European Sites: Appropriate Assessment, 2006 (draft)

<sup>5</sup> Scottish Natural Heritage (January 2015) Habitats Regulations Appraisal of Plans Guidance For Plan-Making Bodies In Scotland Version 3.0 – in the absence of a similar Government publication for HRA of plans in England, this guidance document provides useful and relevant guidance.



There are three European sites that are considered to have a potential impact pathway with development within the Watford Borough. These sites are:

- Burnham Beeches SAC;
- Chiltern Beechwoods SAC; and
- Wormley-Hoddesdonpark Woods SAC.

It is considered that there are no other European sites with which a pathway exists with development in the Borough.

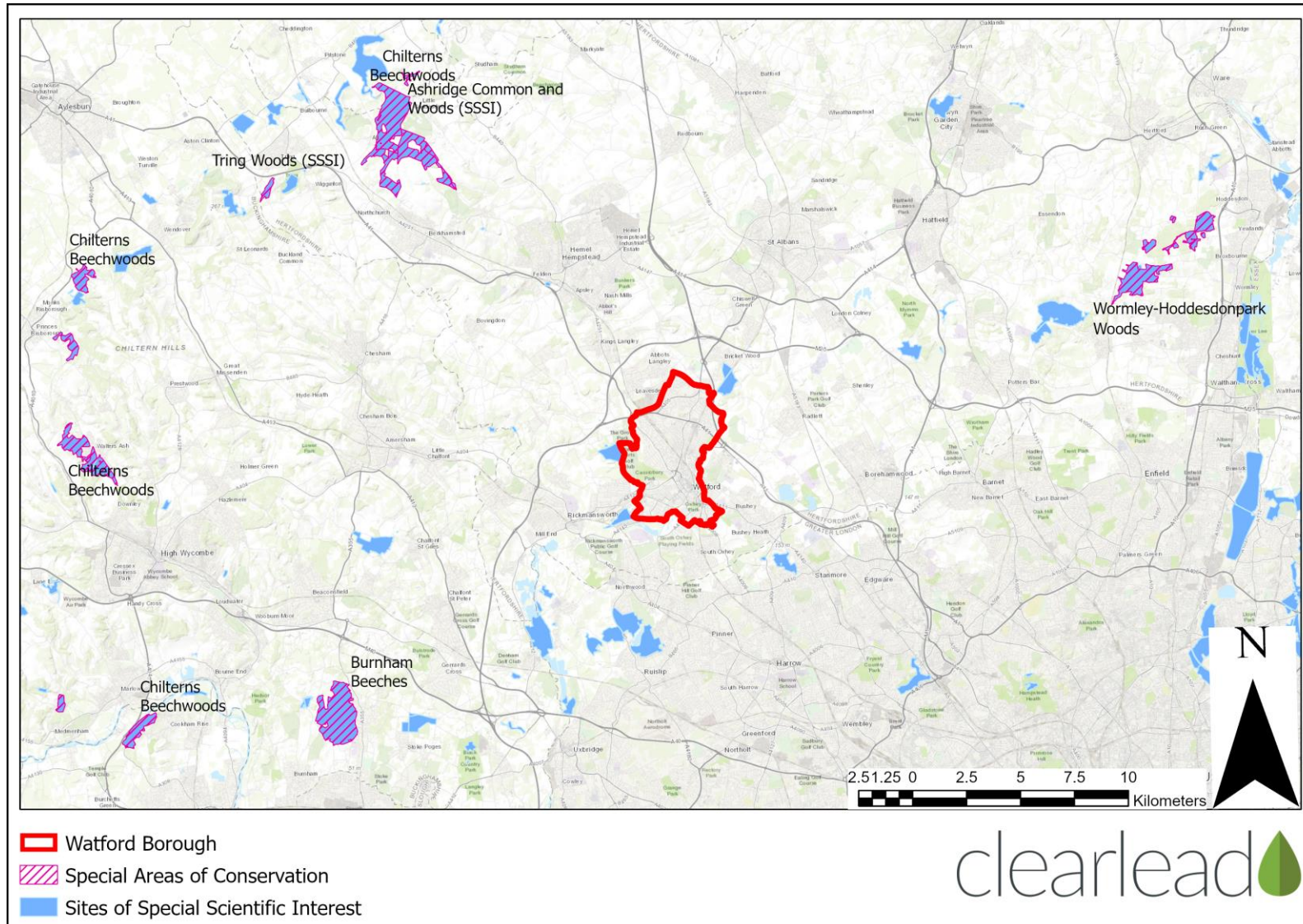
ClearLead Consulting wrote to Natural England in December 2017 to confirm the scope of the Habitats Regulations Assessment (HRA) of the Local Plan. Natural England responded<sup>6</sup> confirming that the three European sites which need to be considered in the HRA are Burnham Beeches SAC, Chiltern Beechwoods SAC; and Wormley-Hoddesdonpark Woods SAC.

These sites are shown in Figure 3.2.

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<sup>6</sup> Email letter from Natural England dated 31/01/18

Figure 3.2: European sites in and near to Watford Borough





Appendix A presents a summary of the site designations, qualifying features and site sensitivities. This information has been obtained from:

- Joint Nature Conservation Committee (JNCC) website [www.jncc.gov.uk](http://www.jncc.gov.uk);
- Multi-Agency Geographical Information Centre (MAGIC) website [www.magic.gov.uk](http://www.magic.gov.uk); and
- Natural England site improvement publications.

## 3.2 Screening

In March 2020, the draft Local Plan was subject to HRA screening. Each policy within the plan was screened using the screening criteria described in Table 3.1 and with reference to the factors affecting the integrity of the three European sites set out in Appendix A. HRA guidance<sup>7</sup> was used to develop the set of screening criteria presented in Table 3.1.

Table 3.1: Local Plan Screening Criteria	
Screening Rationale	Details
LSE	A likely effect is one that cannot be ruled out on the basis of objective information. The test is a 'likelihood' of effects rather than a 'certainty' of effects. Although some dictionary definitions define 'likely' as 'probable' or 'well might happen', in the Waddenzee case <sup>8</sup> the European Court of Justice ruled that a project should be subject to appropriate assessment "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site, either individually or in combination with other plans and projects".
No LSE - A general policy statement	A general statement of policy sets out a strategic aspiration for the plan-making body for a certain issue. A general 'criteria based' policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals. Does not necessarily include more site specific criteria based policies which may require AA.

<sup>7</sup> Scottish Natural Heritage (January 2015) Habitats Regulations Appraisal of Plans Guidance For Plan-Making Bodies In Scotland Version 3.0 originally prepared by David Tyldesley and Associates

<sup>8</sup> European Court of Justice C-127/02

**Table 3.1: Local Plan Screening Criteria**

Screening Rationale	Details
No LSE - Not proposals generated by this plan	Aspects excluded from the appraisal because they are not proposals generated by this plan.
No LSE - A protection policy	Aspects which protect the natural environment, including biodiversity, or conserve or enhance the natural, built or historic environment.
No LSE - No development or change	Aspects which will not lead to development or other change.
No LSE - Makes provision for change but no impact pathway	Aspects which make provision for change but which could have no conceivable effect on a European site, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect, or would not otherwise undermine the conservation objectives for the site.
No LSE - Policy is too general	Aspects which are too general so that it is not known where, when or how the aspect of the plan may be implemented, or where any potential effects may occur, or which European sites, if any, may be affected.

In November 2020 the Final Draft Local Plan was subject to screening. The findings of the screening exercise are presented in Section 4 of this report.

Screening of the Final Draft Local Plan identified LSEs and therefore it has been necessary to proceed to the appropriate assessment stage of HRA (HRA Task 2 in Figure 3.1).

### 3.3 Appropriate Assessment

The Appropriate Assessment (AA) of the Final Draft Local Plan has considered the potential for the growth in Watford to contribute to an increase in air pollution both alone and in combination with growth in other neighbouring areas. This potential effect has been considered in relation to each of the European sites considered in the HRA:

- Burnham Beeches SAC;
- Chiltern Beechwoods SAC; and
- Wormley-Hoddesdonpark Woods SAC.

In order to assess the potential effects on each of the European Sites from an increase in air pollution, the road network around the plan area and the SACs was examined for the following:

- to identify whether strategic roads were present linking the plan area with the European sites; and
- to determine whether any of these strategic roads or associated linking roads occurred within 200m of each SAC (the effects of emissions from vehicles over this distance is considered negligible).

Information on commuting patterns for residents of the plan area was obtained by analysing the national census data<sup>9</sup>. The data shows where residents regularly drive to and from by car or van. This provides an indication of likely strategic routes where increases in traffic associated with the Local Plan could occur both alone and in combination with other plans. In addition, information on predicted transport changes within Hertfordshire between 2020 and 2036 was obtained by reviewing the Hertfordshire County Council Countywide Model of Transport<sup>10</sup>. Further information on this transport model is provided in Section 5.1.

Where appropriate, further information on traffic increase and subsequent air quality changes within each European site was collected by reviewing Local Plan HRAs of the district/borough where the European site was located.

### 3.4 Assessment Limitations

No significant limitations to the assessment were noted.

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<sup>9</sup> <https://www.nomisweb.co.uk/census/2011/WU03EW/chart/1132462215> website accessed 7/1/2020

<sup>10</sup> Hertfordshire COMET: Local Plan Forecasting Report - LP5 (AECOM for Hertfordshire County Council, May 2020)

## 4 Screening Findings

### 4.1 Introduction

The Final Draft Local Plan was screened in November 2020. The detailed screening table can be found in Appendix B.

The policies which were screened in and for which LSEs were identified are:

<b>Table 4.1 Local Plan Policies Screened in</b>		
<b>Policy Chapter</b>	<b>Policy Code</b>	<b>Policy Name</b>
Chapter 1: A Spatial Strategy for Watford	SS1.1	Spatial Strategy
Chapter 3: Homes for a Growing Community	HO3.1	Housing Provision
Chapter 4: A Strong Economy	EM4.1	Providing New Employment
	EM4.2	Designated Industrial Areas
	EM4.3	Office Development
Chapter 13: Site Allocations and New Development	SA13.1	Allocated Sites for Delivery

All of the proposed site allocations detailed in policy SA13.1 were screened in, apart from two education sites.

The policies identified in Table 4.1 and the allocation sites were identified as having the potential to result in an in combination effect with growth in neighbouring areas which could increase air pollution from traffic and result in an LSE on the following European sites:

- Burnham Beeches SAC;
- Chiltern Beechwoods SAC; and
- Wormley-Hoddesdonpark Woods SAC.

All of these European sites are vulnerable to negative effects from air pollution.



No other potential LSEs were identified in the screening of the Final Draft Local Plan policies and site allocations.

## 5 Appropriate Assessment: Air Quality

### 5.1 Introduction and Background

Screening has identified the following policies could have a potential LSE on Burnham Beeches SAC, Chiltern Beechwood SAC and Wormley-Hoddesdonpark SAC due to potential effects from increased air pollution:

- Policy SS1.1 Spatial Strategy;
- HO3.1 Housing Provision;
- EM4.1 Providing New Employment;
- EM4.2 Designated Industrial Areas;
- EM4.3 Office Development; and
- SA13.1 Allocated Sites for Delivery (except the two education allocation sites).

The Site Improvement Plan for each SAC identifies air pollution as a threat to each site. Nitrogen deposition levels currently exceeds the site-relevant critical load class for the qualifying features of each SAC as defined on the Air Pollution Information System (APIS)<sup>11</sup>.

The Local Plan could potentially cause an adverse effect on these European sites if traffic (and therefore emissions to air) were to increase beyond the Plan Area for trips to access employment or other facilities such as recreation, cultural or retail. This could result in an increase in nitrogen deposition, which could have an effect on those habitats sensitive to additional nitrogen through eutrophication, which could lead to effects such as a change in species composition.

Natural England has advised that emissions from point sources more than 200m from the boundary of a site can be considered negligible<sup>12</sup> (this does not mean that there is not the possibility of impacts due to increasing emissions from diffuse sources).

Hertfordshire County Council has developed a Countywide Model of Transport, COMET. This consists of a suite of models including a Variable Demand Model, Highways Model and Public

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<sup>11</sup> [www.apis.ac.uk](http://www.apis.ac.uk)

<sup>12</sup> Letter from English Nature to Runnymede Borough Council, dated 16th May 2006, regarding Conservation (Natural Habitats &C.) Regulations 1994 Runnymede Borough Local Development Framework

Transport Model and has been used to test the cumulative impacts of Local Plan growth across the county.

A new 2036 Forecast Model run was undertaken in early 2020 with districts Local Plan development assumptions as of Autumn 2019. Local Plan growth plus transport mitigation measures as identified by the districts and boroughs has been tested.

Countywide results of the latest Local Plan Run 5 have been documented in the Forecasting Report. The COMET model enables an interpretation of potential impacts across the whole area considering the influence of growth and schemes in other areas.

Hertfordshire County Council have prepared a subsequent interpretation report<sup>13</sup> which provides a more detailed assessment of the model results within the Watford area, taking into account the cumulative impact of growth and potential transport schemes across this area and in other Hertfordshire districts.

Planning assumptions were agreed with Watford Borough Council in Autumn 2019. These include developments completed since 2014 (which is the base year of the model), those already in the planning system, and an allowance for windfall as well as Local Plan sites. These fed into COMET Local Plan Run 5. Run 5 is a model run to determine the cumulative impact of growth across the county and beyond.

A number of transport schemes which were deemed as committed or highly likely along with appropriate access points from the key developments were already coded into the model. In addition, there are general schemes identified in Local Plan Infrastructure Delivery Plans, emerging Growth and Transport Plans and other studies to accommodate growth. In some cases, the impact of sustainable transport measures has been indirectly modelled as speed reductions or mode shifts.

A series of additional sustainable travel measures are planned for the Watford Urban Area. These include school and workplace travel planning and improvements to bus service quality. To simulate the impact of these on the 2036 Future Year, a mode shift away from the car has been applied to journeys with an origin and destination within Watford Borough.

Part of the Chiltern Beechwoods SAC occurred within Hertfordshire and the information within this transport model was discussed in Section 5.2.2. The transport model data was not considered relevant to the other SACs due to their distance from the Hertfordshire border.

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<sup>13</sup> Watford Interpretation of COMET Model Results (Hertford Shire County Council, May 2019)

## 5.2 Assessment of effects alone and in combination

### 5.2.1 Burnham Beeches SAC

Burnham Beeches SAC is located in South Bucks District and occurs approximately 15.4km to the southwest of the Plan Area. The shortest route by road from the Plan Area to the SAC is approximately 28.5km via the M40 and A355. The A355 is the only primary road within 200m of the SAC and connects the M40 with Slough to the south. This road is not considered to be a strategic route for Watford Borough residents travelling to work; analysis of commuting patterns using national census data found that neither South Bucks nor Slough were considered to be key commuting areas<sup>14</sup>. The data shows that residents from the Plan Area commuted by car or van primarily into Greater London and, to a lesser extent, neighbouring areas within South West Hertfordshire.

Although this SAC occurs within the screening radius of 20km, the actual distance to drive to the site is 28.5km which far exceeds this distance. Contribution to traffic along roads within 200m of Burnham Beeches as a result of the Local Plan would therefore be *de minimis* and no further assessment is proposed.

This approach and conclusion are in accordance with the HRA of the South Oxfordshire Local Plan<sup>15</sup>, which has been approved by Natural England, and the HRA of Dacorum Local Plan<sup>16</sup>, which is currently being consulted on.

It is therefore concluded that the Local Plan would not result in adverse effects on the Burnham Beeches SAC either alone or in combination with growth from neighbouring plans and projects.

### 5.2.2 Chiltern Beechwoods SAC

The Chiltern Beechwoods SAC (Ashridge Commons and Woods SSSI) is located in the Borough of Dacorum approximately 13.1km to the north west of the Local Plan Area. The shortest route by road from the Plan Area to the SAC is approximately 19.5km via Watford Road and the A41 to the B5406 which occurs within 200m of the SAC. Dacorum is identified by the Office for National Statistics as a key commuting area for residents of the Plan Area. However, the vast majority of Watford residents that commute to Dacorum are likely to work in the main town of Hemel Hempstead which lies between the Plan Area and the SAC. The B5406 is not considered to be a strategic route for residents within Watford Borough. Indeed, the Watford Interpretation of COMET

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<sup>14</sup> <https://www.nomisweb.co.uk/census/2011/WU03EW/chart/1132462215> website accessed 7/1/2020

<sup>15</sup> LUC (2018). South Oxfordshire Local Plan Habitats Regulations Assessment Report.

<sup>16</sup> TRL (2020). Dacorum Borough Council Local Plan Habitats Regulations Assessment Screening Report.



Model Results demonstrates that traffic is predicted to be reduced in 2036 on Watford Road within the Plan Area, which is the main route linking Watford with the A41 and B5406. Watford Road and the A41 also link the Plan Area with Tring Woodland SSSI which is also a component of the SAC. Tring Woodland SSSI is located approximately 19km west of the Plan Area and approximately 22.5km by the road. The A41 lies within 200m of this SSSI. The A41 is not considered to be a strategic route for Watford Borough residents and, therefore, increases in traffic along this road as a result of the Local Plan would be negligible.

The effects of increased traffic pressures within the Ashridge Commons and Woods SSSI component of the SAC were assessed within the HRA of the Dacorum Local Plan<sup>17</sup>. The HRA used Dacorum Borough Council traffic modelling data to predict the increase in Average Annual Daily Traffic (AADT) flows along the B5406 in 2036. Following an accepted methodology within the Design Manual for Roads and Bridges<sup>18</sup> any changes over 1000 AADT are considered to be 'significant'. The Dacorum HRA concluded that changes to AADTs as a result of their Local Plan are well below the 1,000 AADT threshold and they therefore deemed an in combination assessment unnecessary.

Overall, it is therefore concluded that the Watford Local Plan would not result in an adverse effect on the integrity of the Chiltern Beechwoods SAC either alone or in combination with neighbouring plans and projects.

### **5.2.3 Wormley-Hoddesdonpark Woods SAC**

The Wormley-Hoddesdonpark Woods SAC is located approximately 18.7km to the east of the Plan Area. The shortest route by road from the Plan Area to the SAC is approximately 27km via the M25 to Darnicle Hill which runs immediately adjacent to the SAC. Darnicle Hill is a minor road and no increase in traffic along this road is predicted as a result of policies within the Watford Local Plan. The A10 is the only primary road which runs within 200m of the SAC and the section of road which occurs adjacent to the SAC is approximately 35km from the Plan Area. The A10 is not considered to be a strategic route used by Watford Borough residents and therefore increases in traffic as a result of the Local Plan would be negligible.

In addition, only a relatively small area of SAC occurs within 200m of the A10 which is considered too small to be adversely affected by a reduction in air quality. This issue was considered in detail within the HRA of the Broxbourne Local Plan as this SAC is partly located within that Local Plan area. The HRA reached the same conclusion which was agreed by Natural England.

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<sup>17</sup> TRL 2020. Habitats Regulations Assessment Screening of Dacorum Local Plan.

<sup>18</sup> <https://www.standardsforhighways.co.uk/dmrb/>



It is therefore concluded that the Watford Local Plan would not result in an adverse effect on the integrity of the Wormley-Hoddesdonpark Woods SAC either alone or in combination with neighbouring plans and projects.

## 6 Conclusions

Examination of the road network shows that the actual travelling distances via road between the Plan Area and the European Sites are at least 19.5km. No strategic routes used by residents of the Plan Area were identified within 200m of the SACs. Any contribution to traffic along roads within 200m of the SACs as a result of the Local Plan would be *de minimis*. It is therefore concluded that the Local Plan would not result in an adverse effect on the integrity of the Burnham Beeches SAC, the Chiltern Beechwoods SAC or the Wormley-Hoddesdonpark Woods SAC either alone or in-combination with growth from neighbouring plans and projects.

## 7 Next Steps

This HRA Report is being published for consultation with the Final Draft Watford Local Plan in between 18<sup>th</sup> January 2021 and 1<sup>st</sup> March 2021 for a 6-week period. Natural England will be sent a copy to comment on.

Following consultation on the Final Draft Local Plan, comments received on both the Local Plan and this HRA Report will be considered. Any necessary changes will be made to the HRA Report and to the Local Plan in response to consultee comments, prior to Submission of the Local Plan.

<b>Table 7.1: Watford Local Plan Timetable</b>	
<b>Local Plan Activity</b>	<b>Timeframe</b>
Final Draft Local Plan Consultation	January / February 2021
Consultation comments considered	March / May 2021
Submission to Secretary of State	Q2 2021
Examination	Q3 2021
Adoption	Q4 2022

## Appendix A – Information About European Sites

Table A.1: Burnham Beeches SAC	
<b>Name</b>	Burnham Beeches SAC UK0030034
<b>Location with regards to plan area</b>	The site occurs approximately 15.4km to the south west of the plan area.
<b>Reason(s) for designation:</b>	
ANNEX I Habitats <ul style="list-style-type: none"> <li>9120 Atlantic <i>acidophilous</i> beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Illic-Fagenion</i>)</li> </ul>	
<b>Component SSSI sites</b>	<ul style="list-style-type: none"> <li>Burnham Beeches SSSI</li> </ul>
<b>Conservation objectives</b>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats;</li> <li>The structure and function (including typical species) of qualifying natural habitats;</li> <li>The supporting processes on which qualifying natural habitats rely.<sup>19</sup></li> </ul>

<sup>19</sup> Natural England 30 June 2014 – version 2. <http://publications.naturalengland.org.uk/publication/6014456282742784>

**Table A.1: Burnham Beeches SAC**

**Vulnerability and current conditions**

During the most recent condition assessment of the four SSSI units within the site (2006, 2008 and 2010), three of the units were assessed as being in 'Favourable' condition. The remaining unit was in 'Unfavourable Recovering' condition due to containing stands of conifers with limited regeneration and patchy understorey/ground flora.

A summary of discussions with those responsible for managing the site is detailed in Liley *et al* (2012)<sup>20</sup>. Despite the majority of the SAC habitat being assessed by Natural England as being in favourable condition, there are concerns due to an increased rate of veteran tree loss caused by inappropriate veteran tree management and an increasing gap between young and ancient trees.

Health monitoring of trees is carried out at Burnham Beeches, with staff undertaking detailed surveys of ancient pollards on a 10 year cycle, a less intensive check for management requirements every two years and tree health surveys in both winter and summer (Liley, *et al* 2012). Members of staff who carry out the health monitoring have noticed that the young trees are showing signs of ill health.

**Key factors currently impacting or threatening site integrity and/or the conservation objectives<sup>21</sup>**

- Air pollution: risk of atmospheric nitrogen deposition - lichen communities associated with trees are sensitive to nitrogen deposition.
- Public access/disturbance – veteran trees are vulnerable to damage as a result of soil compaction due to trampling or vehicle movement over the root zone.
- Habitat fragmentation – pressure from new housing development risks isolating the site from surrounding countryside.
- Deer – numerous in parts of the site and causing adverse impacts on tree regeneration and ground flora.
- Species decline – the number of veteran trees on site are declining and there is a significant age gap between these and the next generation.
- Invasive species – oak processionary moth occurs nearby. Rhododendron occurs across the site which also act as a host for the pathogens causing sudden oak death (which also affects beech).

<sup>20</sup> Liley, D., Hoskin, R., Fearnley, H., White, J. & Underhill-Day, J. (2012) Urban development and Burnham Beeches SAC. Unpublished report for Corporation of London.

<sup>21</sup> Adapted from Site improvement plan – Epping Forest SAC (Natural England, 2014).  
<http://publications.naturalengland.org.uk/publication/5689860228644864>

Table A.2: Chiltern Beechwoods SAC	
<b>Name</b>	Chiltern Beechwoods SAC UK0012724
<b>Location with regards to plan area</b>	The site occurs approximately 13.1km to the north west of the plan area.
<b>Reason(s) for designation:</b>	
<p>ANNEX I</p> <p>Primary</p> <ul style="list-style-type: none"> <li>9130 <i>Asperulo-Fagetum</i> beech forests</li> </ul> <p>Non Primary</p> <ul style="list-style-type: none"> <li>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>; important orchid sites)</li> </ul> <p>ANNEX II species</p> <p>Non Primary</p> <ul style="list-style-type: none"> <li>1083 Stag beetle <i>Lucanus cervus</i></li> </ul>	
<b>Component SSSI sites</b>	<ul style="list-style-type: none"> <li>Ashridge Commons and Woods SSSI</li> <li>Aston Rowant Woods SSSI</li> <li>Bisham Woods SSSI</li> <li>Bradenham Woods, Park Wood and The Coppice SSSI</li> <li>Ellesborough and Kimble Warrens SSSI</li> <li>Hollowhill and Pullingshill Woods SSSI</li> <li>Naphill Common SSSI</li> <li>Tring Woodlands SSSI</li> <li>Windsor Hill SSSI</li> </ul>

**Table A.2: Chiltern Beechwoods SAC**

<b>Conservation objectives for the SPA</b>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>• The structure and function (including typical species) of qualifying natural habitats;</li> <li>• The structure and function of the habitats of qualifying species;</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</li> <li>• The populations of qualifying species, and,</li> <li>• The distribution of qualifying species within the site.<sup>22</sup></li> </ul>
<b>Vulnerability and current condition</b>	
<p>The Ashridge Commons and Woods SSSI is the only component SSSI of the SAC which occurs within 19km of the plan area and therefore only this SSSI condition assessment was reviewed. Six of the seven units within this SSSI were in 'Favourable Condition' with the remaining unit in 'Unfavourable Recovering' condition primarily due to deer browsing on young growth which appears to be having an adverse impact on the regeneration of trees.</p> <p>The majority of Beechwoods in the Chilterns are very uniform in terms of age-class and species composition, as a result of historical promotion of beech as a timber tree. Significant changes to the structural and species diversity of these woods are required in order to promote a more natural composition. Beech woodland in the Chilterns is currently facing a decline due to a very low market value for timber and damage to young trees by grey squirrels. The availability of financial support through the Woodland Grant Scheme goes some way in helping to address this issue but it is not clear whether this offers sufficient incentive to woodland managers to continue to manage in ways which will promote an increase in structural and species diversity of the characteristic beechwood communities. In particular, there may be a lack of sufficient financial support to provide for the retention of a larger proportion of mature trees in order to increase the provision of deadwood habitat. This latter issue is the subject of a joint national review by Natural England and the Forestry Commission.</p>	

<sup>22</sup> Natural England 30 June 2014 – version 2. <http://publications.naturalengland.org.uk/publication/4808896162037760>



**Table A.2: Chiltern Beechwoods SAC**

**Key factors currently impacting or threatening site integrity and/or the conservation objectives<sup>23</sup>**

- Forestry and woodland management – woodland management has resulted in a uniform age structure in parts with few gaps in the canopy and restricted regeneration. Climate change may also impact on woodland regeneration and species composition.
- Deer – browsing prevents or hinders natural regeneration of trees and ground flora.
- Changes in species distributions – appropriate monitoring of stag beetle population is not being undertaken, making it difficult to manage the population or its habitat.
- Invasive species – grey squirrels and edible dormouse damage growing trees by bark stripping.
- Disease - box blight has been recorded on part of the SAC which could affect species composition of the site.
- Public access/disturbance – removal of dead wood by the public is an issue on some parts of the SAC which could impact saproxylic invertebrate fauna.
- Air pollution: impacts of atmospheric nitrogen deposition. Atmospheric nitrogen deposition exceeds the critical loads for ecosystem protection. Some parts of the site are recorded as unfavourable (recovering), but impacts associated with nitrogen deposition are unclear.

<sup>23</sup> Adapted from Site Improvement Plan – Chiltern Beechwood SAC (Natural England, 2015).  
<http://publications.naturalengland.org.uk/publication/6228755680854016>

Table A.3: Wormley Hoddesdonpark Wood SAC	
<b>Name</b>	Wormley Hoddesdonpark Woods SAC UK0013696
<b>Location with regards to plan area</b>	The site occurs approximately 18.7km to the east of the plan area.
<b>Reason(s) for designation:</b>	
ANNEX 1 habitats: Primary: 9160 Sub-Atlantic and medio-European oak or oak-hornbeam forests of the <i>Carpinion betuli</i> .	
<b>SSSI component sites</b>	<ul style="list-style-type: none"> <li>• Wormley-Hoddesdonpark Wood North SSSI</li> <li>• Wormley-Hoddesdonpark Wood South SSSI</li> </ul>
<b>Conservation objectives</b>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats;</li> <li>• The structure and function (including typical species) of qualifying natural habitats; and</li> <li>• The supporting processes on which qualifying natural habitats rely.<sup>24</sup></li> </ul>
<b>Vulnerability and current conditions</b>	
<p>During the most recent condition assessment of the SSSI units (2010 and 2012), the majority of the SSSI units within the site were in 'Favourable Condition', with the remaining units in 'Unfavourable Recovering' condition primarily due to management activities, although there is also reference to fly tipping within this unit.</p> <p>The majority of the woods in the complex are in sympathetic ownership with no direct threat (Hoddesdon Park Wood, for example, is managed by the Woodland Trust). There is some pressure from informal recreation, and there has been limited damage in the past (for example from four-wheel drive vehicles). However, most recreation is concentrated on well-established paths. Most of the complex is covered by a High Forest Zone Plan (Hertfordshire County Council 1996) which sets out a framework for woodland management across the whole area. It aims to restore a varied age structure and natural stand types through sustainable forestry. There have been some instances of fly-tipping in the recent</p>	

<sup>24</sup> Natural England 30 June 2014 – version 2. <http://publications.naturalengland.org.uk/publication/4919819195383808>

**Table A.3: Wormley Hoddesdonpark Wood SAC**

past, and this does increase the risk on non-native species, such as cherry laurel and privet from garden waste. Coupled with instances of car dumping, this does indicate that the site attracts some urbanisation pressures.

**Key factors currently impacting or threatening site integrity and/or the conservation objectives<sup>25</sup>**

- Disease - Acute Oak Decline is present in at least two parts of the site and affects both native oak species;
- Invasive species - invasive species currently within the site include sycamore, turkey oak, rhododendron and snowberry;
- Air pollution: risk of atmospheric nitrogen deposition – nitrogen deposition exceeds the site-relevant critical load and hence there is a risk of harmful effects.
- Deer - browsing within the woodland is reducing natural tree regeneration and damaging the woodland;
- Vehicles – current illicit vehicle use is causing localised rutting and soil compaction, which is damaging the woodland ground flora, shrubs and trees. Fly-tipping directly damages the ground flora.
- Woodland management – lack of active management in parts of the site could lead to a reduction in structural and species diversity, the loss of temporary and permanent open space, over-shading, deterioration of veteran pollards and spread of invasive species.
- Recreational pressures - extensive public access occurs on part of the site. Sensitive management of access points and routes by the site's main owners has been largely successful in mitigating the potential adverse effects of this high-level use. However, visitor numbers continue to increase, the types of use can change unpredictably and less obvious adverse effects on important flora and fauna could be missed during routine, 'general purpose' monitoring.

<sup>25</sup> Adapted from Site Improvement Plan – Wormley Hoddesdonpark Wood SAC (Natural England, 2015).  
<http://publications.naturalengland.org.uk/publication/6314181103976448>

## Appendix B – Policy Screening

Table 3B1: Local Plan Screening Criteria	
Screening Rationale	Details
LSE	A likely effect is one that cannot be ruled out on the basis of objective information. The test is a 'likelihood' of effects rather than a 'certainty' of effects. Although some dictionary definitions define 'likely' as 'probable' or 'well might happen', in the Waddenzee case <sup>26</sup> the European Court of Justice ruled that a project should be subject to appropriate assessment "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site, either individually or in combination with other plans and projects".
No LSE - A general policy statement	A general statement of policy sets out a strategic aspiration for the plan-making body for a certain issue. A general 'criteria based' policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals. Does not necessarily include more site specific criteria based policies which may require AA.

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<sup>26</sup> European Court of Justice C-127/02

Table 3B1: Local Plan Screening Criteria	
Screening Rationale	Details
No LSE - Not proposals generated by this plan	Aspects excluded from the appraisal because they are not proposals generated by this plan.
No LSE - A protection policy	Aspects which protect the natural environment, including biodiversity, or conserve or enhance the natural, built or historic environment.
No LSE - No development or change	Aspects which will not lead to development or other change.
No LSE - Makes provision for change but no impact pathway	Aspects which make provision for change but which could have no conceivable effect on a European site, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect, or would not otherwise undermine the conservation objectives for the site.
No LSE - Policy is too general	Aspects which are too general so that it is not known where, when or how the aspect of the plan may be implemented, or where any potential effects may occur, or which European sites, if any, may be affected.

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
SS1.1	Spatial Strategy	In	LSE	<p>Growth set out in this policy could increase air pollution by increasing traffic within the region which could potentially affect the European sites in combination with growth elsewhere.</p> <p>A Footprint Ecology 2019 Report refers to a 5.6km recreational zone of influence around Burnham Beeches SAC meaning that growth in Watford is unlikely to increase recreational pressure on Burnham Beeches due to its distance from the European site. Reference: Liley, D. (2019). <i>Impacts of urban development at Burnham Beeches SAC: update of evidence and potential housing growth</i>. There are no similar studies available for Chiltern Beechwoods and Wormley-Hoddesdonpark Woods. However, it is considered reasonable to extrapolate that the zone of influence around these European sites would be below 13.1km for Chiltern Beechwoods SAC and below 18.7km for the Wormley SAC (i.e. their distances from Watford Borough).</p>	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
CDA2.1	Watford Gateway Strategic Development Area	Out	No LSE - Makes provision for change but no impact pathway	This policy relates to the Watford junction area within the centre of the borough. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary. This policy encourages modal shift to public transport by focusing development on an improved public transport hub. This could help to reduce air pollution within the Watford area.	none	none	none
CDA2.2	Town Centre Strategic Development Area	Out	No LSE - Makes provision for change but no impact pathway	This policy aims to improve the vibrancy and sustainability of the town centre by encouraging appropriate developments within it. By improving the facilities, jobs access and public realm within the town centre this policy also supports improving air quality within the borough. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
CDA2.3	Colne Valley Strategic Development Area	Out	No LSE - Makes provision for change but no impact pathway	This policy relates to the Colne Valley area within the borough. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary. This policy encourages modal shift to public transport by focusing development on an area with good public transport access and also aims to improve walking and cycling access within this part of the borough. This could help to reduce air pollution within the Watford area.	none	none	none



**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
HO3.1	Housing Provision	In	LSE	<p>Growth set out in this policy could increase air pollution by increasing traffic within the region which could potentially affect the European sites in combination with growth elsewhere.</p> <p>A Footprint Ecology 2019 Report refers to a 5.6km recreational zone of influence around Burnham Beeches SAC meaning that growth in Watford is unlikely to increase recreational pressure on Burnham Beeches due to its distance from the European site. Reference: Liley, D. (2019). <i>Impacts of urban development at Burnham Beeches SAC: update of evidence and potential housing growth</i>. There are no similar studies available for Chiltern Beechwoods and Wormley-Hoddesdonpark Woods. However, it is considered reasonable to extrapolate that the zone of influence around these European sites would be below 13.1km for Chiltern Beechwoods SAC and below 18.7km for the Wormley SAC (i.e. their distances from Watford Borough).</p>	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
HO3.2	Housing Mix, Density and Optimising Use of Land	Out	No LSE - No development or change	This is a general policy statement which also provides some protection by setting out a strategy to prevent air pollution by focusing more dense development in more sustainable parts of the borough with relation to accessibility to public transport and facilities. The policy also encourages a mix of housing types to be delivered.	none	none	none
HO3.3	Affordable Housing	Out	No LSE - No development or change	The policy itself will not lead to development. It encourages provision of affordable housing and a mix of tenures to be delivered.	none	none	none
HO3.4	Build to Rent	Out	No LSE - Makes provision for change but no	The policy identifies that proposals for Build to Rent homes will be supported in locations appropriate for residential development. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
			impact pathway				
HO3.5	Specialist Housing and Care Homes	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design of developments and encourages provision of specialist homes.	none	none	none
HO3.6	Student, Co-Living and Non-Self Contained Accommodation	Out	No LSE - Makes provision for change but no impact pathway	The policy identifies that proposals for new student and co-living and non-self-contained accommodation will be supported where it is located within the Core Development Area, or within 800 metres of a railway station located in the Core Development Area. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
HO3.7	Self Build and Custom Housebuilding	Out	No LSE - Makes provision for change but no impact pathway	This policy makes provision for self-build and custom build homes on windfall sites. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary.	none	none	none
HO3.8	Gypsies and Travellers	Out	No LSE - Makes provision for change but no impact pathway	This policy protects existing sites designated to be used by Gypsies and Travellers, unless it is demonstrated they are no longer required. Proposals for new sites will be supported and the policies identifies general requirements for the siting of any new sites within the borough. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
HO3.9	Residential Conversions	Out	No LSE - Makes provision for change but no impact pathway	This policy makes provision for residential conversions subdividing existing properties. There is no impact pathway from development proposed with the European sites due to their distance from the borough boundary.	none	none	none
HO3.10	Building Standards for New Homes	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design of developments and encourages provision of accessible and adaptable homes.	none	none	none
HO3.11	Private and Communal Outdoor Amenity Space	Out	No LSE - A protection policy	This policy sets out requirements for outdoor space required for delivery with residential developments.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
EM4.1	Providing New Employment	In	LSE	This policy supports proposals for new employment floor space within the borough where they contribute towards meeting the identified employment need in the borough and Functional Economic Market Area. To meet these challenging targets, the Local Plan will seek to prevent the net loss of both office and industrial floor space across the borough. New office growth will be prioritised at the Clarendon Road Primary Office Location and new industrial growth will be prioritised in the five Designated Industrial Areas within the borough. Over the plan period, the Council will seek to plan for the creation of 13,000 new jobs. This policy requires further investigation to ensure that employment development at the Clarendon Road Primary Office Location and in Designated Industrial Areas will not increase road traffic near to the European sites identified.	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
EM4.2	Designated Industrial Areas	In	LSE	Policy could encourage travelling into the borough for work which could increase car use and affect air quality within the wider area.	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas
EM4.3	Office Development	In	LSE	Policy could encourage travelling into the borough for work which could increase car use and affect air quality within the wider area.	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas
EM4.4	Economic Development Outside Designated Employment Locations	Out	No LSE - A general policy statement	This is a general policy which relates to changes of use from employment to other uses and what would need to be demonstrated in such a proposal. It is deemed too general to result in a significant effect on the European sites.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
EM4.5	Different Ways of Working	Out	No LSE - A general policy statement	This policy supports development proposals for new forms of workspace including flexible workspace, start-ups, micro businesses and space for social and cultural enterprises across the borough where there is demonstrated to be no significant harm to the amenity of neighbouring land uses. It is deemed too general to result in a significant effect on the European sites.	none	none	none
EM4.6	Training, Skills and Professional Development	Out	No LSE - A general policy statement	The policy relates to training and skills strategy and will not result in any development or impacts which could affect European sites.	none	none	none
VT5.1	Supporting Vibrant Retail Centres	Out	No LSE - Makes provision for change but no	Policy relates to town and local centre uses. There is no impact pathway from any development this might entail with the factors affecting the integrity of the European sites due to their distance from the borough boundary.	none	none	none



**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
			impact pathway				
VT5.2	Watford Town Centre	Out	No LSE - Makes provision for change but no impact pathway	Policy relates to strengthening the town centre uses. There is no impact pathway from any development this might entail with the factors affecting the integrity of the European sites due to their distance from the borough boundary.	none	none	none
VT5.3	Local Centres	Out	No LSE - Makes provision for change but no impact pathway	Policy relates to uses within local centres. There is no impact pathway from any development this might entail with the factors affecting the integrity of the European sites due to their distance from the borough boundary.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
QD6.1	Design for an Attractive Town	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design only.	none	none	none
QD6.2	Design Principles	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design only.	none	none	none
QD6.3	Public Realm	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design only. The policy also encourages modal shift by requiring design for cyclists and pedestrians.	none	none	none
QD6.4	Building Design	Out	No LSE - No develop	Policy itself will not lead to development. It relates to design only.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
			ment or change				
QD6.5	Building Height	Out	No LSE - Makes provision for change but no impact pathway	Policy relates to the design of taller buildings within the borough. There is no impact pathway with the factors affecting the integrity of the European sites.	none	none	none
HE7.1	Enhancement and Protection of the Historic Environment	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design and potential negative effects on heritage assets only.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
HE7.2	Designated Heritage Assets	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design and potential negative effects on heritage assets and conservation areas only.	none	none	none
HE7.3	Non-Designated Heritage Assets	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design and potential negative effects on heritage assets only.	none	none	none
HE7.4	Archaeology	Out	No LSE - No development or change	Policy itself will not lead to development. It relates to design and potential negative effects on archaeology only.	none	none	none
CC8.1	Mitigating Climate Change	Out	No LSE - A	The policy aims to protect the environment and reduce contributions to climate change.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
	and Reducing Carbon Emissions		protectio n policy				
CC8.2	Sustainabl e Constructio n Standards for Non-Residential Developme nt	Out	No LSE - A protectio n policy	The policy aims to protect the environment and reduce contributions to climate change.	none	none	none
CC8.3	Sustainabl e Constructio n and Resource	Out	No LSE - A protectio n policy	The policy aims to protect the environment and reduce contributions to climate change.	none	none	none

**Table B.2 HRA Screening Final Draft Watford Local Plan Policies**

Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
	Manageme nt						
CC8.4	Managing Air Quality	Out	No LSE - A protection policy	Sets out requirements for developments not to contribute to air pollution within Watford borough.	none	none	none
CC8.5	Managing the Impacts of Developme nt	Out	No LSE - A protection policy	Sets out requirements for developments not to contribute to pollution such as contamination, noise and light.	none	none	none
NE9.1	The Natural Environme nt	Out	No LSE - A protection policy	This is a general environmental protection policy. Development proposals will be required to demonstrate a positive impact on Watford's natural environment.	none	none	none
NE9.2	Green Infrastructu re Network	Out	No LSE - A	This policy encourages a stronger green infrastructure within the borough.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
			protectio n policy				
NE9.3	Blue Infrastructu re Network	Out	No LSE - A protectio n policy	This policy encourages a stronger blue infrastructure within the borough	none	none	none
NE9.4	Flood Risk and Mitigation	Out	No LSE - A protectio n policy	The policy aims to protect people and property from flooding and increase resilience to the effects of climate change within the borough. Any flood protection measures are not likely to have an impact pathway with European sites due to their distance from the borough boundary.	none	none	none
NE9.5	Surface Water Manageme nt	Out	No LSE - A protectio n policy	This policy promotes the use of Sustainable Drainage Systems to manage surface water in the borough. Any flood protection measures are not likely to have an impact pathway with European sites due to their distance from the borough boundary.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
NE9.6	Protecting Open Space	Out	No LSE - A protection policy	Requires protection of existing open space for use by residents and visitors to the borough.	none	none	none
NE9.7	Providing New Open Space	Out	No LSE - A protection policy	Requires provision of open space for all residents of new developments, either private or shared.	none	none	none
NE9.8	Biodiversity	Out	No LSE - A protection policy	Supports delivery of biodiversity net gain and states that "Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation".	none	none	none
IN10.1	Integrated Infrastructure Delivery	Out	No LSE - A protection policy	Policy requires infrastructure required for development to be provided.	none	none	none



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					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
IN10.2	Providing Infrastructure to Support New Development	Out	No LSE - A protection policy	Requires developers (not householders) to demonstrate that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from proposed development.	none	none	none
IN10.3	Development Contributions	Out	No LSE - A general policy statement	This policy sets out the intention of the local authority to take developer contributions for necessary infrastructure required for developments, if this cannot be provided on site. This policy could provide some environmental protection as it provides a mechanism for securing measures which might be needed to mitigate for negative environmental effects of developments.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
ST11.1	Sustainable Travel Town	Out	No LSE - A protection policy	This policy sets out how new development will be supported in principle where it contributes towards sustainable and active travel behaviour, respecting the transport user hierarchy set out in the County Council's Local Transport Plan (LTP) and Watford's ambition to be a sustainable travel town.	none	none	none
ST11.2	Protecting and Enhancing Future Public Transport Routes and Watford Junction	Out	No LSE - Makes provision for change but no impact pathway	This policy identifies transport routes and projects to be protected. No transport routes protected by this policy connect with any of the European sites.	none	none	none
ST11.3	Providing Sustainable Transport Infrastructure	Out	No LSE - Makes provision for	No transport routes protected by this policy connect with any of the European sites. This policy supports an increase in modal shift away from motor vehicles.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
	re for Major Development		change but no impact pathway				
ST11.4	A Walking and Cycling Infrastructure Improvement Town	Out	No LSE - A protection policy	The policy requires cycle parking to be delivered within new developments and therefore encourages modal shift away from motorised vehicles. The policy therefore supports improving air quality within the borough.	none	none	none
ST11.5	Electric Vehicles, Car Parking and Car Clubs	Out	No LSE - A protection policy	The policy discourages the use of fossil fuel driven cars. The policy therefore supports improving air quality within the borough.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
ST11.6	Managing the Transport Impacts of Development	Out	No LSE - A protection policy	The policy discourages the use of fossil fuel driven cars and encourages modal shift. The policy therefore supports improving air quality within the borough.	none	none	none
HC12.1	Healthy Communities	Out	No LSE - A protection policy	This policy promotes measures to create healthy communities including reducing air quality, noise and light pollution.	none	none	none
HC12.2	Health Impact Assessments	Out	No LSE - No development or change	This policy requires HIA for major developments. It will not itself lead to development.	none	none	none

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Policy number	Policy name	Screening decision	Reason	Comments	Potential effects on European sites:		
					Burnham Beeches SAC	Chiltern Beechwoods SAC	Wormley-Hoddesdon-park Woods SAC
HC12.3	Built Cultural and Community Facilities	Out	No LSE - Makes provision for change but no impact pathway	Policy relates to provision of community facilities in accessible locations in the borough to meet the needs of residents. There is no impact pathway from any development this might entail with the factors affecting the integrity of the European sites due to their distance from the borough boundary.	none	none	none
SA13.1	Allocated Sites for Delivery	In	LSE	This policy identifies residential, education, employment and mixed use development sites within the borough. The two education allocations are screened out.	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas	air quality potential in combination effects with growth in other areas