



**WATFORD  
BOROUGH  
COUNCIL**

**Watford Local Plan Proposed Modifications  
Sustainability Appraisal Report**

**Non-Technical Summary**

Prepared on behalf of:

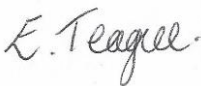





**Watford Borough Council**

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# Quality Management

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## 1 Introduction

This Non-Technical Summary (NTS) summarises the findings of the Sustainability Appraisal (SA) Report for the Local Plan prepared by Watford Borough Council (WBC). This iteration of the SA supports the version of the Watford Local Plan which includes proposed modifications put forward by Watford Borough Council (WBC) following the Examination hearings in January / February 2022.

The SA that accompanied the Publication version of the Watford Local Plan as consulted upon during January to March 2021 precedes this iteration.

The Watford Local Plan Core Strategy was adopted in 2013 and covered the period 2006-2031. It is now considered to be out of date as there have been changes to planning legislation and national planning guidance. A new Local Plan is required to better manage the planning process and replace the Core Strategy. The new Local Plan sets out the Council's approach to new development and includes planning policies and potential sites for development. A proposed modification is to amend the plan period to 2021-2038.

ClearLead Consulting Ltd were commissioned by WBC to undertake the SA of the Watford Local Plan. The SA plays an important role in the evolution of the plan and consideration of all reasonable alternatives.

### 1.1 What is a Sustainability Appraisal?

A SA has been undertaken on the Local Plan as required by the Environmental Assessment of Plans and Programmes Regulations, 2004 (the SEA Regulations). SA is used to evaluate local plans against a set of objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental, social and economic effects, as well as identifying opportunities to improve the environmental quality of Watford and the quality of life of residents in Watford Borough.

The appraisal sets out the alternative policy approaches considered to date and the potential impact they could have on the three elements of sustainability: economy, environment and society. This work has been further refined for the publication version of the Local Plan.

### 1.2 Watford Borough Council Final Draft Local Plan

The Watford Local Plan Core Strategy was adopted in 2013 and covered the period 2006-2031. It is now considered to be out of date, as there have been changes to planning legislation and national planning guidance. A new Local Plan is required to better manage the planning process and replace the Core Strategy. The Final Draft Local Plan sets out the Council's approach to new development up to 2037 and contains a spatial strategy policy in Chapter 1, Strategic Development Areas in Chapter 2, site allocations in Chapter

13 and thematic or 'policies to guide development' in Chapters 3-12. The vision and objectives of the Final Draft Local Plan are presented in Boxes 3.1 and 3.2 of the main SA report.

To date, an SA Scoping Report has been published and strategic options assessed, and the findings presented in a 'Sustainability Appraisal of Strategic Options' report (June 2018). This was published alongside the 'Issues and Options for the new Watford Local Plan' document dated September 2018. Assessment of the reasonable policy options was undertaken between March and August 2019 and provided to WBC officers internally. The First Draft Local Plan was assessed in September 2019 and an SA Report published alongside the First Draft Local Plan consultation which ran from 27th September 2019 to 8th November 2019. During 2020, the Local Plan policies were revised and more detail prepared for the proposed site allocations following the First Draft Local Plan consultation. The Final Draft Local Plan policies and detailed site allocations were subject to SA and in 2021 and an SA report accompanied the Final Draft Local Plan consultation between 18<sup>th</sup> January 2021 and 18<sup>th</sup> March 2021. The Final Local Plan was then submitted in August 2021 and subjected to Examination in Public in January - February 2022.

Modifications to the Final Draft Local Plan proposed by WBC following Examination hearings have been screened and subject to SA, where necessary. The potential effects of the Final Draft Local Plan incorporating modifications are summarised in sections 4 and 5 of this document.

### **1.3 Strategic Objectives of the Local Plan**

The plan objectives cover:

- Transport and mobility;
- Housing;
- Economic Growth;
- Climate Change;
- Historic Environment;
- Place Making and Design;
- Public Realm and Outdoor Environment;
- Health and Well Being;
- Infrastructure; and
- Monitoring and Adaptive Management.

Table 1 lists the policies in the Local Plan which have been assessed. The policies have been assessed by chapter, hence are presented in chapter groups below. The SA matrices prepared during the assessment of each chapter 1 to 12 are presented in Appendix D of the full SA Report. Chapter 13 contained policy SA13.1: Allocated sites for Delivery, which sets out the 63 site allocations. The allocations have been assessed individually and the matrices of assessments are presented in Appendix E of the main SA report.

**Table 1: Local Plan Policies**

<b>Local Plan Chapter</b>	<b>Policies</b>
Chapter 1: A Spatial Strategy for Watford	SS1.1 Spatial Strategy
Chapter 2: Core Development Area	CDA2.1 Watford Gateway Strategic Development Area CDA2.2 Town Centre Strategic Development Area CDA2.3 Colne Valley Strategic Development area
Chapter 3: Homes for a Growing Community	HO3.1 Housing Provision HO3.2 Housing Mix, Density and Optimising Use of Land HO3.3 Affordable Housing HO3.4 Build to Rent HO3.5 Specialist Housing and Care Homes HO3.6 Student, Co-Living and Non-Self Contained Accommodation HO3.7 Self-Build and Custom Housebuilding HO3.8 Gypsies and Travellers HO3.9 Residential Conversions HO3.10 Building Design Standards for Healthy, Accessible and Adaptable Homes HO3.11 Private and Communal Outdoor Amenity Space
Chapter 4: A Strong Economy	EM4.1 Providing New Employment EM4.2 Designated Industrial Areas EM4.3 Office Development EM4.4 Economic Development Outside Designated Employment Locations EM4.5 Different Ways of Working EM4.6 Training, Skills and Professional Development
Chapter 5: A Vibrant Town	VT5.1 Supporting Vibrant Retail Centres VT5.2 Watford Town Centre VT5.3 Local Centres
Chapter 6: An Attractive Town	QD6.1 Design for an Attractive Town QD6.2 Design Principles QD6.3 Public Realm QD6.4 Building Design QD6.5 Building Height
Chapter 7: The Historic Environment	HE7.1 Enhancement and Protection of the Historic Environment HE7.2 Designated Heritage Assets HE7.3 Non-Designated Heritage Assets HE7.4 Archaeology
Chapter 8: A Climate Emergency	CC8.1 Mitigating Climate Change and Reducing Carbon Emissions CC8.2 Sustainable Construction Standards for Non-Residential Development CC8.3 Sustainable Construction and Resource Management CC8.4 Managing Air Quality CC8.5 Managing the Impacts of Development
Chapter 9: Conserving and Enhancing the Environment	NE9.1 The Natural Environment NE9.2 Green Infrastructure Network NE9.3 Blue Infrastructure Network NE9.4 Flood Risk and Mitigation NE9.5 Surface Water Management NE9.6 Protecting Open Space NE9.7 Providing New Open Space NE9.8 Biodiversity
Chapter 10: Infrastructure	IN10.1 Integrated Infrastructure Delivery IN10.2 Providing Infrastructure to Support New Development IN10.3 Development Contributions
Chapter 11: A Sustainable Travel Town	ST11.1 Sustainable Travel Town ST11.2 Protecting and Enhancing Future Public Transport Routes and Watford Junction ST11.3 Providing Sustainable Transport Infrastructure for Major Development

Local Plan Chapter	Policies
	ST11.4 A Walking and Cycling Infrastructure Improvement Town ST11.5 Electric Vehicles, Car Parking and Car Clubs ST11.6 Managing the Transport Impacts of Development
Chapter 12: A Healthy Community	HC12.1 Healthy Communities HC12.2 Health Impact Assessments HC12.3 Built Cultural and Community Facilities
Chapter 13: Site Allocations and New Development	SA13.1 Allocated sites for delivery

## 1.4 What is the current situation in the Local Plan Area?

In order to test whether the Local Plan will contribute to improving the economic, social and environmental situation in Watford, we need to understand current conditions and how they might change without a Local Plan. Table 2 summarises this information. This section is supported by Appendix A and B to the full SA Report which presents the full review of baseline data for the borough.

The initial baseline data was gathered in April 2018. This identified data relevant to Watford Borough, and was organised into the following categories:

- Health, Population and Community;
- Housing;
- Employment and Economy;
- Transport and Accessibility;
- Air, Noise and Light Pollution;
- Climate Change;
- Biodiversity;
- Cultural Heritage;
- Landscape and Townscape;
- Soils and Geology;
- Water; and
- Waste.

This baseline was then updated in 2019 and December 2020, to reflect changes within the borough.

Some baseline data was not available at a local authority level. In some cases, the most recent data available, such as Census data, is now in excess of five years old. This may not therefore reflect current trends within the borough. No other difficulties have been encountered in collating the baseline data.

Some assumptions have been made in the assessments of the plan, including in relation to the site allocations assessed. These assumptions are detailed within Section 2.6 of the SA report.



**Table 2: Sustainability Issues & Likely Evolution without the Local Plan**

Theme	Sustainability Issues	Likely Evolution without the Local Plan
<b>Health, Population and Community</b>	<ul style="list-style-type: none"> <li>• As the population continues to increase, so does the demand for housing, infrastructure, facilities and employment;</li> <li>• The population density within the borough exceeds both the local and the national averages;</li> <li>• Adequate support and facilities will be needed for older residents.</li> <li>• The population is ageing;</li> <li>• Mortality rates remain high and exceed the regional average;</li> <li>• There are large disparities in health between wards;</li> <li>• Levels of smoking continue to rise;</li> <li>• A quarter of residents in Hertfordshire are physically inactive;</li> <li>• The proportion of deaths caused by circulatory disease exceeds the national and regional average;</li> <li>• There is a need to promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation;</li> <li>• The number of reported crimes continues to increase;</li> <li>• There has been a large shift towards more violent types of crimes;</li> <li>• There are large disparities in the number of crimes committed in different wards across the borough;</li> <li>• The number of hate crimes reported continues to increase; and</li> <li>• There is a need to provide safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life.</li> </ul>	<ul style="list-style-type: none"> <li>• There may be additional strain placed on the borough's resources due to the continual growth of the population;</li> <li>• Increased demand for housing, services and infrastructure;</li> <li>• Increased demand for health and social care;</li> <li>• The disparity between wards with regards to deprivation, overcrowding and poverty could widen; and</li> <li>• Crime rates could continue to rise.</li> </ul>

Theme	Sustainability Issues	Likely Evolution without the Local Plan
<b>Housing</b>	<ul style="list-style-type: none"> <li>• The proportion of affordable housing being delivered as part of developments is decreasing and failing to meet the Council's 35% target;</li> <li>• There is a need for a mix of housing types, sizes and tenures to meet the requirements of all areas of the community;</li> <li>• An ageing population will require different housing needs and is an increasing market;</li> <li>• There is a lack of new build on the market;</li> <li>• Homelessness continues to rise;</li> <li>• There is a need to deliver more affordable houses to buy as well as to provide affordable houses to rent; and</li> <li>• There remains a large shortfall between local housing allowances and average rental prices.</li> </ul>	<ul style="list-style-type: none"> <li>• Demand for housing is expected to increase further beyond supply;</li> <li>• An increase in the number of housing applications made through the homelessness register could increase; and</li> <li>• The need for older persons accommodation will rise as the proportion of the population over 65 rises.</li> </ul>
<b>Employment and Economy</b>	<ul style="list-style-type: none"> <li>• There are inequalities in skill levels and income between wards within the borough;</li> <li>• The number of residents that have no qualifications is on the rise;</li> <li>• There is a need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment;</li> <li>• Employment spaces are being lost to other uses;</li> <li>• Despite currently being a net importer of labour, the borough is gradually becoming a net exporter with more residents commuting to London and the surrounding boroughs; and</li> <li>• Manufacturing and human health and social work activities sectors are under-represented compared with the regional and national rates.</li> </ul>	<ul style="list-style-type: none"> <li>• The number of residents without any qualifications is expected to rise; and</li> <li>• The development of the Metropolitan Line could lead to a greater number of workers commuting into central London.</li> </ul>
<b>Transport and Accessibility</b>	<ul style="list-style-type: none"> <li>• Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity;</li> <li>• As the population grows, so does the need to change current infrastructure to meet the demands of all residents, whilst making it future proof; and</li> <li>• Need to provide public transport capacity and safeguard land for transport.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic is expected to continue to rise within the borough;</li> <li>• Increased strain on the road networks;</li> <li>• Unknown longer term effects of COVID-19 on movement patterns; and</li> <li>• Development of the Metropolitan Line could help to ease this pressure on roads.</li> </ul>

Theme	Sustainability Issues	Likely Evolution without the Local Plan
<b>Air, Noise and light Pollution</b>	<ul style="list-style-type: none"> <li>• Need to help reduce pollution from road vehicles;</li> <li>• Reliance on the petrol or diesel-fuelled private car as the main mode of transport;</li> <li>• Air pollution from the strategic road network is an issue across the borough and NO<sub>2</sub> emissions have remained constant;</li> <li>• Noise, air and light pollution could be generated through construction works in the borough, resulting from growth proposed in the Final Draft Local Plan. This pollution will need to be minimised and controlled through Local Plan policies; and</li> <li>• There is a need to reduce light pollution and restrict further intensification of light pollution from new developments.</li> </ul>	<ul style="list-style-type: none"> <li>• Air quality is likely to continue to be an issue (despite any temporary positive effects of the COVID-19 pandemic) due to the road network and high levels of private car dependency;</li> <li>• AQMA boundaries may need to be expanded, or new AQMAs added;</li> <li>• Light pollution is expected to increase with population growth and development; and</li> <li>• Noise complaints could increase due to increased development.</li> </ul>
<b>Climate Change</b>	<ul style="list-style-type: none"> <li>• Reliance on the petrol or diesel-fuelled private car as the main mode of transport;</li> <li>• Greenhouse gas emissions need to be stabilised and reduced over time;</li> <li>• Need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding;</li> <li>• Need to promote the construction of energy-efficient buildings, and to support the installation of renewable and low or zero carbon technology;</li> <li>• New developments need to minimise vulnerability and provide resilience to climate change; and</li> <li>• Need to work with communities to help tackle climate change.</li> </ul>	<ul style="list-style-type: none"> <li>• Greenhouse gas emissions could rise due to the transport issues and additional development;</li> <li>• Temperature increase and rainfall patterns are unlikely to alter from current predictions; and</li> <li>• There will be an increased need for climate change adaptation.</li> </ul>

Theme	Sustainability Issues	Likely Evolution without the Local Plan
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>• Biodiversity generally remains under pressure nationally;</li> <li>• Need to protect and enhance the wildlife and habitats in Watford;</li> <li>• There is increasing pressure presented by invasive non-native species, which is expected to be exacerbated by climate change;</li> <li>• Growing population will increase demand for more development, possibly where there is a potential for loss of habitats and species but there is an opportunity to increase biodiversity in new developments, such as installing green roofs;</li> <li>• Consider and plan for the impacts of climate change on species and habitats;</li> <li>• Need to support the delivery of the Green Infrastructure network in Watford; and</li> <li>• There is a need to ensure that all residents have sufficient access to natural greenspace in order to enjoy the benefits of these assets.</li> </ul>	<ul style="list-style-type: none"> <li>• Pressure on biodiversity is likely to increase with future development require to meet housing targets; and</li> <li>• Climate change is likely to exacerbate pressure on habitats and species, including pressure from invasive non-native species.</li> </ul>
<b>Cultural Heritage</b>	<ul style="list-style-type: none"> <li>• Ensure that the Conservation Areas, heritage assets and features are preserved or enhanced, including identified 'Heritage at Risk';</li> <li>• New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy;</li> <li>• Impacts of future development on the local historic environment need to be considered, including currently unknown sites of historic and archaeological interest which may be discovered through new developments;</li> <li>• Traffic management and the impacts of traffic on amenity have been raised as issues within the Conservation Area Action Plans;</li> <li>• Heritage assets should be managed to sustain their significance;</li> <li>• Ensure that everyone is able to participate in understanding and sustaining their local historic environment;</li> <li>• There is a perceived lack of distinctiveness within the borough; and</li> <li>• The borough needs to develop more of a distinctive cultural offer in order to compete amongst the broader cultural dynamism of London.</li> </ul>	<ul style="list-style-type: none"> <li>• Continual population growth and the associated increased development for housing could encroach on Conservation Areas, which may negatively affect townscape and heritage assets.</li> </ul>

Theme	Sustainability Issues	Likely Evolution without the Local Plan
<b>Landscape and Townscape</b>	<ul style="list-style-type: none"> <li>• Green Belt in the surrounding sub-region constrains development to existing urban areas in Watford but provides important Green Infrastructure functions;</li> <li>• The Chilterns AONB is in close proximity to the borough and it's setting could potentially be affected be development in Watford, depending on its nature and location; and</li> <li>• Character areas in the borough are at risk of degradation from the pressures of new development. Planning policy needs to guide development to ensure it is contextually responsive development and reinforces local character.</li> </ul>	<ul style="list-style-type: none"> <li>• Inconsistent changes to landscape character may well continue if there is no strategic strategy in place which is enforced through Development Management;</li> <li>• Green Belt will continue to provide separation between urban areas;</li> <li>• Opportunities exist to improve the public realm may not come forward without planning policy intervention or developer contributions; and</li> <li>• The risk of character degradation in parts of the borough will continue without planning intervention to guide development to reinforce local character.</li> </ul>
<b>Soils and Geology</b>	<ul style="list-style-type: none"> <li>• There are sites within the borough that have had a previous potentially contaminative use. Previously developed sites which come forward for redevelopment will need to be assessed for soil contamination and remediated if deemed necessary, depending on the use proposed;</li> <li>• There is a need to protect soils and underlying aquifers from pollution;</li> <li>• Most of the borough is covered by a Minerals Safeguarding Area; and</li> <li>• The Orphanage Road Goods Yard concrete batching plant has permanent planning permission that safeguards it from development, and this could pose a constraint for the redevelopment of this part of the borough.</li> </ul>	<ul style="list-style-type: none"> <li>• Due to past activities, contaminated land may be present within the borough which may require remediation when development proposals come forward; and</li> <li>• Underlying aquifers will continue to be vulnerable to pollution and will require protection.</li> </ul>

Theme	Sustainability Issues	Likely Evolution without the Local Plan
<b>Water</b>	<ul style="list-style-type: none"> <li>• Properties in the Lower High Street, Water Lane and Bushey Mill areas are at risk from fluvial and surface water flooding<sup>1</sup>, whereas properties in the Kingsfield Road and Cedar Road, Oxhey and Molteno Road areas are the most prone to groundwater flooding within the borough;</li> <li>• There is a need to promote flood resistance and resilience measures for properties at risk from flooding;</li> <li>• Increasing population will put additional strain on already stressed water resources and waste water infrastructure; and</li> <li>• New development will need to incorporate sustainable drainage systems to sustainability reduce flood risk.</li> </ul>	<ul style="list-style-type: none"> <li>• Population increases will cause further water demand in the borough, increasing strain on water resources and wastewater infrastructure;</li> <li>• Development could increase hardstanding surfaces, reducing water infiltration and increasing surface runoff. This is likely to increase flooding risk; and</li> <li>• The number of areas at subjected to flooding is likely to increase considering to climate change predictions.</li> </ul>
<b>Waste</b>	<ul style="list-style-type: none"> <li>• The amount of household waste produced is on the rise;</li> <li>• Recycling should be encouraged through planning and development; and</li> <li>• There is a need to minimise the impact of municipal waste management on the borough's environment.</li> </ul>	<ul style="list-style-type: none"> <li>• An increase in population is likely to increase waste produced within the borough.</li> </ul>

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<sup>1</sup> Watford Borough Council Level 2 Strategic Flood Risk Assessment, 2014 (Produced by AECOM)

## 2 How the Plan and its alternatives were assessed

The sustainability baseline issues as summarised in table 2 and the environmental protection objectives of other plans, programmes and policies which are relevant to the Watford Local Plan have been reviewed and used to develop a framework of sustainability objectives and sub-objectives which have been used to assess the plan. The SA Framework is presented in Table 3.

**Table 3: SA Framework**

Objectives	Sub-objectives
<b>SA1: Achieve sustainable levels of prosperity and economic growth</b>	<ul style="list-style-type: none"> <li>• To support existing businesses, attracting inward investment and encouraging new businesses start-ups through the creation of employment spaces.</li> <li>• To promote and support economic diversity, and particularly manufacturing and human health and care sectors.</li> </ul>
<b>SA2: To ensure that local residents have employment opportunities and access to training.</b>	<ul style="list-style-type: none"> <li>• To support the delivery of high-quality jobs within the borough.</li> <li>• To give greater focus to learning and skills through the provision / support of education and training facilities in order to meet needs.</li> </ul>
<b>SA3: To ensure ready access to essential services and facilities for all residents</b>	<ul style="list-style-type: none"> <li>• To improve everyone’s access to high quality health, education, recreation, community facilities and public transport.</li> <li>• To ensure facilities and services are accessible by everyone, regardless of age or ability.</li> </ul>
<b>SA4: Ensure that everyone has access to good quality housing that meets their needs</b>	<ul style="list-style-type: none"> <li>• Promote a range of housing types and tenure.</li> <li>• To improve the provision of affordable housing.</li> </ul>
<b>SA5: Encourage healthy lifestyles and improve quality of life for local residents</b>	<ul style="list-style-type: none"> <li>• To promote walking and cycling and community-based activities.</li> <li>• To provide enhanced access to open spaces as part of the borough’s Green Infrastructure network.</li> <li>• To provide access to sporting and recreational facilities.</li> <li>• To provide good quality play spaces to meet the needs of residents.</li> <li>• To provide health facilities to meet the needs of residents.</li> <li>• To provide opportunities for residents to grow their own food.</li> </ul>

Objectives	Sub-objectives
<b>SA6: Reduce both crime and the fear of crime</b>	<ul style="list-style-type: none"> <li>• Improve community cohesion by reducing barriers between neighbourhoods and ensuring that everyone benefits from regeneration.</li> <li>• To plan new development to help reduce crime and the fear of crime through the design of the physical environment and by promoting well-used and over-looked streets and public spaces.</li> </ul>
<b>SA7: To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes</b>	<ul style="list-style-type: none"> <li>• To reduce the need to travel through closer integration of housing, jobs and services and promoting mixed use development.</li> <li>• To prioritise the use of sustainable modes of transport and reduce the reliance on private vehicles.</li> <li>• To help create safe and secure layouts which minimise conflicts between vehicle traffic, cyclists and pedestrians.</li> <li>• To support the expansion of electronic communications networks, including telecommunications and high-speed broadband.</li> <li>• Deliver more facilities for charging plug-in and other ultra-low emission vehicles.</li> </ul>
<b>SA8: To achieve good air quality</b>	<ul style="list-style-type: none"> <li>• To improve air quality across the borough and avoid exacerbating existing areas of poor air quality.</li> <li>• To minimise noise pollution and consider sensitivity of receptors to existing noise sources.</li> </ul>
<b>SA9: To minimise noise and light pollution</b>	<ul style="list-style-type: none"> <li>• To limit light pollution and promote and less invasive lighting sources, considering the balance between safety and environmental impacts.</li> </ul>
<b>SA10: Reduce the borough's contribution to climate change</b>	<ul style="list-style-type: none"> <li>• To minimise CO2 emissions.</li> <li>• To promote the design and construction of energy-efficient developments and encourage the use of low-carbon and renewable energy where practicable.</li> </ul>
<b>SA11: Ensure that the borough is resilient to the effects of climate change</b>	<ul style="list-style-type: none"> <li>• To improve the resilience of the borough to climate change, particularly with respect to the design of new developments.</li> </ul>
<b>SA12: To protect and enhance biodiversity</b>	<ul style="list-style-type: none"> <li>• To protect and enhance designated wildlife sites (international, national and local);</li> <li>• To support the achievement of BAP targets;</li> <li>• To create habitats to ensure sustainable and linked species populations and protect and enhance the Green Infrastructure network in the borough;</li> <li>• To increase tree cover and protect existing woodland; and</li> <li>• To eradicate invasive non-native species from the borough.</li> </ul>



Objectives	Sub-objectives
<b>SA13: To maintain and enhance historic and cultural assets</b>	<ul style="list-style-type: none"> <li>• To safeguard and enhance historic and cultural assets;</li> <li>• To promote local distinctiveness and local identity by repairing historic buildings and areas, and by encouraging the re-use of valued buildings; and</li> <li>• Enhance understanding of the historic assets of the borough.</li> </ul>
<b>SA14: Conserve and enhance the landscape and townscape, encouraging local distinctiveness</b>	<ul style="list-style-type: none"> <li>• To encourage high quality design, which respects local context, and improves local character and distinctiveness;</li> <li>• To improve the quality of life in urban areas by making them more attractive places in which to live, work and visit;</li> <li>• To protect and enhance the borough’s townscape and local sensitive landscapes;</li> <li>• To encourage the use of previously developed (brownfield) land and the re-use of derelict land and buildings; and</li> <li>• To identify, protect and improve quantity and quality of open spaces and public realm.</li> </ul>
<b>SA15: Revitalise the town centre to promote a return to sustainable urban living</b>	<ul style="list-style-type: none"> <li>• Create a viable and attractive town centre that has vitality and life and discourage competing out-of-town developments.</li> </ul>
<b>SA16: Maximise the use of previously developed land and buildings and the efficient use of land.</b>	<ul style="list-style-type: none"> <li>• To protect soils from pollution and remediate contaminated land;</li> <li>• To concentrate development through the reuse of previously developed land and buildings and urban extensions only where the development of greenfield land is unavoidable; and</li> <li>• To maximise the efficient use of land through encouraging high-density development.</li> </ul>
<b>SA17: Maintain and enhance water quality and limit water consumption.</b>	<ul style="list-style-type: none"> <li>• To encourage high water efficiency and conservation, including retrofitting older buildings;</li> <li>• To improve quality and flow of rivers and protect and improve groundwater quality; and</li> <li>• To ensure the borough has the appropriate wastewater and sewerage capacity to deliver any predicted new development.</li> </ul>
<b>SA18: Ensure that new development does not increase flood risk.</b>	<ul style="list-style-type: none"> <li>• To avoid development from being located in areas at risk of flooding taking account of climate change;</li> <li>• To ensure that green infrastructure schemes make space for water and reinstate floodplain; and</li> <li>• To promote sustainable urban drainage systems to reduce flood risk and water loss from natural systems.</li> </ul>
<b>SA19: To minimise use and make efficient use of natural resources.</b>	<ul style="list-style-type: none"> <li>• To minimise the production of waste and promote the re-use, recycling and composting;</li> <li>• To safeguard land for waste processing / disposal within the borough; and</li> <li>• To safeguard reserves of exploitable minerals from sterilisation by other development.</li> </ul>

## 3 Assessment of Alternatives and the Reasons for Choosing the Plan

### 3.1 Introduction

The main SA report describes the SA work undertaken to date on the Local Plan and how it has evolved. It summarises the findings of the appraisal work which helped inform the options (including strategic options (2018) and policy options (2019)) that have been taken forward and which have been developed into the Local Plan policies. Appendix C to the full SA report provides a summary of the output of the options assessments which are described below. It also presents a table developed by WBC which maps the evolution of the policy development from the options to the plan policies.

As the policy options were considered along with their potential strengths and weaknesses, several gaps in the draft plan were identified as it was being prepared. These have been addressed by the inclusion of draft policies which have been identified as “new policy” within Table C.3 in Appendix C to the main SA report. These new policies have also been appraised as part of the SA. Further new policies have been introduced in the Final Draft Local Plan. These policies are listed and discussed in relation to alternatives within Table 6.4 of the main SA report. For any such new policies identified at the draft and final draft local plan stages, no reasonable alternatives were identified.

### 3.2 Appraisal of the Local Plan Strategic Options

The main SA report which accompanied the 2018 Local Plan Issues and Options document considered alternative strategic options relating to the key challenges and issues for Watford borough.

These alternative strategic options consisted of seven distinct issues as follows:

- Housing Development;
- Affordable Housing;
- Types of New Housing;
- Housing for an Aging Population;
- Employment;
- Tall Buildings; and
- Transport.

The potential significant sustainability effects of each alternative strategic option are presented in Table 6.1 within the full SA report. Full details on the assessment are contained in the main body of the SA of Strategic Options Report produced in June 2018<sup>2</sup>. This report was consulted

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<sup>2</sup> Sustainability Appraisal of Strategic Options Report June 2018 accessed via WBC’s website:

<https://www.watfordlocalplan.co.uk/consultation-documents>

on alongside the Issues and Options Consultation (September 2018) and the results of the assessment alongside the consultation responses were used to inform the development of the policy options in 2018-2019.

### 3.3 Appraisal of the Local Plan Policy Options

The policy options considered by WBC have been assessed as part of the SA and an internal report provided to officers to inform the development of the policies for inclusion within the Local Plan. The policy options assessed within the SA are listed in Table 4 below and full details of the options assessed is provided in Table C.1 in Appendix C to the full SA report.

**Table 4: Policy Options Assessed**

Topic Paper	Policy Option
Air Quality, Pollution and Contamination	Air Quality (options 1 & 2)
	Noise Pollution (options 1 & 2)
	Contamination (options 1 & 2)
Built Community Facilities	Built Community Facilities (options 1, 2 & 3)
Climate Change and Resilience	Climate Change and Low Carbon Energy (options 1 & 2)
	Overheating (options 1 & 2)
	Flood Risk (options 1 & 2)
	Water Supply (options 1 & 2)
	Waste Management (options 1, 2 & 3)
High Quality Design and Conservation	High Quality Design (options 1, 2, 3 & 4)
	Conservation (options 1, 2 & 3)
Green Infrastructure, Biodiversity and the Natural Environment	Protection and Enhancement of Biodiversity (options 1 & 2)
	Green Infrastructure and the Natural Environment (options 1 & 2)
	Protecting Open Space (options 1, 2, 3 & 4)
	Provision of Functional Open Space in New Developments (options 1, 2, & 3)
	Landscaping and Green Infrastructure in New Developments (options 1 & 2)
Growth Strategy and Strategic Planning	Approach to Housing Growth (options 1, 2, 3, 4 & 5)
	Approach to Employment (options 1, 2 & 3)
	Approach to Retail (options 1 & 2)
	Approach to Infrastructure (options 1 & 2)
	Approach to Transport Infrastructure (options 1 & 2)
Density and Optimising Land Potential	Housing Density and Optimising Land (options 1 & 2)
Infrastructure	Infrastructure (options 1 & 2)
	Utilities (options 1 & 2)
Employment	Designated Employment Sites (options 1 & 2)
	Non-Designated Employment Sites (options 1 & 2)
	Mixed use Development (options 1 & 2)
Housing	Housing Mix (options 1, 2, 3 & 4)
	Affordable Housing (options 1, 2, 3 & 4)
	Commuted Sums (options 1 & 2)

Topic Paper	Policy Option
	Housing Tenure (options 1, 2 & 3)
	Ageing Population (options 1 & 2)
	Starter Homes (options 1 & 2)
	Self-Build and Custom Housebuilding (options 1 & 2)
	Windfall Sites (options 1 & 2)
	Residential Conversions (options 1, 2 & 3)
	Gypsies and Travellers (option 1)
Promoting Sustainable Transport	Enhancing Public Transport Provision and Supporting Watford as an Important Regional Transport Hub (options 1 & 2)
	Car Parking Standards (options 1, 2 & 3)
	Cycle Parking and Storage (options 1, 2 & 3)
	Prioritising Pedestrians and Cyclists in New Schemes. (options 1, 2 & 3)
Retail and Town Centre	Approach to Retail Throughout the Borough (options 1, 2 & 3)
	Retail Frontages in the Town Centre (options 1, 2, 3 & 4)
	Restriction of Non-Retail Uses in Retail Frontages (options 1, 2 & 3)
	Restaurants (options 1 & 2)
	Evening Economy (options 1 & 2)
	Vacant Units (options 1, 2 & 3)
	Clustering of Betting and Loan Shops (options 1, 2 & 3)
	Small and Independent Shops in the Town Centre (options 1 & 2)
	Local, Neighbourhood and District Centres (options 1, 2 & 3)
Strategic Approaches to Growth	Strategic Approaches to Growth (options 1, 2, 3 & 4)

WBC have used the findings from the policy options assessments to inform decisions regarding the preferred options that were developed into the First Draft Local Plan policies. Table C.3 within Appendix C of the main SA report presents the changes in policy development and shows which policy options were taken forward as the ‘preferred options’ / First Draft Local Plan policies. The First Draft Local Plan policies were assessed in 2019 and the findings presented in the Draft SA Report October 2019.

The methodology followed by WBC for identifying site allocations within the Final Draft Local Plan is set out within Chapter 6 of the main SA report. The methodology identified the site allocations which are considered to be ‘reasonable options’. All of the sites identified as reasonable options were taken forward into the Final Draft Local Plan as allocations in Policy SA13.1. No reasonable site options were rejected before the plan was submitted, although it should be noted that sites have not been included as allocations if they were not able to provide five units or more. The sites not able to provide five units or more were classed as windfall sites.

In the proposed modifications, sites HS33 Land and garages at Kingsfield Court and MU17 44-56 Vicarage Road have been removed from the Local Plan at the request of the landowners as they no longer wanted to include their sites in the Local Plan. As such they are not deliverable and therefore fail to meet the tests for site inclusion set out in national planning

guidance. Together, the allocation sites HS33 and MU17 were expected to deliver 15 dwellings. These 15 dwelling units have been transferred to the anticipated windfall total for the Local Plan and it is assumed by WBC that they may come forward on other windfall sites within the Borough.

## 4 Sustainability Assessment of the Local Plan

Table 5 provides a key to the symbols in the summary tables presented. Potential significant effects (including uncertain effects) are indicated with a thick black border. The findings are summarised below.

**Table 5: Definitions of Significance Scores**

Symbol	Definitions of Significance of Effects Against the SA Objectives
++	<b>Significant Positive Effect:</b> the policy option supports the achievement of this objective; it addresses all relevant sub-objectives and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre.
+	<b>Minor Positive Effect:</b> the policy option supports the achievement of this objective; it addresses some relevant sub-objectives, although it may have only a minor beneficial effect.
0	<b>Neutral Effect:</b> the policy option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant.
?	<b>Uncertain Effect:</b> Uncertain or insufficient information on which to determine the assessment this stage.
-	<b>Minor Negative Effect:</b> the policy option appears to conflict with the achievement of this objective; it does not address relevant sub-objectives and may result in minor adverse effects.
--	<b>Significant Negative Effect:</b> the policy option works against the achievement of this objective; it could exacerbate relevant sub-objectives and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.

## 4.1 Results of the Assessment of Chapters 1 to 12

A summary of the performance of Chapters 1 to 12 is presented in Table . This includes modifications. Overall, 38 potential significant positive effects have been identified in the assessment of the policies within Chapters 1 to 12. No potential significant negative effects or uncertain effects of the policies in these chapters have been identified following modifications to the plan and the incorporation of measures to mitigate for potential negative and uncertain effects.

The modifications to the Final Draft Local Plan have resulted in improved potential sustainability effects of policies 1-12 as follows:

**Table 6: The Difference Modifications Have Made to the Sustainability of Policies in Chapters 1-12**

Policy	SA Objective	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
Chapter 2: CDA2.1 Watford Gateway Strategic Development Area, CDA2.2 Town Centre Strategic Development Area, Policy CDA2.3 Colne Valley Strategic Development Area	SA2	+	++
	SA13	0	+
Chapter 5: Policy VT5.3: Local Centres	SA5	+	0
Chapter 6: Policy QD6.2 Design Principles	SA11	?	++
Chapter 6: QD6.4 Building Design	SA5	+	++
Chapter 7: The Historic Environment	SA13	?	0
Chapter 8: A Climate Emergency	SA8	+	++
Chapter 9: Policy 9.3 Blue Infrastructure Network	SA17	0	++

The performance of Policy VT5.3: Local Centres has changed from potential minor positive in relation to health to neutral, following the modification of the policy to remove wording which did not allow new hot food take aways to be permitted near to schools.

The modifications to the Local Plan include a revision of the plan period from 2018-2036 to 2021-2038. This adjustment takes account of permissions already granted within the 2018-2021 period and creates a greater number of windfall homes to be provided each year but a smaller total amount to be delivered in the plan period. The annual housing requirement remains essentially the same (reduction of 9 units from 793 to 784) and therefore the scope of the plan remains the same. The potential cumulative effects identified in the SA also remain the same and the assessment of policy HO3.1 Housing Provision takes into account the changes as a result of the amended timescale.

Strategic Policy SS1.1 has been modified to remove a target for new jobs delivery and it has been replaced with a breakdown of employment use class development to be delivered. The previous jobs delivery target had not taken into account jobs which could be created in all sectors. The modification does not make any difference to the predicted sustainability effects of Chapter 1. The SA assumes that Policy SS1.1 will result in the creation of new jobs.

**Table 7: Summary Performance of Chapters 1 to 12**

Chapter	SA Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Chapters 1&2	+	++	++	+	0	+	+	+	0	+	0	+	0	++	++	++	0	+	++
Chapter 3	0	0	+	++	++	0	+	0	0	0	0	+	0	+	0	++	0	+	+
Chapter 4	++	++	0	0	0	0	0	0	+	0	0	0	0	+	+	++	0	0	0
Chapter 5	+	0	0	0	0	+	+	0	0	0	0	0	0	++	++	+	0	0	0
Chapter 6	0	0	+	+	++	+	+	0	0	+	++	+	++	++	+	++	0	0	+
Chapter 7	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	0	0	0
Chapter 8	0	0	0	0	+	0	+	++	+	++	++	+	+	0	0	0	++	0	++
Chapter 9	0	0	+	0	++	0	0	0	0	0	+	++	0	+	0	0	++	++	0
Chapter 10	+	+	++	+	+	0	+	0	0	0	0	0	0	0	0	0	+	0	0
Chapter 11	0	0	++	0	++	+	++	++	0	++	++	0	0	0	0	0	0	0	0
Chapter 12	0	0	++	0	++	0	+	+	+	+	0	0	0	+	0	0	0	0	0

## 4.2 Results of the Assessment of Chapter 13 Site Allocations and New Development (Policy SA13.1)

Table 8 below summarises the performance of the site allocations in Policy SA13.1 Site Allocations and New Development. The assessment of all of the site allocations constitutes the assessment of Policy SA13.1.

Site references prefixed with HS are housing allocations, allocations prefixed with MU are mixed use sites, those prefixed with EM are employment sites, those with the prefix ED are potential sites for education facilities and one site prefixed with GT is a proposed site for the

provision of Gypsy and Traveller pitches. The assessment of each site allocation has been informed by site RAG ratings which made use of spatial GIS data (see Appendix D of the main SA report).

There are a number of allocation sites for which potential significant negative effects and uncertain effects have been predicted within the assessments. These are summarised within Table 8 and Table 9.



**Table 8: Potential Significant Negative Effects of Site Allocations**

SA Objective	Site Ref	Description
SA14	HS27	Development of this site would result in the loss of green space, which currently acts a gap between Croxley Business Park and the houses surrounding Croxley View. This loss would be permanent and irreversible, altering the current townscape of this area.
SA16	HS27	Site HS27 is located on entirely greenfield land, therefore development of this site works against SA16, with permanent and irreversible effects. Planning permission has recently been granted for development of this site.
	HS06	Site HS06 is located on entirely greenfield land, therefore development of this site works against SA16, with permanent and irreversible effects.
	ED01	The site is located on entirely greenfield land, therefore development of this site works against SA16, with permanent and irreversible effects.

**Table 9: Uncertain Effects of the Site Allocations**

SA Objective	Site Ref	Description
SA12	HS27	Development of site HS27 would result in the loss of 3.2ha of green infrastructure and a public right of way. Policy NE9.2: Green Infrastructure Network states that such access should not be lost through development and an alternative route identified. It is currently unclear if this will be possible. This site will also need to comply with Policy NE9.6: Protecting Open Space, which requires evidence that the space is surplus to requirements. An overall uncertain effect has been recorded for this SA objective, as it is unclear if this site will be identified as an area which is surplus to need.
SA13	HS28, MU09, MU11	Uncertain effects have been identified for SA13 mainly due to the location of these sites in relation to a nationally or locally Listed Building. Retention of the buildings may not be feasible. Details of this will not be available until site development details are shown within a proposal, and an uncertain effect is identified.

SA Objective	Site Ref	Description
SA18	HS21, HS22, HS23, HS28, HS32, MU16, MU18, MU21, MU22, EM02.	Development of allocation sites located in Flood Zone 3 is at risk of flooding, of which the frequency and severity may increase as a result of climate change. Flood risk is acknowledged within the development considerations of such sites which require proposals to be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy. Local Plan Policy NE9.4 Flood Risk and Mitigation should ensure that development is adequately risk assessed for flooding effects prior to development and mitigated prior to development. However, without this evidence it is not certain that development of these sites can be delivered in a way which avoids increasing flood risk to residents. Therefore, an uncertain effect is identified for SA18 for these sites which are all located within the Colne Valley.
SA19	All allocation sites apart from HS02, HS26, HS29, HS30, HS31, MU15, ED01.	55 of the allocation sites are located within a sand and mineral safeguarding zone. Development of the sites could therefore affect current reserves of exploitable minerals, although the actual effects are uncertain and therefore an uncertain effect of developing these sites has been identified.

The modifications to the site allocations development considerations have resulted in the following changes to the potential effects of the site allocations in Chapter 13 of the Local Plan:

**Table 10: The Difference Modifications Have Made to the Sustainability of Site Allocations in Policy SA13.1**

Site Allocation References	SA Objective	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
HS17, HS18, MU10, MU12- MU14, MU17, MU22	SA13	?	0
HS18	SA14	?	0
HS28, HS32	SA17	?	0
MU05	SA6	0	+
MU05-MU08	SA7	+	++
	SA4	+	0
MU10	SA14	-	0
MU11	SA14	+	++
MU21	SA1 and SA2	0	+
	SA7	+	++
MU24 (formerly EM05)	SA7	-	0
ED01	SA5	-	0

As mentioned above, the modifications resulted in the removal of two site allocations (HS33 Land and garages at Kingsfield Court and MU17 44-56 Vicarage Road). Together, these allocations were expected to deliver 15 dwellings. These units have been transferred to the windfall total for the Local Plan, which is now expected to be, on average, 158. The annual windfall figure has been adjusted to include the 15 units lost from allocation sites HS33 and MU17 and also to account for the extension of the Local Plan period by two years. The removal of the sites does not result in the removal of any potential significant positive or negative effects of the Local Plan. In the assessment of site allocation HS33, uncertain effects were identified in relation to SA3 (access) due to poor accessibility to most facilities and SA19 (waste and minerals) due to the location of the site within a sand and mineral safeguarding zone, which could affect current reserves of exploitable minerals. An uncertain effect was identified in relation to SA19 (waste and minerals) as for site HS33.

The increased windfall figure has been taken into account in the SA assessments along with the modifications to Chapters 1, 2, and 3. The increased windfall figure does not significantly alter the sustainability performance of the Local Plan.

A site has been added through the modifications, GT01 Land at Tolpits Lane, south of Epsom Road, for the provision of Gypsy and Traveller pitches. No potential significant positive or negative effects have been identified in the assessment of site GT01. An uncertain effect is identified in relation to SA19 (waste and minerals) due to the location of the site within a sand and mineral safeguarding zone, which also affects 54 other site allocations within the Local Plan. Development of the sites could affect current reserves of exploitable minerals, although the actual effects are uncertain and therefore an uncertain effect of developing these sites has been identified.

**Table 11: Summary Performance of the Policy SA13.1 Site Allocations**

Site Ref	SA Objective																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
GT01	0	0	-	0	0	0	-	-	-	0	0	0	0	-	0	-	0	0	?	
HS01	0	0	0	+	-	0	-	-	0	0	0	-	0	+	0	+	0	0	?	
HS02	0	0	0	+	++	0	-	+	+	0	0	0	0	+	0	++	0	0	-	
HS03	0	0	+	+	++	0	-	0	0	0	0	0	0	+	+	+	0	0	?	
HS04	0	0	0	+	+	0	-	0	0	0	0	0	0	+	0	++	0	0	?	
HS05	0	-	0	+	-	0	-	0	0	0	0	0	0	+	0	+	0	0	?	
HS06	0	0	0	++	0	0	-	-	0	0	0	0	0	-	0	--	0	0	?	
HS07	-	-	+	++	0	0	-	+	0	0	0	0	0	+	0	++	0	0	?	
HS08	0	0	+	+	-	0	++	++	0	0	0	0	0	+	+	++	0	0	?	
HS09	0	0	0	+	0	0	-	-	0	0	0	0	0	+	+	++	0	0	?	
HS10	0	0	0	+	+	0	+	+	0	0	0	0	0	+	+	++	0	0	?	
HS11	0	0	+	+	-	0	+	0	0	0	0	0	0	-	0	-	0	0	?	
HS12	0	0	0	+	-	0	+	+	0	0	0	0	0	-	+	+	++	0	0	?
HS13	0	0	+	+	++	0	+	0	0	0	0	0	0	+	0	+	0	0	?	
HS14	0	0	+	++	++	0	+	+	0	0	0	0	0	+	+	++	0	0	?	
HS15	0	0	+	++	++	0	+	+	0	0	0	0	0	+	+	++	0	0	?	
HS16	0	0	0	+	++	0	-	-	0	0	0	0	0	++	0	++	0	0	?	
HS17	0	0	+	+	-	0	+	+	0	0	0	0	0	+	+	+	0	0	?	
HS18	0	0	0	+	-	0	++	+	0	0	0	0	0	0	+	++	0	0	?	
HS19	0	0	0	+	-	0	++	0	0	0	0	0	0	+	+	+	0	0	?	
HS20	0	0	0	++	0	0	++	+	0	0	0	0	0	-	+	++	0	0	?	
HS21	0	0	0	++	0	0	++	++	0	0	0	0	0	+	+	++	0	?	?	
HS22	0	0	0	++	0	0	++	++	0	0	0	0	0	+	+	++	0	?	?	
HS23	0	0	0	+	0	0	++	0	0	0	0	0	0	+	+	++	0	?	?	
HS24	0	0	0	+	-	0	-	-	0	0	0	0	0	+	0	++	0	0	?	
HS25	0	0	0	+	0	0	-	0	0	0	0	0	0	+	0	++	0	0	?	
HS26	0	0	0	+	0	0	++	0	0	0	0	0	-	+	0	++	0	0	0	
HS27	0	0	0	++	0	0	-	-	0	0	0	?	0	--	0	--	0	0	?	
HS28	0	0	0	++	+	0	++	+	0	0	0	0	?	++	0	+	0	?	?	
HS29	0	0	+	+	+	0	++	+	0	0	0	0	0	++	0	+	0	0	0	
HS30	0	0	+	+	++	0	++	+	0	0	0	0	0	0	0	++	0	0	0	
HS31	0	0	+	++	+	0	++	+	0	0	0	0	0	0	0	+	0	0	0	
HS32	0	0	0	+	-	0	-	-	0	0	0	0	0	+	0	-	0	?	?	
MU01	0	0	0	+	-	0	-	0	-	0	0	0	0	+	0	+	0	0	?	
MU02	0	0	0	+	+	0	-	0	0	0	0	0	0	+	0	+	0	0	?	
MU03	0	0	0	+	+	0	-	0	0	0	0	0	0	+	0	+	0	0	?	
MU04	0	0	0	+	+	0	-	-	0	0	0	0	0	+	0	+	0	0	?	

Site Ref	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
MU05	+	+	0	++	0	+	++	++	0	0	0	0	0	++	+	+	-	0	?
MU06	+	+	0	++	0	0	++	++	0	0	0	0	0	++	+	++	-	0	?
MU07	+	+	0	0	0	0	++	+	0	0	0	0	0	++	+	++	-	0	?
MU08	+	+	0	++	0	0	++	+	0	0	0	0	0	++	+	++	-	0	?
MU09	+	+	-	++	+	0	+	+	0	0	0	0	?	++	+	++	-	0	?
MU10	0	0	+	++	+	0	++	+	0	0	0	0	0	0	+	+	0	0	?
MU11	+	0	0	++	0	0	++	+	0	0	0	0	?	++	+	++	0	0	?
MU12	+	0	+	+	0	0	++	+	0	0	0	0	0	+	+	++	0	0	?
MU13	+	0	0	++	0	0	++	+	0	0	0	0	0	+	+	++	0	0	?
MU14	0	0	0	+	0	0	++	+	0	0	0	0	0	++	++	++	0	0	?
MU15	+	+	0	+	0	0	++	+	0	0	0	0	0	+	+	++	0	0	0
MU16	+	+	0	++	0	0	+	+	0	0	0	0	0	+	+	++	0	?	?
MU18	0	0	0	++	0	0	0	0	0	0	0	0	0	+	0	++	0	?	?
MU19	0	0	0	++	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?
MU20	0	0	0	++	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?
MU21	+	+	0	++	0	0	++	+	0	0	0	0	0	0	0	-	0	?	?
MU22	+	0	0	++	0	0	++	+	0	0	0	0	0	+	0	++	0	?	?
MU23	+	0	0	++	0	0	-	-	0	0	0	0	0	+	0	++	0	0	?
MU24	++	+	0	0	0	0	++	++	0	0	0	0	0	++	+	++	0	0	?
EM01	++	+	0	0	0	0	++	++	0	0	0	0	0	++	+	++	0	0	?
EM02	++	+	0	0	0	0	0	-	0	0	0	0	0	+	0	++	0	?	?
EM03	++	+	0	0	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?
EM04	++	+	0	0	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?
ED01	0	0	+	0	0	0	+	+	0	0	0	0	-	-	0	--	0	0	0
ED02	0	0	+	0	0	0	-	-	0	0	0	0	0	++	0	+	0	0	?

## 5 Potential Cumulative Effects of the Local Plan

### 5.1 Introduction

This section presents the potential cumulative effects of the Local Plan with the proposed modifications. All of the potential cumulative effects which have been identified are considered to be significant. The potential cumulative effects have been identified as a part of the assessment of policies and allocation sites (potential intra-plan cumulative effects) and also from the implementation of the Local Plan, working in combination with other local plans, programmes or projects (potential inter-plan cumulative effects). Potential cumulative effects of the plan are reported in full within Chapter 8 of the main SA report.

### 5.2 Potential Intra-Plan Cumulative Effects

Table 12 and 13 present the potential intra-plan cumulative effects identified in the assessments of the Local Plan policies (Chapters 1-12 of the Local Plan) and the assessments of the Local Plan site allocations (Chapter 13 of the Local Plan).

**Table 12: Potential Cumulative Effects - Local Plan policies**

SA Objective	Potential Cumulative Effect	Chapter(s) Contributing to the Potential Effect
SA1: Achieve sustainable levels of prosperity and economic growth	++	Chapter 4
SA2: To ensure that local residents have employment opportunities and access to training	++	Chapter 4
SA4: Ensure that everyone has access to good quality housing that meets their needs	++	Chapters 1, 2 and 3
SA5: Encourage healthy lifestyles and improve quality of life for local residents	++	Chapter 3
SA8: To achieve good air quality	++	Chapters 1 and 2
SA10: Reduce the borough's contribution to climate change	++	Chapter 8
SA12: To protect and enhance biodiversity	++	Chapters 1, 6 and 9.
SA14: Conserve and enhance the landscape and townscape, encouraging local distinctiveness	++	Chapters 4 and 13.
SA16: Maximise the use of previously developed land and buildings and the efficient use of land	++	Chapter 6.

**Table 13: Potential Cumulative Effects - Site Allocations (Policy SA13.1)**

SA Objective	Potential Cumulative Effect	Allocation Sites Contributing to the Potential Effect
SA2: To ensure that local residents have employment opportunities and access to training	++	MU05, MU06 and MU07
SA4: Ensure that everyone has access to good quality housing that meets their needs	++	HS02, HS06- HS08, HS14-HS16, HS19-HS23, HS25, HS27, HS28, HS31, MU01, MU02, MU04-MU06, MU08-MU16, MU18-MU23
SA7: To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes	++	HS28, MU05, MU06, MU07, MU08
SA8: To achieve good air quality	++	HS06, HS08, HS14, HS18-HS20, HS21, HS22, HS28, HS29, HS30, HS31, MU05, MU06, MU07, MU08, MU11, MU12, MU13, MU14, MU15, MU16, MU21, MU22, EM01
SA14: Conserve and enhance the landscape and townscape, encouraging local distinctiveness	++	MU05- MU08, MU19 and MU20
SA15: Revitalise the town centre to promote a return to sustainable urban living	++	HS14, HS15, HS21, HS23, MU05, MU06, MU07, MU08, MU15, MU16
SA16: Maximise the use of previously developed land and buildings and the efficient use of land	--	HS06, HS11, HS27
	++	HS01- HS05, HS07- HS10, HS12, HS14-HS26, HS28- HS32, MU01- MU04, MU07, MU10- MU16, MU18-MU20, MU22, MU23, EM02-EM04
SA19: To minimise use and make efficient use of natural resources	--	HS01- HS25, HS27, HS28, HS32, MU01- MU14, MU16, MU18-MU24, EM01-EM04



## 6 Mitigation

Mitigation measures have been put forward to address potential significant negative effects and uncertain effects identified within the assessment of policies and the inter-plan cumulative effects assessment. Most mitigation measures were put forward prior to submission of the plan and some of the modifications have incorporated the mitigation measures. The only remaining mitigation measures relate to the site allocations (Policy SA13.1) and these are shown in Table 14 with a response from WBC.

**Table 14: Mitigation to Address Potential Significant Negative, Uncertain and Cumulative Effects of the Site Allocations (Policy SA13.1)**

Site References	SA Objective	Explanation and Mitigation Measures to Minimise or Avoid Effects	Response from WBC
HS27	SA12	An uncertain effect has been identified for HS27, as this site is currently greenspace with a public footpath through the middle of the site. The uncertain effect identified cannot be mitigated without further assessment of the site use. This could demonstrate the site is currently used by residents of the borough, hence development here would be prevented through Policy NE9.6: Protecting Open Space.	There is an adjacent greenspace that provides for play and amenity use This is protected under Policy NE9.6.
HS28, MU09, MU11	SA13	Potential adverse impacts on the Locally Listed Buildings on site may be mitigated through the site considerations. However, retention of the current buildings may not be feasible. Details of this will not be available until site development details are shown within a proposal, hence the uncertain effects identified cannot yet be mitigated.	Proposed main modifications (M120, M122) to the supporting text and wording of Policy HE7.3 have increased the emphasis on protecting non-designated heritage assets.  Proposed main modifications (M191, M209, M213) to the development considerations set out in Chapter 13 refer to the Heritage Impact Assessment undertaken for respective sites.
HS06,HS27, MU21, ED01	SA16	The only mitigation for the potentially significant negative effects of developing on greenfield land would be to not develop these sites. However, this may not be practicable due to the identified housing need	Land availability to support Watford's development is significantly constrained. Proposed main modification (M181) includes amendments to connect new development to

Site References	SA Objective	Explanation and Mitigation Measures to Minimise or Avoid Effects	Response from WBC
		within the borough. Therefore, this effect cannot be mitigated.	green infrastructure to the east.  MU21 site allocation includes open space provision and community facilities to ensure that new development provides a mix of uses that will support the community.
HS22, HS23, HS28, HS32, MU16, MU18, MU21, MU22, EM02	SA18	These sites are at risk of flooding. The development conditions for this site require a site-specific flood risk assessment and surface water drainage strategy. However, without this evidence it is not certain that this development can be delivered in a way which avoids increasing flood risk to residents. The sequential test and exception test should be undertaken to demonstrate that these sites and others are appropriate for development when compared with other sites within the borough. Policy IN10.1 now refers to the need for site flood risk assessments to apply mitigation measures where issues are identified.	Development proposals are required to provide flood risk assessments as part of Policy NE9.4. This will need to consider flooding on site and the cumulative flood risk off-site where necessary. Explicit reference is made to the Sequential and Exception Tests in paragraph 9.14 which form part of an assessment, as required by policy and respective site development considerations. How a site can be developed and how it mitigates flood risk appropriately cannot be determined until proposals are prepared. The role of the Local Plan is not to be that prescriptive.
HS01-HS24, HS27, HS28, HS32, HS33, MU01-MU14, MU16-MU24, EM01-EM04, GT01	SA19	The potential uncertain effect identified could be mitigated by the inclusion of a consideration of development within sand and mineral safeguarding zones within the policies or supporting text of Local Plan policies. This would ensure potential to work out sand and mineral resources prior to development is considered.	The Hertfordshire Minerals Local Plan forms part of the Watford Development Plan. It is therefore a material consideration when determining planning applications. It is not considered necessary to cross reference the Mineral Plan for each site allocation.

## 7 Monitoring

The SEA Regulations require monitoring of the significant environmental effects of a plan. SA monitoring should cover the significant economic and social effects, as well as the environmental ones.

The following monitoring schedule sets out how the potential effects associated with each of the policy chapters within the Local Plan could be monitored. This schedule has been refined to focus specifically on the monitoring of residual significant negative and uncertain effects following incorporation of modifications.

**Table 6: Proposed Monitoring Framework for Residual Significant Negative and Uncertain Effects**

Potential Effect	Description	Monitoring Indicators
SA12: Uncertain effect	Development of site HS27 loss of green infrastructure and a public right of way.	Hectares of greenfield land lost to development.
		Biodiversity net gain as per DEFRA biodiversity metric.
SA13: Uncertain effects and significant negative cumulative effect	Location of sites HS28, MU09 and MU11 in relation to a Conservation Area or Listed Buildings.	Number of buildings / structures on the 'Heritage At Risk Register'.
		Number of applications granted planning permission contrary to advice from Historic England.
SA14: Significant negative effect	Site HS27 loss of green space (currently acts a gap between Croxley Business Park and the houses surrounding Croxley View).	Gains and losses to the areas of designated green infrastructure.
SA16: Significant negative effect and significant negative cumulative effect	HS06, HS27, ED01 loss of greenfield land.	Hectares of greenfield land lost to development.
		Percentage of completions on previously developed land.
SA18: Uncertain effect and significant negative effect	Flood risk. Policies within Chapter 4 and sites HS21, HS22, HS23, HS28, HS32, MU16, MU18, MU21, MU22, EM02 (all located within the Colne Valley) and Designated Industrial Areas located within Flood Zone 3.	Number of applications granted planning permission contrary to Environment Agency advice.
SA19: Uncertain effect and significant negative cumulative effect	Development of 55 allocation sites within a sand and mineral safeguarding zone.	Number of applications granted planning permission contrary to minerals planning authority (Hertfordshire County Council) advice.

## 8 Next Steps

The SA report is being published alongside the Watford Local Plan proposed modifications following Examination hearings.

On adoption of the plan, an SA Adoption Statement will be prepared which will explain how environmental and sustainability considerations were incorporated into the Local Plan, and how the SA was taken into account during decision making, in compliance with SEA Regulations 16.3c) (iii) and 16.4. It will present the following:

- The reasons for choosing the final Local Plan as adopted in light of the alternatives considered;
- How the findings of the SA were taken into account and integrated into the Local Plan;
- How the representations received through the consultation process were taken into account; and
- Measures that will be taken to monitor the significant sustainability effects of implementing the Local Plan.

**Table 7: Watford Local Plan Timetable**

<b>Local Plan Activity</b>	<b>Timeframe</b>
Consultation on modifications	Q2 2022
Adoption	Q4 2022
SA Adoption Statement	As soon as possible after adoption