Watford Borough Council

Final Watford Draft Local Plan

Schedule A: Proposed Main Modifications, Fifth Iteration

30 May 2022

Schedule of Proposed Main Modifications (Fifth Iteration)

Watford Final Draft Local Plan

This schedule of the proposed main text modifications includes changes since the Regulation 19 version of the Local Plan and the subsequent Hearing sessions of the Local Plan aimed at resolving any potential soundness and/or legal compliance issues identified.

Reasons for a modification can include:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

The schedule is ordered by chapter and modification number and contains the policy reference/paragraph number and page number for each modification.

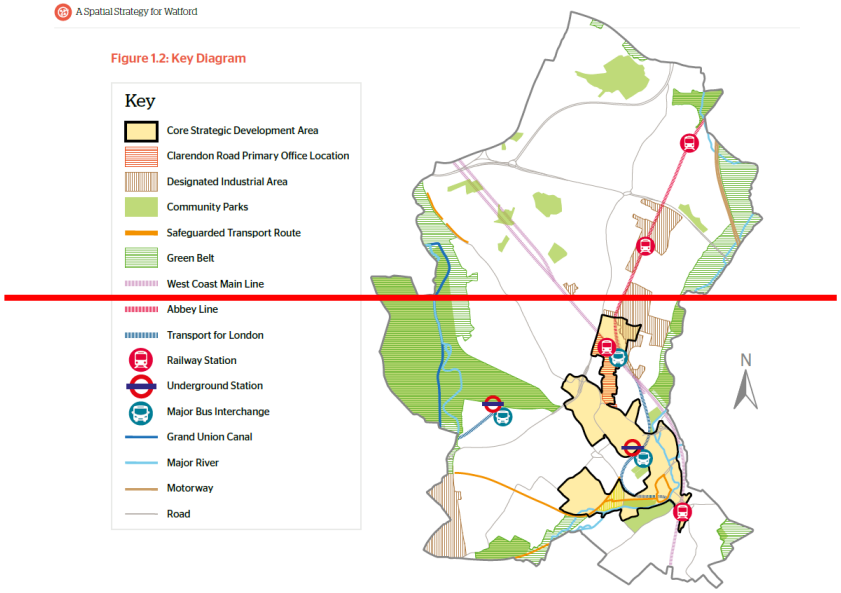
Deleted text, maps or other figures are shown with a ~~red strike-through~~; additions and replacements are underlined in green. Ellipses denote where the paragraph/policy continues before/after the text shown in the modification.

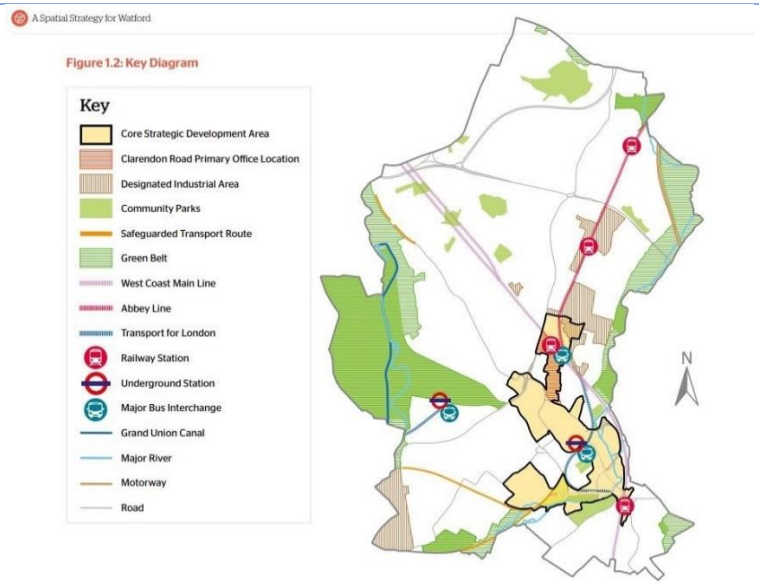
The proposed modifications will subsequently change the document numbering. The policy, paragraph and bullets referenced in this schedule are those found in the Regulation 19 Publication version.

Main Modification Number	Page, Local Plan paragraph, policy (in Final Draft Watford Local Plan Regulation 19 consultation document)	Modification (deleted text shown as red ~~strike through~~ and additional text shown green underlined). Unchanged text is in black font.	○ Reason for modification and Comment ID number
How to use this document (introduction)			
M1	Page, 6, after Table 'The Local Plan and the Spatial Strategy'	The diagrams covering the borough at the beginning of the majority of chapters are included to provide context to the strategic objectives of the Local Plan and opportunities to consider when development comes forward. This also applies to the schematic diagrams for each of the three Strategic Development Areas. The strategic maps are not intended to demonstrate policy requirements and are indicative only. Where specific areas and sites within the borough are covered by particular policies, these are defined on the Policies Map.	• Consistent with national policy • Officer change
CHAPTER 1: A SPATIAL STRATEGY FOR WATFORD			
M2	Front cover	~~2018~~ 2021-~~2036~~ 2038	• Consistent with national policy ○ ID 2002 Drax Investments Limited ○ ID 2063 & 2064, 2068 Glyn Hopkin Holdings Ltd ○ ID 2090 North Western Avenue Watford Ltd ○ ID 1981 St Albans City & District Council

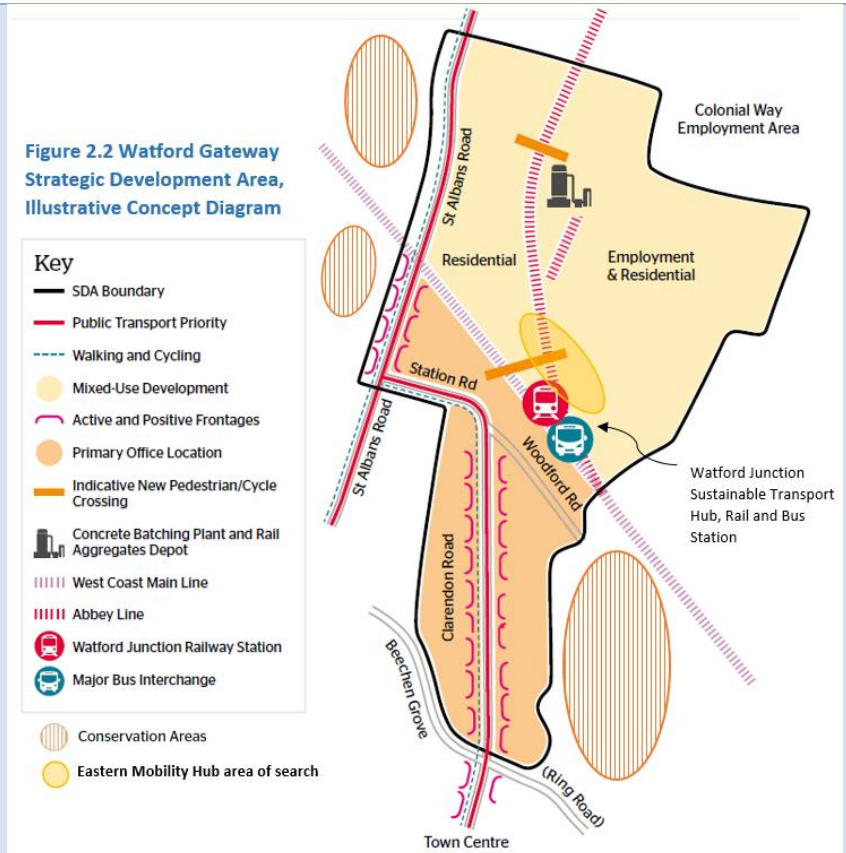
			○ ID 1947 WSP ○ ID 2058 Home Builders Federation ○ ID 2091, 2092 North Western Avenue Watford Ltd • Officer change
M3	Page 8 paragraph 1.2 Second sentence	It covers the period from ~~2018 to 2036~~ 2021 to 2038 and will guide new development so that it goes ahead in a co-ordinated manner, making the best and most appropriate use of land to meet the needs of the community.	• Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
M4	Page 11, paragraph 1.21	Watford will see a lot of change in the ~~18~~ 17 years covered by the plan period, as it grows and makes a transition towards being a more sustainable town, actively tackling climate change, with the aim of becoming carbon neutral.	• Consistent with national policy ○ ID Representors as listed previously in the second row
M5	Page 11 paragraph 1.22 first sentence	This will be achieved by promoting the three overarching objectives of the National Planning Policy Framework at a local level, thereby creating a different and better place in ~~2036~~ 2038.	• Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
M6	Page 11 paragraph 1.23	The following highlight~~s~~ the key Economic, Social and Environmental characteristics of Watford now, and where the Council wants it to be in ~~2036~~ 2038.	• Consistent with national policy ○ ID Representors as listed

	Second sentence		previously in the second row
M7	Page 12, green text box, title	Watford's economy in ~~2036~~ 2038	• Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
M8	Page 13, green text box, title	**Watford's society in ~~2036~~ 2038- the sustainable objectives** New development will have met the needs of a population projected to increase to 97,156 ~~97,080~~ people in ~~2036~~ 2038 (ONS, ~~2011 Census~~ and 2018 based population projections).	• Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
M9	Page 14, green text box, title	Watford's environment in ~~2036~~ 2038	• Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
M10	Page 14 paragraph 1.26 first sentence	The Local Plan is a roadmap of where we want to be, and when looking ahead to ~~2036~~ 2038…	• Consistent with national policy ○ Representors as listed previously in the second row ○ Officer change
M11	Page 15, red text box title	~~2036~~ 2038	• Consistent with national policy

	and paragraph 11		○ ID Representors as listed previously in the second row
M12	Page 17, Key diagram, revised to reflect modifications		• Consistent with national policy

			
M13	Page 21, Strategic Policy SS1.1 paragraph 1	~~The Local Plan makes provision for 14,988 additional homes and 11,500 additional jobs between 2018 and 2036, along with other supporting infrastructure.~~ From 2021 to 2038, the Local Plan makes provision for 13,328 net additional homes and 110,514 sqm of net employment floorspace consisting of 25,206 sqm of industrial uses as classified by the Use Classes B2, B8, E(g)(ii) and E(g)(iii) and 85,488sqm of office uses as classified by the Use Class E(g)(i) between 2021 and 2038, along with supporting infrastructure and facilities. 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~~.	• Positively prepared • Justified • Consistent with national policy ○ ID 1947 WSP ○ ID Representors as listed previously in the second row ○ Officer change
M14	Page 21, Strategic Policy SS1.1 paragraph 2	~~2036~~ 2038	• Consistent with national policy ○ ID Representors as listed

			previously in the second row
M15	Page 21, Strategic Policy SS1.1, paragraph 8	~~All development will take place on brownfield, or previously developed land and only in exceptional circumstances will development on greenfield land be supported.~~ Inappropriate development, as defined in national planning policy, in the Metropolitan Green Belt will not be ~~supported~~ approved except in very special circumstances ~~unless it can be demonstrated that exceptional circumstances apply~~.	• Consistent with national policy ○ Officer change
M16	Page 21, Strategic Policy SS1.1, after final paragraph	The Core Development Area is defined on the Policies Map.	• Consistent with national policy ○ Officer change
CHAPTER 2: CORE DEVELOPMENT AREA			
M17	Page 23, Paragraph 2.2	The Core Development Area comprises three distinct locations, based on their character and the opportunities that each presents to contribute towards making Watford a place that people want to be and where businesses want to invest. The information set out in Figure 2.1 reflects these areas as defined on the Policies Map.	• Consistent with national policy ○ Officer change
M18	Page 24, Paragraph 2.6, New sentence after final sentence	Figure 2.2 is a schematic diagram to provide context for the area and is not to be interpreted as policy.	• Consistent with national policy ○ Officer change
M19	Page 24, after paragraph 2.8, new text	Eastern Mobility Hub The area to the east of the Abbey Line will support the delivery of the Eastern Mobility Hub. As part of a long-term objective to support active transport, this will include a new multi-storey car park and access for coaches and taxis, relieving the pressure on the entrance to Watford Junction rail and bus stations (the Sustainable Transport Hub) located on the west side of the West Coast Main Line. The bridge over the railway lines will facilitate movement for pedestrians and cyclists between the two transport hubs.	• Effective ○ Officer change

M20	Page 24, Figure 2.2, Diagram, revised title and added features including Conservation Areas, Eastern Mobility Hub area of search, sidings to the concrete batching plant, infilled active frontages		• Consistent with national policy • Effective ○ Officer change
M21	Page 25, after paragraph 2.14, new paragraph, delete last sentence of preceding paragraph. Revise	~~However, the compatibility of new uses will need to be carefully considered, particularly where residential uses are proposed.~~ The transformation of the area from an under-utilised employment area to a mixed-use area inclusive of new homes, employment space and community facilities will take place throughout the plan period. It will encompass a new Eastern Mobility Hub east of the railway lines connecting to the Sustainable Transport Hub located west of the railway lines at Watford Junction Station. This will likely come forward in phases as infrastructure is delivered and development opportunities present themselves.	• Effective ○ ID 1972 Canada Life Asset Management ○ ID 2075 Aggregates Industries UK Ltd

	paragraph 2.15	In the first part of the plan period, proposals for the redevelopment of employment floorspace with either replacement or alternative forms of employment uses will be supported. Mixed-use development that may include residential uses that contribute towards the long-term vision of the area will be supported and in such circumstances the loss of employment floorspace may be acceptable. The compatibility of new and existing uses will need to be carefully considered, particularly where when residential uses are proposed in the area as the 'agent of change' principle will need to be addressed. The concrete batching plant and rail aggregates depot (including road access from Orphanage Road and rail sidings running parallel to the Abbey Line) is safeguarded by the Hertfordshire Minerals Local Plan and subject to a 250m Minerals Infrastructure Consultation Area. ~~Its relocation~~ Relocation of the facility will be challenging to achieve and will only be supported where a suitable alternative location has been identified that meets the operational requirements and environmental criteria. New development coming forward in the surrounding area should assume that the facility will remain for the long-term. New development will be required to be designed and mitigated to ensure that it will not prejudice existing or future use of the safeguarded site and associated operations in accordance with the 'agent of change' principle. Appropriate mitigation provided by new development may include locating non-residential floorspace in the lower storeys, orientating habitable rooms, balconies and gardens away from the safeguarded operations, and providing buffer development or screening between the sensitive uses and the safeguarded facility.	
M22	Page 25, paragraph 2.16,	Reprovision of car parking, including access, will need to be considered at a strategic level across the area to avoid fragmentation and inefficient use of land. Large areas of scattered car parking throughout the Strategic Development Area should be avoided. Proposals for car parking that come forward ~~independently of a car parking strategy for the area, or a future masterplan,~~ will not be supported where they could compromise the road network or infrastructure for alternative forms of active travel, such as cycling and walking. A new multi-storey car park will be provided as part of the Eastern Mobility Hub east of the Abbey Line. Any proposals that come forward which include the loss of the existing multi-storey car park and surface parking will need to demonstrate how the replacement facility will be delivered.	• Effective ○ Officer change

M23	Page 25, paragraph 2.17, after fifth sentence	When the area comes forward with more comprehensive mixed-use development in the second part of the plan period and longer-term, a ~~A~~ route for a second bridge that connects Penn Road with Watford Junction is to be protected so that new development does not compromise potential access to the area in the future.	• Effective ○ ID 1972 Canada Life Asset Management
M24	Page 26, after paragraph 2.22	**Delivery and managing development** The Watford Gateway Strategic Development Area consists of two constituent parts; land around Watford Junction Station and the area of Clarendon Road. • East of Watford Junction Station and west of the Abbey Line, site MU05 is a high density development with planning consent to be delivered over several phases to 2031. Site MU06 is located adjacent to the south and will come forward in phases across the plan period. The existing car park is expected to be reprovided as part of the Eastern Mobility Hub. This will help to unlock the central part of site MU06 and support the delivery of a mixed-use quarter in the later stages of the plan period. Road access to the facility will be from Clive Way and a pedestrian/cycle crossing over the West Coast Mainline will provide access to Watford Junction Station, which itself will be improved to increase capacity. The crossing may be delivered in either a single phase across both the West Coast Mainline and Abbey Line or in two phases with a crossing over the West Coast Mainline in the first part of the plan period alongside site MU06, followed with an extension to the crossing that would enable access to land east of the Abbey Line in the later stages of the plan period. If the latter, the crossing will need to be designed so that it may be adapted to support an extension at a later time. While sites MU07 and MU24 are likely to be redeveloped for industrial uses in the first part of the plan period, delivery of the aforementioned facilities will support redevelopment for mixed-use development on land located east of the Abbey Line in the latter stages of the plan period. With the crossing over the West Coast Mainline in place along with the Eastern Mobility Hub, a pedestrian/cycle crossing over the Abbey Line will be delivered to improve access from the east side of Watford Junction Station and reduce the pressure associated with access via the west entrance located opposite Clarendon Road. This will be supported by enhancements to the station, including the forecourt, in the early part of the plan period and ongoing improvements to Clarendon Road. • Clarendon Road is well established as a commercial office district and is subject to an increasing number of proposals for higher density development. Much of the area is unallocated and proposals are anticipated to come forward as windfall as redevelopment opportunities arise. As	• Effective ○ Officer change

		the area continues to intensify, it is envisaged that further investment interest will be secured in the area reflecting the objectives for this part of the Strategic Development Area.	
M25	Page 27, Strategic Policy CDA2.1, Part c)	c) A site for a new primary school ~~site~~ within Site MU05 'Land and Buildings at 94-98 St Albans Road', and a site for a new 3 form entry primary school within Site MU06 'Land at Watford Junction', to meet ~~the~~ demands generated by ~~the~~ development;	• Positively prepared • Effective ○ ID 2103 Hertfordshire County Council ○ ID 1938 Berkeley Homes
M26	Page 27, Strategic Policy CDA2.1, new bullet after Part e)	New development should contribute towards, and not compromise the delivery of the Eastern Mobility Hub to be located east of the Abbey Line;	• Justified ○ Officer change
M27	Page 27, Strategic Policy CDA2.1, Part g)	Prior to the implementation of a planning permission which includes residential uses o~~O~~n land east of the ~~railway line~~ West Coast Main Line, a pedestrian and cycle bridge for commuters and residents ~~across~~ from the east side of the Abbey Line to Watford Junction Station must be agreed ~~before planning permission is granted~~. Development proposals will need to be designed to ensure they do not compromise delivery of the bridge;	• Effective ○ ID 1972 Canada Life Asset Management
M28	Page 27, Strategic Policy CDA2.1, revised text for Part h)	~~A route for a pedestrian and cycle bridge aligned with Penn Road to Watford Junction must be safeguarded;~~ As part of a comprehensive mixed-use redevelopment of the area in the second part of the plan period, a route for a pedestrian and cycle bridge that will enable access to Watford Junction station via Penn Road must be shown to be feasible and achievable when redevelopment proposals are submitted;	• Effective ○ ID 1972 Canada Life Asset Management
M29	Page 27, Strategic Policy CDA2.1, Part j)	On land east of the West Coast Main Line and within the Strategic Development Area, redevelopment of existing employment floorspace for replacement or other employment uses will be supported in the first part of the plan period. Where it is demonstrated that proposals for residential-led mixed-use development will contribute towards the delivery of the wider objectives of the Watford Gateway	• Justified • Effective ○ ID 1972 Canada Life Asset Management

		Strategic Development Area, and the proposed use will not undermine existing uses through the '~~A~~agent of ~~C~~change' ~~P~~principle, the loss of employment floorspace may be acceptable; ~~Existing employment floorspace will be protected, proposals for redevelopment of employment premises will be supported where there is no net loss of employment floorspace and the proposed use will not undermine existing uses through the 'Agent of Change' Principle. As part of the commercial floorspace a replacement childcare facility should be provided."~~ If a proposal is to include the loss of the child care facility, a replacement facility should be reprovided as part of the commercial floorspace. ~~As part of the commercial floorspace a replacement childcare facility should be provided."~~	○ ID 1986 Solum Regeneration ○ ID 2103 Hertfordshire County Council
M30	Page 27, Strategic Policy CDA2.1, new bullet after Part j)	In the first part of the plan period, employment redevelopment proposals will be supported, as will further redevelopment that will enable a transition towards increased mixed-use schemes and supporting infrastructure in the second part of the plan period.	• Effective ○ Officer change
M31	Page 27, Policy CDA2.1, part k)	~~Car parking at Watford Junction should be part of a strategic approach, including provision of a multi-storey car park east of the Abbey Line. Applicants will be required to demonstrate this has been achieved as part of any proposal~~. A new multi-storey car park as part of the Eastern Mobility Hub will be provided on land to the east of the Abbey Line. Proposals that include the loss of the existing multi-storey car park will be required to set out how the replacement facility will be delivered, including delivery phases, as part of the planning application;	• Effective ○ Officer change
M32	Page 27, Strategic Policy CDA2.1, Part l)	New development will not compromise vehicle access from ~~Colonial Way and~~ Clive Way via Colonial Way into the ~~site~~ area and access to the Eastern Mobility Hub ~~station~~;	• Effective ○ ID 1972 Canada Life Asset Management
M33	Page 27, Strategic Policy CDA2.1, Part m)	The concrete batching plant and rail aggregates depot, including its rail sidings and road access, will be safeguarded as significant mineral infrastructure, as shown on the Policies Map. Proposals for development will be required to demonstrate that the proposed use will not undermine the existing safeguarded uses through the 'agent of change' principle;	• Effective ○ ID 2072 Aggregate Industries

M34	Page 27, Strategic Policy CDA2.1, two new bullets after part m)	n) Future development in the Strategic Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area and where prepared, for individual sites. o) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessments for all sites to be submitted prior to the determination of any application.	• Effective • Consistent with national policy ○ ID 2041 Historic England
M35	Page 27, Strategic Policy CDA2.1, after final paragraph	The Watford Gateway Strategic Development Area is defined on the Policies Map.	• Consistent with national policy ○ Officer change
M36	Page 28, Paragraph 2.23, new sentence after final sentence	Figure 2.3 is a schematic diagram to provide context for the area and is not to be interpreted as policy.	• Consistent with national policy ○ Officer change
M37	Page 28, Figure 2.3, Diagram title	Figure 2.3 Town Centre Strategic Development Area, Illustrative Context Plan	• Consistent with national policy ○ Officer change
M38	Page 29, paragraph 2.32, second sentence	In this context, proposals will be expected to contribute towards the vision for Watford to ~~2036~~ 2038,	• Consistent with national policy ○ Officer change
M39	Page 30, paragraph 2.35,	The Civic Core Conservation Area encompasses several listed and locally listed buildings, including the Town Hall and Watford library. A number of cultural facilities are also located within the conservation area ~~nearby~~ including the Colosseum, leisure centre and West Herts College. Development in this area will be guided by the North Hub Masterplan, which seeks to deliver a variety of facilities reflecting the cultural and heritage value of the area. Development ~~P~~proposals will need to have regard to the Heritage Impact Screening Assessment and other ~~consider~~ heritage-related Supplementary Planning Documents and undertake a full Heritage Impact Assessment of the proposals. They must also improve the function and setting of the buildings, reduce the dominance of the road system around	• Consistent with national policy ○ ID 2041 Historic England

		the Avenue Car Park, and make more efficient use of land. A short distance to the west is Cassiobury Park, the largest park in the borough. Proposals for the wider area should seek to improve connectivity to this area given the limited recreation space available in the Town Centre.	
M40	Page 32, paragraph 2.52, third sentence	Informed by the Tall Building ~~Heights~~ Study, the future base height in the Town Centre is considered to be up to five storeys on the High Street, stepping up to eight storeys to the rear, although this may not always be achievable on sites where the site is close to heritage assets.	• Positively prepared • Effective ○ ID 1945 WSP
M41	Page 32, new paragraph after 2.52	**Delivery and managing development** The Town Centre has an established character and dispersed redevelopment opportunities identified in the Local Plan which reflect the evolving nature of the Strategic Development Area. It is envisaged that windfall redevelopment opportunities will come forward on unallocated sites during the plan period and it is important that these are coordinated and contribute positively towards the area. To support the delivery of new development that will enhance the Town Centre, planning guidance such as a Supplementary Planning Document will be prepared. This should be applied in conjunction with other planning tools, such as the Council's 3-D visualisation model, to inform the preparation of development proposals, best understand the impact new development may have on the townscape and heritage assets and assist with decision-making.	• Effective ○ Officer change
M42	Page 33, Policy CDA2.2, second sentence of first paragraph	To achieve this, proposals will need to have regard to Supplementary Planning Documents and strategies supporting redevelopment and enhancements to the Town Centre. These are intended to guide the coordinated delivery of development that will contribute towards achieving the objectives for the area and provide greater detail about specific proposals in the Local Plan that may be relevant. Applicants will be required to demonstrate how proposals will make provision for, and contribute positively towards, the following criteria:	• Effective ○ Officer change
M43	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, Part f)	f) Opportunities should be taken to reduce the vehicle dominance of the ring road. P~~p~~roposals that provide active frontages onto the ring road and contribute towards ~~will be supported,~~ transforming the environment into one that is inclusive by supporting ~~a street that is a positive experience to use for~~ pedestrians and cyclists alongside other transport modes will be a priority. This will help to support the use of the new Sustainable Transport Hub at the southern end of the High Street~~, as well as vehicle users, will be a priority~~;	• Positively prepared ○ ID 2111 Hertfordshire County Council

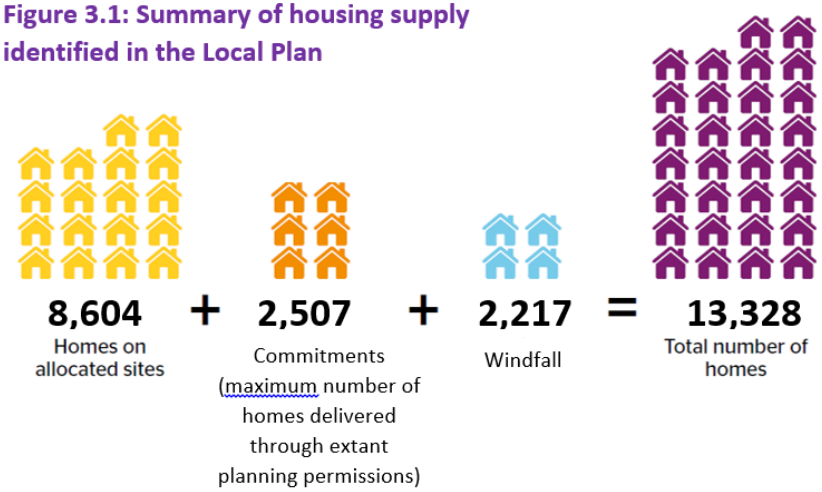
M44	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, part i)	i) Proposals must ~~should~~ demonstrate the provision of innovative waste management and recycling storage and collection systems, to reduce the need for service vehicles along the High Street.	• Effective ○ Officer change
M45	Page 33, Strategic Policy CDA2.2: Town Centre Strategic Development Area, three new bullets after Part h)	h) ~~Heritage assets, in particular St Mary's Church and the surrounding conservation areas, are key to the character of the Strategic Development Area and proposals should be sensitive to these heritage assets, enhancing their character and setting;~~ Heritage assets are located in key parts of the Strategic Development Area such as the High Street and the areas around St Mary's Church and the Town Hall. They are a key component of the character of this area and proposals for new development should respond to these assets, enhancing their character and setting; i) Future development in the Strategic Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area and where prepared for individual sites; j) Specific mitigation measures will be identified through the preparation of further detailed Heritage Impact Assessments for all sites which are to be submitted prior to the determination of any application; k) A site for a new 3 form entry primary school should be located within the strategic development area that is BB103 compliant, including external areas. Applicants are encouraged to identify where a new primary school can be provided.	• Positively prepared • Effective • Consistent with national policy ○ ID 2041 Historic England ○ ID 2109, 2110 Hertfordshire County Council
M46	Page 33, Strategic Policy CDA2.2, after final paragraph	The Town Centre Strategic Development Area is defined on the Policies Map.	• Consistent with national policy ○ Officer change
M47	Page 34, Paragraph	Figure 2.4 is a schematic diagram to provide context for the area and is not to be interpreted as policy.	• Consistent with national policy

	2.23, New sentence after final sentence		○ Officer change
M48	Page 34, Figure 2.3 Diagram title	Figure 2.4 Colne Valley Strategic Development Area, Illustrative Context Plan	• Consistent with national policy ○ Officer change
M49	Page 35, paragraph 2.59,	Major development proposals should have regard to Supplementary Planning Documents, masterplans and strategies related to the Strategic Development Area. Applicants will be expected to demonstrate ~~use a masterplan led approach that demonstrates~~ how they have maximised local opportunities for development of appropriate densities, to improve the public realm and increase access to services and facilities. Applicants will also be expected to demonstrate that proposals would contribute to the co-ordinated delivery of development and that it would not compromise future development opportunities within the Strategic Development Area.'	• Effective ○ Officer change
M50	Page 36, after paragraph 2.67, two new paragraphs	Redevelopment of the hospital is likely to consist of multiple phases; delivery of the multi-storey car park, redevelopment of the hospital and land between the new hospital and Vicarage Road. Development of the Riverwell and the Watford General Hospital/stadium areas should be considered in the context of the wider Strategic Development Area and existing built-up area adjacent and ensure opportunities to connect people with local destinations are optimised, such as creating easily legible routes through the site that are enhanced through each phase. The layout of buildings and their access points should ensure there is good accessibility for people using sustainable transport such as walking, cycling, public bus services and those with mobility issues. The existing hospital located in the north part of the site is adjacent to the existing residential area of Vicarage. Redevelopment schemes will need to take into account how new development may affect these residents and implement design measures to mitigate any possible negative impacts. The area is capable of supporting a base building height of up to six storeys, however, buildings of significant scale are likely to have an impact on the character of the residential area and listed buildings in the vicinity. If proposed, an approach to taller buildings that demonstrates a transition from higher elements in more central parts of the site transitioning to lower lying buildings closer to the boundary of the Strategic Development Area, such as Vicarage Road, will need to be set out.	• Positively prepared ○ ID 1897 West Hertfordshire Hospitals NHS Trust

M51	Page 36, after 2.68, additional paragraph	**Delivery and managing development** The constituent parts of the Colne Valley Strategic Development Area including the Lower High Street, Riverwell and the hospital/stadium areas, will together contribute towards the wider regeneration of the Colne Valley. To support the coordinated delivery of development and achieving the objectives for the area, the following mechanisms are either in place or will be prepared in the future: • Riverwell will continue to deliver new homes and community facilities guided by an existing masterplan for the area developed by the Council in partnership with the private sector. • The Lower High Street area extending from Watford High Street Overground Station to Bushey Overland Station consists of a mix of allocated sites and land that remains unallocated. A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Adoption is anticipated in 2024. • The proposed new hospital is a distinct area within the Strategic Development Area that has outline planning permission. Once delivered, the existing hospital site will be able to support the delivery of new homes in the later part of the plan period. The Council will prepare appropriate guidance for the redevelopment of the surplus land.	• Effective ○ Officer change
M52	Page 37, paragraph 2.72, first sentence	Informed by the Tall~~er~~ Buildings Study, the base future building height in the area is up to five or six storeys.	• Positively prepared • Effective ○ ID 1899 La Salle Investment Management
M53	Page 38, Strategic Policy CDA2.3, first paragraph	The Colne Valley Strategic Development Area is designated to facilitate transformative and co-ordinated change around the River Colne, ~~and~~ Lower High Street and the area of Watford General Hospital ~~area~~, producing a sustainable and mixed-use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses. A masterplan Supplementary Planning Document will be prepared by the Council to guide development in the Lower High Street area and provide greater detail on the objectives and specific proposals in the Local Plan. Once adopted, development proposals will need to have regard to the	• Effective ○ Officer change

		masterplan. Applicants will be expected to demonstrate that their proposals contribute towards the coordinated delivery of development, infrastructure and improvements to the public realm. Proposals should be designed so not inhibit the delivery of other sites or compromise future development opportunities that could make a positive contribution towards the objectives for the area.	
M54	Page 38, Strategic Policy CDA2.3, new bullets after parts a) and j) amend part f),	b) Redevelopment of the existing Watford General Hospital will provide modern facilities that are well integrated and co-ordinated with other developments, designed to minimise impacts on nearby residential areas and are well connected to support sustainable transport options including walking, cycling and bus services; c) A multi-storey car park with a capacity of approximately 1,450 car parking spaces located east of the existing Watford General Hospital car park; f) A site for a new primary school within Site MU21 'Land at Riverwell', and a site for a new 3 form entry primary school within Site MU16 'Land at Tesco', Lower High Street, ~~New primary school sites~~ to meet ~~the~~ demand~~s~~ generated by new development. j) Future development in the Core Development Area will take into account the findings and recommendations of the Council's Heritage Impact Assessment Screening Report for this area, and where prepared, for individual sites. k) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for all sites to be submitted prior to the determination of any application.	• Positively prepared • Effective ○ ID 1897 West Hertfordshire Hospitals NHS Trust ○ ID 2041 Historic England ○ ID 2114 Hertfordshire County Council
M55	Page 38, Strategic Policy CDA2.3, after final paragraph	The Colne Valley Strategic Development Area is defined on the Policies Map.	• Consistent with national policy ○ Officer change
CHAPTER 3: HOMES FOR A GROWING COMMUNITY			
M56	Page 40, paragraph 3.1	~~The Spatial Strategy to 2036 seeks to deliver at least 14,988 new homes.~~ The Spatial Strategy seeks to deliver at least 13,328 net additional new homes between 2021 and 2038. This is equivalent to the delivery of at least 784 new homes each year and forms the baseline figure to calculate the five year housing supply. ~~This figure includes the amount of housing required to meet local need as determined using the government's standard method (14,274 homes) and an additional 5%~~	• Positively prepared • Justified • Effective

		~~allowance (714 homes) to reduce the risk of sites identified in the plan not coming forward as anticipate.~~ The figures that make up ~~this~~ the housing supply in the Local Plan ~~target~~ are set out in Figure 3.1. Figure 3.2 provides an overview of site allocations for residential use and their distribution across the borough. For more detailed information about these sites, refer to Table 13.1 and for site boundaries refer to the Policies Map.	• Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
M57	Page 40, additional paragraph after paragraph 3.2	The number of homes to be delivered on site allocations during the plan period is 8,604 units. This figure is the sum total of the indicative yields for all of the allocations as listed in Chapter 13 which are derived from the size of each site and standard density assumptions depending on its location. As of 1 April 2021, a total of 1,218 units on site allocations have been granted planning consent. These units are not included in the maximum of 2,507 units that could come forward on sites with extant planning permission as represented in Figure 3.1	• Consistent with national policy ○ Officer change
M58	Page 40, figure 3.1 Revised housing figures in diagram (Commitments revised to reflect removal of completions from 2018 to 2021 and remove duplication of planning consents on sites put		• Positively prepared • Justified ○ ID Representors as listed previously in the second row ○ Officer change

	forward as site allocations.	**Figure 3.1: Summary of housing supply identified in the Local Plan**  	
M59	Page 41, paragraph 3.3	As part of the housing to be provided to ~~2036~~ 2038, a total of 2,217 homes are included in the housing supply as windfall. ~~windfall allowance of 2,132 units is included~~. This is based on a combination of three factors including the historical annual average of 70 dwellings per year completed on sites of less than five units; development sites coming forward within the density range identified in the Housing and Economic Land Availability Assessment, but higher than projected; and unidentified sites larger than five dwellings gaining planning permission. Combined, it is expected that windfall development will contribute, on average, ~~116~~ 158 new homes per year over the plan period with the windfall contribution as part of the housing trajectory from 2024/25.	• Positively prepared • Justified • Effective ○ ID Representors as listed previously in the second row ○ Officer change
M60	Page 41, paragraph 3.5	~~2036~~ 2038	• Consistent with national policy ○ ID Representors as listed previously in the second row

M61	Page 41, additional paragraph after paragraph 3.5	The commitments figure of 2,507, as quoted in Figure 3.1, assumes that all sites with planning permission on 1 April 2021, which are not site allocations in the Local Plan, will be developed. This means that any permissions which are not implemented will lead to a reduction in this source of supply. Since the adoption of the Core Strategy in 2013, the Council has seen an average annual lapse rate of 15%. If this rate was to be replicated across all permissions as of 1 April 2021, this supply of 2,507 dwellings would be reduced by 376 dwellings to 2,131 dwellings.	• Consistent with national policy ○ Officer change
M62	Page 41, Strategic Policy HO3.1	To meet housing need, at least 13,328 net additional homes, equivalent to at least 784 new homes per year, ~~Provision~~ will be delivered ~~made for 14,988 new homes, inclusive of a 5% buffer of 714 homes,~~ in Watford ~~Borough~~ between 2021 and 2038. ~~for the period 2018 to 2036~~ Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development.	• Positively prepared • Justified ○ ID Representors as listed previously in the second row ○ Officer change
M63	Page 41, Strategic Policy HO3.1, after last paragraph add new sentence	Site allocations for housing and mixed-use, where residential use would be supported, are defined on the Policies Map.	• Consistent with national policy ○ Officer change
M64	Page 43, Policy HO3.2, 1st paragraph, 1st sentence	Proposals for new residential development of five dwellings or more will be supported where they make provision for at least 20% of the total number of residential units to be family-sized (at least three+ bedrooms).	• Effective Officer change
M65	Page 43, new paragraph after paragraph 3.13	Affordable housing can refer to rented or sale~~s~~ properties and is defined by the National Planning Policy Framework (Annex 2). ~~Definitions of affordable housing are set out in Annex 2 of the National Planning Policy Framework.~~ To best reflect affordable housing as a proportion of the total number of homes completed on a site, the requirement will be ~~based on~~ measured by habitable rooms~~, with supporting information to be provided by an applicant including the number of units, floorspace and bed spaces as part of the housing schedule~~.	• Effective ○ Officer change

		The number of affordable housing units provided does not have to be equivalent to 35% of the total number of housing units proposed. The housing mix, in terms of size of units of the market and affordable elements of the scheme, can be varied so long as the number of habitable rooms provided as affordable accommodation is equivalent to 35% of the total number of habitable rooms in the proposed development. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. Applicants should present affordable housing figures as a percentage of total residential provision by habitable rooms and units to enable comparison as part of the housing schedule. The distribution of habitable rooms can help deliver the type of affordable homes needed in the borough more effectively and contribute towards providing 20% family sized homes across the scheme as set out in Policy HO3.2 'Housing Mix, and Optimising Use of Land'. Applicants are encouraged to engage with the Local Authority at an early stage to determine the housing mix of the affordable housing element of the scheme.	
M66	Page 43, new paragraph after paragraph 3.14	The National Planning Policy Framework requires a proportion of the total number of residential units to be provided for affordable home ownership. Therefore, the delivery of other types of affordable housing, including social rent, are to be applied once this threshold has been achieved.	• Consistent with national policy ○ Officer change
M67	Page 44, Policy HO3.3, first paragraph	Residential developments, ~~including residential institutions~~ of 10 ~~ten~~ homes or more will be supported where they provide at least 35% affordable housing (by habitable room).	• Consistent with national policy ○ Officer change
M68	Page 44, Policy HO3.7, third paragraph	If ~~the~~ a plot has been offered to people ~~registered~~ on the Council's Self Build Register and the open market and marketed for a minimum of 12 months from the commencement of development on the site and has not been sold, then the plot will be returned to the developer. ~~and has not been sold within 12 months of completion of the overall scheme, the property will return to the developer to be built out.~~	• Justified ○ Officer change

M69	Page 44, Policy HO3.3, last paragraph	~~In exceptional circumstances,~~ Where a viability assessment, undertaken in accordance with national planning policy and guidance, demonstrates particular circumstances ~~it is demonstrated~~ that mean the ~~it would not be viable to meet the~~ affordable housing requirements set out in this policy cannot be met, a late-stage review mechanism, which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the Local Planning Authority), will be required. Where it is demonstrated that a higher ~~the~~ number of affordable units can be achieved~~able~~ on site ~~is higher than agreed~~, up to 35%, the applicant will be required to provide the additional units to the Local Authority or Registered Housing Provider upon completion of the development.	• Consistent with national policy ○ Officer change
M70	Page 44, Paragraph 3.19 and 3.20, new sentence and amended structure	Build to Rent schemes will be required to provide affordable housing based on the criteria set out in Policy HO3.3 'Affordable Housing'. Where a developer is proposing a Build to Rent scheme that requires affordable housing to be provided, the affordable housing offer may be entirely Discounted Market Rent, if agreed with the Local Planning Authority. To meet housing need, the proportion of affordable housing to be provided as Discounted Market Rent should be the same as required in Policy HO3.3 'Affordable Housing' (by habitable rooms). The minimum discount on the market rent units should be at least 20%, as required by Planning Practice Guidance. A discount greater than 20% will only be applied if demonstrated to be deliverable through an update to the Local Housing Needs Assessment. In particular circumstances, a viability assessment may be acceptable to demonstrate that the Discounted Market Rent requirement is not achievable. Viability assessments submitted as part of a planning application will be made publically available and robustly scrutinised by the Local Planning Authority. ~~The discount on the market rent should be provided in line with the findings of the Local Housing Needs Assessment.~~ Discounted Market Rent units should be fully integrated into the development, with no differences between these units and the market units, tenure blind. ~~It identified that for a person or family to afford a home in Watford, a discount of between 26-34% would need to be applied to market rents, with the variation reflecting different sizes of homes. This level of discount reflects a local approach to meeting the needs of local residents who cannot afford market rents.~~	• Effective • Consistent with national policy ○ ID 1950 WSP

M71	Page 45, paragraph 3.22, second sentence	~~The allocation of the~~ Discounted Market Rent properties ~~that are not offered as affordable housing~~ should be allocated in a manner agreed between the operator and ~~to people in a manner agreed with~~ the Local Authority.	• Consistent with national policy ○ ID 1998 Cortland Partners
M72	Page 46, Policy HO3.4, first paragraph	Proposals for Build to Rent homes will be supported in locations appropriate for residential development. Affordable housing should be provided in accordance with Policy HO3.3 Affordable Housing, although Discounted Market Rent, at a genuinely affordable rent, will be accepted in place of other affordable housing tenures. ~~Genuinely affordable rents should be established against the most up-to-date Local Housing Market Needs Assessment and should be capped at a level equivalent to the Local Housing Allowance.~~ The discount on the market rent should be at least 20% having regard to the most up-to-date Local Housing Market Needs Assessment or other relevant evidence.	• Effective • Consistent with national policy ○ ID 1950 Watford Centre Limited ○ Officer change
M73	Page 47, Policy HO3.5	**Policy HO3.5: Specialist Care and Supported Living ~~Specialist Housing and Care Homes~~** ~~Existing specialist and supported housing will be protected where it is up to the standards set out in Hertfordshire County Council guidance.~~ ~~The redevelopment of any site that includes housing for vulnerable people will only be acceptable where it meets the standards set out in Hertfordshire County Council guidance and when it meets the following criteria:~~ Proposals for new specialist care and supported living accommodation, as defined in the Glossary, will be supported. Proposals that result in the loss of existing residential accommodation that provides specialist care and supported living will be resisted unless: a) There is no longer an identified need for the existing facility; b) The needs will be met elsewhere in the Borough, preferably close to the existing building or in a preferential location for specialist housing; or c) ~~Reprovision~~ Redevelopment would provide ~~result in~~ improved quality of specialist housing and facilities.	• Consistent with national policy • Justified ○ Officer change

		~~Proposals for new specialist housing should be located within 400m of a district or local centre and public transport,~~ Proposals should be designed to include pick-up and drop-off facilities close to the principal ~~principle~~ entrance that are able to accommodate specialist transport vehicles. To aid mobility, development should provide space for the storage of mobility scooters. ~~New specialist housing and care homes that are provided at market value will be required to comply with the affordable housing requirements set out in Policy HO3.3 'Affordable Housing'.~~ Should a proposal for new specialist care and supported living accommodation fall within Use Class C3, the proposals will be required to provide affordable housing consistent with Policy HO3.3 for that proportion of the scheme. This requirement will not be applied to proposals for new specialist care and supported living accommodation classified as being within Use Class C2.	
M74	Page 48, paragraph 3.32	However, self-build and custom housebuilding will be supported ~~on windfall sites where proposals are for 50 new houses or more~~ on allocations and windfall sites, and proposals that include 50 or more non-flatted homes (excluding affordable housing) will be required to provide 10% of plots for such development.	• Effective ○ Officer change
M75	Page 48, paragraph 3.33, second sentence	Marketing of the site should be demonstrated to have been undertaken proactively to gauge potential interest in a self-build plot ~~by~~ on the open market, including those registered on the Council's Self-build Register.	• Justified ○ Officer change
M76	Page 49, Policy HO3.7	Residential proposals for 50 non-flatted homes ~~houses~~ or more (excluding ~~houses to be provided as~~ affordable homes) will be supported where they provide one self-build plot for every ~~ten~~ 10 houses, in agreement with the Local Planning Authority. This will be secured through legal agreement. The average size of a self-build plot should be comparable to the average size of the market sized plots provided on site. If ~~the~~ a plot has been offered to people ~~registered~~ on the Council's Self-build Register and the open market and marketed for a minimum of 12 months from the commencement of development on the site and has not been sold, then the plot will be returned to the developer ~~and has not been sold~~	• Justified ○ Officer change

		~~within 12 months of completion of the overall scheme, the property will return to the developer to be built out~~.	
M77	Page 52, paragraph 3.46, second sentence	In Watford this translates to about 2% of people who could be living with Alzheimer's by ~~2036~~ 2038.	• Consistent with national policy ○ Officer change
M78	Page 53, Policy HO3.10, third paragraph	For developments of 10 or more homes, at least ~~10%~~ 4% of the dwellings will be built to be wheelchair adaptable and comply with M4(3) of the Building Regulations.	• Justified ○ Officer change
M79	Page 53, Policy HO3.10, fourth paragraph	For developments of 50 homes or more, 2% of dwellings are to ~~should~~ be designed to support someone living with dementia by having regard to the 'Dementia Friendly design principles' set out in Figure 3.3. Homes designed to be M4(3) compliant can also be designed to be 'dementia friendly'. Where such homes are provided, they will contribute towards both the M4(3) and 'dementia friendly' home requirement.	• Effective ○ Officer change
M80	Page 54, paragraphs 3.51 and 3.52	~~Communal~~ Shared private amenity space While private amenity space in the form balconies provides space for residents of the property, these will be small and generally not suitable for gatherings of people or recreational use. Shared private amenity space on-site can enhance the quality of a scheme and support residents by providing areas to socialise and use for recreation purposes. ~~Where communal amenity space is provided this should be of a minimum size of 50sqm for two units, plus 15sqm per additional two units.~~ Apartment schemes should provide high quality shared private amenity space on-site that is accessible to all residents unless it would not be possible or appropriate to do so. The use of roof areas, including podiums and courtyards for additional private or shared amenity or garden space is supported and should ~~encouraged. While the standard is set out this will need to~~ be considered in the wider context of the scheme, in terms of the opportunities and constraints of a site.	• Justified • Effective ○ Officer change

<table>
<tr>
<td></td>
<td></td>
<td>~~Family housing on upper floors should have access to shared amenity space, informal play space and equipped play space (if no facilities are located nearby) and / or a balcony or terrace, subject to acceptable amenity and design considerations. This should be considered in conjunction with Policy NE9.7 'Providing New Open Space'.~~
Where shared private ~~communal~~ amenity space is provided, it should be designed to be accessible to all residents and provide places to sit, play and ~~the~~ exercise. Where provision is catering for families in the development, informal play space, and as appropriate, equipped play space should be integrated into the shared space. It should be adaptable to accommodate the changing needs of residents and be easy to maintain, whilst not compromising its contribution towards creating a quality public realm. Importantly, shared private amenity ~~communal open~~ space should be designed into the scheme so as not to be overshadowed or suffer low levels of daylight.</td>
<td></td>
</tr>
<tr>
<td>M81</td>
<td>Page 54 Policy HO3.11</td>
<td>Policy HO3.11: Private and ~~Communal Outdoor~~ shared private amenity space

Private amenity space

~~A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and at least one additional square metre should be provided for each additional occupant.~~

~~Provision of private amenity space is to meet the following standards:~~ All new homes should be provided with private outdoor amenity space that meets the following minimum standards:

<table>
<tr><th>Size of dwelling</th><th>Apartment</th><th>House/Duplex/Maisonette</th></tr>
<tr><td>1-bed</td><td>5sqm</td><td>12sqm</td></tr>
<tr><td>2-bed</td><td>7sqm</td><td>24sqm</td></tr>
<tr><td>3-bed</td><td>8sqm</td><td>25-~~40~~sqm</td></tr>
<tr><td>4-bed</td><td>9sqm</td><td>25-~~40~~sqm</td></tr>
</table>

The minimum depth and width for all balconies and other private external spaces should be 1.5m. This does not contribute towards the minimum internal space standards.</td>
<td>• Justified
• Effective
○ Officer change</td>
</tr>
</table>

		Shared private amenity space The provision of ~~communal~~ shared private outdoor amenity space, including roof and terrace space, will be supported. Residential development comprising 10 or more flats should provide shared private outdoor amenity space that is high quality and accessible to all residents unless it would not be possible or appropriate to do so. ~~Communal outdoor amenity space will need to be designed to be usable by all residents.~~	
CHAPTER 4: A STRONG ECONOMY			
M82	Page, 56, paragraph 4.2, new sentence after final sentence	Figure 4.1 reflects designated employment areas as defined on the Policies Map. For information about site allocations for employment uses, or have an element of employment use, refer to Tables 13.2 and 13.3 in Chapter 13.	• Consistent with national policy ○ Officer change
M83	Page 56, paragraph 4.4, third sentence	For Watford, the study suggested there was a need for 37,600sqm of office floorspace and 98,400sqm of industrial floorspace. Reflecting the strengths and opportunities across SW Herts and Watford, ~~T~~to contribute towards this requirement, Watford has planned for ~~111,175~~ 85,488sqm of office floorspace and ~~40,759~~ 25,206sqm of industrial floorspace.	• Positively prepared ○ Officer change
M84	Page 56, after paragraph 4.4	The Council will continue to work with neighbouring authorities in the South West Hertfordshire Functional Economic Market Area to deliver the shortfall of industrial floorspace that cannot be provided in Watford over the plan period.	• Positively prepared • Justified ○ Officer change
M85	Page 57, Strategic Policy EM4.1, second paragraph	To meet the employment needs in Watford and contribute towards the strategic employment requirements of South West Hertfordshire, the Local Plan makes provision for 25,206sqm net additional industrial floorspace (Use Classes B2, B8, E(g)(ii) and E(g)(iii)) and 85,488sqm net additional office floorspace (Use Class E(g)(i)). To meet these ~~challenging~~ targets, the Local Plan will seek to prevent the net loss of ~~both~~ office and industrial floorspace across the Borough. New office growth will be prioritised at the Clarendon Road Primary Office Location, while new industrial growth will be prioritised in the five Designated Industrial Areas. ~~Over the plan period, the Council will seek to plan for the creation of 11,500 new jobs.~~	• Positively prepared ○ Officer change

<table>
<tr><td>M86</td><td>Page 57, Strategic Policy EM4.1, third paragraph</td><td>~~The Council will continue to work with neighbouring authorities in the South West Hertfordshire Functional Economic Market Area to deliver the shortfall of industrial floorspace that cannot be provided in Watford over the plan period.~~</td><td>• Positively prepared
• Justified
○ Officer change</td></tr>
<tr><td>M87</td><td>Page 57, Strategic Policy EM4.1, new sentence after last paragraph</td><td>Site allocations for employment and mixed-use development, where employment uses would be supported, are defined on the Policies Map.</td><td>• Consistent with national policy
○ Officer change</td></tr>
<tr><td>M88</td><td>Page 58, paragraph 4.8, last sentence</td><td>The South West Herts Economic Study Update has shown there to be a large demand for industrial floorspace within the plan period, although the borough's Housing and Economic Land Availability Assessment (HELAA) (2021) has identified a shortfall of land for industrial uses up to ~~2036~~ 2038.</td><td>• Consistent with national policy
○ Officer change</td></tr>
<tr><td>M89</td><td>Page 58, Table 4.1, heading and floorspace figures</td><td>Revised Table 4.1 (below paragraph 4.13, p58)
<table>
<tr><th>~~Industrial potential supply 2018-2036~~</th><th>~~Floorspace (sqm)~~</th></tr>
<tr><td>~~Site allocations~~</td><td>~~17,035~~</td></tr>
<tr><td>~~Sites with planning permission~~</td><td>~~23,724~~</td></tr>
<tr><td>~~Total~~</td><td>~~40,759~~</td></tr>
</table>
<table>
<tr><th>Summary of industrial floorspace provision 2021-2038</th><th>Floorspace provision (sqm)</th></tr>
<tr><td>South West Hertfordshire requirement</td><td>481,500</td></tr>
<tr><td>Watford requirement</td><td>97,400</td></tr>
<tr><td>Provision through site allocations</td><td>12,799</td></tr>
<tr><td>Provision on sites with planning permission</td><td>12,407</td></tr>
<tr><td>Total industrial floorspace provision in the Local Plan</td><td>25,206</td></tr>
</table></td><td>• Positively prepared
○ Officer change</td></tr>
</table>

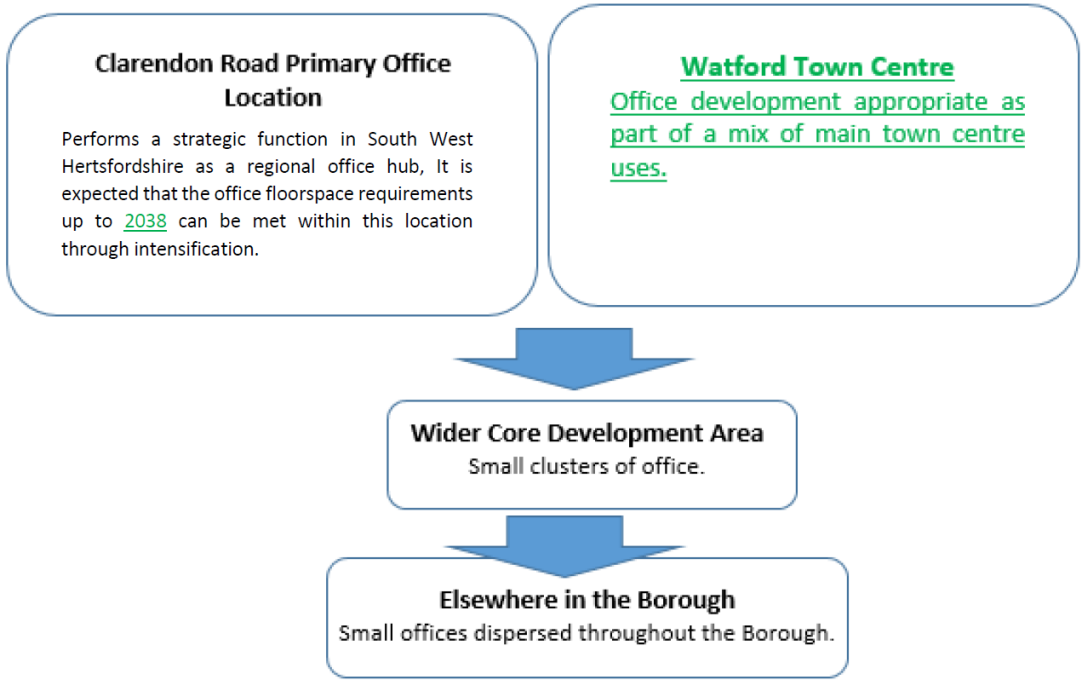
<table>
<tr>
<td>M90</td>
<td>Page 58, Table 4.2, heading and floorspace figures</td>
<td>Revised Table 4.2 (below paragraph 4.15, p59)

<table>
<tr><th>~~Office potential supply 2018-2036~~</th><th>~~Floorspace (sqm)~~</th></tr>
<tr><td>~~Site allocations~~</td><td>~~38,672~~</td></tr>
<tr><td>~~Sites with planning permission~~</td><td>~~72,503~~</td></tr>
<tr><td>~~Total~~</td><td>~~111,175~~</td></tr>
</table>

<table>
<tr><th>Summary of office floorspace provision 2021-2038</th><th>Floorspace provision (sqm)</th></tr>
<tr><td>South West Hertfordshire requirement</td><td>188,000</td></tr>
<tr><td>Watford requirement</td><td>37,600</td></tr>
<tr><td>Provision through site allocations</td><td>19,428</td></tr>
<tr><td>Provision on sites with planning permission</td><td>66,060</td></tr>
<tr><td>Total office floorspace provision in the Local Plan</td><td>85,488</td></tr>
</table>
</td>
<td>• Positively prepared
○ Officer change</td>
</tr>
<tr>
<td>M91</td>
<td>Page 59, Policy EM4.2 2nd paragraph</td>
<td>Proposals for new industrial employment uses will be supported where they contribute to the identified need for industrial land set out in the South West Herts Economic Study Update. ~~To achieve this, proposals will be supported that incur no net loss of industrial floorspace unless~~ Proposals that would incur a net loss of industrial floorspace will be resisted unless the new use would avoid compromising the industrial activities in the area, and:

a) An up-to-date evidence base demonstrates that the site is no longer required for industrial use; or

b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for industrial use in the medium-term.</td>
<td>• Effective
○ Officer change</td>
</tr>
<tr>
<td>M92</td>
<td>Page 60, paragraph 4.19</td>
<td>To preserve the strong sub-regional role that Clarendon Road plays in supporting growth in the office sector, the area will be the preferred location for future office growth. It is important to protect existing office use at this location, in line with the findings of the South West Herts Economic Study Update. For proposals for new office floorspace, the office development hierarchy should be followed (Figure 4.3). The approach aims to direct new office development to the Clarendon Road Primary Office Location and the Town Centre, followed by ~~If it is not possible for the new office to be located~~</td>
<td>• Consistent with national policy
○ Officer change</td>
</tr>
</table>

		~~within the Clarendon Road Primary Office Location, the sequential test should be used to direct the office use to~~ the wider Core Development Area~~, in line with the office hierarchy~~. This ensures tha~~n~~t new office use outside of Clarendon Road contributes to small clusters first, to minimise any potential negative impacts on residential or industrial areas elsewhere.	
M93	Page 60, Figure 4.3		• Consistent with national policy ○ Officer change
M94	Page 60, Policy EM4.3, second paragraph	Proposals for new office development, defined within the office Use Class E(g)(i), that result in no net loss of office floorspace in the Clarendon Road Primary Office Location will be supported. Proposals that would incur a net loss of office floorspace will be resisted unless they safeguard the commercial role and character of the Clarendon Road Primary Office Location, and: a) An up-to-date evidence base demonstrates that the site is no longer required for office use; or b) The property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for office use in the medium-term.	• Effective ○ Officer change

		Mixed-use development, including residential, will be supported where there is no net loss of office floorspace and a predominantly commercial frontage is maintained on to Clarendon Road that reinforces the commercial character of the area.	
M95	Page 60, Policy EM4.3, third paragraph	Mixed-use development, including residential and other uses that are consistent with the type of development and the objectives for the area, will be supported where there is no net loss of office floorspace and a predominantly active commercial frontage is maintained on to Clarendon Road.	• Effective ○ Officer change
M96	Page 60, Policy EM4.3: Office Development, fourth paragraph	Proposals for development of new office uses outside the Clarendon Road Primary Office Location must support the Office Development Hierarchy. ~~Where these are 250sqm (gross) or more, they must also be accompanied by an Impact Assessment. Assessments will need to~~ Proposals are also to demonstrate there will be no significant adverse impact on the office function of Clarendon Road, and that good accessibility by walking, cycling and public transport is provided or available.	• Justified ○ ID 1951 WSP ○ Officer change
CHAPTER 5: A VIBRANT TOWN			
M97	Page 64, Paragraph 5.2, new sentence after final sentence	Figure 5.1 indicatively shows where the Town Centre, District Centres and Local Centres are located in the borough. For more detailed information such as the spatial coverage of these designations, refer to the Policies Map where these are defined.	• Consistent with national policy ○ Officer change
M98	Chapter 5: A vibrant town, page 65. Delete text	~~blue box that sets out the Sequential Test~~.	• Consistent with national policy ○ Officer change
M99	Page 66, Paragraph 5.9, first sentence	There are a number of out-of-centre retail and leisure parks in Watford.	• Justified ○ ID 2030, 2029, 2031 Legal & General Investment Management
M100	Page 66, Policy VT5.1, first paragraph	Planning permission will be granted for the development of retail, leisure, entertainment, arts, culture, office and other main town centre uses (as defined in the NPPF) ~~town centre uses (retail, leisure, entertainment, office, arts and culture)~~ within the defined Town, District and Local Centre boundaries	• Consistent with national policy ○ Officer change

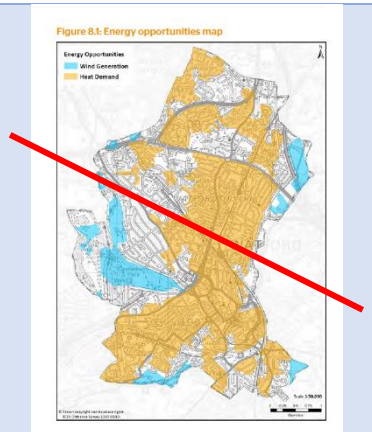
		providing the use is appropriate for the scale and function of each centre. Development within these boundaries should contribute towards the enhancement of the public realm.	
M101	Page 66, Policy VT5.1, third paragraph	To ensure the long-term vitality and viability of ~~the~~ Watford ~~T~~town centre the Council will apply sequential tests for main town centre uses, and require impact assessments for retail and leisure developments over 2,500sqm, in accordance with national planning policy ~~a 'Town Centre first' approach to proposals for retail, leisure, cultural facilities and other town centre uses~~.	• Consistent with national policy ○ Officer change
M102	Page 71, Policy VT5.3, at the end of the policy	The Town Centre, District Centre and Local Centres are defined on the Policies Map.	• Consistent with national policy ○ Officer change
M103	Page 71, Policy VT5.3: Local Centres, bullet f)	~~Are located more than 400m walking distance from the entrance of an existing or permitted primary school.~~	• Justified ○ ID 2019 McDonald's Restaurants Ltd ○ Officer change
CHAPTER 6: AN ATTRACTIVE TOWN			
M104	Page 74, Paragraph 6.4, new sentence after final sentence	Protected areas include all parks and open spaces (detailed map at Figure 9.1) and all conservation areas (detailed map at Figure 7.2). These maps are to provide context about Policy QD6.1, however, they are not intended to set out policy requirements. Areas identified are defined on the Policies Map and this should be referred to as part of the decision-making process.	• Consistent with national policy ○ Officer change
M105	Page 75, Strategic Policy QD6.1, after last paragraph	The Core Development Area, Established Areas and Protected Areas are defined on the Policies Map.	• Consistent with national policy ○ Officer change
M106	Page 76, paragraph 6.8	Local and town wide views are important to residents and those arriving in the town, and are an important aid to finding key locations. Key views are identified in the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document. ~~supporting planning documents.~~	• Effective ○ Officer change

M107	Page 77, Policy QD6.2, final paragraph, last sentence	New development will need to make a positive contribution towards important views in the borough, having regard to the Skyline: Watford's Approach to Taller Buildings Supplementary Planning Document or equivalent future guidance. This includes views from high vantage points, ground level and long distance views. New development should enhance the setting of local landmarks where appropriate. New developments that have an impact on the local skyline will need to be designed to an exceptional standard that will improve the distinctiveness of Watford in a positive way.	• Effective ○ Officer change
M108	Page 77, Policy QD6.2: Design Principles, new paragraph	Sustainable design New developments will need to be designed to minimise their impact on the environment and embrace sustainability principles. This should include measures to reduce the use of resources including energy, water and waste and incorporate soft measures to improve the environment such as green roofs, green walls and multifunctional green spaces.	• Consistent with national policy ○ ID 2133 Hertfordshire County Council
M109	Page 81 QD6.4 Building Design, bullet e)	e)All ground floor units facing the street or public realm should ~~to~~ be designed so that the primary access for each individual unit is directly onto that ~~the~~ street or public realm; deviation from this (by exception) will need to demonstrate that individual ground floor access is not feasible due to the constraints of the site.	• Consistent with national policy ○ ID 1941 Berkeley Homes
M110	Page 81 QD6.4 Building Design, bullet h)	h) internal cores are to serve no more than eight units per floor; deviation from this (by exception) will need to be justified and mitigated through design measures that demonstrate internal living standards will not be adversely affected.	• Consistent with national policy ○ Officer change
M111	Page 81, Policy QD6.4: Building Design, new bullets after Part h)	i) Buildings should be designed to promote the use of stairs through locating the stairwell in a prominent and easily accessible location within the entrance core of the building, providing a well-lit and spacious internal space which allows social interaction as well as being comfortable for residents to walk up and down and to pass one another; j) Secure cycle parking should be provided in easily accessible and convenient locations;	• Consistent with national policy ○ ID 1809 Sport England
M112	Page 83, paragraph 6.28	Where consideration of the suitability and sensitivity of a site suggests that a taller building, or built element, may be justified proposals will need to demonstrate how they will deliver ~~exceptional~~	• Consistent with national policy ○ Officer change

		outstanding design quality, high quality living environments and public benefits for the town and community.	
M113	Page 83, paragraph 6.29, second sentence	To ensure taller buildings are of ~~exceptional~~ outstanding design, applicants should make appropriate use of tools and processes for assessing and improving the design of their proposals, including making use of design review.	• Consistent with national policy ○ Officer change
M114	Page 84, paragraph 6.30	Buildings that would be taller than the base building height for their area will also be required to demonstrate their positive contribution in terms of public benefits to the town and the community. Proposals should be able to demonstrate that t~~T~~hese benefits ~~should~~ clearly exceed the benefits that could be achieved for a building that would be lower than the base height for the appropriate area. These benefits should include, but may not be limited to: a) Enhanced ~~P~~ provision of affordable housing and a good mix of dwelling sizes which reflects the identified housing needs; b) Enhanced p~~P~~rovision of infrastructure, including public transport, cycling and walking infrastructure and social infrastructure to support communities' health and wellbeing, including public open space and access to services and facilities; c) Building to high environmental standards, with comfortable internal living environments that provide good air ventilation, daylight and minimise overheating; d) Maximising opportunities to generate energy, using low carbon and renewable sources and taking advantage of the scale of development; e) Make a positive contribution towards place-making, including measures to reflect and reinforce positive elements of local character, and deliver a ~~signify a~~ recognisable and distinctive local landmark; and f) How the building will contribute towards Watford as a place, in terms of distinctiveness, design quality and how this relates to the urban form.	• Consistent with national policy ○ Officer change
M115	Page 85, Policy QD6.5, part a)	~~Exceptional~~ Outstanding design quality, including height, massing, proportion, materials, detailing, site layout and its relationship with the surrounding area, which set it apart in terms of quality and distinctiveness, and which positively contribute towards the context and character of the area;	• Consistent with national policy ○ Officer change

M116	Page 85, Policy QD6.5, part b)	Significant public benefits that the development will provide, as set out in paragraph 6.30, clearly setting out why these would not be achievable as part of a development restricted to the base building height;	• Effective ○ Officer change
M117	Page 85, Policy QD6.5, part f)	A desire to achieve a specific skyline shape or cluster having regard to Skyline: Watford's Approach to Tall Buildings Supplementary Planning Document or any subsequent replacement document;	• Effective ○ Officer change
CHAPTER 7: THE HISTORIC ENVIRONMENT			
M118	Page 87, paragraph 7.2, new sentence after first sentence	Watford has a diverse and rich range of heritage assets including listed buildings, historic parks and gardens, conservation areas and assets of archaeological significance which make an important contribution towards the character and distinctiveness of the town. ~~(~~Figure 7.2~~).~~ provides an overview of where heritage assets are located in the borough. This map is for context purposes and for more detailed information about specific areas and sites covered by policies refer to the Policies Map. Some key elements of the town's heritage include:	• Consistent with national policy ○ Officer change
M119	Paragraph 7.5, additional evidence base added to list	• Extensive Urban Survey Project Assessment Report (Hunns for HCC) 2000; • List of Freestanding Assets.	• Effective ○ Officer change
M120	Paragraph 7.16, added supporting text	Watford has many attractive and locally significant buildings and features which contribute to the distinctiveness of the town but which are not formally designated as heritage assets. The National Planning Policy Framework ~~NPPF~~ identifies these as non-designated assets. Non-designated assets include a range of buildings, monuments, sites, places, areas or landscapes which have heritage value and should be considered in determining planning applications. These can either be identified as part of the planning process, through neighbourhood plans, conservation area appraisals, ~~or~~ be on Watford's Local List or other documents identified in paragraph 7.5. Many of these are identified in the List of Buildings of Local Interest, which includes freestanding structures; and many places, areas and landscapes in the town are included in conservation areas and therefore, are considered as designated assets.	• Effective ○ ID 2042 Historic England

		Non-designated assets which are not yet identified and which come to light during the preparation of proposals for a site will be taken into account following guidance set out by Historic England so that proportionate weight can be given in the decision-making process. Other assets which are identified through processes such as neighbourhood plans or local history research will be reviewed and recognised as non-designated assets. Watford's local list identifies historic buildings and features which are valued by the local community. When planning permission is required for any proposal which directly or indirectly affects the significance of a non-designated asset then the Council will treat the significance of that asset as a material consideration when determining the application. As part of a planning proposals, applicants should provide an explanation regarding the social and historic context of the heritage asset and how the proposal has responded to this. This should follow guidance set out in the National Planning Policy Framework and guidance provided by Historic England. Proposals for development must have regard to Watford's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent.	
M121	Page 91, Policy HE7.2 Designated Heritage Assets, first paragraph	~~Proposals will be supported where they will not result in the loss of, or substantial harm to an asset unless this will provide substantial public benefits that outweigh the harm or loss caused; where any harm caused to the significance of an asset is deemed to be less than substantial the public benefit from the scheme should convincingly outweigh the harm caused.~~ When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the conservation of the asset. Any harm to, or loss of, significance will require clear and convincing justification in accordance with national policy.	• Justified • Consistent with national policy ○ ID 2042 Historic England ○ Officer change
M122	Policy HE7.3, final paragraph additional policy requirements provided	To preserve and enhance the character, appearance and setting of non-designated heritage assets ~~Locally Listed Buildings~~ all planning applications that affect non-designated assets ~~Locally Listed Buildings~~ will be determined in accordance with the following: a) Where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building; b) All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building;	• Justified • Effective ○ Officer change

		c) Monuments with heritage value will be protected and proposals should consider how they will respond to the retention and enhancement of the structure and its setting in situ or as appropriate. **d)** Identified sites with places and landscapes with heritage value will be protected and proposals will be required to demonstrate how they are positively contributing towards the heritage value to enhance local distinctiveness. Assets which come to light during the course of an application will need to be properly assessed and recommendations reflected in the details of the proposal.	
M123	Page 92, Paragraph 7.20, add to end of paragraph.	Arrangements should be made to store a copy of any reports and other materials which arise from archaeological investigations in relation to development proposals in a location agreed with Local Planning Authority which is publicly available.	• Effective ○ ID 2137 Hertfordshire County Council
CHAPTER 8: A CLIMATE EMERGENCY			
M124	Page 94, delete Figure 8.1		• Consistent with national policy ○ Officer change
M125	Page 94, paragraph 8.3	~~Major developments in the Core Development Area should consider how they can reduce carbon emissions through the use of large-scale renewable energy schemes, such as community energy networks. Areas with potential for community energy schemes are identified on the Watford Energy opportunities map (Figure 8.1).~~	• Consistent with national policy ○ Officer change

		Major developments, particularly those located within the Core Development Area, that could benefit from the scale and density of development anticipated to take place during the plan period, should maximise opportunities to do so. This may include low-carbon and renewable energy schemes that could be integrated into a development and consideration of how the design and management of a scheme could make effective use of materials and reduce waste.	
M126	Page 95, paragraph 8.6, fourth sentence	Therefore, major non-residential developments should aim ~~are~~ to meet the BREEAM 'excellent' standard, or equivalent.	• Consistent with national policy ○ Officer change
M127	Page 95, paragraph 8.7, first sentence	To be effective and reduce costs of retrofitting buildings, applicants should ~~are to~~ provide a pre-assessment certificate to the Local Planning Authority which will set out how sustainability measures can be achieved as part of the development early in the process. Submission of a certificate by an accredited assessor will be required upon completion.	• Consistent with national policy ○ Officer change
M128	Page 96, Policy CC8.2, Second paragraph, first sentence	Proposals should be designed to reduce their impact on the environment and create high quality internal and external space for people to use. Proposals will be supported where it is demonstrated that resources will be used efficiently as part of the construction and operation of a building. This includes appropriate use of technologies, building design and layout, while taking into consideration the effects of climate change. To achieve this, non-residential major developments should aim to achieve BREEAM excellent standard. ~~Applicants should provide a BREEAM pre-assessment completed by a suitably qualified assessor as part of an application.~~ The submission of a Compliance Certificate to the Local Planning Authority upon completion will be secured through planning conditions.	• Consistent with national policy ○ Officer change
M129	Page 94, paragraph 8.4	To be most effective, minimise costs and avoid time delays, applicants should consider sustainable principles from the start of the design process. ~~A Sustainability Statement should be used to set out how proposals will mitigate the impact of climate change and contribute towards sustainable development.~~	• Consistent with national policy ○ Officer change

M130	Page 95, Policy CC8.1, first paragraph	The Council will support proposals that help combat climate change and ensure the borough becomes more resilient, sustainable and adaptable to climate change. ~~Developments should provide a sustainability statement with their application.~~ New development will need to demonstrate how it is contributing positively towards:	• Consistent with national policy ○ Officer change
M131	Page 98, Policy CC8.3, Energy Efficiency	**Energy efficiency** To minimise the impact of new homes on the environment, ~~and achieve Net Zero Carbon, a phased approach to improve the energy efficiency of new homes is set out. To achieve this~~ residential developments should: a) Be designed so they can be adapted to be carbon neutral ~~Net Zero Carbon~~; b) Avoid overheating and use passive ventilation when possible; c) Achieve ~~the minimum applicable percentage, as set out below, of~~ a 19% improvement for carbon emissions over the target emission rate (TER) as set out ~~outlined~~ in National Building Regulations Part L (2013), or any updated government standards, whichever results in a higher target. Proposals that do not meet the~~se~~ energy efficiency target~~s~~ will only be supported if it is unfeasible ~~due to exceptional circumstances~~ and a financial contribution is made towards the Carbon Offset Fund to provide equivalent carbon savings off-site.	• Consistent with national policy • Justified ○ Officer change
M132	Page 98, Policy CC8.3, Water Efficiency, second paragraph	In new, non-residential developments, that are unable to achieve BREEAM 'excellent' standard, water conservation measures should be incorporated to reduce water consumption to a standard equivalent to BREEAM 'very good' for the appropriate building typology.	• Justified • Effective • Consistent with national policy ○ ID 2079 Environment Agency ○ ID 2024 Lidl Great Britain Limited
M133	Page 98, Policy CC8.3, Sustainability	~~Sustainability Statements~~ ~~A Sustainability Statement will be submitted to the Local Planning Authority to demonstrate compliance with this policy for new-build residential developments (other than householder~~	• Effective ○ Officer change

	Statements, delete section	~~applications). The Sustainability Statement will include details as to how energy, water and waste requirements will be complied with and monitored.~~	
M134	Page 100, Policy CC8.4	Development will be supported where it minimises emissions that would ~~does not~~ contribute towards a worsening of existing air quality and~~, where possible,~~ seeks to improve existing air quality. Appropriate mitigation measures will be required to address any potential impact on air quality. ~~An Air Quality Assessment will be required for~~ All major developments and other forms of development that are considered to be at risk of impacts resulting from significant emissions or pollutants will need to consider air quality. This includes, but is not limited to, development where the occupiers/users may be sensitive to poor air quality and development in close proximity to an Air Quality Management Area. ~~Assessments~~ Proposals will be required to consider the cumulative impacts in conjunction with other developments in the vicinity and include mitigation measures where necessary. Where ~~the Air Quality Assessment indicates that~~ a development would cause harm to air quality, planning permission will not be granted unless appropriate mitigation measures are proposed, which demonstrate that: a) Public exposure to the pollution source has been minimised; b) Sensitive development has been located an appropriate distance away from the source of exposure; and c) The development would not lead to the creation of a new street canyon or a building configuration that inhibits effective pollution dispersion.	• Consistent with national policy ○ Officer change
M135	Page 101, Policy CC8.5, first paragraph, second sentence	In accordance with the '~~A~~agent of ~~C~~change' ~~P~~principle~~'~~, new development must ensure it does not cause existing uses in the vicinity to curtail their activities. New development will be required to assess its potential impacts on neighbouring land uses, including the cumulative effects, and set out mitigation measures where appropriate.	• Consistent with national policy ○ ID 2074 Aggregate Industries Ltd ○ ID 2016 Mineral Products Association

			○ ID 2080 Environment Agency
M136	Page 101, Policy CC8.5, Noise pollution and vibration, first sentence	Where development is noise sensitive, noise-generating, or the surrounding area is sensitive to noise and vibration, applicants must undertake a noise assessment to identify potential issues and the required attenuation measures to achieve acceptable noise levels, as defined in national guidance.	• Justified ○ ID 2074 Aggregate Industries ○ ID 2016 Mineral Products Association ○ ID 2080 Environment Agency
M137	Page 101, Policy CC8.5, Contamination, including contamination of groundwater, after second paragraph	Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), infiltration via deep borehole soakaways will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated. Certain discharges into the ground may require an Environmental Permit.	• Justified • Consistent with national policy ○ ID 2074 Aggregate Industries Ltd ○ ID 2016 Mineral Products Association ○ ID 2080 Environment Agency
CHAPTER 9: CONSERVING AND ENHANCING THE ENVIRONMENT			
M138	Page 103, new paragraph after paragraph 9.2	The content of Figure 9.1 reflects the green infrastructure and open space network as defined on the Policies Map. The opportunity areas and strategic/local links demonstrate how important elements of the green infrastructure network are connected and help to show where improvements could be made. This information is set out to provide context and aid policy implementation and applicants are encouraged to consider how their proposals can contribute towards enhancing the green infrastructure network.	• Consistent with national policy ○ Officer change

M139	Page 104, Strategic Policy NE9.1, Part c) onwards	~~c)~~ Ensuring all ~~new~~ development minimises impacts on biodiversity and achieves a measurable biodiversity net gain, following the 'mitigation hierarchy' of avoidance, mitigation or compensation ~~locally where possible~~; ~~d) Following the 'mitigation hierarchy' of avoidance, mitigation or compensation as appropriate;~~ ~~e)~~ d) Maximising the role of watercourses for leisure, recreation and active travel purposes, as well as seeking to enhance their water quality and biodiversity value, as required under the Water Framework Directive; ~~f)~~ e) ~~Minimising~~ Reducing the risk of flooding, including surface water flood risk; ~~g)~~ f) Bettering access to open space across the borough where there is an identified need and delivering new green spaces as part of new development; ~~h)~~ g) Delivering non-traditional forms of urban greening as part of high density development, as well as traditional open space, including green roofs and walls; ~~i)~~ h) Improving the quality of Watford's existing open spaces through development contributions; ~~j)~~ i) ~~Where necessary,~~ Ensuring that protected species and their habitats are a material consideration when determining planning applications; ~~k)~~ j) Protecting trees and encouraging native planting on new development; and ~~l)~~ k) Considering the cumulative impacts of development on green and blue infrastructure. Where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.	• Justified • Effective • Consistent with national policy ○ ID 2081 Environment Agency
M140	Page 106, Policy NE9.2, second paragraph	~~A proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. Native planting should be prioritised.~~ Existing trees, woodlands and hedgerows should be retained wherever possible. If loss is demonstrated as being unavoidable, appropriate replacement or compensation will be required with native species being prioritised.	• Consistent with national policy ○ Officer change
M141	Page 106, Policy NE9.2,	Green infrastructure as defined on the Policies Map will be protected.	• Consistent with national policy

	after final paragraph		○ Officer change
M142	Page 108, Policy NE9.3, paragraph 1 onwards	Development proposals in close proximity to watercourses must support the strategic importance of Watford's blue infrastructure network and seek to maximise its multifunctional environmental, social and economic benefits. Where development is adjacent to a watercourse, proposals are expected to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives. Development proposals in close proximity to, or that include a watercourse must: a) Maintain an undeveloped and unobstructed buffer strip of eight metres from the top of the bank ~~of all watercourses~~ of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Buffer zones should be natural in character, distinct from the built environment, with no light pollution greater than 2 lux, and with native species. ~~Where this enables public access,~~ Proposals should be accompanied by a management plan; b) Conserve and enhance the biodiversity value of the watercourse and its corridor by including Water Framework Directive action measures within the proposal. Action measures could include but are not limited to ~~through the inclusion of~~ in-channel enhancements, the creation of priority wetland habitats, ~~prioritising native planting schemes and by~~ addressing misconnections and the eradication and management of Invasive Non-Native Species; c) Enhance the role of ~~the~~ watercourse corridors as an accessible active travel and leisure route for pedestrians, cyclists and boaters, and increase connectivity along the length of the watercourse. This includes connectivity and access, where appropriate, to the green infrastructure network; d) Integrate the watercourse into the scheme as a vital part of the public realm; and e) Open and re-naturalise modified watercourses, including culverted and piped waterways. New proposals for culverting will be refused and there is a presumption against the use of hard engineering, including gabions. A Water Framework Directive assessment should be submitted as part of proposals and should include an assessment of the works to preventing future improvement, in addition to how the proposal will impact Water Framework Directive status. The provision of crossings and bridges will be supported where they improve connectivity for pedestrians and cyclists, are in keeping with the setting of the area, and are designed to avoid obstructing flood flows and damage to a watercourse.	• Justified • Consistent with national policy ○ ID 2083 Environment Agency ○ ID 2151 Hertfordshire County Council

		Flood Zones 2 and 3 are defined on the Policies Map,	
M143	Page 109, paragraph 9.16	The River Colne basin is designated as Groundwater Source Protection Zone 1, most sensitive with an area buffering the waterway covering much of east Watford identified as Groundwater Source Protection Zone 2 and sensitive to contamination. This means several land uses including industrial, petrol stations and waste management may not be suitable in certain areas of Watford due to the high risk of contamination to the aquifer and drinking water. Developers are expected to implement measures to '~~minimise~~ avoid these potential negative impacts on the ground source'. Where these are required these should be prepared in collaboration with the Environment Agency and the Lead Local Flood Authority.	• Effective • Consistent with national policy ○ ID 2085 Environment Agency
M144	Page 110, Policy NE9.4, Fluvial Flooding, second paragraph onwards	Proposals located within flood zones, need to meet the requirements of the Sequential and Exception Tests. Only water compatible and essential infrastructure are will be permitted within Flood Zone 3b (functional floodplain). Essential infrastructure must also first pass the Exception Test to be located within Flood Zone 3b. Developers should seek to increase the extent of Flood Zone 3b where possible and appropriate. To demonstrate compliance with the Exception Test, a flood resilient design and emergency planning considerations will need to be accounted for, over the lifetime of the development including: a) The development to remain safe and operational under flood events; b) Safe evacuation and/or safely remaining in the building under flood conditions; c) Key services must continue to be provided under flood conditions; and d) Buildings are to be designed for quick recovery following a flood. Any development within Flood Zones 2 and 3, and those over one hectare in Flood Zone 1, should use a Flood Risk Assessment to show how they have considered flood risk beyond the site boundaries, including cumulative impacts arising from other developments. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the Strategic Flood Risk Assessment) and that where possible, development will reduce flood risk overall. Proposals for development in the floodplain must ~~should~~ demonstrate that suitable flood compensation storage will be provided ~~is available~~ to avoid any net loss in floodplain. Additionally, all new development within flood zones require an assessment of the impact of climate change on flood risk on site and elsewhere.	• Effective • Consistent with national policy ○ ID 1913 Three Rivers ○ ID 2084 Environment Agency ○ ID 1781 Ms. Sarah Baxter

		Developers should seek to provide an undeveloped buffer zone of eight metres between the top of the bank of any Main River and any new development (including formal landscaping, sports fields, footpaths, lighting and fencing). Proposals located in areas where waterways have been culverted or altered should seek to re-naturalise the river and surroundings, improve water storage and enhance riparian habitats, in line with requirements to meet Water Framework Directive objectives and the Thames River Basin Management Plan. There is a presumption against the use of hard engineering, including gabions. For any development within eight metres of a culvert, the developer must demonstrate that they have sought to de-culvert, as well as undertake a survey of the culvert to assess its exact location, condition and whether it is commensurate with the lifetime of the development or demonstrate how it will be repaired/upgraded. Flood defences and Main Rivers ~~within the site boundary~~ adjacent to development sites must be maintained, repaired or replaced by the developer for the lifetime of the development. For any development within eight metres of a main river, the developer must demonstrate that access to the river and banks will still be possible for maintenance and emergency works.	
M145	Page 110, Policy NE9.4, Groundwater, fifth paragraph	Where a proposal is located within a Groundwater Source Protection Zone, applicants will be required to demonstrate there will be no significant impacts or risks to controlled waters. If a potential impact is identified, appropriate mitigation measures need to be incorporated as part of the scheme. Within Source Protection Zone 1 (SPZ1), ~~deep~~ infiltration via deep borehole soakaways ~~should be the last resort~~ will not be acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated. Certain discharges into the ground may require an Environmental Permit.	• Consistent with national policy ○ ID 2085 Environment Agency
M146	Page 112, Policy NE9.5, second paragraph, delete last sentence	Sustainable Drainage Systems should make effective use of land by being multifunctional, to maximise ecological benefits such as biodiversity, provide open space or incorporate tree planting and landscaping. Developments will need to ensure the implementation of Sustainable Drainage Systems does not worsen contamination effects, and soakaways should not be located within land affected by land contamination. ~~Details of the Sustainable Drainage System should be submitted to the Council as part of the Sustainability Statement.~~	• Consistent with national policy ○ Officer change
M147	Page 112, Policy NE9.5, fourth paragraph	Sustainable Drainage Systems should be designed and integrated into the proposal to effectively manage the existing surface water flow paths on the site, protect and enhance water quality, and help to mitigate other flood risks.	• Consistent with national policy

			○ ID 2086 Environment Agency
M148	Page 113, Policy NE9.6, first, second and third paragraphs, replace final paragraph	Open space and ancillary facilities used for leisure and recreation will be protected, unless an up to date assessment of needs demonstrates the space is surplus to need. For an open space or an ancillary facility to be considered surplus to requirements, the following must be demonstrated: a) An assessment of needs has been undertaken that has clearly shown the open space, buildings or land to be surplus to requirements, having regard to the Council's most recent evidence base; and b) The open space is not needed for alternative open space uses; or c) An equivalent or better facility in terms of quality and quantity is to be provided in a more suitable location that meets the needs of the local community. Development proposals for alternative open space uses will be supported where an up-to-date assessment of needs clearly shows the benefits outweigh ~~the loss~~ any adverse impacts on the community and the environment. ~~The absence of identification of an open space on the Policies Map does not imply that development is appropriate.~~ Open space and ancillary facilities used for leisure and recreation, as defined on the Polices Map, will be protected.	• Consistent with national policy ○ ID 1810 Sport England ○ ID 2087 Environment Agency
M149	Page 113, paragraph 9.28	As new development comes forward, there may ~~will~~ be opportunities to provide ~~create~~ new publicly accessible ~~communal~~ open space on site. ~~While some level of private amenity space will be expected (Policy HO3.11 Private and Communal Outdoor Amenity Space'), larger developments can also help to provide communal sports and recreational facilities such as~~, The different types of publically accessible open space have been defined in the Watford Green Spaces Strategy and include the following: • Parks, public gardens and recreational grounds; • Amenity green spaces; • Equipped play space; • Natural and semi-natural green spaces; • Outdoor sports facilities; • Churchyards and cemeteries; and	• Effective ○ Office change

		• Allotments. ~~The different types of open space have been defined in the Green Spaces Strategy.~~ The Green Space Strategy sets out where these different facilities are located in the borough and appropriate catchment distances for each type of open space. Where a development does not lie within the catchment distance of a type of open space, it will be imperative that this is provided on site to reverse the deficiency.	
M150	Page 114, Policy NE9.7, first paragraph	New major residential developments proposals will be supported where they contribute to the provision, enhancement and maintenance of open space, either by means of on-site provision or though developer ~~contributions~~ obligations.	• Consistent with national policy ○ ID 1811 Sport England
M151	Page 115, Policy NE9.8	~~Development proposals should apply the mitigation hierarchy to avoid or mitigate harmful effects on biodiversity. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.~~ New development should seek to achieve an overall net gain in biodiversity. This must be measured through the use of the latest ~~Natural England biodiversity~~ Defra Biodiversity metric. The biodiversity metric should demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site. Development should apply the mitigation hierarchy to ~~avoid~~ minimise or mitigate harmful effects on biodiversity. Mitigation and compensation measures must offset any losses to achieve a measurable net gain for biodiversity. Where it is not possible to avoid or mitigate all impacts on site, an offsite Biodiversity Offset Agreement should be submitted to demonstrate that any off-site measures proposed seek to enhance locally and nationally important priorities. To ensure the long-term net gain, all development proposals should prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on-and off-site measures. All development proposals will be required to prepare a proportionate ecological survey and assessment report. Where ~~there is a reasonable likelihood of the presence of~~ a protected species or ~~its~~ habitat is found to be present, ~~applications must be supported by an ecological survey. If present,~~ the proposal must mitigate or compensate appropriately in accordance with the legislation that protects	• Consistent with national policy ○ ID 2088 Environment Agency

		them. Protected sites of international, national and local importance will be protected from inappropriate development based on the importance of the designation.	
CHAPTER 10: INFRASTRUCTURE			
M152	Page 118, Policy 10.1	Proposals should demonstrate a comprehensive, integrated and future-proofed approach to the delivery of development and infrastructure that mitigates the cumulative impact of development, and: a) Contributes appropriately and proportionately towards required infrastructure, having regard to the latest ~~identified in~~ Watford~~'s~~ Infrastructure Delivery Plan, at a rate and scale sufficient to support the growth identified in this Local Plan; b) Where applicable, connects to area-wide infrastructure and enables future connections; c) Safeguards land to deliver area-wide or site-specific infrastructure, as identified in the ~~Watford's Infrastructure Delivery Plan, Site Allocations~~ site allocations and / or other policies in the Local Plan; ~~d) Where development is dependent upon, or creates a specific need for, new or improved infrastructure; this will be delivered on site;~~ e) Is appropriately designed so that it complements and does not unduly restrict development on adjacent or connected sites. Developers will be expected to ~~engage~~ participate in early pre-application engagement with the Council and infrastructure service providers to discuss their requirements. Developer contributions will be sought where needs arise, in line with the policy requirements of this plan; where provision is made on site, this will be considered in the context of other developer contributions.	• Effective • Consistent with national policy ○ ID 2089 Environment Agency ○ Officer change
M153	Page 120, Paragraph 10.17, first sentence	Future-proofed, high quality digital infrastructure, such as fibre optic cables for high speed internet is considered vital to support well-functioning residential and employment areas.	• Consistent with national policy ○ ID 2175 Hertfordshire County Council ○ Officer change
M154	Page 120, Policy IN10.2	~~Planning permission, except for householders, will be granted where it is demonstrated~~ All non-householder development will be expected to demonstrate that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the proposed	• Consistent with national policy • Effective

		development. Where necessary, planning conditions will be used to ensure that development is not occupied ahead of the delivery of any necessary infrastructure upgrades. Infrastructure provision should be made in accordance with relevant requirements set out in this Local Plan; have regard to the latest Watford ~~will reflect the~~ Infrastructure Delivery Plan ~~and its successor documents to~~; meet the needs arising from development, and mitigate adverse social, economic or environmental impacts arising from development. Developers must demonstrate they have explored existing infrastructure capacity with appropriate providers, and how this could be future-proofed, ~~with appropriate providers~~ and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the borough, opportunities should be taken to maximise infrastructure provision on suitable sites. Proposals for residential and employment uses should demonstrate that provision is made for ~~high quality digital facilities~~ high speed internet infrastructure as part of the application.	○ ID 1964 Thames Water ○ Officer change
M155	Page 122, Policy IN10.3	There will be a need to balance the priorities for infrastructure delivery with those for affordable housing, other non-infrastructure related planning obligations and sustainability standards. The Council will secure the infrastructure necessary to support the growth outlined in this plan, ensure sustainable development, meet the needs of development and, where necessary, mitigate the impacts of development by: a) Securing appropriate on-site enabling and development works; b) Charging the Community Infrastructure Levy on developments as required by any charging schedules in operation for the area within which the development is located; c) Securing ~~Section 106 Agreements~~ planning obligations to provide affordable housing and ~~make provision to~~ mitigate the impacts of the development, in accordance with national policy and ~~where necessary, or appropriate~~ have~~ing~~ regard to any relevant Supplementary P~~p~~lanning Documents or other local guidance; d) Securing off-site highway works, including provision for cycling and walking, where necessary; e) Working with relevant service providers to identify and secure infrastructure funding or financing mechanisms.	• Positively prepared • Justified ○ ID 2178 Hertfordshire County Council ○ Officer change
CHAPTER 11: A SUSTAINABLE TRAVEL TOWN			
M156	Page 125, paragraph	~~2036~~ 2038	• Consistent with national policy

	11.7, third sentence		○ ID Representors as listed previously in the second row ○ Officer change
M157	Page 124, Paragraph11.15, last sentence	Improvements to the road network ~~through an extension of Imperial Way,~~ to provide ~~a connection with the new proposed mobility hub and~~ access from Colonial Way via Clive Way with upgrades to the necessary road junction and road extension to provide a connection with the proposed Watford Junction Sustainable Transport Hub. The potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot ~~via Imperial Way~~, should also be facilitated.	• Effective ○ ID 1974, 1976 Canada Life Asset Management
M158	Page 126, Policy ST11.1, Part g)	g) Supporting a ~~Sustainable Transport Hub~~ mobility hub within the town centre that serves as a focal point for multiple modes and links to the High Street Station.	• Positively prepared • Effective ○ 2191 Hertfordshire County Council
M159	Page 126, Policy ST11.1, new bullet after Part g)	h) Enhancing pedestrian and cycle facilities at key junctions with the ring road	• Positively prepared • Justified • Effective ○ ID 2191 Hertfordshire County Council
M160	Page 127, Paragraph 11.14	Watford Junction is the busiest railway station in Hertfordshire. The adjacent bus station, along with taxi rank provision, cycle and walking links and car parking mean that it serves as a multi-modal transport hub for both the town and the wider region. Growth around the station is unlikely to be possible without alterations to the built environment to unlock sites and improve accessibility to sustainable travel. The ability to deliver key transport infrastructure must therefore be preserved. This should include the provision of two new pedestrian / cycle bridges to overcome severance caused by the rail lines as part of the comprehensive redevelopment of the area. One of these bridges ~~which~~ should cross both the West Coast Main Line and Abbey Line, preferably as part of, or within the vicinity of, Watford Junction Station, and the second ~~being~~ should be between Penn Road and	• Effective ○ Officer change

		Colonial Way. Links to these should accommodate both pedestrians and cyclists, ~~and~~ be accessible to non-station users 24 hours a day, ~~to~~ maximise the permeability of the area, provide a connection to the Eastern Mobility Hub and not compromise any future re-routing of vehicle access to the concrete batching plant and rail aggregates depot.	
M161	Page 128, Policy ST11.2	Policy ST11.2: Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Sustainable Transport Hub. To prevent development that would compromise future mass transit, bus prioritisation, walking, and cycling infrastructure, set out in either the South West Hertfordshire Growth and Transport Plan, the Local Cycling and Walking Infrastructure Plan or Watford's Sustainable Transport Strategy, developers will need to have regard to the following Safeguarded Transport Routes ~~the following routes will be protected from development whose~~ to ensure designs would not compromise their ability to prioritise public transport and active travel routes: a) The disused former Croxley Rail Line, including access points and routes on the existing road network, as set out in the ~~Watford MRT Safeguarding Technical Report~~ Croxley Line – Safeguarding for Mass Rapid Transit Technical Report; b) The current Ebury Way cycle path and access to it; and c) The Abbey Line. Additionally, proposals should have regard to: d) Existing ~~Current~~ and planned cycle routes identified in the Local Cycling and Walking Infrastructure Plan; and e) Any future p~~P~~lanned mass rapid transit routes identified by Hertfordshire County Council. ~~All routes are~~ The Safeguarded Transport Routes are identified on the Policies Map and represented in Figure 11.3. The role of Watford Junction as a multi-modal Sustainable Transport Hub ~~hub~~ should be preserved, meaning that development must not hinder the provision of the following on-site and cross-boundary infrastructure; f) New pedestrian / cycle bridges over the West Coast Main Line and Abbey Line and connecting Penn Road with Colonial Way, plus access to these from the existing and new road networks;	• Justified • Effective • Consistent with national policy ○ ID 1974, 1976 Canada Life Asset Management ○ ID 2017 Mineral Products Association ○ ID 2075 Aggregates Industries UK Ltd ○ Officer change

		g) Bus and rail access that also provides for the use of cycles, electric vehicles, drop-off movements, taxis, coaches and any future mass rapid transit access; h) ~~Extension of Imperial Way to~~ Pedestrian and cycling access from Colonial Way (or Imperial Way as part of a comprehensive redevelopment of the area) that will provide a connection to the Eastern Mobility Hub and access to the station and ~~the~~ not compromise potential re-routing of vehicle access to the concrete batching plant and rail aggregates depot. ~~via Imperial Way~~; i) Upgrading of the bus station and bus priority improvements to roads in the vicinity of the station.	
M162	Page 129, paragraph 11.16, amend 2nd sentence	These areas are shown in Figure 11.3 and are representative of the Transport Improvement Areas as defined on the Policies Map.	• Consistent with national policy ○ Officer change
M163	Page 130, paragraph 11.21, after last sentence, add new sentence	Land should also be safeguarded to provide access to the disused former Croxley Rail Line safeguarded transport corridor (and a potential station area).	• Positively prepared • Justified • Effective ○ ID 2189 Hertfordshire County Council
M164	Page 129, Figure 11.3 Revisions to the Safeguarded Transport Route around Thomas Sawyer Way, Dalton Way and Lower High		• Consistent with national policy • Justified ○ Officer change

M165	Page 132, Policy ST11.3, Watford Riverwell, first sentence	Permeability for active travel should be substantially improved, linking to bus stops, Watford General Hospital, Vicarage Road, Stripling Way, Thomas Sawyer Way and Ebury Way, along with the safeguarded disused former Croxley Rail Line.	• Positively prepared • Justified • Effective ○ ID 2189, 2192 Hertfordshire County Council
M166	Page 132, Policy ST11.3, after 2nd paragraph	Transport Improvements Areas and Safeguarded Transport Routes are defined on the Policies Map.	• Consistent with national policy ○ Officer change
M167	Page 133, paragraph11.33	Cycle parking standards are set out in Appendix D and parking should be laid out ~~in accordance to~~ with regard to the Watford Cycle Parking Supplementary Planning Document.	• Effective • Consistent with national policy ○ Officer change
M168	Page 135, Policy ST11.4, Cycle parking, second sentence	Secure and convenient cycle parking facilities should be designed at the outset of the scheme.	• Justified ○ ID 2196 Hertfordshire County Council
CHAPTER 12: A HEALTHY COMMUNITY			
M169	Page 146, Policy HC12.1, third paragraph, fifth sentence	~~Major developments are expected to promote active design by adhering to the 10 Principles of Active Design set out by Sport England.~~ Non-householder developments should promote active design having regard to relevant guidance, including that from Sport England.	• Justified ○ ID 1815 Sport England ○ Officer change
M170	Page 147, Paragraphs 12.4, 12.5, 12.6	~~12.4 A Health Impact Assessment seeks to inform and influence decision making, ensuring that health impacts, and the distribution of those impacts, are considered as part of the planning policy process. They provide a mechanism to understand more broadly how a wider range of economic, environmental and social factors can combine to affect a development.~~ ~~12.5 The Position Statement: Health Impact Assessments (Hertfordshire County Council, 2019) sets out guidance for how a Health Impact Assessment should be undertaken. It seeks to facilitate higher~~	• Effective ○ ID 2204 Hertfordshire County Council

		~~quality development of schemes of 100 or more residential units. This can be applied flexibly depending on the nature of a development proposal. Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are:~~ ~~• Rapid Assessment for simpler proposals;~~ ~~• In-depth Health Impact Assessment for more complicated or larger proposals.~~ ~~12.6 Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth Health Impact Assessments will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment, as a minimum, to support their planning application.~~ The Watford Local Plan seeks to ensure that positive opportunities from development are optimised and that any unintended consequences do not have a disproportionate impact upon the population, especially those more at risk from health inequalities. A Health Impact Assessment (HIA) is an essential assessment for any development proposal to demonstrate that it will not have negative implications for the physical health and mental wellbeing of both existing communities in the vicinity, as well as the future residents of the new development. Health Impact Assessments are a tool through which development can: • Understand the local community health needs and demonstrate how it can support these; • Demonstrate how it has considered health inequalities; • Meet the requirements of the Environmental Impact Assessment (EIA) Regulations for human health; • Meets the policy requirements of the Watford Local Plan that major development proposals undertake a Health Impact Assessment; • Demonstrate the opportunities of a proposal and how a development has been positively planned. Hertfordshire County Council has adopted a Health Impact Assessment Position Statement which sets out when a Health Impact Assessment should be undertaken and frameworks to use for each stage of	

		the Health Impact Assessment process. The Health Impact Assessment Position Statement sets out a threshold for different types of development, including a threshold for the development of 100 residential units or more to be subject to a Health Impact Assessment. ~~This can be applied flexibly depending on the nature of a development proposal.~~ Following a staged methodology from when a scheme is designed, through to construction and occupation, a clear brief is produced from the screening and scoping stages to determine the type of Health Impact Assessment that may be required. The two types of Health Impact Assessment are: • Rapid Assessment for simpler proposals; • In-depth (comprehensive) assessment for more complicated or larger proposals Large development proposals can benefit from undertaking an objective Health Impact Assessment, which is used to inform the design of a scheme to improve its design and increase the likelihood of gaining planning approval, as they summarise many of the issues set out in policies in the Local Plan. In-depth, or comprehensive Health Impact Assessments will be supported on large-scale development proposals, however, all major proposals are encouraged to consider undertaking a Rapid Health Impact Assessment to support their planning application.	
M171	Page 148, Policy HC12.3	Proposals for new, extended or improved cultural and community uses that address a demonstrated demand from the local community will be supported. Such uses should be located within sustainable, accessible locations close to the identified need and as a complementary use within, or close to, an identified Local Centre. Facilities ~~that are proposed in isolated locations or~~ that conflict with existing uses nearby will not be permitted. The loss of existing community and cultural venues will only be permitted where it can be demonstrated that: a) The facility is no longer needed and there is no need for an alternative community or cultural use on that site; or b) The community or cultural uses can be reprovided of a higher quality in an alternative location or manner that is equally accessible to the community. c) In accordance with Appendix F, the property has been vacant for at least 12 months and there is clear marketing evidence to show it cannot be reused or redeveloped for community uses.	• Effective ○ Officer change

		Development within the curtilage of existing community facilities should demonstrate that the continued operation of these facilities is not compromised.	
CHAPTER 13: SITE ALLOCATIONS AND NEW DEVELOPMENT			
M172	Page 150, paragraph 13.2, second sentence	The administrative area of Watford has a capacity for providing ~~14,988~~ 13,328 units over the plan period, with current estimates indicating a ~~793~~ 784 units per annum requirement.	• Consistent with national policy ○ Officer change
M173	Page 150, Paragraph 13.3, first sentence	These sites are ~~identified~~ defined on the Policies Map and set out in Figure 13.1. The policy is applicable to those sites identified in ~~Tables 13.1, 13.2, 13.3 and 13.4~~ Tables 13.1 (housing), 13.2 (Gypsies and Travellers), 13.3 (mixed-use), 13.4 (employment) and 13.5 (education) which include the following information:	• Effective ○ Officer change
M174	Page 151, Paragraph 13.4	The process for calculating the indicative yields of the site has been set out in the ~~HELAA~~ Housing and Economic Land Availability Assessment, as has the wider process for site selection. It is important to emphasise that the indicative yields set out are purely baseline scenarios used to estimate the number of units to be provided within the plan period, based on site size and the sustainability of the surrounding area. Ultimately, the scale of development should be guided by design quality, character and any heritage sensitivities which may affect the site, having regard to the full suite of policies in the Plan including Policies HO3.2: Housing Mix, Density and Optimising Use of Land and QD6.5: Building Height.	• Positively prepared • Justified • Effective ○ ID 1995 Telereal Trillium ○ ID 2000 Cortland Partners ○ ID 2001 Daejan(Watford) Limited ○ ID 2005 Asda ○ ID 2035 IDA Plymouth Holdings ○ ID 2040 IDA London Holdings Ltd. ○ ID 2041 Historic England

			○ ID 2068 Glyn Hopkin Holdings Ltd.
M175	Page 151, new paragraphs after paragraph 13.4	For each site allocation, the types of uses that are considered appropriate have been set out. Proposals for uses classified as sui generis will be supported where these are consistent with the uses set out in Tables 13.1 – 13.5, support the wider objectives for the area, particularly on sites that are located within a Strategic Development Area, and will make a positive contribution towards achieving these. Where proposals include an ancillary use that is not within a use-class set out in a site allocation, applicants should demonstrate how this is consistent with the allocation and the positive contribution it will make to the area. Where there is a potential negative impact, applicants should demonstrate how this will be appropriately mitigated. In addition to meeting the requirements set out in a site allocation, proposals will need to be prepared in accordance with policies in the Local Plan. For sites located within a Strategic Development Area, they will need to comply with policies set out in Chapter 2 'Core Development Area'.	• Effective ○ ID 1928 Coal Pensions Properties Limited
M176	Page 151, paragraph 13.5, new sentence after the first sentence	The development requirements and considerations detailed in Tables 13.1, 13.2, 13.3, ~~and~~ 13.4 and 13.5 are not exhaustive. Accompanying the development considerations for each site allocation is an outline map of the site. This information reflects that special extent of the allocation as defined on the Policies Map.	• Consistent with national policy ○ Officer change
M177	Page 151, Strategic Policy SA13.1, first paragraph	The sites listed in Tables ~~13.1, 13.2, 13.3 and 13.4~~ 13.1 'Allocated sites for housing development', 13.2 'Allocated site for Gypsies and Travellers', 13.3 'Allocated site for mixed-use development', 13.3 'Allocated sites for employment development' and 13.4 'Sites allocated for education development' are defined ~~as shown~~ on the Policies Map~~, are allocated for residential (Use Class C3), mixed-use development (Sui Generous), employment uses (Use Classes B and E), education use (Use Class F1(a)) and any other uses specified~~. Appropriate types of development or land uses are identified for each site allocation. Where mixed-use development is proposed, this may refer to specific identified uses and also consist of one or	• Positively prepared • Justified • Effective ○ ID 1928 Coal Pensions Properties Limited

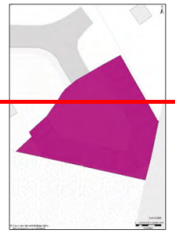
		more of the uses set out in Table 13.3. Other ancillary uses and sui generis will be acceptable where they compatible and positively contribute towards the objectives of the area, particularly where a site is located within a designated Strategic Development Area. Planning Permission will be granted for proposals that: a) Accord with the policies in the Local Plan; b) Have regard to ~~Accord with~~ any Supplementary Planning Document, master plan or development brief that affects the site; c) Deliver the uses identified and a~~A~~ddress the key development considerations for each site; and d) Provide appropriate mitigation measures for issues identified where the development considerations set out the need for an assessment.	
M178	Site allocations for residential use where these are the only proposed uses.	*Residential allocations have been clarified to state these are classified as C3 use. These proposed amendments will be included in the Schedule of Minor Modifications.*	• Effective ○ Officer change
M179	Page 152, Table 13.1: Housing sites HS01 Land and garages at Lych Gate, add new requirement after second bullet	b) Have regard to the Waterdale Recycling Centre and Waste Transfer, which is located approximately 850m from this site. Its operations should be taken into account;	• Effective ○ ID 2207 Hertfordshire County Council
M180	Page 154, Table 13.1: Housing sites HS06 Land at Russell Lane,	~~Incorporate compensatory measures for the loss of Green Belt into the scheme, in line with national policy; and~~	• Justified • Effective ○ ID 2095 North Western Avenue Watford Limited

	amend third bullet	c) A proportionate contribution for compensatory improvements to the environmental quality and accessibility of remaining parts Watford's Green Belt which include areas of existing open space and green infrastructure via a Section 106 agreement;	
M181	Page 157, Table 13.1: Housing Sites HS12 Land and garages between 139 and 149 Queens Road	Timescale ~~1-5~~ 6-15 years	• Effective ○ Officer change
M182	Page 158, Table 13.1, Site HS14, first bullet	~~Avoid any significant adverse impacts on the locally listed building, Exchange House, located opposite the site;~~ a) Future development proposals for HS14 will take account of the findings and recommendations of the Council's Heritage Impact Assessment ; b) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Consistent with national policy ○ ID 2041 Historic England
M183	Page 159, Table 13.1, Site HS15, new bullet after last bullet	d) Future development proposals for HS15 will take account of the findings and recommendations of the Council's Heritage Impact Assessment;	• Consistent with national policy ○ ID 2041 Historic England
M184	Page 161, Table 13.1, Site HS18, replace second and sixth bullets	~~Avoid any significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site, including the Grade II Listed Former Watford County Court House adjacent to the site. A Heritage Impact Assessment may be required;~~ b) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;	• Consistent with national policy ○ ID 2041 Historic England

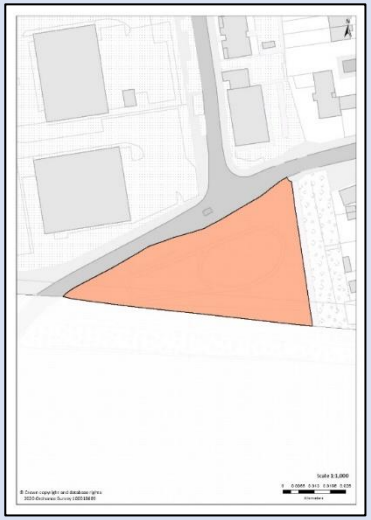
		c) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	
M185	Page 161, Table 13.1, HS20 Land at Derby Road, after second bullet add new bullets	d) Future development at HS20 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Consistent with national policy ○ ID 2041 Historic England
M186	Page 162, Table 13.1, HS21 Land at Waterfields Retail Park, replace fifth bullet	~~Avoid any significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site. A Heritage Impact Assessment may be required;~~ f) Future development at HS21 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; g) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; h) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Consistent with national policy ○ ID 2041 Historic England
M187	Page 162, Table 13.1, HS22 Land and buildings at 252-272 Lower High Street,	~~Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;~~ b) Future development at HS22 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;	• Consistent with national policy ○ ID 2041 Historic England

	replace second bullet	c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	
M188	Page 163, HS23 Land and buildings at 247 Lower High Street, replace third bullet	~~Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;~~ b) Future development at HS23 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Consistent with national policy ○ ID 2041 Historic England
M189	Page 163, Table 13.1: Housing sites HS24 Land and garages between 41 and 61 Brightwell Road	Indicative yield = ~~4~~ 5 units	• Consistent with national policy ○ ID 1917 Three Rivers District Council

M190	Page 165, Table 13.1, HS28 Wiggenhall Depot, replace third bullet	~~Retain the significant locally listed buildings on site where possible. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building;~~ c) Future development at HS28 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; d) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate design; e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for the site to be submitted prior to the determination of any application; f) New development proposals for the site should retain the locally listed buildings on the site. If this cannot be achieved the loss of these assets must be strongly justified and the replacement scheme must be of extremely high quality.	• Consistent with national policy ○ ID 2041 Historic England
M191	Page 167, Table 13.1 Housing sites HS31 Land at Bushey Station	Timescale: ~~1-5~~ 6-15 years	• Effective ○ Officer change
M192	Page 167, Table 13.1 Housing sites HS31 Land at Bushey Station, replace fourth bullet	~~Avoid any adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;~~ d) Future development at HS31 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; e) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact	• Consistent with national policy ○ ID 2041 Historic England

		Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; f) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessments for the site to be submitted prior to the determination of any application;	
M193	Page 168, Table 13.1: Site HS33, delete	Site: **HS33 Land and garages at Kingsfield Court** Size (ha): **0.06** | Location: **Outside of CDA** | Timescale: **6-15 years** | **Indicative yield = 4 units**  **Development requirements and considerations** The site is considered suitable for residential development. Development proposals should: • ~~Take account of the potential risk of contamination on site;~~ • Demonstrate that safe access has been provided to the site; • Incorporate the trees to the south of the site into the design of the scheme. A Tree Survey may be required; • Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site; • Be accompanied by a Preliminary Roost Assessment; and • Be accompanied by a parking survey.	• Consistent with national policy ○ Officer change
M194	Page 169, New Table 13.2- Addition of Gypsy and Traveller Site Tolpits Lane	Table 13.2: Gypsy and Traveller Site	• Consistent with national policy ○ ID 1838 Hertsmere Borough Council

Site: **GT01 Land at Tolpits Lane, south of Epsom Road**			
Size (ha): 0.31	**Location: Outside of CDA**	**Timescale: 1-5 years**	**Indicative Yield = 2 Gypsy and Traveller Pitches**



Development requirements and considerations

The site is considered suitable for the provision of Gypsy and Traveller pitches.

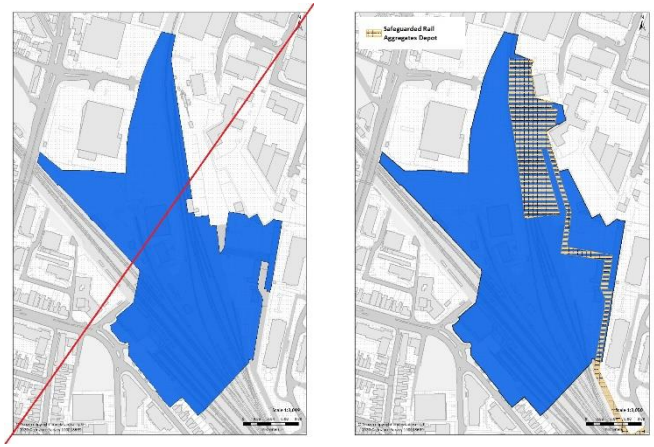
Development proposals should:

Have regard to criteria a-f of Policy H03.8: Gypsies and Travellers.
Ensure that the plots are protected for Gypsy and Traveller use exclusively unless it can be demonstrated that they are no longer required in accordance with Policy H03.8.
Retain and enhance the walking and cycle route immediately adjacent to the eastern boundary of the site.
Provide quality landscaping along the frontage with Tolpits Lane and the path along the eastern boundary of the site
Be accompanied by a Preliminary Ecological Assessment
Incorporate compensatory measures for the loss of Green Belt into the scheme.

M195	Page 169, Table 13.2, Site MU01, amend first sentence	This site is considered suitable for mixed-use development including one or more of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community use~~s~~. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.	• Effective ○ Officer change
M196	Page 169, Table 13.2, Site MU02, amend first sentence	This site is considered suitable for mixed-use development including one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential, ~~and~~ E(e) medical facilities and F2(b) meeting places for community use. Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.	• Positively prepared • Effective Officer change
M197	Page 170, Table 13.2, Site MU03, amend first sentence	This site is considered suitable for mixed-use development including one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community use~~s~~. Redevelopment of the site should be in line with Policy 'HC12.3 Built Cultural and Community Facilities'.	• Positively prepared • Effective ○ Officer change

M198	Page 170, Table 13.2, Site MU04, amend first sentence	This site is considered suitable for mixed-use development including one or more, or a mix thereof, of the uses defined within the following Use Classes: C3 residential and F2(b) meeting places for community uses. Redevelopment of the site should be in line with Policy HC12.3 'Built Cultural and Community Facilities'.	• Positively prepared • Effective ○ Officer change
M199	Page 171, Table 13.2: Mixed-use sites MU05 Land and buildings at 94-98 St Albans Road Safeguarded Rail Aggregates Depot layer added		• Effective ○ ID 2015 Mineral Products Association ○ ID 2018 Mineral Products Association ○ ID 2071 Aggregate Industries UK Ltd ○ ID 2104 Hertfordshire County Council ○ ID 2217 Aggregate Industries UK Ltd
M200	Page 171, Table 13.2: Mixed-use sites MU05 Land and buildings at 94-98 St Albans Road, revised requirements	Indicative yield = 1,214 units C3 residential, 295sqm of E(g)(i) office floorspace, ~~4,960~~ 2,050sqm of E(a), E(c) commercial floorspace and 2,910sqm of F1(a) educational floorspace. This site is considered suitable for mixed-use development ~~including~~ for ~~residential uses~~ C3 residential, E(g)(i) office floorspace and a F1(a) primary school. ~~is also required on site.~~ In addition, one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: C2 residential institutions, E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace, F1(a) education facilities and F2(b) meeting places for community. Development proposals should:	• Positively prepared • Effective • Consistent with national policy ○ ID 2044 Highways England ○ ID 1942 Berkeley Homes ○ ID 2041 Historic England

		a) Support the wider objectives of the Watford Gateway Strategic Development Area; b) Ensure that retail re-provision on site will not exceed the existing retail floorspace; c) Provide a new 3 form entry primary school; d) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network; e) Seek to work collaboratively with the landowner of site MU06, which is located adjacent to the east of the site, to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage; f) Future development at MU05 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; g) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; h) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application; ~~Avoid significant harm to the Nascot Conservation Area, located directly to the west of the site;~~ ~~Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;~~ i) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided; j) Facilitate appropriately and proportionately towards the timely provision of required infrastructure identified in Watford's Infrastructure Delivery Plan, including measures to improve access to the station for cyclist, pedestrians and vulnerable users; and	○ ID 2103 Hertfordshire County Council

		k) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line adjacent to the site.	
M201	Page 172, Table 13.2: Mixed-use sites MU06 Land at Watford Junction, site allocation map Site extended to include land to the east and the area safeguarded to protect the concrete batching plant and rail aggregates depot, rail sidings and access road have been added as Safeguarded Rail Aggregates Depot layer.		• Consistent with national policy ○ ID 1984 Solum Regeneration ○ ID 2071 Aggregate Industries UK Ltd
M202	Page 172, Table 13.2:	Indicative yield = 1,232 units C3 residential, 20,998 sqm of E(g)(i) office floorspace.	• Positively prepared

	Mixed-use sites MU06 Land at Watford Junction, revised requirements	This site is considered suitable for mixed-use development ~~including residential~~ C3 residential, ~~employment and commercial uses~~ E(g)(i) office floorspace, a replacement E(f) childcare facility and a F1(a) primary school. ~~is required on site.~~ Development proposals should: a) Support the wider objectives of the Watford Gateway Strategic Development Area, including the necessary improvements to the station and it~~'~~s operation ~~functionality~~; b) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including measures to improve bus priority around the station; c) ~~A~~ Provide a new 3 form entry primary school; d) ~~A~~ Provide a replacement child care facility; e) Seek to work collaboratively with the landowners of sites MU05 and MU07 ~~which are~~ located adjacent to the site, MU24 located north east of the site and the operator of the concrete batching plant and rail aggregates depot located almost entirely within the site to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage; f) Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided; g) Development will not compromise Clive Way as a safe, high quality active travel route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub; h) In collaboration with the landowners of sites MU05, MU07 and MU24 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides access to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub; i) ~~Support the delivery of a new pedestrian and cycle bridge and the protection of a second crossing route from Penn Road across the railway line;~~ Support the delivery of a second crossing	• Justified • Effective • Consistent with national policy ○ ID 2044 Highways England ○ ID 2017, 2076, 2077, 2078 Aggregate Industries ○ ID 2018 Mineral Products Association ○ ID 1948 Berkeley Homes ○ ID 1974, 1976, 1977 Canada Life Asset Management ○ ID 2041 Historic England ○ ID 2103 Hertfordshire County Council

		point from Penn Road across the railway lines in the latter part of the plan period when comprehensive mixed-use redevelopment is proposed; j) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network; k) ~~Demonstrate that safe access has been provided to the site;~~ l) Have regard to the safeguarded concrete batching plant and rail aggregates depot located largely within the north east boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications; m) Ensure ~~the layout of~~ the scheme has been planned, laid out and designed to minimise ~~any~~ potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the 'agent of change' principle; and ~~This may include locating non-residential floorspace in the lower storeys~~; n) Future development at MU06 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; o) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application; ~~Avoid significant harm to the setting of the Nascot Conservation Area, located directly to the west of the site;~~ ~~Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;~~	

		p) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of the new dwellings to be provided; q) Take account of the potential risk of contamination on site; r) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is subject to groundwater and surface water flood risk; and s) For all noise sensitive development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, ~~rail aggregates depot and associated~~ concrete batching plant and rail aggregates depot located largely within ~~in and adjacent to~~ the site. Early engagement with the site operator will be required to ensure that ~~to ensure that~~ development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of sensitive noise receptors.	
M203	Page 173, Table 13.2: Mixed-use sites – Site MU07 Safeguarded Rail Aggregates Depot layer added		• Effective ○ ID 2071 Aggregates Industries UK Ltd
M204	Page 173, Table 13.2: Mixed-use sites	Timescale: 1-5 years (industrial development) 6-15 years (long-term transitional mixed-use development) Indicative yield = 6,600sqm of B2, B8 industrial floorspace ~~131 residential units~~	• Positively prepared • Justified • Effective

	MU07 Land at Astral House, revised requirements	~~This site is considered suitable for mixed-use development, including residential and employment uses.~~ This site is considered suitable for mixed-use development including one or more of the uses, or a mix thereof, defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development and E(g)(iii) industrial processes. In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: E(e) health facilities, E(f) crèche/nursery, E(g)(ii) research and development, E(g)(iii) industrial processes, C2 residential institutions, C3 residential, and C4 houses in multiple occupation. Development proposals should: a) Support the wider objectives of the Watford Gateway Strategic Development Area; b) Result in no net loss of employment floorspace on site unless the office use is replaced with industrial uses; c) Seek to work collaboratively with the landowners of sites MU06, ~~and~~MU24 ~~EM05~~ and the operator of the concrete batching plant and rail aggregates depot, ~~which are~~ located adjacent ~~to the east of~~ to the site~~,~~ to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage; d) Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided; e) ~~Demonstrate that safe pedestrian and cyclist access to the site has been provided~~; Development will not compromise Clive Way as a safe, high quality active travel route to the Watford Junction Sustainable Transport Hub; f) In collaboration with the landowners of sites MU05, MU06 and MU24 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;	• Consistent with national policy ○ ID 2017, 2076, 2077, 2078 Aggregate Industries ○ ID 2044 Highways England ○ ID 2018 Mineral Products Association ○ ID 1974, 1976, 1977 Canada Life Asset Management ○ ID 1986 Solum Regeneration ○ ID 2041 Historic England

		g) Future development at MU07 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; h) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application; i) Support the delivery of a second crossing point from Penn Road across the railway lines in the latter part of the plan period when comprehensive mixed-use redevelopment is proposed; ~~j) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including the safeguarding of land required for bridge;~~ k) Take account of the potential risk of contamination on site; l) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required if new residential dwellings come forward; ~~due to the scale of the new dwellings to be provided; and~~ m) Have regard to the safeguarded concrete batching plant and rail aggregates depot adjacent to the western boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications; n) Ensure the scheme has been planned, laid out and designed to minimise the potential adverse impacts associated with the railway lines and the concrete batching plant and rail aggregates depot and mitigation provided in line with the 'agent of change' principle; and o) For all noise sensitive development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, concrete batching plant and rail aggregates depot ~~and associated concrete batching plant~~ located ~~in and~~ adjacent to the site. Early engagement with the site operator will be required to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operations due to the introduction of sensitive noise receptors.	

M205	Page 174, Table 13.2, Site MU08, amend first sentence	Indicative yield = 21 units C3 residential, 480sqm of E(g)(i) office floorspace This site is considered suitable for mixed-use development of C3 residential and/or E(g)(i) office floorspace~~, including residential and office uses~~.	• Positively prepared • Effective ○ Officer change
M206	Page 174, Table 13.2, Site MU08, amend last bullet. Two new bullets added	~~Avoid significant harm to the setting of the Nascot Conservation Area, located directly west of the site.~~ Future development at MU08 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; d) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design. e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.	• Consistent with national policy ○ ID 2041 Historic England
M207	Page 175, Table 13.2, Site MU09, amend first sentence	Indicative yield = 120 units C3 residential, 2,770sqm of E(g)(i) office floorspace This site is considered suitable for mixed-use development of C3 residential and/or E(g)(i) offices~~, including residential and office uses~~.	• Positively prepared • Effective ○ Officer change
M208	Amend second bullet Two new bullets after c)	b) ~~Position the tallest elements of the scheme along the Clarendon Road frontage;~~ Building heights along the Westland Road elevation should have regard to the building heights of existing properties on Westland Road opposite the site; d) Future development at MU09 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;	• Consistent with national policy ○ ID 2041 Historic England

		e) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.	
M209	Page 176, Table 13.2, Site MU10, amend first sentence	Indicative yield = 90 units C3 residential This site is considered suitable for mixed-use development including C3 residential~~, including residential and commercial uses~~. One or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use would be supported to provide active ground floor frontages.	• Positively prepared • Effective ○ Officer change
M210	Page 176, Table 13.2, Site MU10, amend third bullet, last two bullets, two new bullet after last bullet	c) Provide a quality, active ground floor frontage and landscaping along ~~the~~ The Parade and Albert Street South; ~~e) Avoid significant harm to the setting of the Civic Core Conservation Area~~ ~~f) Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required~~ e) Future development at MU10 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Effective • Consistent with national policy ○ ID 2041 Historic England
M211	Page 177, Table 13.2, Site MU11,	Indicative yield = 72 units C3 residential	• Positively prepared • Effective

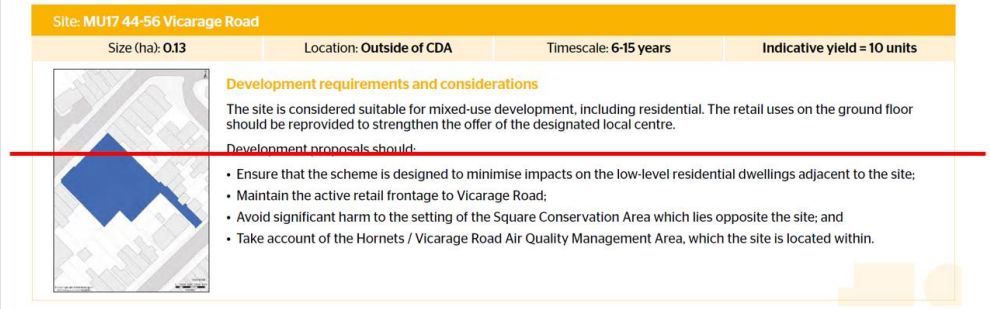
	amend first sentence, amend last two bullet, two new bullet after last bullet	The site is considered suitable for mixed-use development including C3 residential~~, including residential uses and active commercial uses on the ground floor~~. One or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use would be supported to provide active ground floor frontages.	○Officer change
M212	Page 177, Table 13.2, Site MU11, amend second bullet, two new bullets new bullets after second bullet, new bullet after third bullet	~~b) Avoid significant adverse impacts on the locally and nationally listed buildings located in the immediate vicinity of the site, including the locally listed shopfront within the site boundary. If it is demonstrated to be unfeasible to retain the listed building on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the building. A Heritage Impact Assessment may be required.~~ b) Future development at MU11 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application; e) Provide a quality, active ground floor frontage and landscaping along The Parade;	• Consistent with national policy ○ ID 2041 Historic England
M213	Page 178, Table 13.2, Site MU12, amend first sentence	Indicative yield = 14 units C3 residential This site is suitable for mixed-use development including C3 residential~~, including residential and commercial uses~~ and one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use to provide active ground floor frontages.	•Positively prepared •Effective ○ Officer change

M214	Page 178, Table 13.2, Site MU12, amend third bullet	~~Avoid significant adverse impacts on the locally and nationally listed buildings and monuments located in the vicinity of the site. A Heritage Impact Assessment may be required;~~ c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Consistent with national policy ○ ID 2041 Historic England
M215	Page 179, Table 13.2, Site MU13, amend first sentence	Indicative yield = 220 units C3 residential This site is suitable for mixed-use development including C3 residential~~, including residential and commercial uses~~ and one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use to provide active ground floor frontages.	• Positively prepared • Effective ○ Officer change
M216	Page 179, Table 13.2, Site MU13, amend fifth and sixth bullets	~~Avoid significant harm to the setting of the Civic Core Conservation Area which lies directly south of the site;~~ ~~Avoid any significant adverse impacts on the locally and nationally listed buildings and monuments located in the vicinity of the site. A Heritage Impact Assessment may be required;~~ e) Future development at MU13 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Consistent with national policy ○ ID 2041 Historic England

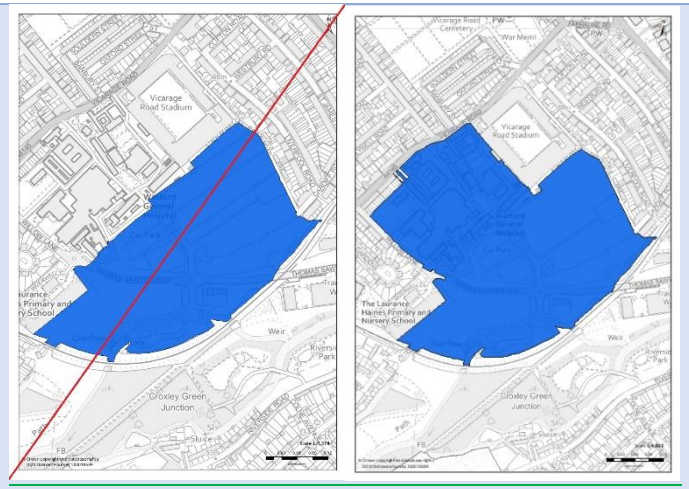
M217	Page 180, Table 13.2, Site MU14, amend first sentence	Indicative yield = 40 units C3 residential This site is suitable for residential led, mixed-use development including C3 residential and one or more of the uses defined within the following Use Classes: E(a), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use ~~E and F class uses~~ are possible on the ground floor to maintain an active frontage.	• Positively prepared • Effective ○ Officer change
M218	Page 180, Table 13.2, Site MU14, amend second bullet	~~Avoid significant adverse impacts on the locally and nationally listed buildings in the vicinity of the site. A Heritage Impact Assessment may be required~~ b) Future development at MU14 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application. However, due to the significance of the heritage assets which form the Holy Rood complex (Grade I church and Grade II ancillary buildings) the building height, scale and massing of any new proposals on the Exchange Road frontage should have regard to the heights, scale and massing of the Holy Rood Complex;	• Consistent with national policy ○ ID 2041 Historic England
M219	Page 180, Table 13.2, Site MU15, amend first sentence	Indicative yield = 19 units C3 residential This site is suitable for mixed-use development including ~~residential~~ C3 residential and F2(b) meeting places for community uses.	• Positively prepared • Effective ○ Officer change
M220	Page 180, Table 13.2, Site MU15, amend third bullet	~~Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site; A Heritage Impact Assessment may be required.~~ d) Future development at MU15 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;	• Consistent with national policy ○ ID 2041 Historic England

		e) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; f) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	
M221	Page 181, Table 13.2: Mixed-use sites MU16 Land at Tesco, amend first and second paragraphs and c)	Indicative yield = 1,338 units C3 residential The site is considered suitable for mixed-use development, including ~~residential~~ C3 residential, ~~E and F class uses~~ and a F1(a) primary school. In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: C2 residential institutions, E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation. Development proposals should: a) Support the wider objectives of the Colne Valley Strategic Development Area, including the linear park; b) Enhance connectivity to the River Colne. This includes providing open space and a green route along the river as part of the linear park proposal. Re-naturalisation of the culverted River Colne will also be supported; c) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network; d) Seek to engage with landowners of site HS21, located adjacent to the west, and HS23, located adjacent to the south, to maximise the benefits of development; e) Provide no additional retail floorspace above the existing on site provision;	• Positively prepared • Effective • Consistent with national policy ○ ID 2041 Historic England ○ ID 2044 Highways England ○ ID 2103 ○ 2211 Hertfordshire County Council

		f) Enhance the strategic view from the railway line to the town centre. Proposals should be supported with images that demonstrate how a proposal will contribute towards the Watford skyline; g) Have building heights along the River Colne that reflect the sensitivity of the location and minimise disturbance on the waterway; ~~Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site, including the locally listed coal duty marker on site. If it is demonstrated to be unfeasible to retain the listed monument on site, the design of the replacement scheme should be of an extremely high quality to justify the loss of the monument. A Heritage Impact Assessment may be required;~~ h) Future development at MU16 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; i) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; j) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application; k) New proposals should seek to incorporate the locally listed coal duty marker into the new scheme; proposals which seek to relocate the monument will need to justify why this is appropriate and that the new location provides an enhanced setting and interpretation of the monument; l) Adequately address the level changes on site; m) Have regard to the high pressure pipeline that traverses the site; n) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk; o) Be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the road network and railway line adjacent to the site;	

		p) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided; q) Take account of the potential risk of contamination on site; r) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan, including a revised junction layout, crossing improvements and provision of a cycle path along Lower High Street; and s) Retain significant trees on site wherever possible, including those with a Tree Protection Order.	
M222	Page 182, Table 13.2, Site MU17, delete	 Site: MU17 44-56 Vicarage Road Size (ha): 0.13 | Location: Outside of CDA | Timescale: 6-15 years | Indicative yield = 10 units Development requirements and considerations The site is considered suitable for mixed-use development, including residential. The retail uses on the ground floor should be reprovided to strengthen the offer of the designated local centre. ~~Development proposals should:~~ • Ensure that the scheme is designed to minimise impacts on the low-level residential dwellings adjacent to the site; • Maintain the active retail frontage to Vicarage Road; • Avoid significant harm to the setting of the Square Conservation Area which lies opposite the site; and • Take account of the Hornets / Vicarage Road Air Quality Management Area, which the site is located within.	• Consistent with national policy ○ Officer change
M223	Page 183, Table 13.2, Site MU18, amend first sentence	Indicative yield = 466 units C3 residential The site is considered suitable for ~~residential-led,~~ mixed-use development, including C3 residential. In addition one or more of, or a mix thereof, the uses defined within the following Use Classes would be supported to provide active ground floor frontages: E(a), E(b), E(c), E(d), E(e), E(f) commercial floorspace and F2(b) meeting places for community use ~~Reprovision of E class uses is possible~~ on the ground floor.	• Positively prepared • Effective ○ Officer change
M224	Page 183, Table 13.2: Mixed-use sites MU18, Land at Colne Valley	~~Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required;~~ e) Future development at MU18 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;	• Positively prepared • Consistent with national policy ○ ID 2041 Historic England

	Retail Park, replace fifth bullet and added requirement after fifth bullet	f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application; h) Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;	○ ID 2044 Highways England ○ ID 2219 National Grid
M225	Page 183, Table 13.2: Mixed-use sites MU18, Land at Colne Valley Retail Park, replace fifth bullet, added requirement after eighth bullet	Have regard to the overhead electricity transmission lines that traverse the site;	• Effective ○ Officer change
M226	Page 184, Table 13.2, Site MU19, amend first sentence	Indicative yield = 43 units C3 residential The site is considered suitable for ~~residential-led,~~ mixed-use development, including C3 residential and transport improvements. In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: C2 residential institutions, C3 residential, E(f) crèche or nursery.	• Positively prepared • Effective ○ Officer change

M227	Page 184, Table 13.2, Site MU20, amend first sentence	Indicative yield = 27 units C3 residential The site is considered suitable for ~~residential-led,~~ mixed-use development, including C3 residential. In addition one or more, or a mix thereof, of the uses defined within the following Use Classes: E(c)(i) financial services, E(c)(ii) professional services and E(c)(iii) other appropriate services in a commercial, business or service locality use would be supported with E class uses suitable on the ground floor.	• Effective ○ Officer change
M228	Page 185, Table 13.2: Mixed-use sites – Site MU21 Allocated Sites For Delivery Layer site MU21 amended to include Watford General Hospital		• Positively prepared • Effective ○ ID 1897 West Hertfordshire Hospitals NHS Trust
M229	Page 185, Site allocation MU21, site area	Size (ha): ~~12.0~~ 18.1 Location: CDA Timescale: 1-15 years Indicative yield = 1,383 units	• Justified ○ ID 1897 West Hertfordshire Hospitals NHS Trust
M230	Page 185, Site allocation MU21, revised development requirements	Indicative yield = 1,383 units C3 residential This site is considered suitable for mixed-use development ~~including~~ for ~~residential~~ C3 residential, ~~commercial uses and~~ a F1(a) primary school, a new hospital and associated car park.	• Positively prepared • Justified • Effective

	and considerations with hospital added to the allocation	In addition one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported: C1 Hotels, C2 residential institutions, E(e) medical or health facilities, F1(a) education, F2(b) meeting places for community use and F2(c) outdoor sport and recreation. Development proposals should: a) Support the wider objectives of the Colne Valley Strategic Development Area; b) Complete a review of transport impact and safety as part of a full Transport Assessment; c) A clearly legible, continuous pedestrian route, suitable for all users including those with mobility issues, should be provided from Vicarage Road to Thomas Sawyer Way along the west side of the existing hospital; d) Cycle infrastructure to be provided along Thomas Sawyer Way and Willow Lane; e) Pedestrian and cycle connections to the disused former Croxley Rail Line adjacent to the southern boundary of the site should be provided; f) Enhance the public realm through the provision of a new public square; g) Facilitate the timely delivery of required infrastructure as identified in the Infrastructure Delivery Plan; h) Future development at MU21 will take into account the findings and recommendations of the Council's Heritage Impact Assessment, recognising the former workhouse within the site boundary is a nationally listed building; i) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; j) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application. Any taller elements of a proposed scheme should be located on the sections of the site farthest away from the heritage assets and buildings heights should step down towards the heritage assets to reflect the heights of the assets; k) Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk; l) Take account of the potential risk of contamination on site; and	• Consistent with national policy ○ ID 1897 West Hertfordshire Hospitals NHS Trust ○ ID 2041 Historic England

		m) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required due to the scale of new dwellings to be provided, including the sewerage pipe traversing the site near the existing hospital.	
M231	Page 186, Table 13.2, Site MU22, new first sentence	Indicative yield = 141 units C3 residential The site is considered suitable for ~~residential-led,~~ mixed-use development, including C3 residential. In addition one or more, or a mix thereof, of the uses defined within the following Use Classes: E(a), E(c) commercial floorspace and F2(b) meeting places for community use would be supported ~~Reprovision of the retail uses is possible~~ on the ground floor.	• Positively prepared • Effective ○ Officer change
M232	Page 186, Table 13.2, Site MU22, replace fifth bullet	~~Avoid any significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.~~ e) Future development at MU22 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; f) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets and their setting identified in the Heritage Impact Assessment or any subsequent fieldwork assessment have been avoided and if this is not possible, minimised through appropriate masterplan design; g) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application;	• Consistent with national policy ○ ID 2041 Historic England
M233	Page 187, Table 13.2, Site MU23, add first sentence	Indicative yield = 422 units C3 residential The site is considered suitable for mixed-use development including C3 residential. In addition, one or more, or a mix thereof, of the uses defined within the following Use Classes would be supported to provide active ground floor frontages: E(a) retail sale of good other than hot food,	• Positively prepared • Effective ○ Officer change

		E(b) food and drink for consumption (mostly) on the premises, E(d) indoor sport, recreation or fitness F1(a) education and F2(b) meeting places for community use.	
M234	Page 187, Table 3.2: Mixed-Use Site Allocations, MU23, Land at Asda, Dome Roundabout, added requirement after second bullet	Be informed by a Traffic Impact Assessment, which should consider the impact of the proposed scheme on the strategic road network;	• Positively prepared ○ ID 2044 Highways England
M235	Page 188, Table 13.3, Employment Site Allocations, EM01 Cassiobury House 11-19 Station Road Amend first sentence	Indicative yield = ~~2,530~~ 5,153sqm of office and commercial floorspace 6,165sqm of hotel floorspace This site is considered suitable for office development (Use Class E(g)(i)).	• Effective ○ Officer change
M236	Page 188, Table 13.3, Employment Site Allocations, EM01	c) ~~Avoid significant adverse impacts on the locally and nationally listed buildings located in the vicinity of the site. A Heritage Impact Assessment may be required.;~~ -Future development at EM01 will take into account the findings and recommendations of the Council's Heritage Impact Assessment; and	• Consistent with national policy ○ ID 2041 Historic England

	Cassiobury House 11-19 Station Road Amend third bullet. After fourth bullet, new bullet	d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application.	
M237	Page 188, Table 13.3, Site EM02, amend first sentence	*[See the proposed amended allocation in the row below]*	• Positively prepared • Effective ○ Officer change

Site: EM02 Land to the south of Wiggenhall Industrial Estate			
Size (ha): 0.58	**Location: CDA**	**Timescale: 1-5 years ~~6-15~~**	**Indicative Yield =** ~~11,600~~ 5,800sqm of B2, B8, E(g)(ii), E(g)(iii) industrial ~~office~~ floorspace

This site is considered suitable for ~~office~~ industrial uses ~~development~~ and may include one or more of the uses defined within the following **Use Classes**: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.

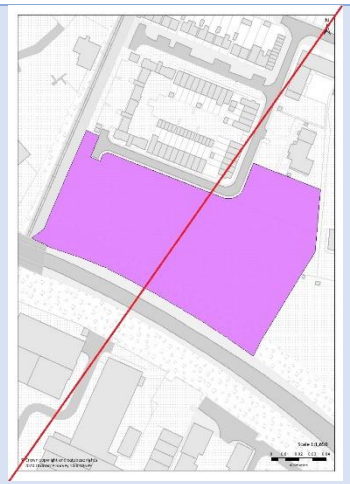
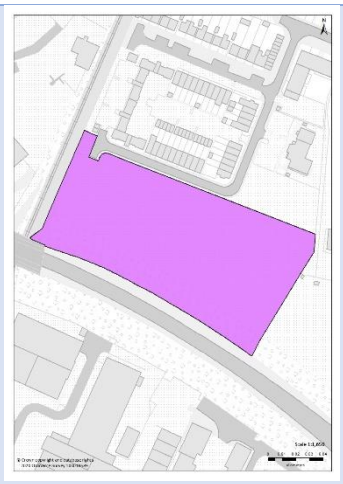
Development proposals should:

Be informed by a site-specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zones 2 and 3, and is also subject to groundwater and surface water flood risk;
Ensure that a safe access to the site has been provided; ~~and~~
Be designed to enable access from the disused former Croxley Rail Line to Thomas Sawyer Way; and
• Take account of the potential risk of contamination on site.

M238	Page 189, Table 13.3, Site EM03, amend first sentence	This site is considered suitable for industrial uses and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.	• Positively prepared • Effective ○ Officer change
M239	Page 189, Table 13.3, Site EM04, amend first sentence	This site is considered suitable for industrial uses and may include one or more of the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development, E(g)(iii) industrial processes.	• Positively prepared • Effective ○ Officer change
M240	Page 190, Table 13.3: Employment sites – Site ~~EM05~~ MU24 Allocated Sites For Delivery Layer amended - existing site Land at Colonial Way/Clive Way, ~~EM05~~, changed to a mixed-use site, reference MU24		• Positively prepared • Justified • Effective ○ Officer change
M241	Page 190, Table 13.3: Employment sites	Timescale: 1-5 years (short-term industrial redevelopment) 6-15 years (long-term transitional mixed-use development) Indicative yield = 8,215 ~~9,200~~ sqm of industrial floorspace	• Positively prepared • Effective

	Site allocation ~~EM05~~ MU24 Land at Colonial Way/Clive Way, renumbered and relocated to Table 13.2	This site is considered suitable for ~~industrial uses~~ mixed-use development including one or more, or a mix thereof, the uses defined within the following Use Classes: B2 general industrial, B8 storage and distribution, E(g)(ii) research and development and E(g)(iii) industrial processes. In addition, one or more of the uses defined within the following Use Classes would be supported: E(e) health facilities, E(f) crèche/nursery, C2 residential institutions, C3 residential and C4 houses in multiple occupation. Development proposals should: a) Support the wider objectives of the Watford Gateway Strategic Development Area; b) Seek to work collaboratively with the landowners of sites MU06 and MU07 and the operator of the concrete batching plant and aggregates facility ~~which is~~ located ~~adjacent to the~~ west of the site to maximise the benefits of development and to ensure that the development proposals consider the cumulative impacts of development, including heritage; c) Have regard to the safeguarded concrete batching plant and rail aggregates depot located west of the boundary of the allocation site and the 250m Mineral Infrastructure Consultation Area which surrounds the safeguarded facility. The County Council, as the Minerals Planning Authority, should be consulted on any applications which come forward on this site and the adopted Minerals Local Plan Safeguarding Policy must be taken into account in the consideration of any applications; d) Whilst seeking to maximise the benefits of development, consideration will need to be given to the potential re-routing of vehicle access to the safeguarded concrete batching plant and rail aggregates depot via Colonial Way. Vehicle access will be required to be maintained at all times from Orphanage Road unless an alternative route is provided; e) New development will not compromise Clive Way as a safe, high quality active travel route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub; f) In collaboration with the landowners of sites MU05, MU06 and MU07 support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provides a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub;	• Consistent with national policy ○ ID 2017, 2077, 2078 Aggregate Industries UK Limited ○ ID 1974, 1976, 1977 Canada Life Asset Management ○ ID 1928 Coal Pension Properties Limited ○ Limited ○ ID 1986 Solum Regeneration ○ ID 2041 Historic England

		g) In the case of residential development, p~~P~~rovide mitigation for any adverse impact resulting from the industrial uses on site in line with the 'agent of change' principle; h) ~~Avoid any significant adverse impacts on the nationally listed buildings located within 300m of the site. A Heritage Impact Assessment may be required;~~ Future development at MU24 will take into account the results and recommendations of the Council's Heritage Impact Assessment; i) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site to be submitted prior to the determination of any application; j) Take account of the potential risk of contamination on site; k) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required if new dwellings come forward; and l) For all noise sensitive development, be accompanied by a Noise Assessment and provide appropriate mitigation for noise associated with the railway line, concrete batching plant and rail aggregates depot located west of ~~in and adjacent to~~ the site. Early engagement with the site operator will be required to ensure that to ensure that development does not prejudice the existing or future use of the safeguarded site and associated operation due to the introduction of noise receptors.	
M242	Site allocations for residential use where these are the only proposed uses.	*Residential allocations have been clarified to state these are classified as C3 use. These proposed amendments will be included in the Schedule of Minor Modifications.*	• Effective ○ Officer change

M243	Page 191, Table 13.4: Education facilities – Site ED01 Allocated Sites For Delivery Layer site ED01 boundary amended	 	• Effective ○ ID 2055 Hertfordshire County Council
M244	Page 191, Table 13.4: Education facilities, Site: ED01 Former Meriden School Site, first bullet.	Development proposals should: • Provide appropriate mitigation for the lapsed detached playing field for Park Gate Junior School in line with the Playing Pitch Strategy (2020);	• Positively prepared ○ ID 2055 Hertfordshire County Council
Appendix A: ~~Draft~~ Monitoring Framework			

M245	Page 193, Chapter 1 row	~~Number of jobs / 13,000 jobs provided 2018 -2036 / Planning applications~~	• Justified ○ ID 2002 Drax Investments Limited ○ ID 2063 Glyn Hopkin Holdings Ltd ○ ID 2090 North Western Avenue Watford Ltd ○ ID 1947 WSP ○ ID 2058 Home Builders Federation ○ Officer change
M246	Page 193, Chapter 3 row 1	~~14,274 dwellings 2018 - 2036 with 793 per year. Maintain 5 year housing supply.~~ 13,328 net additional dwellings between 2021 and 2038, equivalent to 784 homes per year.	• Positively prepared • Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
Appendix B: Housing Trajectory			

M247	Page 198, Appendix B: Housing Trajectory (table), revised to reflect 2021-2038 housing need figure of 13,328 new homes to be completed	Appendix B: Housing Trajectory ~~| Year	Commitments (completions and extant permissions)	Housing Completions from site allocations	Windfall allowance	Annual housing completions	Cumulative housing completions |~~ ~~| 2018/19	268	0	0	268	268 |~~ ~~| 2019/20	262	0	0	262	530 |~~ ~~| 2020/21	235	0	0	235	765 |~~ ~~| 2021/22	676	771	139	1,586	2,351 |~~ ~~| 2022/23	676	759	139	1,574	3,925 |~~ ~~| 2023/24	676	684	139	1,499	5,424 |~~ ~~| 2024/25	676	757	139	1,572	6,996 |~~ ~~| 2025/26	676	611	[illegible]	1,426	8,422 |~~ ~~| 2026/27	0	881	140	1,021	9,443 |~~ ~~| 2027/28	0	553	140	693	10,136 |~~ ~~| 2028/29	0	916	140	1,056	11,192 |~~ ~~| 2029/30	0	687	140	827	12,019 |~~ ~~| 2030/31	0	444	140	584	12,603 |~~ ~~| 2031/32	0	493	140	633	13,236 |~~ ~~| 2032/33	0	365	140	505	13,741 |~~ ~~| 2033/34	0	275	140	415	14,156 |~~ ~~| 2034/35	0	212	140	352	14,508 |~~ ~~| 2035/36	0	340	140	480	14,988 |~~ ~~| Total	4,345	8,745	2,095	14,988	14,988 |~~		• Positively prepared • Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change

<table>
<tr>
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<td>Appendix B: Housing Trajectory
<table>
<tr><th>Year</th><th>Commitments (completions and extant permissions)</th><th>Housing Completions from site allocations</th><th>Windfall allowance</th><th>Annual housing completions</th><th>Cumulative housing completions</th></tr>
<tr><td>2021/22</td><td>925</td><td>344</td><td>0</td><td>1,269</td><td>1,269</td></tr>
<tr><td>2022/23</td><td>609</td><td>144</td><td>0</td><td>753</td><td>2,022</td></tr>
<tr><td>2023/24</td><td>725</td><td>374</td><td>0</td><td>1,099</td><td>3,121</td></tr>
<tr><td>2024/25</td><td>248</td><td>732</td><td>158</td><td>1,138</td><td>4,259</td></tr>
<tr><td>2025/26</td><td>0</td><td>848</td><td>158</td><td>1,006</td><td>5,265</td></tr>
<tr><td>2026/27</td><td>0</td><td>835</td><td>158</td><td>993</td><td>6,258</td></tr>
<tr><td>2027/28</td><td>0</td><td>540</td><td>158</td><td>698</td><td>6,956</td></tr>
<tr><td>2028/29</td><td>0</td><td>735</td><td>158</td><td>893</td><td>7,849</td></tr>
<tr><td>2029/30</td><td>0</td><td>407</td><td>158</td><td>565</td><td>8,414</td></tr>
<tr><td>2030/31</td><td>0</td><td>905</td><td>158</td><td>1,063</td><td>9,477</td></tr>
<tr><td>2031/32</td><td>0</td><td>703</td><td>158</td><td>861</td><td>10,338</td></tr>
<tr><td>2032/33</td><td>0</td><td>590</td><td>158</td><td>748</td><td>11,086</td></tr>
<tr><td>2033/34</td><td>0</td><td>515</td><td>159</td><td>674</td><td>11,760</td></tr>
<tr><td>2034/35</td><td>0</td><td>374</td><td>159</td><td>533</td><td>12,293</td></tr>
<tr><td>2035/36</td><td>0</td><td>347</td><td>159</td><td>506</td><td>12,799</td></tr>
<tr><td>2036/37</td><td>0</td><td>211</td><td>159</td><td>370</td><td>13,169</td></tr>
<tr><td>2037/38</td><td>0</td><td>0</td><td>159</td><td>159</td><td>13,328</td></tr>
<tr><td>Total</td><td>2,507</td><td>8,604</td><td>2,217</td><td>13,328</td><td>13,328</td></tr>
</table>
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<tr>
<td>M248</td>
<td>Page 199, Appendix B, Housing Trajectory, graph title- ‘Housing Trajectory 2018-2036’</td>
<td>Housing Trajectory ~~2018-2036~~ 2021-2038</td>
<td>• Consistent with national policy
○ ID Representors as listed previously in the second row</td>
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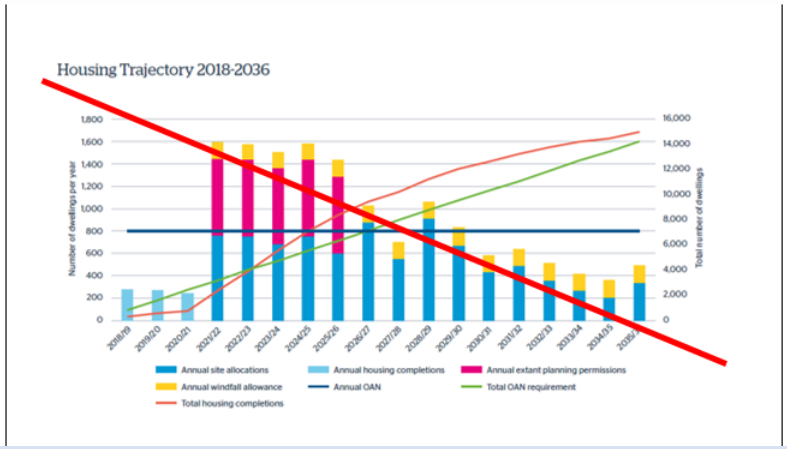
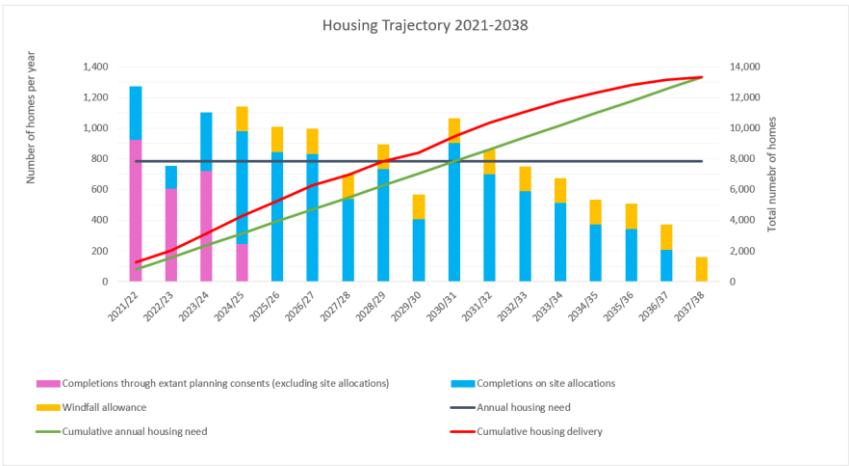
M249	Page 199, Appendix B: Housing Trajectory (chart), revised to reflect 2021-2038 housing need figure of 13,328 new homes to be completed	Styles   	• Positively prepared • Justified • Consistent with national policy ○ ID Representors as listed previously in the second row ○ Officer change
Appendix C: TRANSPORT INFRASTRUCTURE REQUIREMENTS			
M250	Page 202, Watford Gateway	The Eastern M~~m~~obility H~~h~~ub, located east of the railway lines at Watford Junction station with a new multi-storey car park, a new station bridge connecting the two platforms and infrastructure provision for vulnerable road users via an extended link from Clive Way and through to Orphanage Road.	• Effective

<table>
<tr><td></td><td>Strategic Development Area, second row, second column</td><td>Improved access to the ~~new~~ Eastern Mobility ~~h~~Hub through upgrade works along the existing route of ~~along~~ Imperial Way, Clive Way and Reeds Crescent/Orphanage Road.</td><td>○ ID 1976 Canada Life Asset Management</td></tr>
<tr><td>M251</td><td>Page 202, Watford Gateway Strategic Development Area, fourth row</td><td>New pedestrian ~~bridge~~ and cycle bridge over the Abbey Line to connect Penn Road ~~and Colonial Way Imperial Park,~~ land to the east of the Abbey Line, improvements to the station access for vulnerable users, and improvements to the station car park access.</td><td>• Effective
○ ID 1976 Canada Life Asset Management</td></tr>
<tr><td colspan="4">Appendix D: Cycle Parking Standards</td></tr>
<tr><td>M252</td><td>Residential cycle parking standards, lines 1-6</td><td>
<table>
<tr><th>Use Class</th><th colspan="2">High Sustainability Area</th><th colspan="2">Other Areas</th></tr>
<tr><td></td><td colspan="4">Minimums</td></tr>
<tr><td>Residential</td><td>Long-Term (employee / resident)</td><td>Short-Term (visitor)</td><td>Long-term (employee / resident)</td><td>~~Long-Term (employee / resident)~~ Short-term (visitor)</td></tr>
<tr><td>C2 Residential Institutions</td><td>1 space per 5 staff</td><td>1 space per 20 units</td><td>1 space per 8 staff</td><td>N/A</td></tr>
</table>
</td><td>• Effective
○ Officer change</td></tr>
</table>

		C3 Dwelling House 1 Bed C3 Dwelling House 2+ bed ~~C3 Dwelling House 2 Bed~~ ~~C3 Dwelling House 3+ Bed~~	1.25 spaces per unit 2.00 spaces per unit ~~2.00 spaces per unit~~ ~~2.50 space per unit~~	1 space per 20 units	1.25 spaces per unit 1.75 spaces per unit ~~1.75 spaces per unit~~ ~~2.25 spaces per unit~~	1 space per 20 units	
		C4 Houses and Multiple Occupation	1 space per 2 bedrooms	1 space per 20 units	1 space per 2 bedrooms	1 space per 20 units	
Appendix E: Car Parking Standards							
M253	Non-residential, line 1, B2 General Industrial	B2 General Industrial (spaces per 150~~0~~sqm)					• Effective ○ Officer change
M254	Non-residential, line 1, B8 Storage and Distribution	B8 Storage and Distribution (spaces per 150~~0~~sqm)					• Effective ○ Officer change
Appendix G: Glossary							
M255	**Specialist Care and Supported Living Accommodation**	This includes the following forms of housing: • **Age-restricted general market housing:** This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services. • **Retirement living or sheltered housing:** This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live					• Consistent with national policy ○ Officer change

		independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager. • **Extra care housing or housing-with-care:** This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses. • **Residential care homes and nursing homes:** These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.	
M256	Town Centre Uses	~~**Town Centre Uses:** Defined by the National Planning Policy Framework as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).~~ **Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).	• Consistent with national policy ○ Officer change
Appendix H: Planning policies to be superseded by the Watford Local Plan			
M257	Page 214, title	**Appendix H: Planning policies to be superseded by the Watford Local Plan ~~2018 – 2036~~ 2021 - 2038**	• Consistent with national policy

			○ ID Representors as listed previously in the second row