



**WATFORD
BOROUGH
COUNCIL**

Watford Local Plan Proposed Modifications

Sustainability Appraisal Report

Appendix C: Sustainability Appraisal of Policy Options

Prepared on behalf of:

Watford Borough Council

Date: May 2022









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Quality Management

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1. Introduction

This appendix presents the policy options considered by Watford Borough Council (WBC) in the early stages of the Local Plan Review preparation. The policy options were developed through consideration of evidence in a series of internal topic papers prepared by WBC officers. A summary of the output of the options assessments is presented in Table C.2.

Table C.3 has been developed by WBC. It maps the evolution of the policy development from the options to the Draft Local Plan policies.

2. Policy Options Assessed

Table C.1 is arranged alphabetically according to the heading of each topic paper. The table presents all of the policy options considered and assessed in the SA.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
Air Quality, Pollution and Contamination	Air Quality	Air Quality (1)	All development which may be sensitive to poor air quality (such as residential or community facilities) should be assessed and adequate mitigation provided. Where adequate mitigation is not provided, planning permission should be refused.
		Air Quality (2)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
	Noise Pollution	Noise Pollution (1)	All noise sensitive development should be located away from noise generating uses. Where this is not possible, a full noise assessment will be required to demonstrate that appropriate mitigation will be provided.
		Noise Pollution (2)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
	Contamination	Contamination (1)	Policy that proposes that where there may be a potential risk of contamination and ground condition issues, a preliminary risk assessment will be required to identify the risks and to demonstrate that appropriate remediation measures will be carried out.
		Contamination (2)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
Built Community Facilities	Built Community Facilities	Built Community Facilities (1)	Protection of registered assets of community value and community facilities. Community facilities registered as an Asset of Community Value will not be allowed to change their use. Other community facilities will be protected unless it can be demonstrated they are not longer required. A criteria-based approach would enable alternative community uses to be considered prior to other uses. Redevelopment of a site used for community uses to be supported where the proposal is to re-provide improved facilities on the site that better meet the needs of the community.
		Built Community Facilities (2)	Protection of community facilities. Community facilities will be protected unless it can be demonstrated they are no longer required and there is suitable provision elsewhere in the vicinity. A criteria-based approach would enable alternative community uses to be considered prior to other uses. Redevelopment of a site used for community uses to be supported where the proposal is to re-provide improved facilities on the site that better meet the needs of the community.
		Built Community Facilities (3)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
Climate Change and Resilience	Low Carbon Design and Renewable and Low Carbon Energy	Climate Change and Low Carbon Energy (1)	Minimising GHG emissions and improving Energy Efficiency. A policy that requires energy efficiency performance above the building regulations for residential developments (19% above part L). New commercial buildings will have to meet BREEAM standards (e.g. Excellent/ Very Good), while developments of certain size will need to provide a proportion (potentially 20%?) of low carbon energy on site/ or contribute to the council's Offset Fund.
		Climate Change and Low Carbon Energy (2)	Reducing Greenhouse Gas. emissions and Energy Efficiency. Do not have a policy and rely on guidance set out in the National Planning Policy Framework (specifically paras 150b, 153b) and Planning Practice Guidance.
	Overheating	Overheating (1)	A policy that requires applicants to set out the measures to be included as part of a proposal to avoid overheating in new buildings as part of a planning application. This could be included as part of a Sustainability/ Energy Statement.
		Overheating (2)	Overheating Do not have a policy for overheating. Use guidance set out in the National Planning Policy Framework (2018) and identify it as a requirement in the Residential Design Guide SPD.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
	Flood Risk	Flood Risk (1)	Flood Risk and the Water Environment. Development must be located, designed and laid out to minimise the risk of flooding from all sources, whilst not increasing the risk of flooding elsewhere. For non-allocated sites the sequential and exception test needs to be applied based on the requirements in the National Planning Policy Framework, as amended, and associated guidance. The design and layout of all major developments and areas of hardstanding should incorporate methods for Sustainable Urban Drainage. These should be designed from the outset of the scheme to ensure there is a reduction in the level of surface water leaving the site. SuDs systems should be designed and located sensitively to ensure the quality of the local water environment is maintained. Details of the proposed SuDS should be submitted as part of any planning application including provision for arrangements for the whole life management and maintenance of the provided SuDS. Where appropriate be part of green and blue infrastructure on site and incorporate biodiversity and add to the landscape quality of the development.
		Flood Risk (2)	No Policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance (with specific guidance for the design/ landscaping, green infrastructure aspect of SuDs identified in design policy and supporting supplementary planning documents).
	Water Supply	Water Supply (1)	A policy requiring the efficient use of water resources in new housing developments that is higher than standard building regulations. The requirement would be to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Water Supply (2)	No Policy. No Local Plan policy and rely on guidance set out in the National Planning Policy Framework (2018).
	Waste Management	Waste Management (1)	All new development to comply with the requirements for waste management provision in the New Development Design Guide 2019 (formerly the Residential Design Guide SPD). How compliance has been met will need to be demonstrated at application stage e.g. Design and Access Statement or Planning Statement.
		Waste Management (2)	No Policy. Do not have a policy specific for but identify waste management in the design policy as a specific objective, while providing further guidance in supplementary design guidance
		Waste Management (3)	No Policy. Do not have a policy locally specific and rely on guidance set out in the National Planning Policy Framework and adopted policies and approaches set out in the Hertfordshire Waste Local Plan.
High Quality Design and Conservation	High Quality Design	High Quality Design (1)	Comprehensive Design Policy. This approach would provide a specific policy in the local plan establishing a clear expectation for high quality design. There would be a clear link to the density policy and the residential design guide which will include guidance on the design parameters for achieving higher densities within each of the three sustainability zones. It would include a comprehensive list of key design principles, linked specifically with the new build residential design guide. It may also include height restrictions for taller buildings and have key criteria for high density schemes (350 dph) and taller buildings (10 storeys in town centre, 6 storeys elsewhere).

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		High Quality Design (2)	Reliance on the Residential Design Guide (light touch policy). Set out the just key principles for good design and place more reliance on the Residential Design Guide SPD and the Planning Practice Guidance relating to high quality design.
		High Quality Design (3)	Use of a Design Code to Support the Residential Design Guide. Set out the just key principles for good design, rely on the Residential Design Guide SPD and require an applicant to provide a 'Building for Life 12' self-assessment as part of a planning application (only applies to new development and excludes householder proposals).
		High Quality Design (4)	No Policy. This approach will not have a local plan policy and would rely on the NPPF and Planning Practice Guidance relating to high quality design.
		Conservation	Conservation (1)
		Conservation (2)	No Specific Policy but Include in General Design Policy. Include heritage as a key design principle in the design policy rather than have a specific policy in the Local Plan for heritage.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Conservation (3)	No Policy. This approach would not have a specific policy in the Local Plan but would rely on the paragraphs in the National Planning Policy Framework.
Green Infrastructure, Biodiversity and the Natural Environment	Protection and Enhancement of Biodiversity	Protection and Enhancement of Biodiversity (1)	For Development Proposals of 10 Dwellings or More, Biodiversity Offsetting Will be Managed Through a Net Gain Approach. All major schemes that require planning permission should provide measurable net gains for biodiversity. This could be on site, or an off-site contribution to strengthen existing ecological habitats and networks. Net gains would be measured using the DEFRA metric.
		Protection and Enhancement of Biodiversity (2)	For Development Proposals of 30 dwellings or More (or a higher number to be decided), Biodiversity Offsetting Will be Managed Through a Net Gain Approach. For Development Proposals of Less Than 30 dwellings or More (or a higher number to be decided), a Commitment to Protect and Enhance Sites with Biodiversity Value Must be Demonstrated. All development proposals of 30 (?) dwellings should provide measurable net gains for biodiversity, using the DEFRA metric. Development proposals of under 30 (?) dwellings should be able to demonstrate a commitment to protecting and enhancing biodiversity. Where development proposals may impact on biodiversity, appropriate mitigation should be required (including an on-site contribution where necessary).

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
	Green Infrastructure and the Natural Environment	Green Infrastructure and the Natural Environment (1)	Protect and Enhance Strategic Green and Blue Infrastructure Networks. All development that requires planning permission should be able to demonstrate a commitment to protecting and enhancing the green infrastructure network and how the submitted proposal will contribute towards this.
		Green Infrastructure and the Natural Environment (2)	No Policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
	Protecting Open Space	Protecting Open Space (1)	Protect Open Spaces Through a Criteria Based Approach. Planning permission resulting in the loss of open space or ancillary facilities used for leisure and recreation will only be supported where it can be clearly demonstrated the space no longer meets certain criteria (criteria could be based on quality/value and distance thresholds, alternative forms of open space based on need).
		Protecting Open Space (2)	Do Not Permit Open Space to be Built on Unless the Facility can be Re-provided. Planning permission resulting in the loss of open space or ancillary facilities used for leisure and recreation unless the space is re-provided (of a similar or higher quality) in a more suitable location that meets the needs of the local community.
		Protecting Open Space (3)	Protect Open Spaces with Local Green Space Designations. Planning permission will be refused for proposals that are designated as Local Green Spaces. Local Green Spaces are designated in Local Plans.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
		Protecting Open Space (4)	No Policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
	Provision of Functional Open Space in New Developments	Provision of Functional Open Space in New Developments (1)	Require Major Development Proposals to Provide Open Space Based on Identified Need. Development proposals for 10 dwellings or over will be required to provision a set amount of open space per dwelling. This will be designed to have a functional use rather than basic landscaping and reflect the type of open space needed in the area. However, there will be a dispensation/ departure from this standard if the site is located in close proximity to existing high value open space. (Provision then would be determined by landscape design to deliver amenity space). Where the site is near an existing low value open space, an appropriate level of open space would be provided on site and/or a development contribution will be sought to enhance the value of the nearby open space.
		Provision of Functional Open Space in New Developments (2)	Require Major Development Proposals to Provide X sqm of Open Space per Dwelling. Development proposals for 10 dwellings or over will be required to provision a set amount of open space per dwelling, as guided by a locally set standard.
		Provision of Functional Open Space in New Developments (3)	No Policy. Have no policy on open space provision and instead treat it as a design issue, relying on NPPF paragraphs.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
	Landscaping and Green Infrastructure in New Developments	Landscaping and Green Infrastructure in New Developments (1)	Comprehensive Design Policy. This approach would provide a specific policy in the Local Plan establishing a clear expectation for high quality design of green infrastructure as part of new developments. This would likely been in the form of an urban greening factor, a numerical based factor which would determine the quantity and quality of green infrastructure required.
		Landscaping and Green Infrastructure in New Developments (2)	No policy and rely on the Residential Design Guide. Set out the key principles for good landscaping and place more reliance on the Residential Design Guide SPD and the Planning Practice Guidance relating to high quality design.
Growth Strategy and Strategic Planning	Housing Growth	Approach to Housing Growth (1)	Housing distribution: <ul style="list-style-type: none"> • Areas of Low Sustainability (10%) • Areas of Medium Sustainability (20%) • Areas to High Sustainability (70%)
		Approach to Housing Growth (2)	Housing distribution: <ul style="list-style-type: none"> • Areas of Low Sustainability (15%) • Areas of Medium Sustainability (25%) • Areas of High Sustainability (60%)

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
		Approach to Housing Growth (3)	Housing distribution: <ul style="list-style-type: none"> • Areas of Low Sustainability (20%) • Areas of Medium Sustainability (20%) • Areas of High Sustainability (60%)
		Approach to Housing Growth (4)	Housing distribution: <ul style="list-style-type: none"> • Areas of Low Sustainability (10%) • Areas of Medium Sustainability (40%) • Areas of High Sustainability (50%)
		Approach to Housing Growth (5)	Housing distribution: <ul style="list-style-type: none"> • Areas of Low Sustainability (5%) • Areas of Medium Sustainability (15%) • Areas of High Sustainability (80%)
	Employment	Approach to Employment (1)	Allocate new sites for employment development.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
		Approach to Employment (2)	Focus employment development on existing areas designated for employment uses.
		Approach to Employment (3)	Do not allocate or protect employment land to facilitate more housing delivery and work with the SW Herts authorities to consider how Watford's employment needs can be accommodated outside of the borough boundary.
	Retail	Approach to Retail (1)	Protect the town centre and do not set out a strategic approach to new retail provision, thereby relying on guidance set out in the National Planning Policy Framework in areas outside of the designated town centre area.
		Approach to Retail (2)	Protect the town centre, other retail centres and support new retail floor space coming forward when strategic sites are brought forward.
	Infrastructure	Approach to Infrastructure (1)	Focus on local provision to provide new infrastructure such as GP surgeries, schools and community spaces within the borough.
		Approach to Infrastructure (2)	Provide infrastructure in a more strategic context by working with neighbouring authorities to meet shared needs.
	Transport Infrastructure	Approach to Transport Infrastructure (1)	Prioritise private vehicle modes of travel with alternative modes of sustainable transport providing a supporting role within the borough and wider area.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Approach to Transport Infrastructure (2)	Prioritise sustainable travel modes with less emphasis on private vehicle travel.
Density and Optimising Land Potential	Density Patterns Across The Borough	Housing Density and Optimising Land (1)	Optimising Development Potential. Require developments to make best use of land by using housing density bands based on sustainability and accessibility (as shown on the accompanying sustainability map) while also ensuring that dispensation for site specific circumstances are provided for by enabling departures away from the range in certain circumstances.
		Housing Density and Optimising Land (2)	Optimise Land Potential By Design. Do not identify banded sustainability areas and instead require applicants to make best use of land through scheme design by considering site specifics including any constraints and access to facilities and services. This then will be considered by the individual case officer at application stage.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
Infrastructure	Infrastructure	Infrastructure (1)	<p>Planning permission will only be granted where it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the new development. Infrastructure provision will reflect the council's priorities for infrastructure set out the Infrastructure Delivery Plan and its successor documents.</p> <p>Priority projects will include:</p> <ul style="list-style-type: none"> • Schools delivery. • Green Infrastructure delivery on development sites. • Wayfinding and public art projects as identified in the WBC Cultural Strategy. • Future proofed communications, in particular broadband. • Sustainable transport using the safeguarded Metropolitan Line Extension route.
		Infrastructure (2)	<p>No Policy. Rely on the National Planning Policy Framework. Issues such as sustainable transport and flooding are dealt with by other policies. Education is dealt with by HCC – land can be safeguarded where required through the sites polices.</p>

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
	Utilities	Utilities (1)	Require developers to demonstrate that they have explored existing capacity (and opportunities to extend it) with appropriate utilities providers. Planning permission for employment use (B1/B2) should demonstrate that provision is made for high quality digital facilities.
		Utilities (2)	No Policy. Rely on the National Planning Policy Framework.
Employment	Employment Growth	Designated Employment Sites (1)	Protect existing B use classes in (employment) designated employment areas Support changes of use within B classes, however, changes of use to other use classes (e.g. classes A (shops and professional services), D uses (leisure and assembly) and sui generis will not be permitted.
		Designated Employment Sites (2)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
		Non-Designated Employment Sites (1)	Support Employment Growth Outside Of Designated Employment Areas. Changes of use and redevelopment of sites to encourage employment uses to support small businesses where they are in keeping with the character of the area and would not adversely affect amenity (noise, odour, traffic etc.) of the surrounding area.
		Non-Designated Employment Sites (2)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Mixed use Development (1)	Support Mixed Use Development And Colocation In Employment Areas. Enable a mix of uses in employment areas where they are complementary to employment uses and do not undermine the existing employment offer on the site. Redevelopment will be supported where there is no net loss of B class floor space (borough-wide policy).
		Mixed use Development (2)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
Housing	Housing Mix	Housing Mix (1)	Strategic Housing Market Assessment. recommendations Require developments to deliver a housing mix based on the findings of the Strategic Housing Market Assessment across the borough.
		Housing Mix (2)	Housing Mix Based On Sustainability. Set out a housing mix requirement that varies across the borough and reflects the sustainability of an area as shown on the Sustainability Map.
		Housing Mix (3)	High Proportion Of Smaller Units. Have an approach requiring a skewed housing mix requirement which sets out a higher proportion of small units and work with neighbouring authorities to provide a higher proportion of family sized units outside of Watford's boundary as part of their requirement to consider Watford's unmet housing need.
		Housing Mix (4)	No policy. Do not have a policy and allow the market to deliver the types of housing that are most in demand.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
	Affordable Housing	Affordable Housing (1)	Affordable Housing Based On Units. Require all developments of 11 or more dwellings, or on sites larger than 0.5 ha to provide ***% (currently 35%) affordable housing based on the number of units.
		Affordable Housing (2)	Affordable Housing Based Bed Spaces And Habitable Rooms. Require all developments of 11 or more dwellings, or on sites larger than 0.5 ha to provide ***% (currently 35%) to provide affordable housing based on the number of bed spaces and habitable rooms.
		Affordable Housing (3)	Higher Affordable Housing Requirement Through Subsidy. Require all developments of 11 or more dwellings, or on sites larger than 0.5 ha to provide ***% (currently 35%) to provide affordable housing, plus an additional ***% (through Watford Borough Council subsidy) affordable housing based on the number of bedrooms or bed spaces/habitable rooms.
		Affordable Housing (4)	No Policy. Have no policy and enable the market to determine how housing is delivered.
	Commuted Sums	Commuted Sums (1)	On-Site Provision Of Affordable Housing. Affordable housing will be expected to be provided on site. Commuted sums will only be considered appropriate in exceptional circumstances in agreement with the local authority.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Commuted Sums (2)	Commuted Sums In Lieu Of Affordable Housing. Affordable housing will be provided on site where appropriate. However, the council will support commuted sums in lieu of on-site delivery to be invested in alternative affordable housing schemes to meet local need.
	Housing Tenure	Housing Tenure (1)	Tenure Based On Units Only. Require a tenure mix (based on total number units only) reflective of the recommendations of the SW Herts Strategic Housing Market Assessment (tbc 2019).
		Housing Tenure (2)	Tenure Mix Based On Housing Type. Require a tenure mix reflective of the recommendations of the SW Herts Strategic Housing Market Assessment (tbc 2019) that is based on dwelling size (bed spaces/persons) and tenure type.
		Housing Tenure (3)	Higher Social Rent Housing Tenure. Require developers to provide affordable housing tenure mix that has a higher proportion of social rent than recommended subject to viability on a case by case basis.
	Ageing Population	Ageing Population (1)	Optional Technical Standards. Require a proportion of new homes to achieve the optional adoptable (and/or) accessibility technical standards.
		Ageing Population (2)	Specialist Housing. Support sheltered and specialist housing where there is an identified need. Such provision will be considered in lieu of affordable housing.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
	Starter Homes	Starter Homes (1)	Starter Homes As Part Of New Development. Require new residential developments to provide a proportion of starter homes on sites above a certain threshold (e.g. e.g. 5% on sites of 100 units and above).
		Starter Homes (2)	No policy. Do not have a policy, rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
	Self-Build And Custom Housebuilding	Self-Build And Custom Housebuilding (1)	Percentage Of Sites To Be Used For Self-Build. Sites larger than one hectare be required to provide 5% as self-build plots where feasible.
		Self-Build And Custom Housebuilding (2)	Infill Sites. Permit self-build schemes on sites that come forward in residential areas resulting in the intensification of existing residential plots.
	Windfall Sites	Windfall Sites (1)	Include Windfall Allowance. Estimate the number of dwellings to come forward based on the historic trend of small sites coming forward in recent years as part of the housing target.
		Windfall Sites (2)	Do Not Include Windfall. Do not include a windfall allowance in the borough's housing target. Not including

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
	Residential Conversions	Residential Conversions (1)	Do Not Permit Conversions Of Large Dwellings Below A Certain Size Threshold. Permit the conversion of dwellings to smaller units and HMOs over an identified size threshold across the borough (e.g. 120sqm). Conversions will only be permitted where they provide an appropriate housing mix (i.e. do not disproportionate number of 1 bed units).
		Residential Conversions (2)	Conversions In Reflecting Sustainability Classification. Permit property conversions in areas of 'High Sustainability' (as shown in the Optimising Land topic paper) with a lower floor space threshold (e.g. 120sqm) and have a higher floor space threshold in 'Medium' and 'Low Sustainability' areas (e.g. 160 sqm). Conversions will only be permitted where they provide an appropriate housing mix (i.e. do not provide a disproportionate number of 1 bed units).
		Residential Conversions (3)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.
	Gypsies and Travellers	Gypsies and Travellers (1)	No policy. Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
Promoting Sustainable Transport	Enhancing Public Transport Provision And Supporting Watford As An Important Regional Transport Hub	Enhancing Public Transport Provision And Supporting Watford As An Important Regional Transport Hub (1)	Protecting and Enhancing Transport Nodes. Have a policy that safeguards key transport routes including those for potential future investment, namely the disused rail line [Former Met Line Extension] and the Abbey Line. The policy would prevent development that would compromise future mass transit provision infrastructure. It can also include protecting key cycling assets/ routes e.g. Ebury Way. This policy may also include a support mechanism for key projects that may be agreed in the Southwest Herts Growth and Transport Plan.
		Enhancing Public Transport Provision And Supporting Watford As An Important Regional Transport Hub (2)	No Policy. Don't have a policy and rely on the general paragraphs in the NPPF 2018.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
	Car Parking Standards	Car Parking Standards (1)	<p>Maximum Parking Standards. Establish maximum parking standards based on a zonal approach to the borough (see map in Appendix 1 [of topic paper]). The parking standards would require a higher maximum in the Low Sustainability Areas and a lower maximum in in the inner high sustainability areas. For example:</p> <ul style="list-style-type: none"> • High Sustainability Area – Maximum 0.3/0.5 spaces per unit* No Parking or ‘car-lite’ also supported • Medium Sustainability Area – Maximum 0.75/1.0 spaces per unit • Low Sustainability Area – Maximum 1.25/1.5 spaces per unit <p>Standards for all non-residential uses will be provided also – based primarily on the same zonal structure with higher maximums in the Low Sustainability Areas and lower maximums in the higher areas. Approximately 20% of spaces should have active charging facilities, with passive provision for all remaining spaces. A proportion of car club spaces (final proportion to be defined) should be provided on site, with potential contribution for offsite provision in cases where on site provision is not possible</p>

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
		Car Parking Standards (2)	<p>Minimum Parking Standards. Establish minimum parking standards based on a zonal approach (see map in Appendix 1) to the borough. The Parking Standards would require a higher minimum in the outer Low Sustainability Areas and a lower minimum in the inner High Sustainability Areas. For example:</p> <ul style="list-style-type: none"> • High Sustainability Area – Minimum 0.3/0.5 spaces per unit • Medium Sustainability Area – Minimum 0.75/1.0 spaces per unit • Low Sustainability Area – Minimum 1.25/1.5 spaces per unit <p>Standards for non-residential uses will be provided also. These will be based primarily on the same zonal structure with higher minimums in the Low Sustainability Areas and lower minimums in the higher areas. Approximately 20% of spaces should have active charging facilities with passive provision for all remaining spaces. A proportion of car club spaces (final proportion to be defined) should be provided on site with potential contribution for off-site provision in cases where provisions is not possible.</p>
		Car Parking Standards (3)	<p>No Parking Standards. Do not have parking standards and use the NPPF 2018. This would be largely similar to the objectives of the Ministerial Statement in March 20153. There would have specific requirements for electric cars and car clubs based on a proportion of the total site provision (although the total provision is unknown under this policy option)</p>

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
	Cycle Parking And Storage	Cycle Parking And Storage (1)	<p>Cycle Parking and Storage. Have a policy on cycle parking which identifies a minimum number of cycle spaces on a per unit ratio. There would also be significant emphasis in the guidance on the design, location and security of cycle storage depending on the use class of development and the type of residential use (e.g. housing, or apartments). This will be linked to a consolidated design guide and/or cycle parking guide and will be based on at least 1 cycle space per unit.</p>
		Cycle Parking And Storage (2)	<p>More Prescriptive Cycle Parking Policy. Besides a standard 1 space per unit, the policy would insist on specifics e.g. large item storage in apartments over 20 units, as well as insisting on access being created to rear terraced properties.</p>
		Cycle Parking And Storage (3)	<p>No Policy. Use the NPPF paragraphs to determine cycle parking provision on site.</p>
	Prioritising Pedestrians And Cyclists In New Schemes.	Prioritising Pedestrians And Cyclists In New Schemes. (1)	<p>Policy by Design. Don't have a specific policy and deal with designing for pedestrian and cyclist priority as part of a larger design policy which would be elaborated upon in a consolidated design guide.</p>
		Prioritising Pedestrians And Cyclists In New Schemes. (2)	<p>Full and Specific Design Policy. Have a policy specific in the transport section of the plan for the design of healthy streets for cycling and walking.</p>

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Prioritising Pedestrians And Cyclists In New Schemes. (3)	No Policy. Don't have a policy and rely on the general paragraphs in the NPPF 2018.
Retail and Town Centre	The Changing Face Of Retail	Approach To Retail Throughout The Borough (1)	Protect the Town Centre. Only Policy to protect retail in the town centre only. Planning decisions for sites outside the town centre area to rely on the NPPF.
		Approach To Retail Throughout The Borough (2)	Protect All Retail Floorspace. Policy to protect the town centre and other designated retail centres and support new retail floorspace coming forward when strategic sites are developed.
		Approach To Retail Throughout The Borough (3)	Retail Floorspace. Policy approach – no policy. Rely on the National Planning Policy Framework.
		Retail Frontages in the Town Centre (1)	Town Centre Areas – Primary Frontages. End the identified Primary Retail Frontages at Exchange Road, as the flyover provides a physical barrier.
		Retail Frontages in the Town Centre (2)	Town Centre Areas – Primary Frontages. End the identified Primary Retail Frontage at Clarendon Road.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
		Retail Frontages in the Town Centre (3)	Town Centre Areas – Secondary Frontages. Remove reference to Secondary Frontages and do not identify Secondary Frontages on the Policies Map. Outside the primary shopping frontage but within the Town Centre, enable the full range of town centre uses to be permitted subject to the sequential test.
		Retail Frontages in the Town Centre (4)	Town Centre Areas – Secondary Frontages. Remove reference to Secondary Frontages in some parts of the town centre – for example, The Parade. Identify primary frontages and reduce secondary frontage along the Parade to encourage redevelopment.
		Restriction Of Non-Retail Uses In Retail Frontages (1)	Restrict Non-Retail Uses In All Identified Retail Frontages. Set out uses considered to be acceptable in primary and secondary frontages. Redevelopment could be enabled with a requirement to ensure there is no loss of retail or service floorspace and that frontages remain contiguous.
		Restriction Of Non-Retail Uses In Retail Frontages (2)	Restrict Non-Retail Uses In Identified Retail Frontages. Set out uses considered to be acceptable in primary and secondary frontages. Redevelopment could be enabled with a requirement to ensure a percentage of retail or service floorspace is retained and that frontages remain contiguous.
		Restriction Of Non-Retail Uses In Retail Frontages (3)	Retail Frontages. Policy approach – no policy. Rely on the National Planning Policy Framework.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Restaurants (1)	A3 Hub Areas in the Town Centre Encourage. A3 uses to locate together in identified hub areas (likely to be at the entrance points to Intu) to support the town's family friendly economy. Restrictions relating to the proportion of A1 and A3 uses will not apply. Additional A4 and A5 uses are not suitable in these areas. Restrict A3 uses elsewhere in the town centre.
		Restaurants (2)	A3 Hub Areas in the Town Centre. No policy. Rely on the National Planning Policy Framework and allow A3 uses on an ad hoc basis.
		Evening Economy (1)	Nuisance/Safety Around A3 Restaurant, A4 Drinking Establishment And A5 Take-Away Uses. Policy approach to protect the amenity of residents close to a property where a change of use or a new building is proposed for Class A3, A4 or A5. Consideration would need to be given to the impact on amenity in terms of noise, fumes and in terms of community safety issues arising from the change in land use.
		Evening Economy (2)	Nuisance/Safety Around A3 Restaurant, A4 Drinking Establishment And A5 Take-Away Uses. Policy approach – no policy. Rely on the National Planning Policy Framework and other Local Plan policies such as design and the Residential Design Guide.
		Vacant Units (1)	Support temporary use of vacant ground floor premises where the use is consistent with primary and secondary frontages and where it can be demonstrated that the unit is being actively marketed.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
		Vacant Units (2)	Permit any temporary use except for residential that will not adversely affect the amenity of the area.
		Vacant Units (3)	No policy. Rely on the National Planning Policy Framework with no provision for the temporary use of vacant premises.
		Clustering Of Betting And Loan Shops (1)	Only permit a limited number of shops within a set distance.
		Clustering Of Betting And Loan Shops (2)	Have a two-tier approach where betting and money shops are not allowed to cluster in the primary retail frontage but enable limited clustering in the secondary retail frontage.
		Clustering Of Betting And Loan Shops (3)	Do not have a policy and enable the market to determine the location of shops in the High Street.
		Small And Independent Shops In The Town Centre (1)	Require a proportion of smaller units where appropriate with areas designated for small pop up shops
		Small And Independent Shops In The Town Centre (2)	No policy. Rely on the National Planning Policy Framework. Small and independent shops would need to compete with the rest of the market for sites.

Table C.1: Policy Options Assessed			
Topic Paper	Key Issue	Policy Option	Policy Option Text
		Local, Neighbourhood And District Centres (1)	Protect and Consolidate Local, District and Neighbourhood Centres. Focus on the consolidation of a viable range of functions and uses that make the location a recognisable destination in the local area. This particularly relates to convenience retailing, leisure, local employment and workspace. Loss of existing floorspace would not be supported with the expectation that replacement floorspace would be re-provided as part of any redevelopment. Smaller local and neighbourhood centres should focus on a limited but variety of uses and provide convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.
		Local, Neighbourhood And District Centres (2)	Prioritise the Neighbourhood and District Centres with less emphasis on Local Centres. Protect and consolidate District and Neighbourhood Centres but do not seek to protect smaller Local Centres enabling the market to determine if they are viable.
		Local, Neighbourhood And District Centres (3)	Local, Neighbourhood And District Centres. Policy approach – no policy. Rely on the National Planning Policy Framework.
Strategic Approaches to Growth	Strategic Approaches to Growth	Strategic Approaches to Growth (1)	Sites Based on Sustainability and Accessibility. Prioritise land that has been previously developed (brownfield land) based on sites identified in the Housing and Economic Land Availability Assessment which is based on effective use of land and efficient densities as informed by their level sustainability and accessibility. Key designations that contribute to the sustainability of the area will be afforded a greater degree of protection from development to ensure the delivery of sustainable development.

Table C.1: Policy Options Assessed

Topic Paper	Key Issue	Policy Option	Policy Option Text
		Strategic Approaches to Growth (2)	<p>Identified Sites Including Redevelopment of Open Space and Employment Land. Prioritise land that has been previously developed (brownfield land) based on sites identified in the Housing and Economic Land Availability Assessment. Areas designated for uses other than residential, such as open space and employment, within the borough to be included to meet development needs.</p>
		Strategic Approaches to Growth (3)	<p>Identified Sites Including Release of Green Belt Land for Development. Prioritise land that has been previously developed (brownfield land) based on sites identified in the Housing and Economic Land Availability Assessment. Include the release of land designated as Green Belt where this is not considered to make a 'very significant' contribution towards the separation of existing built up areas.</p>
		Strategic Approaches to Growth (4)	<p>Intensification of all Areas. Significant intensification of all areas of the borough based on sites identified for development with no baseline criteria related to sustainability or density.</p>

3. Findings of the Policy Options Assessment

Table C.2 presents a summary of the policy options assessment. Each policy option has been assessed against the 19 SA objectives within the SA Framework to the same level of detail. The full report of the options assessment can be made available on request.

Key to symbols:

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

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Air Quality Policy Options	1	0	0	0	+	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	+	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
Noise Pollutions Policy Options	1	0	0	0	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	+	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0
Contamination Policy Options	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0
Built Community Facilities Policy Options	1	0	0	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	-	0	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
Climate Change and Low Carbon Policy Options	1	0	0	0	+	0	0	0	+	0	++	++	+	0	+	0	0	0	0	0
	2	0	0	0	0	0	0	0	+	0	+	+	+	0	+	0	0	0	0	0
Overheating Policy Options	1	0	0	0	+	0	0	0	+	0	++	++	+	0	+	0	0	0	0	0
	2	0	0	0	+	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0
Flood Risk Policy Options	1	0	0	0	0	+	0	0	0	0	0	+	+	+	+	0	0	+	++	0
	2	0	0	0	0	0	0	0	0	0	0	?	0	0	?	0	0	?	?	0

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Water Supply Policy Options	1	0	0	0	+	0	0	0	0	0	0	++	0	0	0	0	0	+	0	0
	2	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0
Waste Management Policy Options	1	0	0	+	+	0	0	0	0	0	0	0	+	0	+	0	0	0	0	+
	2	0	0	+	+	0	0	0	0	0	0	0	+	0	+	0	0	0	0	+
	3	0	0	?	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
High Quality Design Policy Options	1	0	0	++	++	?	?	+	+	+	+	0	0	0	++	0	+	0	0	0
	2	0	0	?	?	+	?	?	0	0	0	+	?	+	?	+	0	?	0	+
	3	0	0	+	+	?	?	?	+	+	+	0	?	0	+	?	0	?	0	0
	4	0	0	?	?	+	?	?	0	0	0	+	?	+	?	+	?	?	0	+
Conservation Policy Options	1	0	0	0	0	0	0	0	0	0	0	0	0	?	?	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	?	?	0	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0	0
Protection and Enhancement of Biodiversity Policy Options	1	0	0	0	0	0	0	0	0	0	0	0	?	0	?	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	?	0	?	0	0	0	0	0
	1	0	0	0	0	+	0	0	0	0	0	0	++	0	0	+	+	0	0	0

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Green Infrastructure and the Natural Environment Policy Options	2	0	0	0	0	-	0	0	0	0	0	0	--	0	0	0	0	0	0	0
Protecting Open Space Policy Options	1	0	0	-	0	-	0	0	0	0	0	0	--	0	-	0	0	0	0	0
	2	0	0	?	0	+	0	0	0	0	0	0	--	0	+	0	0	0	0	0
	3	0	0	?	0	?	0	0	0	0	0	0	?	0	?	0	0	0	0	0
	4	0	0	--	0	-	0	0	0	0	0	0	-	0	--	0	0	0	0	0
Provision of Functional Open Space in New Developments Policy Options	1	0	0	--	-	-	0	0	0	0	0	0	0	0	?	0	0	0	0	0
	2	0	0	-	-	-	0	0	0	0	0	0	0	0	?	0	0	0	0	0
	3	0	0	--	--	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Landscaping and Green Infrastructure in New Developments Policy Options	1	0	0	+	0	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0
	2	0	0	0	0	-	0	0	0	0	0	0	0	0	-	0	0	0	0	0
Housing Growth: Approach to Housing Growth Policy Options	1	0	0	+	-	0	0	-	0	-	-	0	-	0	?	0	?	0	0	0
	2	0	0	--	+	0	0	+	0	+	+	0	--	0	--	0	--	0	0	0
	3	<i>Not assessed as not deemed a reasonable alternative.</i>																		
	4	<i>Not assessed as not deemed a reasonable alternative.</i>																		

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	5	0	0	++	-	0	0	-	0	-	-	0	+	0	+	0	++	0	0	0
Density Patterns Across the Brough: Housing Density and Optimising Land Policy Options	1	0	0	+	+	+	?	++	+	+	++	0	0	0	?	0	+	0	0	0
	2	0	0	?	?	?	0	-	?	?	?	0	0	0	-	0	?	0	0	0
Infrastructure Policy Options	1	+	+	++	0	0	0	++	0	0	+	0	+	0	0	0	0	0	-	0
	2	0	0	+	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0
Utilities Policy Options	1	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0
Employment Growth: Designated Employment Sites Policy Options	1	?	?	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0
	2	?	?	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0
Employment Growth: Non-Designated Employment Sites Policy Options	1	+	+	0	-	0	0	+	+	+	+	0	0	0	0	-	+	0	0	0
	2	-	-	0	+	0	0	?	?	?	?	0	0	0	0	?	0	0	0	0
Employment Growth: Mixed Use Development Policy Options	1	++	+	0	++	0	0	++	?	?	+	0	0	0	+	+	+	0	0	0
	2	?	?	0	?	0	0	?	?	?	?	0	0	0	?	?	?	0	0	0
Housing Mix Policy Options	1	0	0	?	-	?	?	?	?	?	?	?	?	?	?	0	?	?	?	?
	2	0	0	0	-	0	0	++	+	+	++	0	0	0	0	0	0	0	0	0

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	3	0	0	0	--	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	--	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Affordable Housing Policy Options	1	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	4	0	0	0	--	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Commuted Sums Policy Options	1	0	0	0	+	0	-	-	-	-	-	-	0	0	-	0	0	-	-	0
	2	0	0	0	+	0	--	-	-	-	-	-	0	0	-	0	0	-	-	0
Housing Tenure Policy Options	1	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ageing Populations Policy Options	1	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Starter Homes Policy Options	1	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Self-Build and Custom Housebuilding Policy Options	1	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Windfall Sites Policy Options	1	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Residential Conversions Policy Options	1	0	0	0	+	0	0	0	-	-	0	0	0	0	+	0	+	0	0	0
	2	0	0	+	+	+	?	+	+	+	+	0	0	0	+	0	++	0	0	0
	3	0	0	0	-	0	0	0	-	-	0	0	0	0	+	0	+	0	0	0
Gypsies and Travellers Policy Options	1	0	0	++	+	-	+	?	0	0	0	+	+	0	+	0	+	0	+	0
Enhancing Public Transport Provision and Supporting Watford as an Important Regional Transport Hub Policy Options	1	0	0	+	0	+	0	+	0	0	+	0	0	0	0	0	0	0	0	0
	2	0	0	-	0	-	0	-	0	0	+	0	0	0	0	0	0	0	0	0
Car Parking Standards Policy Options	1	0	0	0	-	+	0	++	+	0	+	0	0	0	0	0	0	0	0	0
	2	0	0	0	+	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	0	?	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0
	1	0	0	0	0	+	0	+	0	0	+	0	0	0	0	0	0	0	0	0

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Cycle Parking and Storage Policy Options	2	0	0	0	0	+	+	+	0	0	+	0	0	0	0	0	-	0	0	0
	3	0	0	0	0	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0
Prioritising Pedestrians and Cyclists in the New Schemes Policy Options	1	0	0	0	0	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0
	2	0	0	+	0	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	+	0	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0
The Changing Face of Retail: Approach to Retail Throughout the Borough Policy Options	1	+	0	+	0	0	-	-	0	+	0	0	+	0	+	++	++	0	0	0
	2	0	0	+	0	+	+	+	0	0	0	0	0	0	-	-	-	0	0	0
	3	0	0	0	0	0	+	+	0	0	0	0	0	0	-	-	-	0	0	0
The Changing Face of Retail: Retail Frontage in the Town Centre Policy Options	1	?	0	+	0	0	-	0	0	0	0	0	0	0	+	++	+	0	0	0
	2	+	0	+	0	0	-	0	0	0	0	0	0	0	+	++	+	0	0	0
	3	+	0	0	0	0	0	0	0	0	0	0	0	0	-	?	0	0	0	0
	4	-	0	0	+	0	0	+	0	0	0	0	0	0	?	?	0	0	+	0
The Changing Face of Retail: Restriction of Non-Retail Uses in Retail Frontages Policy Options	1	+	0	+	0	0	0	-	0	0	0	0	0	0	+	+	+	0	0	0
	2	+	0	0	0	0	0	0	0	0	0	0	0	0	+	++	+	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	-	0	0	0

Table C.2: Policy Options																				
SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
The Changing Face of Retail: Restaurants Policy Options	1	0	0	+	0	-	0	-	0	+	0	0	0	0	++	+	+	0	0	0
	2	0	0	0	0	+	0	+	0	-	0	0	0	0	-	-	0	0	0	0
The Changing Face of Retail: Evening Economy Policy Options	1	0	0	0	0	0	+	0	0	++	0	0	0	0	+	+	0	0	0	0
	2	0	0	0	0	0	+	0	0	+	0	0	0	0	+	+	0	0	0	0
The Changing Face of Retail: Vacant Units Policy Options	1	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	++	0	0	0
	2	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	++	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	+	-	0	0	0	0
The Changing Face of Retail: Clustering of Betting and Loan Shops Policy Options	1	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	0	0
	2	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0
	3	0	0	0	0	0	0	0	0	0	0	0	0	0	-	--	0	0	0	0
The Changing Face of Retail: Small and Independent Shops in the Town Centre Policy Options	1	++	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	0	0
	2	--	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0	0
The Changing Face of Retail: Local, Neighbourhood and District Centres Policy Options	1	+	0	++	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0
	2	+	0	+	0	-	0	-	0	0	0	0	0	0	0	0	0	0	0	0
	3	0	0	--	0	--	0	--	0	0	0	0	0	0	0	0	0	0	0	0

Table C.2: Policy Options

SA Objective		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Strategic Approaches to Growth Policy Options	1	0	0	0	+	0	0	+	0	0	0	0	0	0	+	0	+	0	+	0
	2	0	--	0	+	-	0	-	0	0	0	0	--	0	-	0	-	0	+	0
	3	0	0	0	+	0	0	-	0	0	0	0	--	0	--	0	-	0	+	0
	4	0	0	0	+	--	0	-	0	0	0	0	--	0	--	0	--	0	?	0

4. Development of Options into Policies

Table C.3 presents the development of policy options into First Draft Local Plan policies and shows which policy options were taken forward as policies. Following work undertaken by officers to develop the options into policies, which involved consultation with members and stakeholders, some gaps in policy were identified leading to the inclusion of additional policies at the draft plan stage. Any such policies introduced into the plan in order to fill a policy gap have been identified as 'new policy' within the final column of Table C.3. The 'new' policies were identified to fill policy gaps. It is considered that there are no reasonable alternatives to the 'new' policies as described within Table C.3.

Table C.3: WBC First Draft Local Plan Policy Development

Policy option reference number	Topic	Sub issue	Policy option	Policy option description	Changes made to policy option to create First Draft Local Plan policy
1.1.0	Strategic Approaches to Growth	Protection of Green Belt land	Policy to protect Green Belt land	Policy protects Green Belt land but spells out how a Green Belt review could force us to release some of our Green Belt land for the Final Draft Local Plan.	N/A
1.1.1	Strategic Approaches to Growth	Strategic Approaches to Growth	Sites Based on Sustainability and Accessibility	Prioritise land that has been previously developed (brownfield land) based on sites identified in the Housing and Economic Land Availability Assessment which is based on effective use of land and efficient densities as informed by their level sustainability and accessibility. Key designations that contribute to the sustainability of the area will be afforded a greater degree of protection from development to ensure the delivery of sustainable development.	N/A
1.1.2	Strategic Approaches to Growth	Strategic Approaches to Growth	Identified Sites Including Redevelopment of Open Space and Employment Land	Prioritise land that has been previously developed (brownfield land) based on sites identified in the Housing and Economic Land Availability Assessment. Areas designated for uses other than residential, such as open space and employment, within the borough to be included to meet development needs.	N/A
1.1.3	Strategic Approaches to Growth	Strategic Approaches to Growth	Identified Sites Including Release of Green Belt Land for Development	Prioritise land that has been previously developed (brownfield land) based on sites identified in the Housing and Economic Land Availability Assessment. Include the release of land designated as Green Belt where this is not considered to make a 'very significant' contribution towards the separation of existing built up areas.	N/A

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1.1.4	Strategic Approaches to Growth	Strategic Approaches to Growth	Intensification of all Areas	Significant intensification of all areas of the borough based on sites identified for development with no baseline criteria related to sustainability or density.	N/A
2.1.1	Growth Strategy and Strategic Planning	Housing Growth	Housing distribution	<p>Areas of Low Sustainability (10%)</p> <p>Areas of Medium Sustainability (20%)</p> <p>Areas to High Sustainability (70%)</p>	<p>The final sites allocations were based on the findings of the Housing and Economic Land Availability Assessment. With a shortage of sites to meet the development needs Watford is unable to 'pick and choose' the sites to come forward.</p> <p>Therefore, the strategy is not based on distribution but on sites that are available and have land owner consent to be in the Local Plan.</p>
2.1.2	Growth Strategy and Strategic Planning	Housing Growth	Housing distribution	<p>Areas of Low Sustainability (15%)</p> <p>Areas of Medium Sustainability (25%)</p> <p>Areas of High Sustainability (60%)</p>	As above.
2.1.3	Growth Strategy and Strategic Planning	Housing Growth	Housing distribution	<p>Areas of Low Sustainability (20%)</p> <p>Areas of Medium Sustainability (20%)</p> <p>Areas of High Sustainability (60%)</p>	N/A

Table C.3: WBC First Draft Local Plan Policy Development

2.1.4	Growth Strategy and Strategic Planning	Housing Growth	Housing distribution	Areas of Low Sustainability (10%) Areas of Medium Sustainability (40%) Areas of High Sustainability (50%)	N/A
2.1.5	Growth Strategy and Strategic Planning	Housing Growth	Housing distribution	Areas of Low Sustainability (5%) Areas of Medium Sustainability (15%) Areas of High Sustainability (80%)	N/A
2.1.6	Strategic Policies	Developer Contributions	Developer Contributions	Policy SD2.6 Developer Contributions has been added to ensure that necessary infrastructure is provided alongside development. Contributions will be sought where onsite delivery is not practicable.	N/A
3.1.1	Climate Change and Resilience	Climate change and low carbon energy	Minimising GHG emissions and improving energy efficiency	A policy that requires energy efficiency performance above the building regulations for residential developments (19% above Part L). New commercial buildings will have to meet BREEAM standards (e.g. Excellent/ Very Good), while developments of certain size will need to provide a proportion (potentially 20%?) of low carbon energy on site/ or contribute to the council's Offset Fund.	The Issue of Energy Efficiency, Water Supply and Overheating are now in a combined policy in Sustainable Design and Construction, which requires a sustainability statement to be submitted detailing all three issues.
3.1.2	Climate Change and Resilience	Climate change and low carbon energy	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework (specifically paras 150b, 153b) and Planning Practice Guidance.	As above.

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3.2.1	Climate Change and Resilience	Overheating	Overheating	A policy that requires applicants to set out the measures to be included as part of a proposal to avoid overheating in new buildings as part of a planning application. This could be included as part of a Sustainability/ Energy Statement.	The Issue of Energy Efficiency, Water Supply and Overheating are now in a combined policy in Sustainable Design and Construction, which requires a sustainability statement to be submitted detailing all three issues.
3.2.2	Climate Change and Resilience	Overheating	No policy	Do not have a policy for overheating. Use guidance set out in the National Planning Policy Framework (2018) and identify it as a requirement in the Residential Design Guide SPD.	As above.

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3.3.1	Climate Change and Resilience	Flood Risk	Flood risk and the water environment	<p>Development must be located, designed and laid out to minimise the risk of flooding from all sources, whilst not increasing the risk of flooding elsewhere. For non-allocated sites the sequential and exception test needs to be applied based on the requirements in the National Planning Policy Framework, as amended, and associated guidance.</p> <p>The design and layout of all major developments and areas of hardstanding should incorporate methods for Sustainable Urban Drainage (SuDS). These should be designed from the outset of the scheme to ensure there is a reduction in the level of surface water leaving the site.</p> <p>SuDs systems should be designed and located sensitively to ensure the quality of the local water environment is maintained.</p> <p>Details of the proposed SuDS should be submitted as part of any planning application including provision for arrangements for the whole life management and maintenance of the provided SuDS.</p> <p>Where appropriate be part of green and blue infrastructure on site and incorporate biodiversity and add to the landscape quality of the development.</p>	Separate flood risk policy.
3.3.2	Climate Change and Resilience	Flood Risk	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance (with specific guidance for the design/landscaping, green infrastructure aspect of SuDs identified in design policy and supporting supplementary planning documents).	N/A

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3.4.1	Climate Change and Resilience	Water Supply	Optional water standards	A policy requiring the efficient use of water resources in new housing developments that is higher than standard building regulations. The requirement would be to meet the tighter Building Regulations optional requirement of 110 litres/person/day.	The Issue of Energy Efficiency, Water Supply and Overheating are now in a combined policy in Sustainable Design and Construction, which requires a sustainability statement to be submitted detailing all three issues.
3.4.2	Climate Change and Resilience	Water Supply	No policy	No Local Plan policy and rely on guidance set out in the National Planning Policy Framework (2018).	N/A
3.5.1	Climate Change and Resilience	Waste Management	Waste management	All new development to comply with the requirements for waste management provision in the New Development Design Guide 2019 (formerly the Residential Design Guide SPD). How compliance has been met will need to be demonstrated at application stage e.g. Design and Access Statement or Planning Statement.	N/A
3.5.2	Climate Change and Resilience	Waste Management	No policy	Do not have a specific policy for waste but identify waste management in the design policy as a specific objective, while providing further guidance in supplementary design guidance.	N/A
3.5.3	Climate Change and Resilience	Waste Management	No Policy	Rely on guidance set out in the National Planning Policy Framework and adopted policies and approaches set out in the Hertfordshire Waste Local Plan.	N/A

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4.1.1	Built Community Facilities	Built Community Facilities	Protection of registered assets of community value and community facilities	<p>Community facilities registered as an Asset of Community Value will not be allowed to change their use. Other community facilities will be protected unless it can be demonstrated they are no longer required.</p> <p>A criteria-based approach would enable alternative community uses to be considered prior to other uses.</p> <p>Redevelopment of a site used for community uses to be supported where the proposal is to re-provide improved facilities on the site that better meet the needs of the community.</p>	Most of this approach is not carried forward, however, a policy is proposed to prevent the loss of existing cultural and social venues to reflect corporate priorities and as part of Local Centres.
4.1.2	Built Community Facilities	Built Community Facilities	Protection of community facilities	<p>Community facilities will be protected unless it can be demonstrated they are no longer required and there is suitable provision elsewhere in the vicinity.</p> <p>A criteria-based approach would enable alternative community uses to be considered prior to other uses.</p> <p>Redevelopment of a site used for community uses to be supported where the proposal is to re-provide improved facilities on the site that better meet the needs of the community.</p>	
4.1.3	Built Community Facilities	Built Community Facilities	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
5.1.1	Housing Density and Optimising Land Potential	Optimising Land Potential	Optimising land potential	Require developments to make best use of land by using housing density bands based on sustainability and accessibility (as shown on the accompanying sustainability map) while also ensuring that dispensation for site specific circumstances are provided for by enabling departures away from the range in certain circumstances.	There is now a density requirement for employment land.

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5.1.2	Housing Density and Optimising Land Potential	Optimising Land Potential	Optimising land potential by design	Do not identify banded sustainability areas and instead require applicants to make best use of land through scheme design by considering site specifics including any constraints and access to facilities and services. This then will be considered by the individual case officer at application stage.	N/A
5.2.1	Employment	Designated Employment Sites	Protect existing B use classes in (employment) designated employment areas	Support changes of use within B classes, however, changes of use to other use classes (e.g. classes A (shops and professional services), D uses (leisure and assembly) and sui generis will not be permitted.	N/A
5.2.2	Employment	Designated Employment Sites	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
5.3.1	Employment	Non-Designated Employment Sites	Support employment growth outside of designated employment areas	Changes of use and redevelopment of sites to encourage employment uses to support small businesses where they are compatible with the area and would not adversely affect amenity (noise, odour, traffic etc.) of the surrounding area.	More text included to stipulate requirements for complementary supporting uses versus destination uses.
5.3.2	Employment	Non-Designated Employment Sites	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A

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5.4.1	Employment	Mixed Use Development	Support mixed use development and colocation in employment areas	Enable a mix of uses in employment areas where they are complementary to employment uses and do not undermine the existing employment offer on the site. Redevelopment will be supported where there is no net loss of B class floor space (borough-wide policy).	N/A
5.4.2	Employment	Mixed Use Development	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
6.1.0	Housing	Delivery	New (based on the HELAA)	Housing Delivery Policy base on Development Considerations (there is a new site) and the HELAA final numbers are required.	New policy (an alternative approach would be do not have a policy and rely directly on development considerations set out for each site without referring to other strategic considerations in the Local Plan. However, this is not considered a reasonable alternative and is not under active consideration by the planning team.)

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6.1.1	Housing	Garage Sites	New (based on HELAA)	HELAA noted potential for garage sites to contribute to delivery but were not available to include in the final document. This policy therefore supports the redevelopment of garage sites to contribute to windfall delivery.	New policy (an alternative approach would be to consider garage sites as any other windfall site would be considered when brought forward for redevelopment. However, this is not considered a reasonable alternative and is not under active consideration by the planning team.)
6.1.2	Housing	Garages Sites	No policy		N/A
6.1.2	Housing	Housing Mix	Strategic housing market assessment recommendations	Require developments to deliver a housing mix based on the findings of the Strategic Housing Market Assessment across the borough.	Housing mix requirement included in more detail.
6.1.2	Housing	Housing Mix	Housing mix based on sustainability	Set out a housing mix requirement that varies across the borough and reflects the sustainability of an area as shown on the Sustainability Map.	N/A
6.1.3	Housing	Housing Mix	High proportion of smaller units	Have an approach requiring a skewed housing mix requirement which sets out a higher proportion of small units and work with neighbouring authorities to provide a higher proportion of family sized units outside of Watford's boundary as part of their requirement to consider Watford's unmet housing need.	N/A
6.1.3	Housing	Housing Mix	No policy	Do not have a policy and allow the market to deliver the types of housing that are most in demand.	N/A

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6.2.1	Housing	Affordable Housing	Affordable housing based on units	Require all developments of 11 or more dwellings, or on sites larger than 0.5 ha to provide ***% (currently 35%) affordable housing based on the number of units.	More detail on affordable housing requirement added.
6.2.2	Housing	Affordable Housing	Affordable housing-based bed spaces and habitable rooms	Require all developments of 11 or more dwellings, or on sites larger than 0.5 ha to provide ***% (currently 35%) to provide affordable housing based on the number of bed spaces and habitable rooms.	50% requirement added but will be subject to viability testing following consultation on the First Draft Local Plan.
6.2.3	Housing	Affordable Housing	Higher affordable housing requirement through subsidy	Require all developments of 11 or more dwellings, or on sites larger than 0.5 ha to provide ***% (currently 35%) to provide affordable housing, plus an additional ***% (through Watford Borough Council subsidy) affordable housing based on the number of bedrooms or bed spaces/habitable rooms.	N/A
6.2.4	Housing	Affordable Housing	No policy	Have no policy and enable the market to determine how housing is delivered.	N/A
6.3.1	Housing	Commuted Sums	On-site provision of affordable housing	Affordable housing will be expected to be provided on site. Commuted sums will only be considered appropriate in exceptional circumstances in agreement with the local authority.	N/A
6.3.2	Housing	Commuted Sums	Commuted sums in lieu of affordable housing	Affordable housing will be provided on site where appropriate. However, the council will support commuted sums in lieu of on-site delivery to be invested in alternative affordable housing schemes to meet local need.	N/A
6.4.1	Housing	Housing Tenure	Tenure based on units only	Require a tenure mix (based on total number units only) reflective of the recommendations of the SW Herts Strategic Housing Market Assessment (tbc 2019).	N/A

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6.4.2	Housing	Housing Tenure	Tenure mix based on housing type	Require a tenure mix reflective of the recommendations of the SW Herts Strategic Housing Market Assessment (tbc 2019) that is based on dwelling size (bed spaces/persons) and tenure type.	N/A
6.4.3	Housing	Housing Tenure	Higher social rent housing tenure	Require developers to provide affordable housing tenure mix that has a higher proportion of social rent than recommended subject to viability on a case by case basis.	N/A
6.5.1	Housing	Aging Population	Optional technical standards	Require a proportion of new homes to achieve the optional adoptable (and/or) accessibility technical standards.	Additional requirement added for a proportion of new homes to support wheelchair access.
6.5.2	Housing	Aging Population	Specialist housing	Support sheltered and specialist housing where there is an identified need. Such provision will be considered in lieu of affordable housing.	Requirement added for a proportion of new homes to be designed to support people with disabilities and dementia.
6.6.1	Housing	Starter Homes	Starter homes as part of new development	Require new residential developments to provide a proportion of starter homes on sites above a certain threshold (e.g. 5% on sites of 100 units and above).	N/A
6.6.2	Housing	Starter Homes	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A

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6.7.1	Housing	Self-Build and Custom Housebuilding	Percentage of sites to be used for self-build	Sites larger than one hectare be required to provide 5% as self-build plots where feasible.	Policy included to support self-build homes on brownfield plots greenfield sites. Required to comply with national guidance.
6.7.2	Housing	Self-Build and Custom Housebuilding	Infill sites	Permit self-build schemes on sites that come forward in residential areas resulting in the intensification of existing residential plots.	N/A
6.8.1	Housing	Windfall Sites	Include windfall allowance	Estimate the number of dwellings to come forward based on the historic trend of small sites coming forward in recent years as part of the housing target.	Requirement set out as part of the 'scale of development' policy.
6.8.2	Housing	Windfall Sites	Do not include windfall	Do not include a windfall allowance in the borough's housing target.	N/A
6.9.1	Housing	Residential Conversions	Do not permit conversions of large dwellings below a certain size threshold	Permit the conversion of dwellings to smaller units and HMOs over an identified size threshold across the borough (e.g. 120sqm). Conversions will only be permitted where they provide an appropriate housing mix (i.e. do not disproportionate number of 1 bed units).	N/A

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6.9.2	Housing	Residential Conversions	Conversions in reflecting sustainability classification	Permit property conversions in areas of 'High Sustainability' (as shown in the Optimising Land topic paper) with a lower floor space threshold (e.g. 120sqm) and have a higher floor space threshold in 'Medium' and 'Low Sustainability' areas (e.g. 160 sqm). Conversions will only be permitted where they provide an appropriate housing mix (i.e. do not provide a disproportionate number of 1 bed units).	Threshold set out of 150 sqm which reflects the current approach in the existing Local Plan.
6.9.3	Housing	Residential Conversions	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
6.10.1	Housing	Gypsies and Travellers	No policy	Rely on policies set out in the National Planning Policy Framework and other housing and design related policies set out in the Local Plan.	N/A
7.1.1	Retail and the Watford Town Centre	Approach to retail throughout the Borough	Protect the town centre only	Policy to protect retail in the town centre only. Planning decisions for sites outside the town centre area to rely on the NPPF.	Combined into Policy V9.1 Ensuring the Vitality of the Town and Local Centres to support appropriate town centre uses in town, district and local centres.
7.1.2	Retail and the Watford Town Centre	Approach to retail throughout the Borough	Protect all retail floorspace	Policy to protect the town centre and other designated retail centres and support new retail floorspace coming forward when strategic sites are developed.	
7.1.3	Retail and the Watford Town Centre	Approach to retail throughout the Borough	No policy	Rely on the National Planning Policy Framework with no provision for the temporary use of vacant premises.	N/A

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7.2.1	Retail and Town Centre	Retail Frontages in the Town Centre	Primary shopping area: King Street to Exchange Road	End the identified Primary Shopping Area at Exchange Road as the flyover provides a physical barrier with Secondary Frontages covering the Parade.	Primary shopping frontage shown on the Policies Map.
7.2.2	Retail and the Watford Town Centre	Retail Frontages in the Town Centre	Primary shopping area: King Street to Clarendon Road	End the identified Primary Shopping Area and at Clarendon Road with Secondary Frontages covering the remainder of the High Street and Parade.	N/A
7.2.3	Retail and the Watford Town Centre	Retail and the Watford Town Centre	Secondary frontages: Do not have secondary frontages	Remove reference to Secondary Frontages and do not identify Secondary Frontages on the Policies Map. Outside the primary shopping frontage but within the Town Centre, enable the full range of town centre uses to be permitted subject to the sequential test.	N/A
7.2.4	Retail and the Watford Town Centre	Retail and the Watford Town Centre	Secondary frontages: Designate frontages in some areas	Remove reference to Secondary Frontages in some parts of the town centre – for example, The Parade. Identify primary frontages and reduce secondary frontage along the Parade to encourage redevelopment.	Secondary frontages shown on the Policies Map.
7.3.1	Retail and the Watford Town Centre	Restriction of non-retail uses in retail frontages	Restrict non-retail uses in all identified retail frontages.	Set out uses considered to be acceptable in primary and secondary frontages. Redevelopment could be enabled with a requirement to ensure there is no loss of retail or service floorspace and that frontages remain contiguous	N/A

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7.3.2	Retail and the Watford Town Centre	Restriction of non-retail uses in retail frontages	Remove reference to secondary frontages and do not identify secondary frontages on the Policies Map.	Set out uses considered to be acceptable in primary and secondary frontages. Redevelopment could be enabled with a requirement to ensure a percentage of retail or service floorspace is retained and that frontages remain contiguous.	Policy V9.2 sets out uses within Primary and Secondary Retail Frontages, in addition the A3 Hubs are now contained in this policy. Appropriate Uses within 'intu' are in separate Policy V9.3
7.3.3	Retail and the Watford Town Centre	Restriction of non-retail uses in retail frontages	No policy.	This approach would not have a specific policy in the Local Plan but would rely on the paragraphs in the National Planning Policy Framework.	N/A
7.4.1	Retail and the Watford Town Centre	Restaurants	A3 hub areas	Encourage A3 uses to locate together in identified hub areas (likely to be at the entrance points to Intu) to support the town's family friendly economy. Restrictions relating to the proportion of A1 and A3 uses will not apply. Additional A4 and A5 uses are not suitable in these areas. Restrict A3 uses elsewhere in the town centre.	Included in Policy V9.2 with the Primary Retail Frontages.
7.4.2	Retail and the Watford Town Centre	Restaurants	No policy	Rely on the National Planning Policy Framework and allow A3 uses on an ad hoc basis.	N/A
7.5.1	Retail and the Watford Town Centre	Evening Economy	Nuisance/safety around A3 restaurant, A4 drinking establishment and A5 take-away uses.	Policy approach to protect the amenity of residents close to a property where a change of use or a new building is proposed for Class A3, A4 or A5. Consideration would need to be given to the impact on amenity in terms of noise, fumes and in terms of community safety issues arising from the change in land use.	N/A

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7.5.2	Retail and the Watford Town Centre	Evening Economy	No policy	Rely on the National Planning Policy Framework and other Local Plan policies such as design and the Residential Design Guide.	No policy required.
7.6.1	Retail and the Watford Town Centre	Vacant Units	Permit temporary uses consistent with existing frontages	Support temporary use of vacant ground floor premises where the use is consistent with primary and secondary frontages and where it can be demonstrated that the unit is being actively marketed.	N/A
7.6.2	Retail and the Watford Town Centre	Vacant Units	Permit temporary uses without restrictions	Permit any temporary use except for residential that will not adversely affect the amenity of the area.	Changes to the Permitted Development Rights and agreed relaxation with the Secondary Retail Frontages mean that this is no longer appropriate.
7.6.3	Retail and the Watford Town Centre	Vacant Units	No policy	Rely on the National Planning Policy Framework with no provision for the temporary use of vacant premises.	N/A
7.7.1	Retail and the Watford Town Centre	Clustering of betting and loan shops	Restrict clustering using a defined distance threshold	Only permit a limited number of shops within a set distance.	No betting shop policy required.
7.7.2	Retail and the Watford Town Centre	Clustering of betting and loan shops	Define areas where clustering is a higher risk	Have a two-tier approach where betting and money shops are not allowed to cluster in the primary retail frontage but enable limited clustering in the secondary retail frontage.	N/A
7.7.3	Retail and the Watford Town Centre	Clustering of betting and loan shops	No policy	Do not have a policy and enable the market to determine the location of shops in the high street.	No policy required as no clustering has been evidenced.

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7.8.1	Retail and the Watford Town Centre	Small and Independent Shops	Set out requirement to support small/temporary businesses	Require a proportion of smaller units where appropriate with areas designated for small pop up shops.	N/A
7.8.2	Retail and the Watford Town Centre	Small and Independent Shops	No policy	Rely on the National Planning Policy Framework. Small and independent shops would need to compete with the rest of the market for sites.	No independent shops policy required.
7.9.1	Retail and the Watford Town Centre	Local, Neighbourhood and District Centres	Protect and consolidate local, district and neighbourhood centres	Focus on the consolidation of a viable range of functions and uses that make the location a recognisable destination in the local area. This particularly relates to convenience retailing, leisure, local employment and workspace. Loss of existing floorspace would not be supported with the expectation that replacement floorspace would be re-provided as part of any redevelopment. Smaller local and neighbourhood centres should focus on a limited but variety of uses and provide convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.	Combined to form Policy V9.4 detailing appropriate uses in District and Local Centres. The smallest (less than 7 units) centres have been removed to enable significant consideration of those remaining.
7.9.2	Retail and the Watford Town Centre	Neighbourhood and District Centres	Prioritise the neighbourhood and district centres with less emphasis on local centres	Protect and consolidate district and neighbourhood centres but do not seek to protect smaller local centres enabling the market to determine if they are viable.	
7.9.3	Retail and the Watford Town Centre	Neighbourhood and District Centres	No policy	Rely on the National Planning Policy Framework with no provision for the temporary use of vacant premises.	N/A

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8.1.1	Design and Conservation	High Quality Design	Comprehensive design policy	<p>This approach would provide a specific policy in the local plan establishing a clear expectation for high quality design. There would be a clear link to the density policy and the residential design guide which will include guidance on the design parameters for achieving higher densities within each of the three sustainability zones. It would include a comprehensive list of key design principles, linked specifically with the new build residential design guide.</p> <p>It may also include height restrictions for taller buildings and have key criteria for high density schemes (350 dph) and taller buildings (10 storeys in town centre, 6 storeys elsewhere).</p>	<p>Policy is split into:</p> <p>DC7.1 Strategic Principles for High Quality Design</p> <p>DC7.2 Quality of Place</p> <p>DC7.3 Building Design</p> <p>DC7.4 Taller Buildings</p>
8.1.2	Design and Conservation	High Quality Design	Reliance on the residential design guide (light touch policy)	<p>Set out the just key principles for good design and place more reliance on the Residential Design Guide SPD and the Planning Practice Guidance relating to high quality design.</p>	<p>Policy is split into:</p> <p>DC7.1 Strategic Principles for High Quality Design</p> <p>DC7.2 Quality of Place</p> <p>DC7.3 Building Design</p> <p>DC7.4 Taller Buildings</p>
8.1.3	Design and Conservation	High Quality Design	Use of a design code to support the residential design guide	<p>Set out the just key principles for good design, rely on the Residential Design Guide SPD and require an applicant to provide a 'Building for Life 12' self-assessment as part of a planning application (only applies to new development and excludes householder proposals).</p>	N/A
8.1.4	Design and Conservation	High Quality Design	No policy	<p>This approach will not have a local plan policy and would rely on the NPPF and Planning Practice Guidance relating to high quality design.</p>	N/A

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8.2.1	Design and Conservation	Conservation	Specific policy for conserving and enhancing our heritage	Identifies key principles for conserving and enhancing the historic environment in Watford including conservation areas, listed buildings and their setting. It should include a proactive policy for the management of the heritage at risk. This would be supported by key supplementary planning documents.	Policy split into: DC7.5 Heritage Assets and the Historic Environment Policy DC7.6 Nationally Listed Buildings and Registered Parks and Gardens Policy DC7.7 Conservation Areas DC7.8 Locally Listed Buildings DC7.9 Archaeology
8.2.2	Design and Conservation	Conservation	No specific policy but include in general design policy	Include heritage as a key design principle in the design policy rather than have a specific policy in the Local Plan for heritage.	N/A
8.2.3	Design and Conservation	Conservation	No policy	This approach would not have a specific policy in the Local Plan but would rely on the paragraphs in the National Planning Policy Framework.	N/A

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9.1.1	Transport	Enhancing public transport provision and supporting Watford as an important regional transport hub	Protecting and enhancing transport nodes	<p>Have a policy that safeguards key transport routes including those for potential future investment, namely the disused rail line [former Met Line Extension] and the Abbey Line.</p> <p>The policy would prevent development that would compromise future mass transit provision infrastructure. It can also include protecting key cycling assets/ routes e.g. Ebury Way.</p> <p>This policy may also include a support mechanism for key projects that may be agreed in the Southwest Herts Growth and Transport Plan.</p>	Confirm that the Hempstead Amenity Verge was discussed and is identified on the Policies Map.
9.1.2	Transport	Enhancing public transport provision and supporting Watford as an important regional transport hub	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A

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9.2.1	Transport	Car parking standards	Maximum parking standards	<p>Establish maximum parking standards based on a zonal approach to the borough (see map in Appendix 1). The parking standards would require a higher maximum in the Low Sustainability Areas and a lower maximum in the inner high sustainability areas. For example:</p> <p>High Sustainability Area – Maximum 0.3/0.5 spaces per unit* No Parking or ‘car-lite’ also supported</p> <p>Medium Sustainability Area – Maximum 0.75/1.0 spaces per unit</p> <p>Low Sustainability Area – Maximum 1.25/1.5 spaces per unit</p> <p>Standards for all non-residential uses will be provided also – based primarily on the same zonal structure with higher maximums in the Low Sustainability Areas and lower maximums in the higher areas.</p> <p>Approximately 20% of spaces should have active charging facilities, with passive provision for all remaining spaces. A proportion of car club spaces (final proportion to be defined) should be provided on site, with potential contribution for offsite provision in cases where on site provision is not possible</p>	Included minimum and maximum range for car parking.
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Table C.3: WBC First Draft Local Plan Policy Development

9.2.2	Transport	Car parking standards	Minimum parking standards	<p>Establish minimum parking standards based on a zonal approach (see map in Appendix 1) to the borough. The Parking Standards would require a higher minimum in the outer Low Sustainability Areas and a lower minimum in the inner High Sustainability Areas. For example:</p> <p>High Sustainability Area – Minimum 0.3/0.5 spaces per unit</p> <p>Medium Sustainability Area – Minimum 0.75/1.0 spaces per unit</p> <p>Low Sustainability Area – Minimum 1.25/1.5 spaces per unit</p> <p>Standards for non-residential uses will be provided also. These will be based primarily on the same zonal structure with higher minimums in the Low Sustainability Areas and lower minimums in the higher areas.</p> <p>Approximately 20% of spaces should have active charging facilities with passive provision for all remaining spaces. A proportion of car club spaces (final proportion to be defined) should be provided on site with potential contribution for off-site provision in cases where provisions is not possible.</p>	N/A
9.2.3	Transport	Car parking standards	No parking standards	<p>Do not have parking standards and use the NPPF 2018. This would be largely similar to the objectives of the Ministerial Statement in March 2015¹.</p> <p>There would have specific requirements for electric cars and car clubs based on a proportion of the total site provision (although the total provision is unknown under this policy option).</p>	N/A

¹ <https://www.gov.uk/government/speeches/planning-update-march-2015>

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9.3.1	Transport	Cycle Parking and Storage	Cycle parking and storage	Have a policy on cycle parking which identifies a minimum number of cycle spaces on a per unit ratio. There would also be significant emphasis in the guidance on the design, location and security of cycle storage depending on the use class of development and the type of residential use (e.g. housing, or apartments). This will be linked to a consolidated design guide and/or cycle parking guide and will be based on at least 1 cycle space per unit.	N/A
9.3.2	Transport	Cycle Parking and Storage	More prescriptive cycle parking policy	Besides a standard 1 space per unit, the policy would insist on specifics e.g. large item storage in apartments over 20 units, as well as insisting on access being created to rear terraced properties.	N/A
9.3.3	Transport	Cycle Parking and Storage	No policy	Use the NPPF paragraphs to determine cycle parking provision on site.	N/A
9.4.1	Transport	Prioritising pedestrians and cyclists in new schemes	Policy by design	Do not have a specific policy and deal with designing for pedestrian and cyclist priority as part of a larger design policy which would be elaborated upon in a consolidated design guide.	N/A
9.4.2		Prioritising pedestrians and cyclists in new schemes	Full and specific design policy	Have a policy specific in the transport section of the plan for the design of healthy streets for cycling and walking.	N/A
9.4.3		Prioritising pedestrians and cyclists in new schemes	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A

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10.1.1	Green Infrastructure	Biodiversity	For development proposals of 10 dwellings or more, biodiversity offsetting will be managed through a net gain approach	All major schemes that require planning permission should provide measurable net gains for biodiversity. This could be on site, or an off-site contribution to strengthen existing ecological habitats and networks. Net gains would be measured using the DEFRA metric.	N/A
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10.1.2	Green Infrastructure	Biodiversity	<p>For development proposals of 30 dwellings or more (or a higher number to be decided), biodiversity offsetting will be managed through a net gain approach</p> <p>For development proposals of less than 30 dwellings or more (or a higher number to be decided), a commitment to protect and enhance sites with biodiversity value must be demonstrated</p>	<p>All development proposals of 30 (?) dwellings should provide measurable net gains for biodiversity, using the DEFRA metric.</p> <p>Development proposals of under 30 (?) dwellings should be able to demonstrate a commitment to protecting and enhancing biodiversity. Where development proposals may impact on biodiversity, appropriate mitigation should be required (including an on-site contribution where necessary).</p>	<p>Due to the forthcoming Environment Bill, policy has been made more specific to follow national policy. This includes a 10% requirement for net gain. It is applied to all major development (10+ units).</p>
10.2.1	Green Infrastructure	Green infrastructure and the natural environment	Protect and enhance strategic green and blue infrastructure networks	All development that requires planning permission should be able to demonstrate a commitment to protecting and enhancing the green infrastructure network and how the submitted proposal will contribute towards this.	N/A

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10.2.2	Green Infrastructure	Green infrastructure and the natural environment	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
10.3.1	Green Infrastructure	Protecting open space	Protect open spaces through a criteria-based approach	Planning permission resulting in the loss of open space or ancillary facilities used for leisure and recreation will only be supported where it can be clearly demonstrated the space no longer meets certain criteria (criteria could be based on quality/value and distance thresholds, alternative forms of open space based on need).	Policy merged with option 2 (10.3.2).
10.3.2	Green Infrastructure	Protecting open space	Do not permit open space to be built on unless the facility can be re-provided	Planning permission resulting in the loss of open space or ancillary facilities used for leisure and recreation unless the space is re-provided (of a similar or higher quality) in a more suitable location that meets the needs of the local community.	Policy merged with option 1 (10.3.2).
10.3.3	Green Infrastructure	Protecting open space	Protect open spaces with local green space designations	Planning permission will be refused for proposals that are designated as Local Green Spaces. Local Green Spaces are designated in Local Plans.	N/A
10.3.4	Green Infrastructure	Protecting open space	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A

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10.4.1	Green Infrastructure	Provision of functional open space in new developments	Require major development proposals to provide open space based on identified need	<p>Development proposals for 10 dwellings or over will be required to provide a set amount of open space per dwelling. This will be designed to have a functional use rather than basic landscaping and reflect the type of open space needed in the area.</p> <p>However, there will be a dispensation/ departure from this standard if the site is located in close proximity to existing high value open space. (Provision then would be determined by landscape design to deliver amenity space).</p> <p>Where the site is near an existing low value open space, an appropriate level of open space would be provided on site and/or a development contribution will be sought to enhance the value of the nearby open space.</p>	Policy amended for a contribution to be required when open space is not provided on site.
10.4.2	Green Infrastructure	Provision of functional open space in new developments	Require major development proposals to provide X sqm of open Space per dwelling	Development proposals for 10 dwellings or over will be required to provision a set amount of open space per dwelling, as guided by a locally set standard.	N/A
10.4.3	Green Infrastructure	Provision of functional open space in new developments	No policy	Have no policy on open space provision and instead treat it as a design issue, relying on NPPF paragraphs.	N/A

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10.5.1	Green Infrastructure	Landscaping and green infrastructure in new developments	Comprehensive design policy	This approach would provide a specific policy in the Local Plan establishing a clear expectation for high quality design of green infrastructure as part of new developments. This would likely been in the form of an urban greening factor, a numerical based factor which would determine the quantity and quality of green infrastructure required.	N/A
10.5.2	Green Infrastructure	Landscaping and green infrastructure in new developments	Landscaping and green infrastructure in new developments: No policy and rely on the residential design guide	Set out the key principles for good landscaping and place more reliance on the Residential Design Guide SPD and the Planning Practice Guidance relating to high quality design.	N/A
11.1.1	Contamination and Pollution	Air Quality	Assessment of all development for air quality	All development which may be sensitive to poor air quality (such as residential or community facilities) should be assessed and adequate mitigation provided. Where adequate mitigation is not provided, planning permission should be refused.	N/A
11.1.2	Contamination and Pollution	Air Quality	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
11.2.1	Contamination and Pollution	Noise Pollution	Locate development away from noise generators	All noise sensitive development should be located away from noise generating uses. Where this is not possible, a full noise assessment will be required to demonstrate that appropriate mitigation will be provided.	N/A

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11.2.2	Contamination and Pollution	Noise Pollution	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	Policy NE8.6 Managing the Impacts of Development has been included to capture all elements of pollution prevention.
11.3.1	Contamination and Pollution	Contamination	Requirement for preliminary risk assessments	Policy that proposes that where there may be a potential risk of contamination and ground condition issues, a preliminary risk assessment will be required to identify the risks and to demonstrate that appropriate remediation measures will be carried out.	N/A
11.3.2	Contamination and Pollution	Contamination	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	Merged into policy on Managing the Impacts of Development.
	Infrastructure	Infrastructure	Justify infrastructure requirements required on site	Identify priority projects and only permit development where supported infrastructure is provided or demonstrated otherwise.	Policy V9.5 identifies priority projects to support growth and provides a hook for collecting developer contributions.
	Infrastructure	Infrastructure	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
	Infrastructure	Utilities	Future proof development technological change	Developers to demonstrate how they have made provision for utilities and digital facilities.	Policy V9.6 reflects this.

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	Infrastructure	Utilities	No policy	Do not have a policy and rely on guidance set out in the National Planning Policy Framework and Planning Practice Guidance.	N/A
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