



**WATFORD
BOROUGH
COUNCIL**

Watford Local Plan Proposed Modifications

Sustainability Appraisal Report

Prepared on behalf of:

Watford Borough Council

Date: May 2022


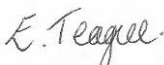

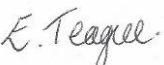






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Table of Contents

1	Introduction	1
1.1	Background	1
1.2	Purpose and Requirements for the Impact Assessments	2
1.3	Habitat Regulations Assessment.....	2
1.4	Equalities Impact Assessment.....	3
1.5	This Document	3
2	Approach to the SA	5
2.1	SA Process	5
2.2	Methodology.....	5
2.2.1	Stage A Scoping.....	5
2.2.2	Task A3: Identifying sustainability issues and problems.....	10
2.2.3	Task A4: Developing the SA assessment framework	10
2.2.4	Task A5: Consulting on the scope of the SA.....	15
2.3	Stage B Developing and refining alternatives and assessing effects	15
2.3.1	Task B1 Develop options including reasonable alternatives	15
2.3.2	Task B2 Evaluate the likely effects of the plan and alternatives	17
2.3.3	Task B3 Consider ways of mitigating adverse effects and maximising beneficial effects ..	26
2.3.4	Task B4 Proposed Measures to monitor the significant effects of implementing the plan	26
2.4	Stage C Preparing the Sustainability Appraisal Report	26
2.5	How the requirements of the SEA Regulations are being met	27
2.6	Assumptions and Limitations.....	30
3	The Scope and Content of Watford Borough Council’s Local Plan	32
4	Review of Policies, Plans and Programmes.....	36
4.1	Introduction	36
4.2	PPP Review - Summary of Key Messages.....	36
5	Summary of Baseline Data	42
5.1	Introduction	42
5.2	Health, Population and Community.....	42
5.2.1	Key Sustainability Issues	42
5.2.2	Future Evolution of the Baseline.....	43



5.2.3	Data Gaps	43
5.3	Housing	43
5.3.1	Key Sustainability Issues	43
5.3.2	Future Evolution of the Baseline.....	44
5.3.3	Data Gaps	44
5.4	Employment and Economy	44
5.4.1	Key Sustainability Issues	44
5.4.2	Future Evolution of the Baseline.....	45
5.4.3	Data Gaps	45
5.5	Transport & Accessibility	45
5.5.1	Key Sustainability Issues	45
5.5.2	Future Evolution of the Baseline.....	46
5.5.3	Data Gaps	46
5.6	Air, Noise and Light Pollution.....	46
5.6.1	Key Sustainability Issues	46
5.6.2	Future Evolution of the Baseline.....	46
5.6.3	Data Gaps	47
5.7	Climate Change	47
5.7.1	Key Sustainability Issues	47
5.7.2	Future Evolution of the Baseline.....	47
5.7.3	Data Gaps	48
5.8	Biodiversity	48
5.8.1	Key Sustainability Issues	48
5.8.2	Future Evolution of the Baseline.....	48
5.8.3	Data Gaps	49
5.9	Cultural Heritage.....	49
5.9.1	Key Sustainability Issues	49
5.9.2	Future Evolution of the Baseline.....	49
5.9.3	Data Gaps	49
5.10	Landscape & Townscape.....	50
5.10.1	Key Sustainability Issues	50
5.10.2	Future Evolution of the Baseline.....	50
5.10.3	Data Gaps	50

5.11	Soils & Geology	50
5.11.1	Key Sustainability Issues	50
5.11.2	Future Evolution of the Baseline.....	51
5.11.3	Data Gaps	51
5.12	Water	51
5.12.1	Key Sustainability Issues	51
5.12.2	Future Evolution of the Baseline.....	51
5.12.3	Data Gaps	52
5.13	Waste	52
5.13.1	Key Sustainability Issues	52
5.13.2	Future Evolution of the Baseline.....	52
5.13.3	Data Gaps	52
6	Findings of the Appraisal of Alternatives.....	53
6.1	Introduction	53
6.2	Appraisal of the Local Plan Strategic Options.....	53
6.3	Appraisal of the Local Plan Policy Options.....	64
7	SA Findings of the Local Plan Appraisal Including Modifications.....	77
7.1	Introduction	77
7.2	Summary of Potential Significant Effects of Chapters 1 to 12.....	88
7.3	Chapter 13 Site Allocations and New Development (Policy SA13.1).....	97
7.3.1	Summary of Potential Significant Effects of Policy SA13.1 Site Allocations	100
8	Potential Cumulative Effects of the Local Plan	105
8.1	Introduction	105
8.2	Potential Intra-Plan Cumulative Effects.....	105
8.3	Potential Inter-Plan Cumulative Effects.....	113
9	Mitigation and Enhancement Measures Proposed	115
10	Proposed Monitoring Framework.....	122
11	Next Steps	125

Figures

Figure 2.1: The SA Process.....	9
Figure 3.1: Watford Local Plan Area.....	31

Tables

Table 2.1: Local Plan SA topics compared with SEA Topics.....	7
Table 2.2: SA Framework.....	11
Table 2.4: Definition of Assessment Criteria.....	18
Table 2.5: Definitions of Significance Scores.....	19
Table 2.6: RAG Criteria used in the Assessment of Site Allocations.....	21
Table 2.7: Fulfilling the requirements of the SEA Regulations.....	26
Table 4.1: Key Messages from the PPP review.....	36
Table 6.1: Potential Significant Sustainability Effects of the Strategic Options.....	56
Table 6.2: Policy Options Assessed.....	64
Table 6.3: Allocation Site Suitability Criteria.....	67
Table 6.4: New Policies Introduced into the Final Draft Local Plan.....	72
Table 7.1: Final Draft Local Plan Policies	77
Table 7.2: The Difference the Modifications have made to the SA Findings.....	80
Table 7.3: Summary Performance of Chapters 1 to 12	88
Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12.....	89
Table 7.5: Summary Performance of the Policy SA13.1 Site Allocations	97
Table 7.6: Potential Significant Positive Effects Identified in the Assessment of Policy SA13.1	100
Table 7.7: Potential Significant Negative Effects Identified in the Assessment of Policy SA13.1	102
Table 7.8: Uncertain Effects Identified in the Assessment of Policy SA13.1.....	103
Table 8.1: Potential Cumulative Effects - Final Draft Local Plan policies	105
Table 8.2: Potential Cumulative Effects - Site Allocations (Policy SA13.1).....	108
Table 8.3: Potential Inter-Plan Cumulative Effects	113
Table 9.1: Enhancement Measures - Final Draft Local Plan Policies	116
Table 9.2: Mitigation - Site Allocations (Policy SA13.1)	117
Table 9.3: Enhancement Measures - Final Draft Local Plan Site Allocations (Policy SA13.1)	119
Table 10.1: Proposed Monitoring Framework.....	122
Table 11.1: Watford Local Plan Timetable	125



Appendices

Appendix A – Review of Relevant, Plans, Policies and Programmes

Appendix B – Baseline Data

Appendix C – Sustainability Appraisal of Policy Options

Table C.1: Policy Options Assessed

Table C.2: Policy Options

Table C.3: WBC Changes in Policy Development

Appendix D –Local Plan Chapters 1 -12 Sustainability Appraisal Matrices

Appendix E –Local Plan Chapter 13 (Policy SA13.1 Allocation Sites) Sustainability Appraisal Matrices

Appendix F – Screening of Main Modifications

1 Introduction

1.1 Background

This iteration of the SA Report supports the post-Examination hearings version of the Watford Local Plan inclusive of proposed modifications put forward by Watford Borough Council (WBC).

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

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

ClearLead Consulting Ltd have been commissioned to undertake the Sustainability Appraisal (SA) of the Local Plan. The SA plays an important role in the evolution of the plan and consideration of all reasonable alternatives. To date, a SA Scoping Report has been published and strategic options assessed, and the findings presented in a 'Sustainability Appraisal of Strategic Options' report (June 2018). This was published alongside the 'Issues and Options for the new Watford Local Plan' document dated September 2018. An SA of the reasonable policy options was undertaken between March and August 2019 and provided to WBC officers internally. An SA of the 'First Draft Local Plan' was then undertaken between August and September 2019 and a draft SA report prepared in October 2019.

Following First Draft Local Plan consultation in August 2019, the Local Plan has been amended and reassessed and more detailed assessment of sites allocations has taken place in 2020. Consultation on the Final Draft Local Plan took place between 18th January 2021 and 18th March 2021. Following consultation and Examination hearings, modifications have been proposed to the plan and these have been screened to ascertain whether the main modifications make a difference to the SA. A number of amendments have subsequently been made to the SA and this SA Report now accompanies the modified version of the Local Plan. Section 7 of this report demonstrates the difference the modifications make to the sustainability performance of the Local Plan.

1.2 Purpose and Requirements for the Impact Assessments

Sustainability Appraisal and Strategic Environmental Assessment

SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (February 2019) also requires SA of Local Plans. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations¹). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including Local Plans. The purpose of the SEA Directive is to ensure a high level of environmental protection, and to integrate the consideration of the environment into the preparation and adoption of plans, with a view to promoting sustainable development.

Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process as set out in the Planning Practice Guidance² (updated 2014). The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA 'testing' of the Local Plan policies and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's development.

1.3 Habitat Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2010 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a 'Habitats Regulations Assessment' (HRA). This requirement includes strategic plans with an impact on land use.

HRA has been undertaken in parallel to the SA and has been reported on separately.

The scope of the HRA was confirmed through correspondence with Natural England dated 31st January 2018. The draft Local Plan policies were subject to HRA screening and the HRA has progressed to the next stage, Appropriate Assessment (AA) due to the identified of a likely significant effect from growth in Watford and neighbouring areas combining to affect the Chiltern Beechwoods SAC from air pollution. The Final Draft Local Plan policies were subject to HRA screening and AA and a HRA Report prepared which accompanied the Final Draft Local Plan

¹ Environmental Assessment of Plans and Programmes Regulations 2004 SI 1644:
<http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

² <https://www.gov.uk/government/collections/planning-practice-guidance>

during consultation in January 2021 to March 2021. Natural England confirmed in July 2021³ that it is content with the findings of the HRA which is that the Watford Local Plan will not result in any adverse effects on European sites and that no further HRA is required.

The main modifications to the Final Draft Local Plan have been screened in April 2022 and no further likely significant effects have been identified.

1.4 Equalities Impact Assessment

An Equalities Impact Assessment (EqIA) is a way of measuring the potential impact (positive, negative or neutral) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. This Act places a general duty on the Council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics. The equality duty came into force in April 2011 and covers the following Personal Protected Characteristics:

- Age;
- Disability;
- Gender (male/female);
- Gender reassignment;
- Marriage and civil partnership⁴;
- Pregnancy and maternity;
- Race;
- Religion or belief; and
- Sexual orientation.

EqIA is therefore an essential tool for demonstrating that the Council has complied with the law by shaping the way decisions are taken and thereby improving outcomes. It enables a good understanding of different needs and the differential impacts that the policies may have on different groups. A separate EqIA has been undertaken by the Council in parallel with the SA. Equalities issues are also be addressed within the SA framework (see Section 2).

1.5 This Document

This SA Report incorporates Strategic Environmental Assessment (SEA) and SA as an integrated assessment and sets out the alternative policy approaches considered to date and the potential

³ Email dated 5 July 2021 from Natural England Planning Lead Advisor West Anglia Team to ClearLead Consulting Ltd

⁴ Age, Marriage and civil partnership - not all aspects of the duty apply.

effects they could have on sustainability. It presents the findings of the appraisal of the Final Draft Local Plan, which contains strategic policies, thematic policies and site allocations and incorporates subsequent modifications proposed following Examination hearings.

SA is an iterative process that is used to identify the most suitable and sustainable approaches to development in a local plan.

Alternatives to the Final Draft Local Plan assessed through SA during the Issues and Options consultation stage and during the development of the Final Draft Local Plan policies are discussed within Section 6. The 'Sustainability Appraisal of the Strategic Options Report' (June 2018) can be accessed via the following link on the Council's website:

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

This section describes the background to the SA Report for the Local Plan and the assessment requirements. The remaining sections of this document are structured as follows:

- Section 2 describes the approach to the SA;
- Section 3 presents the scope and content of the Local Plan;
- Section 4 presents the findings from the review of policies, plans and programmes;
- Section 5 presents a summary of baseline data;
- Section 6 presents the findings of the appraisal of alternatives;
- Section 7 presents the findings of the appraisal of the Local Plan;
- Section 8 presents potential cumulative effects of the Local Plan;
- Section 9 presents the mitigation and enhancement measures proposed ;
- Section 10 provides details of the proposed monitoring framework; and
- Section 11 presents the next steps.

2 Approach to the SA

2.1 SA Process

The SA process is shown in Figure 2.1. Stage A, Scoping, has been completed and culminated in the production of an SA framework of objectives and sub-objectives against which to assess the Local Plan and its alternatives. This was completed in April 2018.

This SA Report encompasses Stage A, Stage B and Stage C of the SA process (evaluation of the Final Draft Local Plan against the SA framework and SA report preparation) and fulfils the requirements to:

- Evaluate the potential effects of the Final Draft Local Plan implementation;
- Identify and propose mitigation of significant adverse effects; and
- Propose appropriate monitoring of significant effects⁵.

2.2 Methodology

The following text sets out the approach taken to complete the SA stages outlined in Figure 2.1.

2.2.1 Stage A Scoping

The purpose of the scoping stage is to set out proposals for conducting the SA, so that the SA tests the sustainability of the Local Plan using up to date information about the social, environmental and economic issues in the Borough.

Task A1: Identifying other relevant policies, plans and programmes, and sustainability objectives

The legislative context in which the Final Draft Local Plan is being prepared can best be understood through a review of related policies, plans, and programmes (PPP). The SEA Regulations require information on:

- *“an outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes”* (Schedule 2, Paragraph 1); and
- *“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”* (Schedule 2, Paragraph 5).

⁵ Requirements of the SEA Regulations. See Table 2.5 for further details.

The review process ensures that the Final Draft Local Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the Local Plan and the SA. Carrying out this review at an early stage of plan development allows for any inconsistencies or constraints within the Final Draft Local Plan to be addressed. It also provides the context for the SA and informed the development of the SA framework (see Table 2.2).

For practical reasons, the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The focus has been to ensure that only policies that are current and have direct relevance to the Final Draft Local Plan are reviewed. An outline of the policy documents and their objectives are provided in Appendix A and a summary of the key messages / objectives is provided in Table 4.1 in Section 4 of this report. Key documents in Appendix A have been updated in December 2020.

In some cases, where lower level plans include the objectives set out at a national or international level, then the national and international plans have not been included.

Task A2: Collecting baseline information

The SEA Regulations require a description of the following to be presented:

- “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Schedule 2, Paragraph 2);
- “the environmental characteristics of areas likely to be significantly affected” (Schedule 2, Paragraph 3);” and
- “the likely significant effects on the environment... on issues such as (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape (Schedule 2, Paragraph 6).”

Baseline data enables a characterisation of the plan area to be developed, including the sensitivity of the environment. Gaining an understanding of this information allows the impacts of the plan to be assessed and its performance to be monitored after adoption. Baseline information can put the plan area into context in relation to a national or regional situation or in relation to adjacent areas.

It is, therefore, necessary to collect sufficient information about the current baseline state of Watford borough to predict the future environmental and socio-economic trends to allow effects to be adequately predicted and monitored. The detailed baseline information has been compiled

in a series of topics in line with published guidance⁶ and includes comparators, targets and trends where possible. The topics set out within the SEA Regulations have been expanded into a number of sustainability topics as presented within Table 2.1 to include socio-economic topics as well as environmental. Interrelationships between topics are considered (where appropriate) within the individual SA topic chapters.

Table 2.1: Local Plan SA topics compared with SEA Topics	
SA Topics adopted for this assessment	SEA Regulations topics required to be considered
Population & Communities	Population Human Health
Housing	Material Assets
Employment & Economy	Not required by SEA regulations
Transport & Access	Material Assets
Air, Noise & Light Pollution	Air
Climate Change	Climatic Factors
Biodiversity & Geodiversity	Biodiversity, flora and fauna
Landscape, Townscape & Land	Landscape Soils
Cultural Heritage	Cultural heritage, including architectural and archaeological heritage Material assets
Water	Water
Waste & Minerals	Not required by SEA regulations

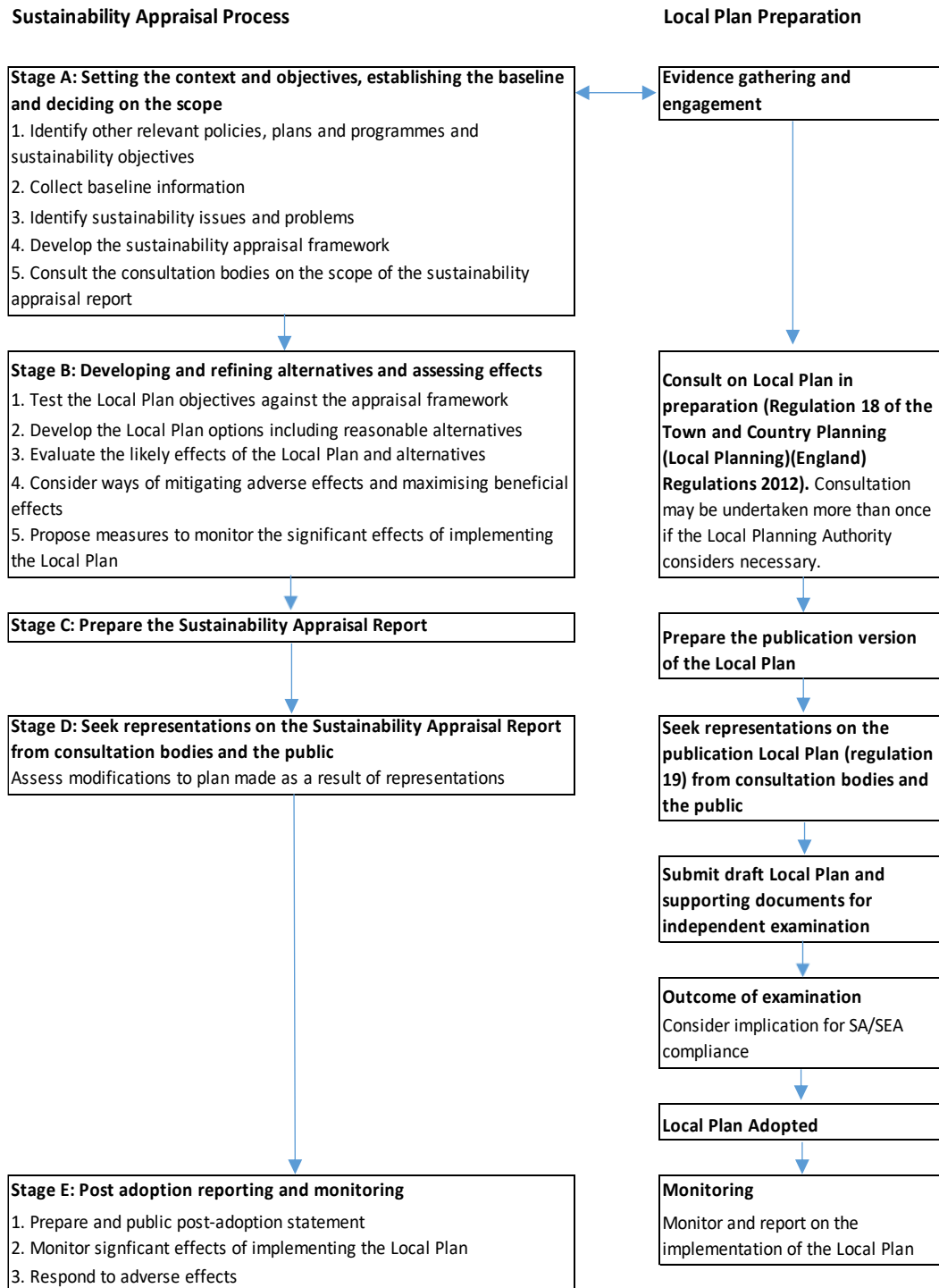
⁶ A practical guide to the Strategic Environmental Assessment Directive 2005 ODPM ISBN 1851127887

Relevant baseline information is provided in relation to health and equalities within the Employment & Skills and Human Health SA topics (see Appendix B sections 3 and 6).

The SA Scoping Report prepared for the WBC Local Plan Review produced in April 2018⁷ and the draft SA Report prepared in October 2019 have been reviewed and any relevant data transferred into this SA Report. Key data sources and data gaps have been updated in Appendix B and in Section 5. Section 5 also describes the evolution of the baseline without the plan and identifies key sustainability issues for each topic.

⁷ Watford Borough Council Local Plan Review Sustainability Appraisal Scoping Report, 2018

Figure 2.1: The SA Process



(Source: Adapted from Department for Communities and Local Government (2014) Planning Practice Guidance)

2.2.2 Task A3: Identifying sustainability issues and problems

Key sustainability issues have been identified within Section 5 of this report and are derived from the baseline data collated.

2.2.3 Task A4: Developing the SA assessment framework

The preparation of the Scoping Report culminated in the presentation of a framework of 19 SA objectives against which the Local Plan and its reasonable alternatives will be tested. For consistency the SA framework proposed during the scoping stage is based on the SA framework previously used to assess the DPDs in Watford. The SA framework was reviewed against those being used to assess DPDs in neighbouring authorities, and was adapted to ensure that it is similar, particularly to the frameworks being used in the SAs of the South West Hertfordshire group of authorities (Dacorum, Hertsmere, St Albans, Three Rivers). These authorities have committed to work together on planning matters⁸ and therefore it is beneficial that each authority assesses the sustainability of policy and sites in a similar manner as far as possible given that local issues may differ between authorities.

The SA framework was updated and amended in 2019 to reflect up to date sustainability issues identified during the scoping stage in 2018. In updating the SA framework, the previous SA Objectives were reviewed with relation to:

- Their relevance to the scope and objectives of the Final Draft Local Plan;
- The practicalities of assessing against these objectives;
- Any additional sustainability objectives which should be potentially included or scoped out identified through the review and update of the plans, policies, and programmes; and

The SA framework is presented in Table 2.2.

⁸ Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council, and Watford Borough Council are committed to working together under the Duty-to-Co-operate (DtC) to ensure that the growth needs of the four council areas are appropriately considered in the context of:

- the area covered by the districts above;
- the relevant provisions of the National Planning Policy Framework (NPPF); and
- any other material considerations so that their collective development needs are planned for in the most sustainable ways (Draft Memorandum of Understanding (August 2017).

Table 2.2: SA Framework	
Objectives	Sub-objectives
SA1) Achieve sustainable levels of prosperity and economic growth	<ul style="list-style-type: none"> • To support existing businesses, attracting inward investment and encouraging new businesses start-ups through the creation of employment spaces. • To promote and support economic diversity, and particularly manufacturing and human health and care sectors.
SA2) To ensure that local residents have employment opportunities and access to training.	<ul style="list-style-type: none"> • To support the delivery of high-quality jobs within the borough. • To give greater focus to learning and skills through the provision / support of education and training facilities in order to meet needs.
SA3) To ensure ready access to essential services and facilities for all residents	<ul style="list-style-type: none"> • To improve everyone's access to high quality health, education, recreation, community facilities and public transport. • To ensure facilities and services are accessible by everyone, regardless of age or ability.
SA4) Ensure that everyone has access to good quality housing that meets their needs	<ul style="list-style-type: none"> • Promote a range of housing types and tenure. • To improve the provision of affordable housing.
SA5) Encourage healthy lifestyles and improve quality of life for local residents	<ul style="list-style-type: none"> • To promote walking and cycling and community-based activities. • To provide enhanced access to open spaces as part of the borough's Green Infrastructure network. • To provide access to sporting and recreational facilities. • To provide good quality play spaces to meet the needs of residents. • To provide health facilities to meet the needs of residents. • To provide opportunities for residents to grow their own food.

Table 2.2: SA Framework	
Objectives	Sub-objectives
SA6) Reduce both crime and the fear of crime	<ul style="list-style-type: none"> • Improve community cohesion by reducing barriers between neighbourhoods and ensuring that everyone benefits from regeneration. • To plan new development to help reduce crime and the fear of crime through the design of the physical environment and by promoting well-used and over-looked streets and public spaces.
SA7) To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes	<ul style="list-style-type: none"> • To reduce the need to travel through closer integration of housing, jobs and services and promoting mixed use development. • To prioritise the use of sustainable modes of transport and reduce the reliance on private vehicles. • To help create safe and secure layouts which minimise conflicts between vehicle traffic, cyclists and pedestrians. • To support the expansion of electronic communications networks, including telecommunications and high-speed broadband. • Deliver more facilities for charging plug-in and other ultra-low emission vehicles.
SA8) To achieve good air quality	<ul style="list-style-type: none"> • To improve air quality across the borough and avoid exacerbating existing areas of poor air quality. • To minimise noise pollution and consider sensitivity of receptors to existing noise sources.
SA9) To minimise noise and light pollution	<ul style="list-style-type: none"> • To limit light pollution and promote and less invasive lighting sources, considering the balance between safety and environmental impacts.
SA10) Reduce the borough's contribution to climate change	<ul style="list-style-type: none"> • To minimise CO₂ emissions. • To promote the design and construction of energy-efficient developments and encourage the use of low-carbon and renewable energy where practicable.
SA11) Ensure that the borough is resilient to the effects of climate change	<ul style="list-style-type: none"> • To improve the resilience of the borough to climate change, particularly with respect to the design of new developments.

Table 2.2: SA Framework	
Objectives	Sub-objectives
SA12) To protect and enhance biodiversity	<ul style="list-style-type: none"> • To protect and enhance designated wildlife sites (international, national and local); • To support the achievement of BAP targets; • To create habitats to ensure sustainable and linked species populations and protect and enhance the Green Infrastructure network in the borough; • To increase tree cover and protect existing woodland; and • To eradicate invasive non-native species from the borough.
SA13) To maintain and enhance historic and cultural assets	<ul style="list-style-type: none"> • To safeguard and enhance historic and cultural assets; • To promote local distinctiveness and local identity by repairing historic buildings and areas, and by encouraging the re-use of valued buildings; • Enhance understanding of the historic assets of the borough.
SA14) Conserve and enhance the landscape and townscape, encouraging local distinctiveness	<ul style="list-style-type: none"> • To encourage high quality design, which respects local context, and improves local character and distinctiveness; • To improve the quality of life in urban areas by making them more attractive places in which to live, work and visit; • To protect and enhance the borough's townscape and local sensitive landscapes; • To encourage the use of previously developed (brownfield) land and the re-use of derelict land and buildings; and • To identify, protect and improve quantity and quality of open spaces and public realm.
SA15) Revitalise the town centre to promote a return to sustainable urban living	<ul style="list-style-type: none"> • Create a viable and attractive town centre that has vitality and life and discourage competing out-of-town developments.
SA16) Maximise the use of previously developed land and buildings and the efficient use of land.	<ul style="list-style-type: none"> • To protect soils from pollution and remediate contaminated land; • To concentrate development through the reuse of previously developed land and buildings and urban extensions only where the development of greenfield land is unavoidable; and • To maximise the efficient use of land through encouraging high-density development.

Table 2.2: SA Framework

Objectives	Sub-objectives
SA17) Maintain and enhance water quality and limit water consumption.	<ul style="list-style-type: none">• To encourage high water efficiency and conservation, including retrofitting older buildings;• To improve quality and flow of rivers and protect and improve groundwater quality; and• To ensure the borough has the appropriate wastewater and sewerage capacity to deliver any predicted new development.
SA18) Ensure that new development does not increase flood risk.	<ul style="list-style-type: none">• To avoid development from being located in areas at risk of flooding taking account of climate change;• To ensure that green infrastructure schemes make space for water and reinstate floodplain; and• To promote sustainable urban drainage systems to reduce flood risk and water loss from natural systems.
SA19) To minimise use and make efficient use of natural resources.	<ul style="list-style-type: none">• To minimise the production of waste and promote the re-use, recycling and composting;• To safeguard land for waste processing / disposal within the borough; and• To safeguard reserves of exploitable minerals from sterilisation by other development.

2.2.4 Task A5: Consulting on the scope of the SA

The Scoping Report was consulted on with the statutory consultees for a period of 6 weeks between 18 December 2017 and 29 January 2018. The SA Scoping Report can be accessed on the Council's website via this link:

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

Comments reviewed on the Scoping Report have been recorded in a 'recommendations tracker' and used to update the Scoping Report. The scoping information is presented in Sections 4 and 5 of this report.

2.3 Stage B Developing and refining alternatives and assessing effects

2.3.1 Task B1 Develop options including reasonable alternatives

This stage consists of developing and refining reasonable alternatives and assessing effects. It fulfils the requirements to identify, describe and evaluate the likely significant effects on the environment of "*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*"⁹.

Strategic policy options were assessed in 2018 and the findings were presented in a report which accompanied the Issues and Options consultation (see Section 2.3.2 below). The findings are also reproduced within Section 6 of this report. Since then, more detailed policy approach options have been developed by WBC in 2018/2019 and these policy options have been assessed against the SA framework in the same way as the strategic options. The findings of the policy options are also summarised in Section 6 of this report. The methodology for these assessments is described in more detail below.

WBC Local Plan - Strategic Options

The key issues and challenges for Watford Borough are described within the Issues and Options consultation document (September 2018). The options set out within the Issues and Options consultation document were subject to SA and consisted of seven distinct issues, each with between two and eight different options to be considered relating to the following issues:

- Housing Development;
- Affordable Housing;
- Types of New Housing;

⁹ SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004) (Reg 12 (1(b)))

- Housing for an Aging Population;
- Employment;
- Tall Buildings; and
- Transport.

WBC Local Plan - Policy Options

Policy approach options were set out within a series of detailed topic papers prepared by WBC in 2018/19. The policy options grouped within the topic papers addressed the key issues identified within the Borough at the issues and options stage. For example, the employment topic paper contained policy options which address the key issue of employment growth. In total the policy options considered 47 key issues.

The 13 topic papers covered the following:

- Air Quality, Pollution and Contamination;
- Built Community Facilities;
- Climate Change and Resilience;
- High Quality Design and Conservation;
- Green Infrastructure, Biodiversity and the Natural Environment;
- Growth Strategy and Planning;
- Density and Optimising Land Potential;
- Infrastructure;
- Employment;
- Housing;
- Promoting Sustainable Transport;
- Retail and Town Centre; and
- Strategic Approaches to Growth.

Full details of the policy options assessed are provided in Appendix C and they are also summarised within Section 6.

Several gaps in the Local Plan were identified as it was being prepared at the Draft Local Plan and Final Draft Local Plan stages. These have been addressed by the inclusion of new policies at each stage and the reasons for adding them identified (see Section 6 for further details). Whether there are any reasonable alternatives to the new policies have been considered and identified. As part of the evolution of the plan, whether there are any reasonable alternatives to these policies will continue to be considered. If further alternatives are identified, then these will be assessed as part of the next iteration of the Local Plan or alongside any modifications as part of the accompanying SA.

2.3.2 Task B2 Evaluate the likely effects of the plan and alternatives

WBC First Draft Local Plan

The First Draft Local Plan was prepared during 2019 and was informed by the findings of the SA of the Issues and Options consultation document and the consultation findings on the key issues facing the borough. The First Draft Local Plan included:

- 11 strategic policies which set out the planning requirements to guide future growth. Within these policies are five relating to Strategic Development Areas. These are strategic areas in the borough where new development will be supported in principle if it is consistent with the Local Plan; and
- 39 local planning policies which are intended to address local issues. Two of these policies allocated sites for housing (Policy 4H.1) and employment (Policy E5.1) development in the borough.

The First Draft Local Plan was assessed against the SA framework as a draft SA Report prepared in October 2019. The draft SA Report (October 2019) set out the potential sustainability effects of the First Draft Local Plan policies and proposed allocation sites. The First Draft Local Plan and the SA report were subject to consultation between 27th September 2019 and 8th November 2019.

WBC Final Draft Local Plan

The potential effects of alternatives to the Final Draft Local Plan policies have been assessed and the findings are summarised in Section 6 of this report.

The Local Plan has been amended following the First Draft Plan consultation to take account of the consultation comments received and the mitigation put forward within the SA. The amended Local Plan is the Final Draft Local Plan (incorporating modifications).

Each Final Draft Local Plan policy and allocation site has been assessed against the 19 SA objectives in the SA framework (Table 2.2) using the criteria in Table 2.3 below. These criteria informed the overall significance score of the potential sustainability effects identified for each SA objective (Table 2.4).

Modifications have been proposed by WBC following Regulation 19 consultation in early 2021 in response to consultation comments received and also following Examination hearings in January / February 2022. The main modifications have been screened by the SA consultants to ascertain whether any of them are significant in respect of the SA. The following modification screening criteria were applied:

- A. The change is significant and would make a change to the SA findings, therefore requiring reassessment;

- B. The change is not significant but warrants an amendment to the SA Report for factual purposes; or
- C. The change has no effect on the SA findings and does not require any factual amendment to the SA Report.

Screening of modifications is reported in Appendix F. For any modifications screened in for criterion A (above), the assessment of the Final Draft Local Plan policies and site allocations has been revisited, using the same methodology, and updated to provide residual potential effects of the Final Draft Local Plan incorporating modifications. The residual effects are presented in Chapter 7 which is supported by appendices D and E.

Table 2.3: Definition of Assessment Criteria	
Criterion	Description
Significance	An assessment of the significance of the potential effects identified. This could be a positive effect, negative effect, neutral effect, significant positive effect or significant negative effect. The definitions for these effects are detailed in Table 2.5
Permanent/temporary	An assessment of whether the predicted effects would be permanent (P), or temporary (T).
Reversible/irreversible	An assessment of whether or not the identified effect can be reversed (R) e.g. the loss of greenfield land to development would be irreversible (I).
Spatial extent	How far the effect is predicted to be spread geographically. <ul style="list-style-type: none"> • Low (L) = A specific area within WBC boundary • Medium (M) = Across the entire WBC boundary, possibly reaching to neighbouring boroughs • High (H) = Beyond the WBC Local Plan Boundary, with national or international ramifications
Magnitude	An assessment of the proportion of the receptor affected by the identified effect. <ul style="list-style-type: none"> • Low (L) =20-40% of receptor or capacity affected • Medium (M) = 40-80% of receptor affected • High (H) =80+% of the receptor affected
Duration	An assessment of the time period the predicted effects are likely to last. This could be: <ul style="list-style-type: none"> • Short (S)= 0-5 years • Medium (M) = 5-10 years • Long (L)= 10 years or more, up to the end of the Local Plan period (2037)

Criterion	Description
Direct/Indirect	An assessment of whether the predicted effect will be directly (D) as a result of option implementation, or indirectly (I) caused by the policy option.
Likelihood	An assessment of how likely it is that the implementation of the policy option will lead to the predicted effect. This could be low (L), moderate (M) or high (H).
Cumulative effect	An assessment of whether or not there is potential for a cumulative effect to occur on the Sa objective as a result of the policy option working in combination with other circumstances, policies or factors. Y= potential cumulative effect. No potential cumulative effect identified.

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
++	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	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> • enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • enhance and redefine the location in a positive manner; • repair or restore receptors badly damaged or degraded through previous uses; and/or • improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.
+	Minor Positive Effect: the policy option supports the achievement of this objective; it addresses some relevant sub-	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would:

Table 2.4: Definitions of Significance Scores		
Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
	objectives, although it may have only a minor beneficial effect	<ul style="list-style-type: none"> improve undesignated yet recognised receptor qualities at the neighbourhood scale; fit into or with the existing location and existing receptor qualities; and/or enable the restoration of valued characteristic features partially lost through other land uses.
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	N/A
?	Uncertain Effect: Uncertain or insufficient information on which to determine the assessment this stage	N/A
-	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	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <ul style="list-style-type: none"> be out of scale with the location; or leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.
--	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.	Permanent Irreversible Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> permanently degrade, diminish or destroy the integrity of the receptor; cause a very high quality receptor to be permanently changed and its quality diminished;

Table 2.4: Definitions of Significance Scores		
Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
		<ul style="list-style-type: none"> • cannot be fully mitigated and may cumulatively amount to a severe adverse effect; • be at a considerable variance to the location, degrading the integrity of the receptor; and/or • will be substantially damaging to a high quality receptor such as a specific regional or national designation.

The assessment of housing and employment site allocation options needed to consider site characteristics and location. In order to do this, GIS was used. In addition, the assessment had to ensure that all sites options were considered consistently to ensure a ‘level playing field’ (i.e. ensure consistent data are used for all site options assessed). In this case, time and resource limitations meant there was limited potential to generate data for all site options through site visits and/or discussions with site promoters. An efficient and standardised site assessment methodology therefore needed to be developed, making use of GIS to support the spatial analysis. To achieve this, an analysis has been undertaken of data available to inform the site assessment for each SA framework objective which was then been used to develop RAG site assessment criteria which are linked to the SA objectives (Table 2.5).

GIS data was not appropriate or available to support the assessment against SA objectives:

- SA1: Achieve sustainable levels of prosperity and economic growth; and
- SA6: Reduce both crime and the fear of crime.

This is because the sub-objectives which support these SA objectives are not spatial i.e. whether a site could contribute to the achievement of these SA objectives does not relate to its location. Therefore, the assessment of these SA objectives has used the significance criteria described above, without the additional data from the GIS which has been available for the spatial elements of the other objectives.

Where GIS has been identified as being able to inform the assessment, a ‘RAG’ (red, amber, green) rating was applied to each indicator. This was determined through the application of a set of RAG criteria which are set out in Table 2.5. These criteria have been generated through reference to existing guidance / good practice and the sources of this guidance and good practice are also included within Table 2.5. Some criteria have been identified using professional judgement of the consultants and where this is the case it is indicated within Table 2.5. Only the SA objectives which can be informed by the GIS are included within this table.

The results of the RAG ratings (see Appendix E) then informed the assessment of the site allocations listed within Policy SA13.1 Allocation Sites for Development against the SA framework.

Table 2.5: RAG Criteria used in the Assessment of Site Allocations			
SA Objective	Indicator	RAG	Justification
SA2: To ensure that local residents have employment opportunities and access to training	Proximity to Employment Areas	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2012
	Income Deprivation	Top 10%-30% Most Deprived Top 40%-50% Most Deprived 40%-10% Least Deprived	Indices of Deprivation 2015 Online map http://dclgapps.communities.gov.uk/imd/idmap.html
SA3: To ensure ready access to essential services and facilities for all residents	Proximity to leisure and recreation	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to healthcare facility	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to a train station	>800m <800m	CIHT Planning for Walking Guidelines, 2015
	Proximity to community centre	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2013
	Proximity to place of Worship	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2014

Table 2.5: RAG Criteria used in the Assessment of Site Allocations			
SA Objective	Indicator	RAG	Justification
	Proximity to town or Local centre	>0.8km walking distance <0.8km walking distance <0.4km walking distance	CIHT Planning for Walking Guidelines, 2015
	Proximity to a primary school	>3.2km <3.2km <1km	Home to School Transport and Travel Guidance, 2014 ¹⁰
	Proximity to a secondary school	>4.8km <4.8km <1km	Home to School Transport and Travel Guidance, 2014 ⁷
SA4: Ensure that everyone has access to good quality housing that meets their needs	Affordable housing expected yield	<12 houses 12-30 houses 31+ houses	Based on the requirements within policy H4.3.
SA5: Encourage healthy lifestyles and improve quality of life for local residents	Access to open space	>300m to nearest 2ha site <300m to nearest 2ha site	Natural England ANGSt guidance, 2010
	Proximity to leisure and recreation	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015

¹⁰ Department for Education, Home to school Travel and Transport Guidance, Statutory Guidance for Local Authorities, July 2014

Table 2.5: RAG Criteria used in the Assessment of Site Allocations

SA Objective	Indicator	RAG	Justification
	Proximity to healthcare facility	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015
SA7: To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015
	Proximity to a train station	>800m <800m	CIHT Planning for Walking Guidelines, 2015
	Proximity to employment areas	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2012
SA9: To minimise noise and light pollution	Light Pollution	8->32 Nanowatts 1-7 nanowatts <0.25-0.99 Nanowatts	CPRE Light Pollution map
	Noise pollution	>70dB 65-70dB <65dB	Extrium- England Noise Map Viewer http://www.extrium.co.uk/noiseviewer.html
SA12: To protect and enhance biodiversity	Local Nature Reserve	Includes or is adjacent <50m >50m	Natural England
	Proximity to SSSI	<200m 200-800m >800m	RTPI Strategic Environmental Assessment, Practice advice, 2018. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a SSSI.
	Environmental Deprivation	Top 10%- 30% Most deprived Top 40%- 50% Most deprived	Indices of Deprivation, 2015 Online map http://dclgapps.communities.gov.uk/imd/idmap.html

Table 2.5: RAG Criteria used in the Assessment of Site Allocations

SA Objective	Indicator	RAG	Justification
		40%-10% Least Deprived	
SA13: To maintain and enhance historic and cultural assets	Conservation Areas	Intersects or is adjacent <50m >50m	It is appropriate to 'flag' a site red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a conservation area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects in a heritage asset.
	Listed Buildings	Intersects or is adjacent <50m >50m	
	Scheduled Monuments	<10m <25m >25m	RTPI Practice Advice 2018
	Historic Park or Garden	<10m <25m >25m	RTPI Practice Advice 2019
SA16: Maximise the use of previously developed land and buildings and the efficient use of land.	Previously Developed Land	No Part Yes	RTPI Practice advice, 2017
SA17: Maintain and enhance water quality and limit water consumption.	Water Course	<10m 10-1000m >1000m	Cirra Environmental Good Practice on Site (Third Edition), 2010
	Groundwater Source Protection Zone	Zone 1 Zone 2 Zone 3	Environment Agency
SA18: Ensure that new development does not increase flood risk.	Flood Zone	Zone 3 Zone 2 Zone 1	Environment Agency

Table 2.5: RAG Criteria used in the Assessment of Site Allocations			
SA Objective	Indicator	RAG	Justification
SA19: To minimise and make efficient use of natural resources	Sand and Mineral Safeguarding	Within Safeguarding Zone Outside of Safeguarding Zone	Professional judgement

2.3.3 Task B3 Consider ways of mitigating adverse effects and maximising beneficial effects

Consideration has been given to appropriate mitigation measures that could be adopted within the Local Plan for any uncertain and potential negative effects identified within the assessment of the First Draft Local Plan and in the assessment of the Proposed Allocation Local Plan. Consideration has also been given to measures which could enhance the sustainability performance of the policies in both rounds of assessment. How the mitigation and enhancement measures have been taken on board by the plan authors will be discussed within the SA adoption statement (produced when the Local Plan is adopted). The mitigation and enhancement measures put forward in the assessment of the Final Draft Local Plan are presented in Section 9.

2.3.4 Task B4 Proposed Measures to monitor the significant effects of implementing the plan

A proposed monitoring framework is included in Section 10, in order to monitor the potential effects of the Local Plan. This has been refined to specifically address any residual significant effects of the submission Local Plan identified.

2.4 Stage C Preparing the Sustainability Appraisal Report

This stage involves documenting the SA process and presenting the findings within a formal SA Report (this report). It sets out the findings of the SA of the Local Plan policies as well as the reasonable alternatives considered.

The ways in which this SA report meets the legal requirements of the SEA Regulations are demonstrated in Table 2.6.

2.5 How the requirements of the SEA Regulations are being met

Table 2.6 outlines where elements of the SEA regulations¹ are addressed within this SA report.

Table 2.6: Fulfilling the requirements of the SEA Regulations	
What the regulations say¹¹	How this is addressed
An outline of the contents, main objectives of the plan or programme.	Set out in Section 3 of this document.
An outline of the relationship with other relevant plans and programmes.	Set out in Section 4 of this document.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 5 of this document.
The environmental characteristics of areas likely to be significantly affected.	Sections 6 and 7 outline the potential environmental effects on areas likely to be significantly affected by the plan and its alternatives. The characteristics of the borough and potential interactions have been informed by information contained within the SA baseline data (Section 5).
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 of this document outlines key issues (including problems) related to each SA topic. This includes sites designated pursuant to Directives 79/409/EEC and 92/43/EEC.
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4 and Appendix A outline relevant environmental protection objectives. The way that those environmental objectives have been taken into account has been through integrating them into the SA framework.

¹¹ Please see Schedule 2 of the SEA regulations: *Information for Environmental Reports*.

Table 2.6: Fulfilling the requirements of the SEA Regulations

What the regulations say¹¹	How this is addressed
<p>The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. The identification of the above effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.</p>	<p>Section 7 sets out the potential significant effects of the Final Draft Local Plan policies and its reasonable alternatives, with modifications.</p> <p>Details of the nature of effects are provided within Appendices D and E. This includes indirect (secondary), cumulative (cumulative and synergistic), duration (short/medium/long term), permanent or temporary and negative or positive effects. Definitions are provided within Section 2.3, tables 2.4 and 2.5.</p> <p>Potential cumulative effects of the Final Draft Local Plan policies are presented in Section 8. Potential cumulative effects of the Final Draft Local Plan with other plans, programmes and projects are presented in Section 8.</p>
<p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>Section 9 sets out mitigation measures for significant negative effects and uncertain effects and relevant enhancement measures.</p>
<p>An outline of the reasons for selecting the alternatives dealt with.</p>	<p>Section 6 and Appendix C outline the reasons for selecting the alternatives dealt with. This will also be explained within the Adoption Statement.</p>
<p>A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Section 2 outlines the methodology for all stages of the SA and Section 2.6 specifically describes any technical difficulties that were encountered.</p> <p>Section 5 outlines data gaps.</p>
<p>A description of measures envisaged concerning monitoring.</p>	<p>Set out in Section 10 of this document.</p>
<p>A Non-Technical Summary of the information provided under the above headings.</p>	<p>See separate Non-Technical Summary.</p>
<p>The report must include the information that may reasonably be required taking into account</p>	<p>The whole SA Report addresses this.</p>

Table 2.6: Fulfilling the requirements of the SEA Regulations

What the regulations say ¹¹	How this is addressed
<p>current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.</p>	
<p>Consultation: Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).</p>	<p>The Scoping Report was consulted on with the statutory consultees for a period of 6 weeks between 3rd September and 15th October 2018. Comments have been reviewed and used to update the Revised Scoping Report (August 2019).</p>
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.</p>	<p>The SA Report was consulted on with the public between 18th January 2021 and 1st March 2021 alongside the Final Draft Local Plan and was sent directly to the SEA statutory consultees for their comment.</p>
<p>EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.</p>	<p>No potential effects have been identified in the assessment of the Local Plan (see Sections 7 and 8) on other EU Member States. There is therefore no requirement to consult with other EU Member States on this SA Report.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8). Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed: The plan or programme as adopted.</p>	<p>This will be set out in the SA Adoption Statement.</p>

Table 2.6: Fulfilling the requirements of the SEA Regulations	
What the regulations say¹¹	How this is addressed
<p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.</p> <p>The measures decided concerning monitoring.</p>	
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation.</p>	<p>This will be set out in the SA Adoption Statement.</p>

2.6 Assumptions and Limitations

The SEA Regulations require the SA Report to include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Baseline data has been available across the Borough however there are cases where data gaps have been identified. This have been listed for each topic areas in Section 5 of this report, Summary of Baseline Data. The baseline data was gathered between October-December 2017 and was considered up to date when published post-consultation in April 2018.

The assessment of sites has been undertaken as a desk-based exercise using the baseline information presented in Appendix B and utilising GIS to provide spatial information to inform the assessments. No site visits have been undertaken specifically for the purposes of the SA. Distances have been measured in GIS. Walking distance has been measured based on quickest or shortest routes including safe crossings rather than 'as the crow flies'. Distances to environmental constraints or receptors have been measured in GIS 'as the crow flies'. Whilst every effort is made to ensure accurate measurement within the GIS system, these distances are approximate. The red line boundaries for the potential site allocations have been provided to the assessors based on the knowledge at the time and there may be some inaccuracies in the boundaries assessed.

Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of precisely how the plan will be implemented and limited by understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions. Assumptions are made cautiously and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the Local Plan options in more general terms.

Some assumptions are noted within the assessments of the sites and the Final Draft Local Plan policies. For example, it has been assumed that all sites will be developed and that designated areas for employment will see some development of employment uses too. Also we have assumed that the anticipated yields for each allocation indicated within the housing policy will be delivered.

The appraisal findings have needed to make assumptions regarding future infrastructure delivery. In practice, however, infrastructure delivery is highly uncertain. If it is a case that infrastructure delivery lags behind housing development, or does not materialise at all, then the results of the appraisal may alter.

No other technical difficulties have been identified in undertaking the assessments.

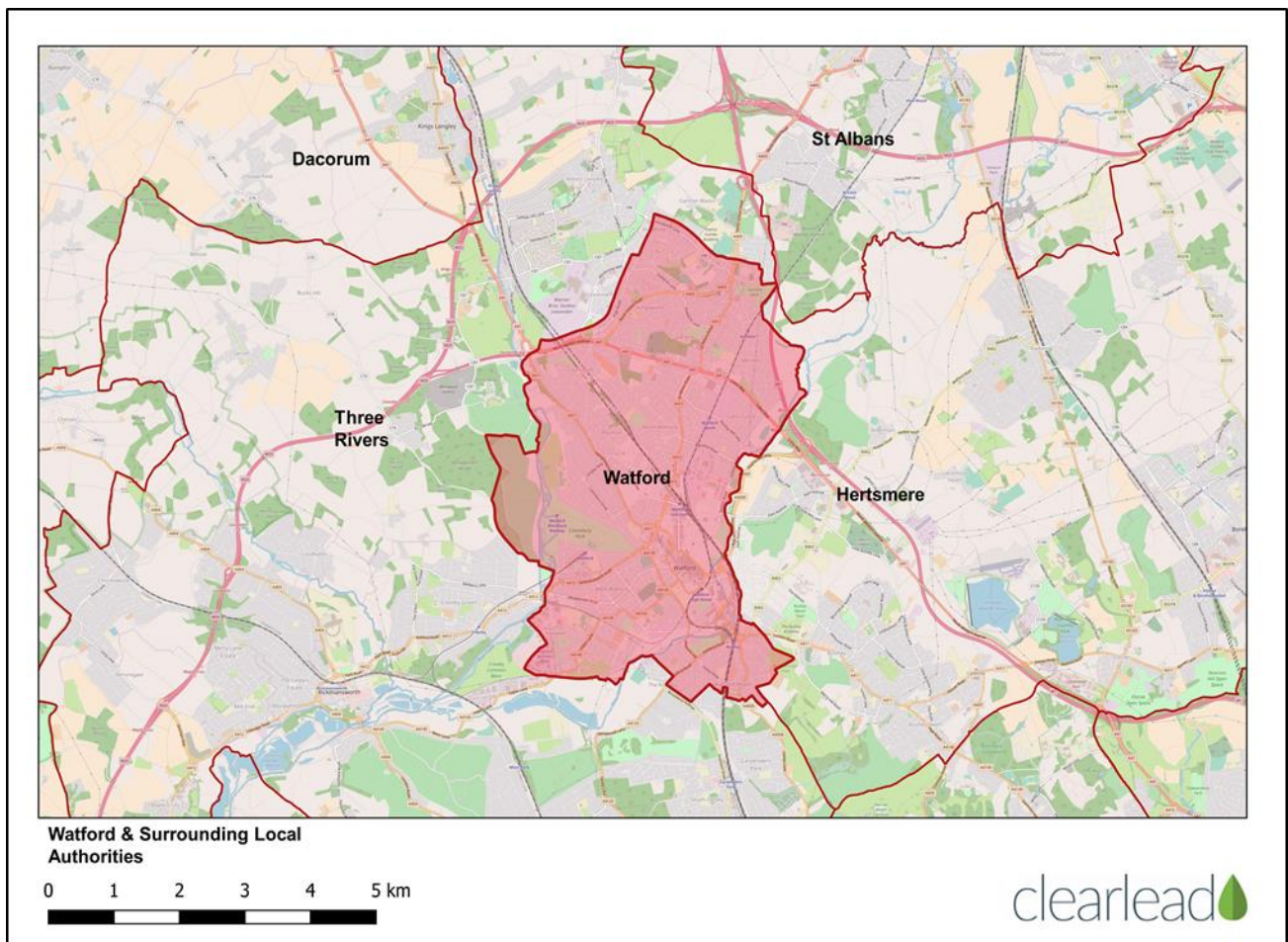
3 The Scope and Content of Watford Borough Council's Local Plan

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

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

The Local Plan area is shown in Figure 3.1 (area in red).

Figure 3.1: Watford Local Plan Area



The Local Plan sets out the Council's approach to new development up to 2037 and contains a spatial strategy policy in Chapter 1, Strategic Development Areas in Chapter 2, site allocations in Chapter 13 and thematic or 'policies to guide development' in Chapters 3-12. The vision and objectives of the Local Plan are presented in Boxes 3.1 and 3.2.

Box 3.1: Helping to Create a Better Watford in 2037: Contributing Towards a Collective Vision

At the edge of London, and also a part of the County of Hertfordshire, Watford will embrace its role as a major urban centre that acts as a focus for employment, homes, leisure, its town centre and greenspaces, making the most of its excellent connections to the capital and surrounding areas

Watford will be an exemplar town in how it embraces the challenge of sustainability and climate change, with environmentally friendly construction and design, working towards being carbon neutral

High quality design will be showcased as part of new development, with accessible and inclusive high density, mixed use development and enhanced open spaces

Green and blue infrastructure will be conserved and enhanced, maximising their value for biodiversity and other important ecosystem services

The Town Centre will retain its key role as a destination in the sub-region, home to a mix of cultural and leisure uses and a vibrant place for people to socialise and work

Cycle and walking provision will be comprehensively planned for, encouraging a more active population. Public transport will also be prioritised, encouraging a move from car based travel for shorter journeys, reducing congestion and air pollution

Watford's social, cultural, built environment and heritage assets will be protected, and where possible their settings enhanced

Local economies will be supported by creating opportunities for local businesses to access new markets and providing a mix of employment spaces to support business growth

The population will be healthier, with more opportunities to be active through walking and cycling and access to high quality open spaces

Growth will be supported by a range of high quality infrastructure delivered in a comprehensive, timely and coordinated manner, making the most efficient use of land

In 2037, Watford will continue to be a welcoming and vibrant place and home to a wide range of communities where people enjoy a high quality of life

Box 3.2: Watford Final Draft Local Plan Objectives

Watford's Economy in 2037 - the Sustainable Objectives

The Plan will have helped attract business investment to support jobs growth, strengthening its key role in the sub regional economy

The employment opportunities in the town will have increased with a highly skilled labour force and the provision of quality education facilities

Employment areas will have been intensified making more effective use of land and higher employment densities with appropriate areas supporting a mix of complementary uses

Watford town centre will have been enhanced as a place to socialise as well as to shop, providing an enjoyable experience for people of all ages

The town and wider area will have an attractive range of activities available, reinforcing Watford's appeal as a destination for leisure and recreation

Redevelopment and delivery of high quality office floor space in Clarendon Road will have brought in new investment, facilitating growth

Watford's Environment in 2037 - the Sustainable Objectives

The town will have a more sustainable pattern of urban development and transport, minimising their impact on the environment and reducing pollution

New development will be high quality, designed to minimise its impact on the environment through greater energy and resource efficiency and adapted to climate change

Climate change adaptations and renewable energy opportunities will have been incorporated into new and existing developments

The network of open spaces, parks and waterways, and the connections between them, will have been improved to support increased recreational activities

Important biodiversity and wildlife habitats will have been protected and connections within the green and blue infrastructure networks improved, increasing their value for wildlife

New development will also have made improvements to biodiversity and strengthened Watford's ecosystems, reversing the national trend of biodiversity decline

Important heritage assets such as locally and nationally listed buildings, historic green spaces and conservations areas will have been protected and the historic environment enhanced

Box 3.2: Watford Final Draft Local Plan Objectives Continued

Watford's Society in 2037 - the Sustainable Objectives

New development will have met the needs of a population projected to increase to 97,080 people in 2037, an increase of 8% (ONS, 2011 Census and 2018 based population projections)

The town will be characterised by mixed and balanced communities and new development that will have made a positive contribution towards this

It will be an socially inclusive place for everyone, with a mix of homes for single occupancy, couples, families and older people including those with special needs

There will be a high quality, safe, clean and attractive public realm that encourages people to be more active through walking and cycling, encouraging social interaction and better health

Traffic congestion will be reduced and air quality improved, with priority given to public transport, shared car use, walking and cycling

4 Review of Policies, Plans and Programmes

4.1 Introduction

The policy context in which the Local Plan is being prepared can best be understood through a review of related Policies, Plans and Programmes (PPP). The SEA Regulations require information on:

- *“An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.”* (Schedule 2, Paragraph 1); and
- *“The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.”* (Schedule 2, Paragraph 5)

The review process ensures that the Local Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the Local Plan and the SA.

For practical reasons the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focussed to ensure that only policies that are current and of direct relevance to the Local Plan are reviewed. A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Appendix A. Table 4.1 outlines the key messages of the PPP.

The completed review of policies, plans and programmes provides the context for the SA and helps to inform an SA framework of objectives and sub-objectives which will guide the subsequent appraisal process.

4.2 PPP Review - Summary of Key Messages

Table 4.1 sets out the key messages drawn from the review of PPP. In Appendix A, some topics have been combined because the PPP related to them overlap or are very similar and therefore the SA Topics listed in Table 4.1 are not entirely the same as those in Section 5 of this document. This applies to Economy and Employment and Skills (which have been combined into ‘Economy and Employment’ in Appendix A) and Population, Human Health and Crime and Safety (which have been combined into ‘Health and Community’ in Appendix A). The messages presented in Table 4.1 are reflected within the detailed SA framework which can be found in Table 2.2.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
Economy and Employment	<ul style="list-style-type: none"> • Support the sustainable growth and expansion of all types of business and enterprise. • Create jobs and prosperity to meet the twin challenges of global competition and of a low-carbon future. • Ensure that there is an adequate supply of employment land to meet local needs. Additional space is required to meet business needs within Watford up to 2031, particularly in relation to office space and industrial space. • Raise the economic performance of the Borough by supporting existing businesses, attracting inward investment and encouraging new businesses start-ups. • Support opportunities for the improvement of the skills and educational attainment levels of the Borough's labour supply. • Protect and strengthen apprenticeship schemes. • Support small businesses.
Health and Community	<ul style="list-style-type: none"> • Reduce crime including the fear of crime. • Reduce anti-social behaviour. • Deliver safe and secure networks of green infrastructure and open space. • Optimise the health and wellbeing of people in Hertfordshire throughout the course of their lives • Promote healthier lifestyles. • Increase physical activity levels. • Contribute to the improvement of health and quality of life. • Ensure an integrated approach to housing and community facilities and services. • Provide opportunities for members of the community to mix and meet. • Improve access to allotments. • Play spaces are attractive, welcoming, engaging and accessible for all local children and young people. • Improve public health by strengthening local activities which connect people with nature. • Protect important green spaces. • Support policies for the protection of existing open spaces and provision for new open spaces, sports and recreational facilities. • Ensure that there are appropriate facilities for the disabled and elderly. • Improve participation in sports. Improve access to high quality open spaces and opportunities for sport and recreation in order to contribute to the health and well-being of communities.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Ensure everyone has access to local, good quality health and social care services that meet their needs, especially children, older people and those living in more deprived areas. • Ensure social equality and prosperity for all. • Prevent and reduce homelessness. • Ensuring that Gypsies and Travellers have fair access to suitable accommodation, education, health and welfare provisions.
Housing	<ul style="list-style-type: none"> • Enable housing growth and deliver a mix of high-quality housing to meet local needs. • Deliver high quality, adequately size and thermally efficient housing; at a location that allows access to community facilities. • The NPPF requires the Local Plan to seek to deliver the full Objectively Assessed Housing Need (OAHN) of the area for market and affordable housing and identify a five year supply of deliverable sites to meet the identified need. • Ensure that housing growth requirements are accommodated in the most sustainable way. • Priority to address the housing needs of older people and small households. • Improve the condition and management of existing housing. • Prevent and reduce homelessness. • Investigate options to expand the portfolio of temporary accommodation in the Borough.
Transport and Accessibility	<ul style="list-style-type: none"> • Prioritise walking, cycling and public transport. • Enhance accessibility to key community facilities, services and jobs for all. • Create a more reliable, less congested and better-connected transport network. • Encourage sustainable transport and reduce the need to travel. • Reduce greenhouse gas emissions from transport. • To develop a transport system that provides access to employment, shopping, education, leisure and health facilities for all, including those without a car and those with impaired mobility. • To ensure that the transport system contributes towards improving the efficiency of commerce and industry and the provision of sustainable economic development in appropriate locations. • To mitigate the effect of the transport system on the built and natural environment and on personal health. • Support the expansion of electronic communications networks, including telecommunications and high-speed broadband. • Incorporate facilities for charging plug-in and other ultra-low emission vehicles.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones.
Air, Noise and Light Pollution	<ul style="list-style-type: none"> • Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum and meet agreed air quality targets and objectives. • Minimise noise pollution. • Limit the impact of light pollution from artificial light on local amenity. • Promote low-carbon vehicles and renewable sources of energy. • Promotion of walking and cycling as a healthy and more preferable options to car for local journeys. • Minimise pollution and other adverse effects on the local and natural environment.
Climate	<ul style="list-style-type: none"> • Build resilience to climate change and flood risk. • Safeguard functional floodplain and areas for future flood alleviation schemes. • Avoid development in areas of flood risk. • Improve flood awareness and emergency planning. • Enhance and restore the river corridor. • Promote the use of Sustainable Drainage Systems (SDS). • Ensure that all residents are informed of the potential risk of flooding and their appropriate flood evacuation route. • Minimise the effects of climate change. • Encourage the implementation of sustainable land management techniques to reduce the impact of extreme weather events • Reduce emissions of greenhouse gases that may cause climate change. • Improve energy efficiency in homes as well as helping businesses improve their energy productivity. • Encourage the provision of renewable energy. • Move towards a low-carbon economy. • Increase energy efficiency. • Manage water use.
Biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks. • Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible. • Support is needed to achieve local BAP targets. • Creation of more resilient ecosystems, through better management of habitats by making them bigger and more joined up.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Prevention, control and eradication of invasive non-native species, especially those that will have the most detrimental effects on biodiversity. • Identify opportunities for green infrastructure provision, recognising the multiple functions that green infrastructure provides to the area. • Ensure that any new development will not harm nature conservation interests, unless the benefits of development at that location clearly outweigh the harm caused. • Conserve riparian landscapes and habitats. • Increase tree cover within urban areas. • Reduce the direct pressures on biodiversity and address the underlying causes of biodiversity loss. • Create or restore areas of wildlife-rich habitat outside the protected site network.
Cultural Heritage	<ul style="list-style-type: none"> • Conserve and enhance nationally and locally designated cultural and historical assets as well as those which are undesignated. • Maintain and enhance access to cultural heritage assets. • Respect, maintain and strengthen local character and distinctiveness. • Improve the quality of the built environment. • Preserve and enhance Conservation Areas.
Landscape and Townscape	<ul style="list-style-type: none"> • Protect and enhance the quality and distinctiveness of natural landscapes and townscapes, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures. • Promote high quality design that respects and enhances local character. • Ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. • Ensure that developments establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. • Conserve and enhance the green infrastructure of the Borough. Increase green connectivity for people and for wildlife, creating enhanced links to existing green infrastructure assets, including lateral links across town. • Encourage the use of previously developed (brownfield) land. • Promote the re-use of derelict land and buildings. • There are major economic benefits to be gained from natural capital and their value should be incorporated into decision-making.
Soils and Geology	<ul style="list-style-type: none"> • Remediate land contamination. • Protect soil quality and avoid soil pollution.

Table 4.1: Key Messages from the PPP review

SA Topic	Key Messages from Review
Water	<ul style="list-style-type: none">• Reduce the pollution of groundwater and prevent or limit the entry of pollutants.• Protect and enhance surface and groundwater quality.• Improve water efficiency.• Return watercourses to a more natural state, increasing the biodiversity value and generating Water Framework Directive improvements.• Ensure that water quality is improved or maintained where possible.• Promote sustainable and water efficient development.
Waste	<ul style="list-style-type: none">• Waste should be managed in line with the waste hierarchy:<ul style="list-style-type: none">– Prevent or reduce waste;– Reuse;– Recycle;– Other recovery methods; and– Dispose.• To improve the environment and protect human health by supporting a resource efficient economy.• To promote the provision of well-designed and efficient facilities, that drive waste management practices up the waste hierarchy and are located to ensure no harm to human health and the environment, and which reduce waste volumes to be disposed in landfill.• Encourage the increased and efficient use of recycled waste materials in Hertfordshire.• Work towards eliminating avoidable plastic waste.

5 Summary of Baseline Data

5.1 Introduction

This section presents the key sustainability issues currently affecting Watford and the predicted future evolution of the baseline without the Local Plan. This section is arranged by SA topic as presented in Table 2.2 and is supported by Appendix B which presents the full review of baseline data for the borough. Appendix B and relevant parts of this section were updated in relation to key data sources in December 2020. The update undertaken at that time is not a comprehensive update of baseline data.

5.2 Health, Population and Community

5.2.1 Key Sustainability Issues

The following sustainability issues have been identified:

- As the population continues to increase, so does the demand for housing, infrastructure, facilities and employment;
- The population density within the borough exceeds both the local and the national averages;
- Adequate support and facilities will be needed for older residents.
- The population is ageing;
- Mortality rates remain high and exceed the regional average;
- There are large disparities in health between wards;
- Levels of smoking continue to rise;
- A quarter of residents in Hertfordshire are physically inactive;
- The proportion of deaths caused by circulatory disease exceeds the national and regional average;
- There is a need to promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation;
- The number of reported crimes continues to increase;
- There has been a large shift towards more violent types of crimes;
- There are large disparities in the number of crimes committed in different wards across the borough;
- The number of hate crimes reported continues to increase; and
- There is a need to provide safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life.

5.2.2 Future Evolution of the Baseline

The population of Watford is set to continue to rise over the next 20 years. Going on current trends the population is likely to become both older and more diverse which may put additional strain on the borough's resources. The continued growth in population is likely to cause an increase in demand for housing, services and infrastructure. There will also be an ongoing need to provide inclusive services in order to meet the needs of all residents.

As the population in Watford ages, the demand for health and social care needs will increase. In some of the most deprived areas, life expectancy is 8.9 years lower for men and 5.8 years lower for women than in the least deprived areas. This gap may well widen over time if levels of deprivation, overcrowding and poverty continue.

Without further intervention, it is likely that crime rates in Watford will continue to rise. This increasing trend mirrors what is being seen across Hertfordshire and London, but the changes in categorisation and types of crime may have an impact on the residents' overall feeling of safety. The 'One Watford' community safety partnership may help to tackle certain types of crime and improve the feeling of safety in the borough. Without intervention, disparities may continue to exist at a ward level.

5.2.3 Data Gaps

Some of the data used has been taken from the 2011 Census which may not adequately reflect current trends. More recent data regarding populations is expected to be available following the 2021 census. Data for physical activity of residents within the borough could not be obtained.

The lack of hate crime data available at local authority level made it difficult to compare. Data could not be found on the fear of crime or residents' perception of safety.

The current COVID-19 crisis could alter the reported trends in crime in Watford, but this is currently uncertain.

5.3 Housing

5.3.1 Key Sustainability Issues

The following sustainability issues have been identified:

- The proportion of affordable housing being delivered as part of developments is decreasing and failing to meet the Council's 35% target;
- There is a need for a mix of housing types, sizes and tenures to meet the requirements of all areas of the community;
- An ageing population will require different housing needs and is an increasing market;

- There is a lack of new build on the market;
- Homelessness continues to rise;
- There is a need to deliver more affordable houses to buy as well as to provide affordable houses to rent; and
- There remains a large shortfall between local housing allowances and average rental prices.

5.3.2 Future Evolution of the Baseline

As the population in the borough continues to rise, so does the demand for housing and the current demand for affordable housing in Watford greatly exceeds supply. Households who are unable to wait for accommodation through the housing register and do not have other housing options may result in more applications being made for housing through the homelessness legislation. The need for older persons accommodation will continue to rise as there is projected to be a 44% increase in the population aged 65+ over 2020-2036 as identified in the South West Hertfordshire Local Housing Needs Assessment (September 2020).

5.3.3 Data Gaps

Low numbers of sales transactions in some local authorities can lead to volatility in data for annual price change by local authority for England. While efforts have been made to account for this volatility, the change in price in these local levels can be influenced by the type and number of properties sold in any given period.

The impact that the current COVID-19 crisis will have on local property values and rents is unclear.

5.4 Employment and Economy

5.4.1 Key Sustainability Issues

The following sustainability issues have been identified:

- There are inequalities in skill levels and income between wards within the borough;
- The number of residents that have no qualifications is on the rise;
- There is a need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment;
- Employment spaces are being lost to other uses;
- Despite currently being a net importer of labour, the borough is gradually becoming a net exporter with more residents commuting to London and the surrounding boroughs; and
- Manufacturing and human health and social work activities sectors are under-represented compared with the regional and national rates.

5.4.2 Future Evolution of the Baseline

The borough has recovered from the recent drop in employment and levels are rising again. Attainment of qualifications continues to rise with more residents gaining NVQ4 levels and above, but the number of residents who have no qualifications is also rising and is still above both national and regional levels. With growing interest in the area from large employers there may be a new demand for higher educated employees.

Continued development in the borough will work towards securing employment opportunities for and retain and improve its reputation as an attractive place for business. There has been an increase in the number of residents commuting from the borough to London and the other surrounding areas for work. However, the extension of the Metropolitan line would provide greater connectivity with London may draw more commuters into the borough, but equally, it could make commuting into London more attractive.

5.4.3 Data Gaps

A lot of the data for the chapter was sourced from Nomis (ONS official labour market statistics), where some of the data for the tables used was missing as well as more recent data relating to self-employed numbers. Data also had to be taken from 12-month totals with data points at the end of each quarter. There was not an overall end of year average, so all data was been taken from Q2 of each respective year.

Data is not yet available on the impact of the COVID-19 crisis on employment and the local economy.

5.5 Transport & Accessibility

5.5.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity;
- As the population grows, so does the need to change current infrastructure to meet the demands of all residents, whilst making it future proof; and
- Need to provide public transport capacity and safeguard land for transport.

5.5.2 Future Evolution of the Baseline

Despite the borough having good sustainable transport links there is still a high dependency on the private car. Although there may be some temporary positive effects of the COVID-19 crisis on local traffic levels these are likely to be short-lived as 'business as usual' may return in 2021/2022. The longer term effects of COVID-19 on movement patterns is unknown. Traffic has been expected to continue to rise within the borough and at a higher rate than both the county and national average, this is likely to place additional pressure on the already stressed road network. However, if the extension of the Metropolitan Line is successful, traffic levels could decrease as residents may opt for quicker and more sustainable transport options and working from home could become more prevalent. The creation of more accessible cycle routes may also help to deter residents from using private cars.

5.5.3 Data Gaps

None.

5.6 Air, Noise and Light Pollution

5.6.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Need to help reduce pollution from road vehicles;
- Reliance on the petrol or diesel-fuelled private car as the main mode of transport;
- Air pollution from the strategic road network is an issue across the borough and NO₂ emissions have remained constant;
- Noise, air and light pollution could be generated through construction works in the borough, resulting from growth proposed in the Final Draft Local Plan. This pollution will need to be minimised and controlled through Local Plan policies; and
- There is a need to reduce light pollution and restrict further intensification of light pollution from new developments.

5.6.2 Future Evolution of the Baseline

Although there may be some temporary positive effects of the COVID-19 crisis on local traffic and air quality these are likely to be short-lived as 'business as usual' may return in 2021/2022. It is therefore likely that air quality will continue to be an issue in the borough due to its large road network and the reliance on the private car. Continued growth across the borough will increase the demand for housing and could subsequently result in more cars on the road. Further exceedance of the 40 µg/m³ annual mean objective within AQMAs may see boundaries revised

or even the creation of additional AQMA sites. However, the Council have invested in a number of initiatives to help improve air quality and the increase in the number of electric vehicles is promising and it will go some way in reducing air pollution from transport within the borough.

Further population growth and the increasing need for new development is likely to generate further light pollution and enhanced intensification of lighting levels in certain areas of the borough. Additional construction work as a result of development may also lead to more noise complaints.

5.6.3 Data Gaps

The Infrastructure Delivery Plan being prepared to accompany the WBC Local Plan Review was not available at the time of writing this report. It will provide details of transport schemes.

5.7 Climate Change

5.7.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Reliance on the petrol or diesel-fuelled private car as the main mode of transport;
- Greenhouse gas emissions need to be stabilised and reduced over time;
- Need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding;
- Need to promote the construction of energy-efficient buildings, and to support the installation of renewable and low or zero carbon technology;
- New developments need to minimise vulnerability and provide resilience to climate change; and
- Need to work with communities to help tackle climate change.

5.7.2 Future Evolution of the Baseline

Given the reliance on the private car as the main mode of transport within the borough, ongoing increases of vehicle ownership, the lack of vehicles meeting emissions standards and the requirement for additional residential development, it could be considered likely that greenhouse gas emissions will rise in the future. However, there is the potential for advances in technological solutions and changes in policy to begin to stabilise and reduce emissions over time. Local policy reducing car-based development could affect this as could the increasing use of electric vehicles.

Despite this, the current estimates for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future given the timescales associated with climate

change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

5.7.3 Data Gaps

Data from the BEIS was only available up until 2014. The 2017 release, which includes data up until 2015, did not provide data at local authority level.

5.8 Biodiversity

5.8.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Biodiversity generally remains under pressure nationally;
- Need to protect and enhance the wildlife and habitats in Watford;
- There is increasing pressure presented by invasive non-native species, which is expected to be exacerbated by climate change;
- Growing population will increase demand for more development, possibly where there is a potential for loss of habitats and species but there is an opportunity to increase biodiversity in new developments, such as installing green roofs;
- Consider and plan for the impacts of climate change on species and habitats;
- Need to support the delivery of the Green Infrastructure network in Watford; and
- There is a need to ensure that all residents have sufficient access to natural greenspace in order to enjoy the benefits of these assets.

5.8.2 Future Evolution of the Baseline

Pressure on biodiversity in the borough is likely to increase with development required to meet housing targets. Climate change is also likely to exacerbate pressure on habitats and species as habitats become less suitable, and native species need to adapt to survive, in competition with invasive non-native species such as Japanese knotweed, Giant hogweed and Himalayan balsam are known to occur within Watford and are often left unmanaged. The management of non-native invasive species, facilitating the movement of species across the borough and creating a network of natural greenspaces would help improve biodiversity and help species adapt to climate change.

5.8.3 Data Gaps

Data on habitats and species present within the borough is not available on a borough wide basis. It could be accessible on a site by site basis via studies undertaken to support planning applications.

It would be useful to have more up to date data on ANG within the borough in order to determine whether deficiency in access exists.

5.9 Cultural Heritage

5.9.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Ensure that the Conservation Areas, heritage assets and features are preserved or enhanced, including identified 'Heritage at Risk';
- New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy;
- Impacts of future development on the local historic environment need to be considered, including currently unknown sites of historic and archaeological interest which may be discovered through new developments;
- Traffic management and the impacts of traffic on amenity have been raised as issues within the Conservation Area Action Plans;
- Heritage assets should be managed to sustain their significance;
- Ensure that everyone is able to participate in understanding and sustaining their local historic environment;
- There is a perceived lack of distinctiveness within the Borough; and
- The Borough needs to develop more of a distinctive cultural offer in order to compete amongst the broader cultural dynamism of London.

5.9.2 Future Evolution of the Baseline

Continual growth in the Borough and the increasing demand for housing, may well mean development could encroach on Conservation Areas and could negatively affect townscape and heritage assets. Continued investment in culture within the Borough will help Watford better compete with the surrounding boroughs as well as London.

5.9.3 Data Gaps

No data gaps have been identified.

5.10 Landscape & Townscape

5.10.1 Key Sustainability Issues

The following sustainability issues have been identified:

- Green Belt in the surrounding sub-region constrains development to existing urban areas in Watford but provides important Green Infrastructure functions;
- The Chilterns AONB is in close proximity to the Borough and it's setting could potentially be affected by development in Watford, depending on its nature and location; and
- Character areas in the Borough are at risk of degradation from the pressures of new development. Planning policy needs to guide development to ensure it is contextually responsive development and reinforces local character.

5.10.2 Future Evolution of the Baseline

There has been a trend for inconsistent changes to landscape character to take place which may well continue if there is no strategic strategy in place which is enforced through Development Management.

Green Belt will continue to provide separation between urban areas within the sub-region whilst constraining the built area in Watford. The Green Belt areas also provide important Green Infrastructure functions.

Opportunities exist to improve the public realm in some parts of the town centre; however, these may not come forward without planning policy intervention or developer contributions.

The risk of character degradation in parts of the Borough will continue without planning intervention to guide development to reinforce local character.

5.10.3 Data Gaps

No data gaps have been identified.

5.11 Soils & Geology

5.11.1 Key Sustainability Issues

- There are sites within the Borough that have had a previous potentially contaminative use. Previously developed sites which come forward for redevelopment will need to be assessed for soil contamination and remediated if deemed necessary, depending on the use proposed;
- There is a need to protect soils and underlying aquifers from pollution;

- Most of the Borough is covered by a Minerals Safeguarding Area; and
- The Orphanage Road Goods Yard concrete batching plant has permanent planning permission that safeguards it from development, and this could pose a constraint for the redevelopment of this part of the borough.

5.11.2 Future Evolution of the Baseline

Due to past activities, contaminated land may be present within the borough which may require remediation when development proposals come forward.

Underlying aquifers will continue to be vulnerable to pollution and will require protection.

5.11.3 Data Gaps

No data gaps have been identified.

5.12 Water

5.12.1 Key Sustainability Issues

- Properties in the Lower High Street, Water Lane and Bushey Mill areas are at risk from fluvial and surface water flooding¹², whereas properties in the Kingsfield Road and Cedar Road, Oxhey and Molteno Road areas are the most prone to groundwater flooding within the borough;
- There is a need to promote flood resistance and resilience measures for properties at risk from flooding;
- Increasing population will put additional strain on already stressed water resources and waste water infrastructure; and
- New development will need to incorporate sustainable drainage systems to sustainability reduce flood risk.

5.12.2 Future Evolution of the Baseline

The increases in population will drive further water demand in the borough and place increasing strain, on the already stressed water resources and wastewater infrastructure. Development could result in the loss of green spaces to hardstanding surfaces. This will reduce water infiltration, increase surface runoff and subsequently increase the risk of flooding, unless sustainable urban

¹² Watford Borough Council Level 2 Strategic Flood Risk Assessment, 2014 (Produced by AECOM)

drainage solutions are adopted. Taking predicted rainfall patterns into account and the future effects of climate change, it could be assumed that there will be an increase in areas subjected to flooding.

5.12.3 Data Gaps

Specific water quality data for the stretches of the Grand Union Canal, River Colne and the River Gade within the Borough could not be sourced. A Water Cycle Study for the South West Hertfordshire Councils is currently in preparation and will be reviewed when it is available.

Up to date water consumption data for the Borough will be used to update the SA baseline when available from either the Water Cycle Study or Affinity Water.

5.13 Waste

5.13.1 Key Sustainability Issues

- The amount of household waste produced is on the rise;
- Recycling should be encouraged through planning and development; and
- There is a need to minimise the impact of municipal waste management on the borough's environment.

5.13.2 Future Evolution of the Baseline

With the increasing population it is likely that the amount of waste produced will continue to rise. The council have set an achievable target of 50% of waste to be reused, recycled or composted by 2020. Continued work with the Hertfordshire Waste Partnership may help the Borough meet this target.

5.13.3 Data Gaps

No data gaps have been identified.

6 Findings of the Appraisal of Alternatives

6.1 Introduction

This section of the SA Report describes the SA work undertaken in relation to testing options for the Local Plan. It summarises the findings of the appraisal work which helped inform the options (including strategic options appraisal (2018) and policy options appraisal (2019)) that have been taken forward and which have been developed into the Local Plan policies.

Appendix C provides a summary of the output of the options assessments which are described below. It also reproduces a table (Table C.3) developed by WBC which maps the evolution of the policy development from the options to the Draft Local Plan policies.

SEA Guidance published by the RTPI¹³ advises that alternatives are not needed for every plan issue. A 'policy versus no policy' comparison of alternatives is necessary only where 'no policy' is under active consideration by the planning team. Where only one alternative is reasonable, then looking at other alternatives is not 'reasonable'. Not meeting objectively assessed housing need and going against Government policy are also generally not 'reasonable'.

6.2 Appraisal of the Local Plan Strategic Options

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

These alternative strategic options sit beneath seven distinct issues as presented in Box 6.1. References are provided in Box 6.1 to the corresponding questions within the Issues and Options document (June 2018)¹⁴.

¹³ RTPI Practice Advice, Strategic Environmental Assessment Improving the effectiveness and efficiency of SEA/SA for land use plans, January 2018, Commissioned by RTPI South East written by Levett-Therivel. Section 3, p12

¹⁴ Sustainability Appraisal of the Strategic Options Report (June 2018)
<https://www.watfordlocalplan.co.uk/consultation-documents>

Box 6.1: Options Assessed in the SA

Housing Development (Questions 4 and 5)

1. Building more flats, especially in taller buildings at key locations.
2. When opportunities arise redeveloping existing residential areas with more homes than they currently support (intensification).
3. Building on some of our open spaces or green belt where these are of low quality and poorly used.
4. Working with neighbouring councils to see if some of our housing need can be met outside the Watford Borough boundary.

Affordable Housing (Questions 6 and 7)

1. The Council continues to prioritise affordable housing onsite when new housing development comes forward.
2. The Council encourages developers to make a financial contribution that can be used to provide affordable housing on other sites in the Borough.

Types of New Housing (Question 9)

1. Focus on delivering mainly flats.
2. Focus on delivering mainly family sized flats.
3. Focus on delivering mainly small houses.
4. Focus on delivering mainly family sized housing.
5. Deliver a mix of different housing types.

Housing for an Aging Population (Questions 12 and 13)

1. Deliver purpose built retirement homes.
2. Ensure new homes are adaptable for all ages to live in.

Employment (Question 14)

1. Continue to protect existing employment areas from redevelopment to other uses such as housing.
2. Do not protect existing employment areas from redevelopment to other uses such as housing.

Tall Buildings (Question 17)

1. Allow tall buildings to be built anywhere in Watford.
2. Do not allow any more tall buildings in Watford.
3. Allow tall buildings if the suitability of each is considered on a case by case basis.
4. Identify which parts of the Borough where tall buildings are acceptable.

Transport (Question 19, 23 and 24)

1. A 20mph speed limit on all residential roads.
2. Congestion charging in the most congested areas.
3. Improving the quality and continuity of walking and cycling routes.
4. Increasing the frequency of buses and providing priority bus lanes.
5. Creating better access to the railway networks.

The potential significant sustainability effects of each alternative strategic option are presented in the following Table 6.1. The tables only describe the potential significant effects; the options may also result in potential minor negative or minor positive effects which are not reported in Table 6.1. Full details on the assessment are contained in the main body of the SA of Strategic Options Report produced in June 2018¹⁵. That report was consulted on alongside the Issues and Options Consultation (September 2018) and the results of the assessment as well as the consultation responses were used to inform the development of the policy options in 2018-2019.

¹⁵ Sustainability Appraisal of Strategic Options Report June 2018 accessed via WBC's website:

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

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
Housing Development (Questions 4 and 5)	
<p>Option 1: Building more flats, especially in taller buildings at key locations.</p>	<p>This option could lead to potential significant positive effects on the efficient use of land (SA16), sustainable patterns of development (SA7) and access to facilities and sustainable transport modes (SA3).</p> <p>This policy option could have a potential significant negative effect on light pollution (SA9) because taller buildings are likely to contribute to existing light pollution unless controlled. An uncertain effect is identified in relation to SA13 (maintain and enhance historic and cultural assets). It could be beneficial to provide development in tall buildings if they do not affect any heritage assets but if the tall buildings are near to Conservation Areas or other assets, they could negatively affect their character and/or settings.</p>
<p>Option 2: When opportunities arise redeveloping existing residential areas with more homes than they currently support (intensification).</p>	<p>The assessment mainly identifies potential minor negative and positive effects. The option could support local businesses but place pressure on existing facilities.</p> <p>A potential uncertain effect was also identified with regards to Borough’s contribution to climate change (SA10) as the option provides opportunity for the delivery of more energy-efficient homes, but redevelopment could be resource intensive. Due to the unknown location of the development, other potential uncertain effects have been identified in relation to historical and cultural assets (SA13), revitalising the town centre (SA15), and delivery of more sustainable patterns of development (SA7).</p>
<p>Option 3: Building on some of our open spaces or green belt where these are of low quality and poorly used.</p>	<p>This option would result in the development of green spaces and therefore the assessment has identified potential significant negative effects on biodiversity (SA12), SA14 (landscape and townscape) and the efficient use of land (SA16). Due to the unknown location of development uncertain effects were identified in relation to historical and cultural assets (SA13), revitalising the town centre (SA15) and delivery of more sustainable patterns of development (SA7).</p>
<p>Option 4: Working with neighbouring councils to see</p>	<p>The assessment mainly identifies minor positive and negative effects. Uncertainty is identified in relation to SA8 (air quality) and the contribution to climate change (SA10). Locating residents further away from the</p>

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
if some of our housing need can be met outside the Watford Borough boundary.	<p>Borough may lead to residents travelling further to access facilities and services in Watford and contributing further to air quality issues. However, this is dependent upon the location of development, as they may be near to sustainable transport modes and facilities and services outside of the Borough.</p> <p>Maintaining historic and cultural assets (SA13), the efficient use of land (SA16) and the delivery of sustainable patterns of development (SA7) have been identified as being uncertain, as they are dependent upon the sites identified for development.</p>
Affordable Housing (Questions 6 and 7)	
Option1: The Council continues to prioritise affordable housing onsite when new housing development comes forward.	Option 1 performed more strongly than option two as it provides more confidence that affordable housing will be delivered as part of developments. A potential significant positive effect was identified in relation to ensuring that everyone has access to good quality housing (SA4).
Option 2: The Council encourages developers to make a financial contribution that can be used to provide affordable housing on other sites in the Borough	An uncertain effect is identified in relation to health and wellbeing (SA5) because this option would not allow integration of affordable housing with market housing.
Types of New Housing (Question 9)	
Option 1: Focus on delivering mainly flats.	Potential significant positive effects have been identified in relation to the efficient use of land (SA16) because flats offer the potential to maximise housing delivery, whilst making efficient use of development plots.

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
	Uncertain effects are also identified for SA10 (Reduce the Borough’s contribution to climate change) and SA13 (To maintain and enhance historic and cultural assets).
Option 2: Focus on delivering mainly family sized flats.	<p>Like Option 1, a potential significant positive effect has been identified in relation to the efficient use of land (SA16). The assessment identified that flats may not be the appropriate style of housing to meet the needs of all of the Borough’s residents, but family sized flats may offer additional internal and external space when compared to Option 1.</p> <p>Uncertain effects are also identified for SA7 (To deliver more sustainable patterns of development), SA8 (air quality), SA10 (Reduce the Borough’s contribution to climate change) and SA 13 (to maintain and enhance historic and cultural assets).</p>
Option 3: Focus on delivering mainly small houses.	Due to the unknown location of development, the assessment identifies uncertainty with regards to delivering more sustainable patterns of development (SA7), the maximisation of previously developed land (SA16), maintaining and enhancing historic and cultural assets (SA13) and the conservation and enhancement of the landscape and townscape (SA14). The effect on the contribution to climate change (SA10) and the encouragement of healthy lifestyles and improving quality of life for local residents (SA5) and has also been identified as uncertain. This will depend on the type and design of development, for example, the amount of outside space incorporated and the provision of walking and cycling access.
Option 4: Focus on delivering mainly family sized housing.	Due to the unknown location of development, the assessment identifies uncertainty with regards to delivering more sustainable patterns of development (SA7), the maximisation of previously developed land (SA16), maintaining and enhancing historic and cultural assets (SA13) and the conservation and enhancement of the landscape and townscape (SA14). The effect on the contribution to climate change (SA10) and the encouragement of healthy lifestyles and improving quality of life for local residents (SA5) and has also been identified as uncertain. As for Option 3, this will depend on the type and design of development.

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
<p>Option 5: Deliver a mix of different housing types.</p>	<p>The assessment identified potential significant positive effects in relation to the provision of good quality housing to meets the needs of local residents (SA4). This option works positively towards ensuring housing needs are met and provides flexibility to delivery different types of housing, suitable for all.</p> <p>Due to the unknown location of development, the assessment identifies uncertainty with regards to delivering more sustainable patterns of development (SA7), the maximisation of previously developed land (SA16), maintaining and enhancing historic and cultural assets (SA13) and the conservation and enhancement of the landscape and townscape (SA14). The effect on the contribution to climate change (SA10) and the encouragement of healthy lifestyles and improvement quality of life for local residents (SA5) and has also been identified as uncertain. As for Options 3 and 4 this will depend on the type and design of development.</p>
<p>Housing for an Aging Population (Questions 12 and 13)</p>	
<p>Option 1: Deliver purpose-built retirement homes.</p>	<p>A potential uncertain significant positive effect has been identified in relation to the encouragement of healthy lifestyles and improvement of the quality of life for local residents (SA5). Purpose built retirement homes may provide opportunities for residents to be more sociable and physically active, encouraging healthier lifestyles. However, this would depend on the type of development delivered. Uncertain effects are also identified for access to essential services and facilities (SA3) and delivering more sustainable patterns of development (SA7).</p>
<p>Option 2: Ensure new homes are adaptable for all ages to live in.</p>	<p>Potential significant positive effects have been identified with regards to SA5 (encouragement of healthy lifestyles and improvement of the quality of life for local residents) and SA4 (ensuring quality housing for all). This option has the potential to deliver homes that are adapted to suit varying needs such as older residents, families and shared homes. Homes that are adaptable to suit a variety of needs could assist in maintaining independence, integration within the community and provide a better quality of life.</p> <p>Uncertain effects are also identified for access to essential services and facilities (SA3) and delivering more sustainable patterns of development (SA7).</p>

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
Employment (Question 14)	
Option 1: Continue to protect existing employment areas from redevelopment to other uses such as housing.	<p>Significant positive effects have been identified in relation to SA1 (achieving sustainable levels of prosperity and growth) because protecting employment spaces will help to support existing businesses and may also attract inward investment and encourage new businesses start-ups.</p> <p>This option could contribute to providing job security but may not necessarily create more job opportunities.</p>
Option 2: Do not protect existing employment areas from redevelopment to other uses such as housing.	<p>Potential significant negative effects have been identified in relation to SA1 (achieving sustainable levels of prosperity and growth) and SA2 (generation of employment opportunities), because the loss of employment areas to housing developments will not help to secure sustainable levels of economic growth and could result in the loss of jobs.</p> <p>Uncertain effects have been identified with regards to SA13 (maintain and enhance historic and cultural assets) and SA15 (revitalising the town centre), due to the uncertainty of development locations.</p>
Tall Buildings (Question 17)	
Option 1: Allow tall buildings to be built anywhere in Watford.	<p>This policy option could result in a significant positive effect on both SA1 (achieving sustainable levels of prosperity) and SA16 (maximising the use of previously developed land).</p> <p>Significant negative effects have been identified with regards to SA5 (encouraging healthy lifestyles) and SA14 (conservation and enhancement of the landscape and townscape). Taller buildings are unlikely to provide health benefits and may also impact negatively on existing neighbourhoods causing overshadowing, effecting the setting of nearby neighbourhoods, as well as creating micro-climates. Allowing tall buildings to be develop anywhere in the Borough will alter both the townscape and landscape. An uncertain significant negative effect has been identified for light and noise pollution (SA9) as tall buildings are likely to contribute further to the issue. However, there is some uncertainty because impacts on residents from noise sources would depend on the location of development. This option could allow tall buildings to be built away from key transport hubs and facilities, and may not provide a close integration of housing, jobs and services.</p>

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
<p>Option 2: Do not allow any more tall buildings in Watford.</p>	<p>A potential uncertain significant negative effect is identified in relation to ensuring sustainable prosperity (SA1). It is uncertain whether not allowing tall buildings in the Borough could negatively affect the local economy.</p> <p>New developments have the potential to enhance townscape in certain parts of the Borough and by not allowing tall buildings this option could result in land being developed which is less sustainably located or more environmentally constrained. Uncertain effects are therefore identified for SA7 (sustainable patterns of development) and SA12 (biodiversity).</p> <p>Potential uncertain effects have also been identified with regards access to delivering good quality housing (SA4), maintaining and enhancing historical and cultural assets (SA13) and making optimal use of previously developed land.</p>
<p>Option 3: Allow tall buildings if the suitability of each is considered on a case by case basis.</p>	<p>The assessment of this option identifies a potential significant positive effect in relation to maximising the use of previously developed land (SA16). This option has the potential to concentrate development near transport nodes and the town centre. By considering the suitability of developments on a case by case basis there is potential for potential negative effects to be avoided or minimised.</p>
<p>Option 4: Identify which parts of the Borough where tall buildings are acceptable.</p>	<p>The potential effects of this option are similar to those of Option 3. This option provides control with regards to land use planning and greater certainty for developers. It could also be used to enhance the townscape of particular parts of the Borough (e.g. Clarendon Road) and could result in business clusters and therefore a potential significant positive effect is identified in relation to SA1 (achieving sustainable levels of prosperity) as well as for SA16 (maximising the use of previously developed land).</p>
<p>Transport (Questions 19, 23 and 24)</p>	
<p>Option 1: A 20mph speed limit on all residential roads.</p>	<p>A potential significant positive effect is identified in relation to SA5 (healthy lifestyles and quality of life). 20 mph speed limits on residential roads is likely to improve road safety in the Borough. An uncertain effect has</p>

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
	been identified in relation to SA8 (air quality), because there is some evidence that suggests that reduced traffic speeds can help to improve air quality.
Option 2: Congestion charging in the most congested areas.	The assessment of this option has identified potential significant positive effects in relation to air quality (SA8), delivering sustainable levels of development (SA7) and reducing the Borough’s contribution to climate change (SA10). This option discourages the use of private vehicles, reducing the number of vehicles on the Borough’s roads and subsequently reducing the levels of greenhouse gas emissions and air pollution.
Option 3: Improving the quality and continuity of walking and cycling routes.	The assessment of this option has identified potential significant positive effects relating to SA5 (health and wellbeing), SA7 (delivering sustainable levels of development), SA8 (air quality) and SA10 (reducing the Borough’s contribution to climate change). This option is likely to see an increased uptake of cycling and walking, providing health benefits to the Borough’s residents, as well as reducing the number of private vehicles on the Borough’s roads and reducing air pollution. Greater walking and cycling continuity should make the Borough more connected, facilitating walking and cycling to key facilities within Watford, including the town centre.
Option 4: Increasing the frequency of buses and providing priority bus lanes.	The assessment of this option has identified potential significant positive effects for air quality (SA8), delivering sustainable levels of development (SA7) and reducing the Borough’s contribution to climate change (SA10). The option works towards reducing the number of private vehicles on the Borough’s roads and subsequently reducing the levels of greenhouse gas emissions and air pollution within the Borough. Increasing the frequency of buses and providing priority bus lanes will make bus journeys quicker, encouraging greater bus patronage.
Option 5: Creating better access to the railway networks.	The assessment of this option has identified potential significant positive effects relating to SA7 (delivering sustainable levels of development), SA8 (air quality), and SA10 (reducing the Borough’s contribution to climate change). Creating better access to public transport will help to reduce the number of private vehicles on the road and allow greater choice regarding transport modes.

Table 6.1: Potential Significant Sustainability Effects of the Strategic Options

Option	Potential Significant Effects
<p>Option 6: In new developments, prioritise walking, cycling and public transport over access by private vehicles</p>	<p>The assessment of this option has identified potential significant positive effects relating to SA7 (delivering sustainable levels of development), SA5 (health wellbeing and quality of life), SA8 (air quality), and SA10 (reducing the Borough’s contribution to climate change). This option is likely to see an increased uptake of cycling and walking, providing health benefits to the Borough’s residents, as well as reducing the number of private vehicles on the Borough’s roads and subsequently reducing the levels of greenhouse gas emissions and air pollution.</p>
<p>Option 7: Deliver car-free neighbourhoods in areas where there is good access to other types of transport (e.g. new developments with no car parking)</p>	<p>The assessment of this option has identified potential significant positive effects relating to SA7 (delivering sustainable levels of development), SA5 (health wellbeing and quality of life), SA8 (air quality), SA10 (reducing the Borough’s contribution to climate change) and SA3 (access to services and facilities). This option is likely to see increased uptake in cycling and walking, providing health benefits to the Borough’s residents as well as improved street safety. Introducing car free neighbourhoods would help reduce reliance on private vehicles as well as improving air quality within these neighbourhoods.</p> <p>A potential uncertain effect has been identified in relation to access to high quality housing (SA3). Not providing parking spaces in new developments may not be a suitable option for all the Borough’s residents but may be attractive for others.</p>

6.3 Appraisal of the Local Plan Policy Options

Topic papers were prepared by WBC officers relating to the topics listed in Table 6.2. Options for addressing the issues discussed in the topic papers were identified and passed to the SA consultants to assess.

The policy options were subject to SA 2019 and an internal report provided to officers to inform the development of the policies for inclusion within the First Draft Local Plan. The policy options appraised are listed in Table 6.2 below and full details of the options assessed is provided in Table C.1 in Appendix C. Each policy option has been considered against each of the SA objectives and sub-objectives within the SA framework (Table 2.2), and the effects are described in relation to the significance criteria (Table 2.3). A summary of the policy options appraisal findings is provided within Table C.2 of Appendix C and the full report is available on the WBC website.

Table 6.2: Policy Options Assessed	
Topic Paper	Policy Option
Air Quality, Pollution and Contamination	Air Quality (options 1 & 2)
	Noise Pollution (options 1 & 2)
	Contamination (options 1 & 2)
Built Community Facilities	Built Community Facilities (options 1, 2 & 3)
Climate Change and Resilience	Climate Change and Low Carbon Energy (options 1 & 2)
	Overheating (options 1 & 2)
	Flood Risk (options 1 & 2)
	Water Supply (options 1 & 2)
	Waste Management (options 1, 2 & 3)
High Quality Design and Conservation	High Quality Design (options 1, 2, 3 & 4)
	Conservation (options 1, 2 & 3)
Green Infrastructure, Biodiversity and the Natural Environment	Protection and Enhancement of Biodiversity (options 1 & 2)
	Green Infrastructure and the Natural Environment (options 1 & 2)
	Protecting Open Space (options 1, 2, 3 & 4)
	Provision of Functional Open Space in New Developments (options 1, 2, & 3)
	Landscaping and Green Infrastructure in New Developments (options 1 & 2)
Growth Strategy and Strategic Planning	Approach to Housing Growth (options 1, 2, 3, 4 & 5)
	Approach to Employment (options 1, 2 & 3)
	Approach to Retail (options 1 & 2)
	Approach to Infrastructure (options 1 & 2)
	Approach to Transport Infrastructure (options 1 & 2)
Density and Optimising Land Potential	Housing Density and Optimising Land (options 1 & 2)
Infrastructure	Infrastructure (options 1 & 2)

Table 6.2: Policy Options Assessed	
Topic Paper	Policy Option
	Utilities (options 1 & 2)
Employment	Designated Employment Sites (options 1 & 2)
	Non-Designated Employment Sites (options 1 & 2)
	Mixed use Development (options 1 & 2)
Housing	Housing Mix (options 1, 2, 3 & 4)
	Affordable Housing (options 1, 2, 3 & 4)
	Commuted Sums (options 1 & 2)
	Housing Tenure (options 1, 2 & 3)
	Ageing Population (options 1 & 2)
	Starter Homes (options 1 & 2)
	Self-Build and Custom Housebuilding (options 1 & 2)
	Windfall Sites (options 1 & 2)
	Residential Conversions (options 1, 2 & 3)
	Gypsies and Travellers (option 1)
Promoting Sustainable Transport	Enhancing Public Transport Provision and Supporting Watford as an Important Regional Transport Hub (options 1 & 2)
	Car Parking Standards (options 1, 2 & 3)
	Cycle Parking and Storage (options 1, 2 & 3)
	Prioritising Pedestrians and Cyclists in New Schemes. (options 1, 2 & 3)
Retail and Town Centre	Approach to Retail Throughout the Borough (options 1, 2 & 3)
	Retail Frontages in the Town Centre (options 1, 2, 3 & 4)
	Restriction of Non-Retail Uses in Retail Frontages (options 1, 2 & 3)
	Restaurants (options 1 & 2)
	Evening Economy (options 1 & 2)
	Vacant Units (options 1, 2 & 3)
	Clustering of Betting and Loan Shops (options 1, 2 & 3)
	Small and Independent Shops in the Town Centre (options 1 & 2)
Local, Neighbourhood and District Centres (options 1, 2 & 3)	
Strategic Approaches to Growth	Strategic Approaches to Growth (options 1, 2, 3 & 4)

Following the appraisal of policy options and internal consideration of the SA findings, the preferred policy options were chosen. The findings from the SA of policy options presented within Appendix C informed decisions to select the preferred options that were developed into the First Draft Local Plan policies. The preferred options were drawn out of the policy options discussed collaboratively between planning officers and the Council's Planning Policy Advisory Group. Following these discussions, the preferred options were carried forward with the agreement of the Council's Planning Policy Advisory Group. Table C.3 within Appendix C maps the progression of the policy options taken forward as preferred options policies within the First Draft Local Plan.

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’ within Table C.3. The ‘new’ policies were drafted because there could be potential issues not addressed when future planning applications are determined. Where ‘new’ strategic policies have been drafted, the intention is to provide improved connections between different policies to increase the prospect that the objectives can be achieved.

The alternative to ‘new’ local policies would be to have no policy; in effect this is the position subject to previous stages of the SA. Having ‘no policy’ would reduce the effectiveness of other policies in the respective chapters.

Site Allocations

Site allocations have been gathered using the Government methodology, as set out in the [Housing and Economic Land Availability Assessment Planning Practice Guidance](#) (2019). Further detail on how WBC has undertaken the process can be found in the Watford Housing and Economic Land Availability Assessment (2019)¹⁶. Two iterations of the process were undertaken to seek to meet Watford’s Objectively Assessed Need (OAN). The methodology was amended to reflect additional actions undertaken in 2020. The final HELAA was completed in January 2021¹⁷.

For sites to be included in the Local Plan, WBC determined that there must be evidence that a site is suitable, achievable and available. Suitability of sites was tested generally through land use categories and sites were considered unsuitable based on certain constraints. Details of the site selection process are set out in the table below.

¹⁶

https://www.watford.gov.uk/downloads/download/971/watford_housing_and_economic_land_availability_assessment_helaa_2019

¹⁷

https://www.watford.gov.uk/downloads/file/3598/housing_and_economic_land_availability_assessment_helaa_2nd_iteration_final_2021

Table 6.3: Allocation Site Suitability Criteria	
Land Use / Constraint	Comment and reasoned justification to pursue/ not pursue past Stage 1
Garage Sites ¹⁸	All garages sites are likely to be considered suitable unless there are insurmountable design/access constraints.
Ecological Sites	Sites of national and international ecological importance have not been considered suitable due to their ecological and biodiversity importance. These do not have development potential.
Greenbelt	For the first iteration of the HELAA, Green Belt sites were surveyed but not considered suitable. As the Green Belt Review has since been completed, the second iteration of the HELAA has undergone a reassessment of Green Belt sites which are recommended for release as part of the review for development potential.
Flood Zone 3B	Sites in Flood Zone 3b have not been carried forward. Sites in Flood Zone 2 and 3a have been brought forward with their suitability determined through the Strategic Flood Risk Assessment Level 2 and the SA.
Heritage Assets	National and Locally Listed Buildings with no significant ancillary space for redevelopment were not considered suitable. If there is a heritage asset on a site where development is possible (where the asset is retained or if there is significant public gain following demolition) these may have been considered suitable for potential redevelopment only where development would not result in significant harm to a nationally or locally listed building.
Open Spaces	No areas of open space were taken forward. Watford has a significant housing target (793 units per annum) and existing green spaces/ allotments are likely to become more important as the population increases. Accordingly it is not considered appropriate to develop on the borough's green spaces.
Woodland	With limited woodland, all woodland sites were ruled out due to their exceptional importance for biodiversity, carbon sequestration, and recreation and amenity.

¹⁸ Garage sites in the curtilage of a flatted development or those with less than 4 garage units were not surveyed.

Table 6.3: Allocation Site Suitability Criteria	
Land Use / Constraint	Comment and reasoned justification to pursue/ not pursue past Stage 1
Design and Access ¹⁹	At times, a site may not be conducive to good design by virtue of its constrained nature or access impediments. These sites were not carried forward.
Contrary to good land use and planning	<p>There are cases where it was clear that an existing and operational land use which is required for good planning and sustainable development would be displaced if it was considered suitable as having development potential. Accordingly, these sites were not considered suitable for redevelopment. This included important employment/ retail areas, schools, health and community provision. In cases regarding community centres and health facilities where there is a reasoned view that re-providing the community/health facility as part of a potential redevelopment is possible, this resulted in such a site being taken forward for further consideration.</p> <p>While schools with large ancillary land may be viewed as capable of intensification or development, this assumes the operational requirements only requires classroom space, or it assumes that expansion of existing premises is not going to happen. Extensions to the schools may be required given the need for more places stemming from increased housing provision. Therefore no education sites were brought forward for further consideration.</p> <p>For retail sites, if there was a reasoned case for redevelopment, the site was brought forward, while sites which are currently meeting the operational land space requirements have not been considered further.</p> <p>All employment sites were not taken forward as to do so would result in the loss of existing and operational employment land. This is based on the most recent economic studies and employment land reviews where there is concern over the loss of economic land.</p> <p>Sites with economic land use intensification potential within designated employment areas were identified and taken forward for further consideration with the view to meeting employment land needs. Just like most other land uses, many employment sites would technically be capable of intensification should they be demolished and rebuilt. However this is impractical and a</p>

¹⁹ In addition, some sites with narrows parts e.g. access roads or awkward site shapes meant that the actual developable site area was reduced. Although this site was theoretically capable of providing 5 or more units, the awkward shape meant that in effect, the developable site area was incapable of providing 5 units or more. This are not included but considered as windfall sites.

Table 6.3: Allocation Site Suitability Criteria	
Land Use / Constraint	Comment and reasoned justification to pursue/ not pursue past Stage 1
	<p>targeted approach was developed to find specific sites in employment areas with potential for intensification, consistent with the way in which residential areas were assessed. Sites within designated employment areas were identified based on:</p> <ul style="list-style-type: none"> • Vacant land or units²⁰ • Ancillary land²¹ • Non B class “destination uses”²²

²⁰ To be assessed, the vacant units had to be capable of demolition and rebuild without undermining any existing employment provision on site. Therefore, vacant units within wider buildings were not assessed. Vacant land and buildings were identified through the Employment Land Review and aerial view searches.

²¹ Ancillary land was defined as land not being used for active employment, such as large areas of car parking. Ancillary land was identified through aerial view searches.

²² Destination uses have been defined as car based destinations that do not support the current employment provision and offer low job densities. It was considered an alternate use could be sought on this sites to reduce trips generated and to enhance employment provision. Examples of destination uses would be are car sales showrooms and places of worship. While some units do not provide B class floor space, a distinction was made where they support current employment provision. For instance, nurseries and gyms can be used by employees in the employment area, enabling single trips and are significant employers. In addition, there are some other non B Class floor space which can provide a relatively significant number of jobs. Non B class destination uses were identified through the Employment Land Review.

Following this process, indicative site yields were calculated and then sites were not included as allocations if they were not able to provide 4 units or more. The sites not able to provide 4 units or more were classed as windfall sites.

Achievability was then assessed, which considered viability. Sites were typically only ruled out if there were substantial landownerships for a small number of units. This was only a small number of sites.

Finally, to assess availability, 200+ letters were sent to landowners asking if they had any intentions of redeveloping the site and for agreement to include the site in the Local Plan for the specified use (housing/employment/mixed use). This proved to be the largest barrier to including sites in the Plan. Sites that were considered suitable for redevelopment were ruled out if there was no ownership agreement to include the site in the Local Plan as they were not therefore deliverable.

This methodology identified the site allocations which are considered to be 'reasonable options'. All of the sites identified as reasonable options were taken forward into the Final Draft Local Plan as allocations in Policy SA13.1. No reasonable site options were rejected before the plan was submitted, although it should be noted that sites were not included as allocations if they were not able to provide four units or more. The sites not able to provide five units or more were classed as windfall sites. In the proposed modifications, sites HS33 Land and garages at Kingsfield Court and MU17 44-56 Vicarage Road have been removed from the Local Plan at the request of the landowners as they no longer wanted to include their sites in the Local Plan. As such they are not deliverable and therefore fail to meet the tests for site inclusion set out in national planning guidance.

Assessment of Site Allocations

Sites identified in 2019 for delivering policies H4.1 and E5.1 within the First Draft Local Plan were assessed in the SA of the First Draft Local Plan in 2019. Following consultation of the First Draft Local Plan between September and November 2019, consultation comments were considered, and detailed site allocations developed (including estimated minimum and maximum yields). The site allocations were assessed in detail between April and May 2020 and findings and recommended mitigation measures provided to WBC officers in June 2020.

Development considerations were then developed for each site, boundaries and yields were adjusted through consultation with land owners and officers and in light of the findings of the SA. The site allocations with their development considerations were then incorporated into the Final Draft Local Plan and subject to SA in November/December 2020.

New policies introduced into the Final Draft Local Plan

A number of new policies have been incorporated into the Final Draft Local Plan since the First Draft Local Plan. The new policies are presented in Table 6.4 along with the reasons for adding them into the Final Draft Local Plan. Some alternatives to the new policies are identified in Table 6.4 but in all cases these are not considered to be reasonable (as described in the table) which is why they have not been subject to SA.

Table 6.4: New Policies Introduced into the Final Draft Local Plan

Policy number	Policy name	Status in Final Draft Local Plan	Description	Justification for no Reasonable Alternative Policy Approach
HO3.4	Build to Rent	New policy	New form of housing that does not currently exist in the borough but will likely arrive during the plan period. Issue is not well covered in the NPPF guidance but it is referred to NPPF Annex 2.	Alternative approach would be no policy. However, there would then be a risk that no affordable housing will be delivered on these types of development. Due to this risk, 'no policy' is not under active consideration by the planning team.
HO3.6	Student, Co-Living, and Non-Self Contained Accommodation	New policy	Not currently a significant issue in the borough. However, accommodation patterns may change over the plan period as housing models change.	Alternative approach would be no policy. Risk that affordable housing may not be provided. Schemes would come forward, however, there would be no guidance to steer proposals potentially resulting in lower quality living environments. Due to this risk, 'no policy' is not under active consideration by the planning team.
HO3.8	Gypsies and Travellers	New policy	Need for two pitches during the plan period.	Could put forward a site allocation, however, given the requirement is small it is thought that having a policy that can assess a proposal would be more appropriate. Therefore putting forward a site allocation is not under active consideration by the planning team.
HO3.11	Private and Communal Outdoor Living Space	New policy	Currently have no requirement in place and this is resulting in poorer quality living environments.	Alternative approach would be no policy. However, this would have a negative effect on healthy living and reduce quality of life and therefore 'no policy' is not under active consideration by the planning team.
EM4.1	Provision of New Employment	New strategic policy	Strategic policy setting out details of employment provision.	Alternative approach would be no policy and details are incorporated into other policies. However, without a strategic policy there is no overarching policy which brings these details together and this would make the

Table 6.4: New Policies Introduced into the Final Draft Local Plan

Policy number	Policy name	Status in Final Draft Local Plan	Description	Justification for no Reasonable Alternative Policy Approach
				plan objectives more difficult to achieve. Therefore 'no policy' is not under active consideration by the planning team.
EM4.5	Different Ways of Working	New policy	Need to be adaptable to changing employment trends.	Alternative approach would be no policy. Risk is that employment space will not be adaptable to future employment patterns. Due to this risk, 'no policy' is not under active consideration by the planning team.
EM4.6	Training, Skills and Professional Development	New policy	Seeking to get greater community benefits from economic development.	No policy. Risk is that opportunities to support local people and increase locally available skills will not take place. Has consequences for addressing deprivation. Due to this risk, 'no policy' is not under active consideration by the planning team.
VT5.1	Supporting Vibrant Retail Centres	New strategic policy	Provide a policy umbrella for the borough.	Alternative approach would be no policy and rely on non-strategic policies. However, without a strategic policy there is no overarching policy which brings these details together and this would make the plan objectives more difficult to achieve. Therefore 'no policy' is not under active consideration by the planning team.
CC8.1	Mitigating Climate Change and Reducing Carbon Emissions	New strategic Policy	To provide more context about how the plan will address climate change.	Alternative approach would be no policy and rely on non-strategic policies. However, without a strategic policy there is no overarching policy which brings these details together and this would make the plan objectives more difficult to achieve. Therefore 'no

Table 6.4: New Policies Introduced into the Final Draft Local Plan

Policy number	Policy name	Status in Final Draft Local Plan	Description	Justification for no Reasonable Alternative Policy Approach
				policy' is not under active consideration by the planning team.
CC8.2	Sustainable Construction Standards for Non-Residential Development	New policy	Policies have now been viability tested.	Have a BREEAM requirement for 'very good' standard rather than 'excellent'. Risk is that environmental quality of buildings will not be as high and opportunities not taken to mitigate climate change. Due to this risk, 'no policy' is not under active consideration by the planning team.
CC8.3	Sustainable Construction and Resource Management	New policy	Additional energy efficiency requirement added. Has been subject to viability testing.	No additional energy requirements. Risk is that further reduction of carbon emissions are missed. A higher energy efficiency requirement of 35% has been viability tested and found not to be deliverable in the current market.
IN10.1	Integrated Infrastructure Delivery	New strategic Policy	To provide a clearer framework for delivery.	Alternative approach would be no policy. However, without a strategic policy there is no overarching policy which brings these details together and this would make the plan objectives more difficult to achieve. Therefore 'no policy' is not under active consideration by the planning team.
ST11.1	Sustainable Travel Town	New strategic policy	To provide a clearer framework for delivery.	Alternative approach would be no policy. However, without a strategic policy there is no overarching policy which brings these details together and this would make the plan objectives more difficult to achieve. Therefore 'no policy' is not under active consideration by the planning team.

Table 6.4: New Policies Introduced into the Final Draft Local Plan

Policy number	Policy name	Status in Final Draft Local Plan	Description	Justification for no Reasonable Alternative Policy Approach
ST11.2	Protecting and Enhancing Future Public Transport Routes and Watford Junction	New policy	Further work has been undertaken to identify projects.	Alternative approach would be no policy. Risk that development opportunities that could assist with the delivery of infrastructure may be compromised or missed. Due to this risk, 'no policy' is not under active consideration by the planning team.
QD6.1	Design for an Attractive Town	New strategic policy	To provide a clearer framework for delivery.	Alternative approach would be no policy. However, the linkages between the local policies would be reduced. Therefore 'no policy' is not under active consideration by the planning team.
QD6.3	Public Realm	New policy	While the Local Plan has limited scope to affect public realm this policy is intended to influence development in the strategic development areas where there is expected to be significant change which includes the public realm.	Alternative approach would be no policy and rely on design policies. Risks a missed opportunity to enhance the public realm which could adversely affect design, climate change and health agendas associated with new development. Due to this risk, 'no policy' is not under active consideration by the planning team.
NE9.1	The Natural Environment	New strategic policy	To provide a clearer framework for delivery.	Alternative approach would be no policy. However, without a strategic policy there is no overarching policy which brings these details together and this would make the plan objectives more difficult to achieve. Therefore 'no policy' is not under active consideration by the planning team.

Table 6.4: New Policies Introduced into the Final Draft Local Plan

Policy number	Policy name	Status in Final Draft Local Plan	Description	Justification for no Reasonable Alternative Policy Approach
HC12.1	Healthy Communities	New strategic policy	To provide a clearer framework for delivery.	Alternative approach would be no policy. However, the risk of no policy is that health is not embedded in developments and delivering the plan objectives and sustainable development would be more difficult. Due to this risk, 'no policy' is not under active consideration by the planning team.
HC12.2	Health Impact Assessments	New policy	HIAs cover a wide remit of policy considerations.	Alternative approach would be no policy. However, the risk of no policy is that development is less likely to consider the impact on people holistically. Due to this risk, 'no policy' is not under active consideration by the planning team.

7 SA Findings of the Local Plan Appraisal Including Modifications

7.1 Introduction

This section describes the SA findings of appraisal of the policies within the Final Draft Local Plan and amended to take into account main modifications following Regulation 19 consultation and Examination hearings. The policies have been assessed in groups, by chapter and the findings are summarised by chapter in Section 7.2.

Table 7.1 lists the policies in the Final Draft Local Plan which have been assessed.

Table 7.1: Final Draft Local Plan Policies	
Chapter	Policies
Chapter 1: A Spatial Strategy for Watford	SS1.1 Spatial Strategy
Chapter 2: Core Development Area	CDA2.1 Watford Gateway Strategic Development Area CDA2.2 Town Centre Strategic Development Area CDA2.3 Colne Valley Strategic Development area
Chapter 3: Homes for a Growing Community	HO3.1 Housing Provision HO3.2 Housing Mix, Density and Optimising Use of Land HO3.3 Affordable Housing HO3.4 Build to Rent HO3.5 Specialist Housing and Care Homes HO3.6 Student, Co-Living and Non-Self Contained Accommodation HO3.7 Self-Build and Custom Housebuilding HO3.8 Gypsies and Travellers HO3.9 Residential Conversions HO3.10 Building Design Standards for Healthy, Accessible and Adaptable Homes HO3.11 Private and Communal Outdoor Amenity Space

Table 7.1: Final Draft Local Plan Policies	
Chapter	Policies
Chapter 4: A Strong Economy	EM4.1 Providing New Employment EM4.2 Designated Industrial Areas EM4.3 Office Development EM4.4 Economic Development Outside Designated Employment Locations EM4.5 Different Ways of Working EM4.6 Training, Skills and Professional Development
Chapter 5: A Vibrant Town	VT5.1 Supporting Vibrant Retail Centres VT5.2 Watford Town Centre VT5.3 Local Centres
Chapter 6: An Attractive Town	QD6.1 Design for an Attractive Town QD6.2 Design Principles QD6.3 Public Realm QD6.4 Building Design QD6.5 Building Height
Chapter 7: The Historic Environment	HE7.1 Enhancement and Protection of the Historic Environment HE7.2 Designated Heritage Assets HE7.3 Non-Designated Heritage Assets HE7.4 Archaeology
Chapter 8: A Climate Emergency	CC8.1 Mitigating Climate Change and Reducing Carbon Emissions CC8.2 Sustainable Construction Standards for Non-Residential Development CC8.3 Sustainable Construction and Resource Management CC8.4 Managing Air Quality CC8.5 Managing the Impacts of Development
Chapter 9: Conserving and Enhancing the Environment	NE9.1 The Natural Environment NE9.2 Green Infrastructure Network NE9.3 Blue Infrastructure Network

Table 7.1: Final Draft Local Plan Policies	
Chapter	Policies
	NE9.4 Flood Risk and Mitigation NE9.5 Surface Water Management NE9.6 Protecting Open Space NE9.7 Providing New Open Space NE9.8 Biodiversity
Chapter 10: Infrastructure	IN10.1 Integrated Infrastructure Delivery IN10.2 Providing Infrastructure to Support New Development IN10.3 Development Contributions
Chapter 11: A Sustainable Travel Town	ST11.1 Sustainable Travel Town ST11.2 Protecting and Enhancing Future Public Transport Routes and Watford Junction ST11.3 Providing Sustainable Transport Infrastructure for Major Development ST11.4 A Walking and Cycling Infrastructure Improvement Town ST11.5 Electric Vehicles, Car Parking and Car Clubs ST11.6 Managing the Transport Impacts of Development
Chapter 12: A Healthy Community	HC12.1 Healthy Communities HC12.2 Health Impact Assessments HC12.3 Built Cultural and Community Facilities
Chapter 13: Site Allocations and New Development	SA13.1 Allocated Sites for Delivery

Policy SA 13.1: Allocated sites for delivery sets out the 62 site allocations (which are either allocated for housing, gypsy and traveller sites, education, mixed use or employment use). The allocations have been assessed individually and the findings are summarised in Section 7.3 below.

The SA matrices prepared during the assessment of each chapter 1 to 12 are presented in Appendix D. The matrices of the assessments of Chapter 13 (the site allocations) are presented in Appendix E along with the supporting RAG assessment.

7.2 Local Plan Modifications

Main modifications to the Local Plan have been screened and those identified as having the potential to alter the SA findings have led to reassessment. Table 7.2 presents the changes to the SA findings resulting from the main modifications. Further detail on the revised assessments can be found in appendices D and E.

Table 7.2: The Difference the Modifications have made to the SA Findings			
Policy / Site Allocation modified	Summary of modification	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
Chapter 2: CDA2.1 Watford Gateway Strategic Development Area, CDA2.2 Town Centre Strategic Development Area, Policy CDA2.3 Colne Valley Strategic Development Area	SA2: The provision of five new primary schools is now identified at specific sites within the Watford Junction and Colne Valley SDAs and at an unspecified site within the Town Centre SDA within the modifications. This should help to meet the needs for primary education throughout the plan period.	+	++
	SA13: Changes to requirements in relation to heritage impact assessments and protection of heritage assets has resulted in an improvement in the potential sustainability effects of these policies, from neutral to minor positive.	0	+
Chapter 5: Policy VT5.3: Local Centres	SA5: The modification to remove restrictions for hot foot takeaway proposals near to schools changes the potential effects of this chapter from a potential minor positive effect to neutral in relation to health.	+	0

Table 7.2: The Difference the Modifications have made to the SA Findings

Policy / Site Allocation modified	Summary of modification	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
Chapter 6: Policy QD6.2 Design Principles	SA11: Policy QD6.2 now requires new developments to be designed to minimise their impact on the environment and embrace sustainability principles. This should include measures to reduce the use of resources including energy, water and waste and incorporate soft measures to improve the environment such as green roofs, green walls and multifunctional green spaces. Together with policies QD6.1 and QD6.4, a potential minor positive effect is now predicted to result from the policies within Chapter 6.	?	++
Chapter 6: QD6.4 Building Design	SA5: Modifications to QD6.4 require buildings to be designed to promote the use of the stairs, providing a well-lit and spacious internal space which allows social interaction as well as being comfortable for residents to walk up and down and to pass one another. Secure cycle parking should also be provided in easily accessible and convenient locations. Policies. Together, with policies these policies QD6.3 and QD6.5 which promote access to public open space, amenity and play spaces they will contribute to improving quality of life and healthier lifestyles and a potential significant positive effect is now identified.	+	++
Chapter 7: The Historic Environment	SA13: A modification to the first paragraph in Policy HE7.2 is consistent with national policy and is more explicit that 'great weight will be given to the conservation of the asset'. This mitigates for an uncertain effect of the policies within this chapter which allow for loss or harm to an asset if it can be justified in line with national policy.	?	0
Chapter 8: A Climate Emergency	SA8: An enhancement measures was proposed when the Final Draft Local Plan was assessed, to remove the words 'and where possible'. This changes has been	+	++

Table 7.2: The Difference the Modifications have made to the SA Findings			
Policy / Site Allocation modified	Summary of modification	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
	included in the main modifications and has resulted in the improvement of the sustainability effects of the policies in Chapter 8.		
Chapter 9: Policy 9.3 Blue Infrastructure Network	SA17: Due to modifications policy NE9.3 now includes requirements for developments which are close to a water course to contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status as defined by the Water Framework Directive (WFD) objectives. Proposals are encouraged to deliver channel enhancements. Details of the requirements for buffer areas are also included. The modification of policy NE9.3 has improved the overall performance of the policies in Chapter 9 against SA17 from neutral to a potential significant positive effect.	0	++
Chapter 13: Site allocations HS17, HS18, MU10, MU12- MU14, MU17, MU22	SA13: Development at these sites could affect historic assets. The modified development considerations require design mitigation to be submitted in the Heritage Impact Assessment prior to approval.	?	0
Chapter 13: Site allocation HS18 Car Park at Vicarage Road/Exchange Road	SA14: modifications giving greater emphasis to Heritage Impact Assessments improve the performance against this SA objective with regards to local distinctiveness and townscape.	?	0

Table 7.2: The Difference the Modifications have made to the SA Findings

Policy / Site Allocation modified	Summary of modification	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
Chapter 13: Site allocation HS28 Wiggshall Depot and HS32 Riverside Road and Garages	SA17: This site is located adjacent to the River Colne and lies in Groundwater Source Protection Zone 1. Adverse impacts on groundwater source should be identified, considered and mitigated by Local Plan policy NE9.4: Flood Risk and Mitigation. A proposed modification has also been added to Policy CC8.5 referring to protection of ground source water. This works in conjunction with proposed modifications to Policy NE9.3 and Policy NE9.5 which highlight the need for development to consider ecological impacts in the context of the Water Framework Directive. Policy NE9.3: Blue Infrastructure could help to mitigate this, due to the 8m buffer required. With this mitigation in place within the Local Plan policies, an overall neutral effect is identified.	?	0
Chapter 13: Site allocation MU05 Land and buildings at 94-98 St Albans Road	SA6: the potential effect has changed from neutral to potential minor positive effect due to the modification to require an active ground floor frontage.	0	+
Chapter 13: Site allocation MU05-MU08	SA7: improved potential sustainability effects from minor positive to significant positive due to additional wording requiring collaboration to support a new pedestrian and cycle bridge access to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub.	+	++

Table 7.2: The Difference the Modifications have made to the SA Findings

Policy / Site Allocation modified	Summary of modification	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
	SA4: changed from minor positive to neutral because it is now not certain that residential uses will come forward on this allocation site.	+	0
Chapter 13: Site allocation MU10 Land to the Rear of 125-127 the Parade	SA14: improved potential sustainability effects from potential minor negative effect to neutral due to the additional of policy wording requiring mitigation for potential negative effects on heritage assets which could affect the townscape and local distinctiveness.	-	0
Chapter 13: Site allocation MU11 23-37 The Parade	SA14: improved potential sustainability effects from potential minor positive effect to potential significant positive effect in relation to townscape and distinctiveness through requiring provision of a quality, active ground floor frontage and landscaping along The Parade.	+	++
Chapter 13: Site allocation MU21 Land at Riverwell	SA1 and SA2: the redevelopment of the hospital is now included in this allocation and this has resulted in potential minor positive effects against objectives SA1 and SA2 which relate to supporting the economy and employment.	0	+
	SA7: Additional development considerations relating to sustainable transport access for pedestrians and cyclists has resulted in an improvement of performance from a potential minor positive to significant positive effect.	+	++
Chapter 13: Site allocation MU24 Land at Colonial	SA7: In collaboration with the landowners of sites MU05, MU06 and MU07 proposals should support the delivery of a new pedestrian and cycle bridge that crosses the West Coast Main Line and Abbey Line and provide a route to the Eastern Mobility Hub and Watford Junction Sustainable Transport Hub. This will improve the	-	0

Table 7.2: The Difference the Modifications have made to the SA Findings			
Policy / Site Allocation modified	Summary of modification	Potential Sustainability Effect in Final Draft Plan (January 2021)	Potential Sustainability Effect with Modifications (April 2022)
Way/Clive Way (formerly EM05)	performance of this site in relation sustainable transport access and mitigate for a potential minor negative effect identified prior to the modifications. A neutral effect is now identified.		
Chapter 13: Site allocation ED01 Former Meriden School Site	SA5: Potential effect has been changed from minor negative to neutral. The modification means that some open space near the school will not be developed as part of this allocation.	-	0

In addition to the changes identified in Table 7.2, further improvements to the performance of allocations sites have resulted from the availability of the finalised Infrastructure Delivery Plan 2021 and a proposed main modification to Policy IN10.2 which has clarified that planning conditions will be used to ensure appropriate infrastructure is available or provided where it is not. This has led to the improvement in sustainability performance of a high number of allocation sites against SA3²³ (access to services and facilities) and SA5²⁴ (health), replacing potential negative and uncertain effects with neutral effects.

²³ Allocation sites HS01-HS06, HS08-HS12, HS14-HS16, HS18- HS32, MU01- MU08, MU13-MU16, MU18- MU23.

²⁴ Allocation sites HS07, HS09, HS20, HS22, HS25, HS27, MU05-MU08, MU11-MU16, MU18, MU21- MU23

Amendments have been made to the following policies and site allocations to take account of modifications which were not screened in as significant to the SA but required amendment to the assessments of policies and site allocations to ensure they are factually correct (modification screening criterion B):

- Strategic Policy SS1.1;
- Strategic Policy CDA2.1 Watford Gateway Strategic Development Area;
- Strategic Policy CDA2.2: Town Centre Strategic Development Area;
- Policy HO3.11 Private and Communal Outdoor Living Space;
- Policy QD6.2 Design Principles;
- Policy HE7.2 Designated Heritage;
- Policy HE7.3 Non-designated Heritage Assets;
- Policy CC8.2 Sustainable Construction Standards for Non-residential Development;
- Policy CC8.3 Energy Efficiency;
- Policy CC8.4 Managing Air Quality;
- Policy CC8.5 Managing the Impacts of Development;
- Strategic Policy NE9.1 The Natural Environment;
- Policy NE9.2 Green Infrastructure Network;
- Policy IN10.1 Integrated Infrastructure Delivery;
- Policy IN10.2 Providing Infrastructure to Support New Development;
- Policy HC12.1 Healthy Communities;
- Site allocation HS01 Land and garages at Lych Gate;
- Site allocation HS12 Land and garages between 139 and 149 Queens Road;
- Site allocation HS14 Land at 14-20 Upton Road;
- Site allocation HS15 Land at 80 Cassio Road;
- Site allocation HS20 Land at Derby Road;
- Site allocation HS21 Land at Waterfields Retail Park;
- Site allocation HS22 Land and buildings at 252-272 Lower High Street;
- Site allocation HS23 Land and buildings at 247 Lower High Street;
- Site allocation HS24 Land and garages between 41 and 61 Brightwell Road;
- Site allocation HS28 Wiggshall Depot;
- Site allocation HS31 Land at Bushey Station;
- Site allocation HS33 Land and garages at Kingsfield Court (removed from the plan);
- Site allocation MU01 Land at Woodside Community Centre;
- Site allocation MU02 Land at 501 St Albans Road;
- Site allocation MU03 Land at the Lemarie Centre;
- Site allocation MU06 Land at Watford Junction;
- Site allocation MU08 22-28 Station Road;
- Site allocation MU09 Land at Watford Police Station;
- Site allocation MU10 Land to the rear of 125-127 The Parade;
- Site allocation MU15 18 Watford Field Road;

- Site allocation MU16 Land at Tesco;
- Site allocation MU17 44-56 Vicarage Road (removed from the plan);
- Site allocation MU18 Land at Colne Valley Retail Park;
- Site allocation MU19 Land to the west of and parallel to Ascot Road;
- Site allocation MU20 Land east of Ascot Road;
- Site allocation MU23 Land at Asda, Dome Roundabout;
- Site allocation EM01 Cassiobury House 11-19 Station Road;
- Site allocation EM02 Land to the south of Wiggshall Industrial Estate;
- Site allocation EM03 Gateway Zone;
- Site allocation EM04 Land Between 14-18 Greenhill Crescent; and
- Site allocation ED01 Former Meriden School Site.

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

Two site allocations (HS33 Land and garages at Kingsfield Court and MU17 44-56 Vicarage Road) have been deleted from the Local Plan through the modifications. Together, these allocations were expected to deliver 15 dwellings. These units have been transferred to the windfall total for the Local Plan, which is now expected to be, on average, 158. The annual windfall figure has been adjusted to include the 15 units lost from allocation sites HS33 and MU17 and also to account for the extension of the Local Plan period by two years. No potential significant negative or positive effects were identified in the SA of allocation site HS33. Uncertain effects were identified in relation to SA3 (access) due to poor accessibility to most facilities and SA19 (waste and minerals) due to the location of the site within a sand and mineral safeguarding zone, which could affect current reserves of exploitable minerals. No potential significant negative or positive effects were identified in the SA of allocation site MU17. An uncertain effect was identified in relation to SA19 (waste and minerals) as for site HS33.

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

A site has been added through the modifications, GT01 Land at Tolpits Lane, south of Epsom Road, for the provision of Gypsy and Traveller pitches. No potential significant positive or negative effects have been identified in the assessment of site GT01. An uncertain effect is identified in relation to SA19 (waste and minerals) due to the location of the site within a sand

and mineral safeguarding zone, which also affects 54 other site allocations within the Local Plan. Development of the sites could affect current reserves of exploitable minerals, although the actual effects are uncertain and therefore an uncertain effect of developing these sites has been identified.

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

7.3 Summary of Potential Significant Effects of Chapters 1 to 12

Table 7.3 presents a summary of the potential effects of the policies within Final Draft Local Plan Chapters 1 to 12 with modifications. There are no potential significant negative or uncertain effects identified. The potential significant positive effects are described in Table 7.4.

Table 7.3: Summary Performance of Chapters 1 to 12																			
Chapter	SA Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Chapters 1&2	+	++	++	+	0	+	+	+	0	+	0	+	0	++	++	++	0	+	++
Chapter 3	0	0	+	++	++	0	+	0	0	0	0	+	0	+	0	++	0	+	+
Chapter 4	++	++	0	0	0	0	0	0	+	0	0	0	0	+	+	++	0	0	0
Chapter 5	+	0	0	0	0	+	+	0	0	0	0	0	0	++	++	+	0	0	0
Chapter 6	0	0	+	+	++	+	+	0	0	+	++	+	++	++	+	++	0	0	+
Chapter 7	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	0	0	0
Chapter 8	0	0	0	0	+	0	+	++	+	++	++	+	+	0	0	0	++	0	++
Chapter 9	0	0	+	0	++	0	0	0	0	0	+	++	0	+	0	0	++	++	0
Chapter 10	+	+	++	+	+	0	+	0	0	0	0	0	0	0	0	0	+	0	0
Chapter 11	0	0	++	0	++	+	++	++	0	++	++	0	0	0	0	0	0	0	0
Chapter 12	0	0	++	0	++	0	+	+	+	+	0	0	0	+	0	0	0	0	0

Potential Significant Positive Effects of Chapters 1 to 12

38 potential significant positive effects of Chapters 1 to 12 have been identified in the assessment. Table 7.4 presents a summary of the potential significant positive effects by chapter.

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12		
SA Objective	Chapters	Description
SA1	Chapter 4	Chapter 4 aims to strengthen the borough's employment offer as well as to ensure the right type of employment is available in the right places.
SA2	Chapter 4	The policies within Chapter 4 promote and support increased provision of employment floorspace in the borough. This should create jobs within the borough.
	Chapters 1 & 2	The implementation of Local Plan Chapter 1: A Spatial Strategy will increase opportunities for employment for those living within Watford. There is also some learning and education provision in the form of five new primary schools within the Watford Junction, Colne Valley and Town Centre SDAs. This should help to meet the needs for primary education throughout the plan period.
SA3	Chapters 1 & 2	Chapters 1 and 2 are expected to improve the rail, cycle and walking networks throughout the borough. New development is also focused within areas of high sustainability, which should help to ensure that all new developments have access to essential facilities and services including new primary school facilities. This chapter should help in the achievement of all sub-objectives; thus, a potential significant positive effect has been recorded.
	Chapter 10	The policies within Chapter 10 aim to ensure that an adequate infrastructure network accompanies development, either through direct integration with proposals, or through seeking development contributions. Proposals are also encouraged to future-proof development by ensuring infrastructure is suitable for further growth. This should help to provide infrastructure which meets the needs of current and future residents of the borough.

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12

SA Objective	Chapters	Description
	Chapter 11	The policies support the provision of sustainable transport infrastructure (e.g. a sustainable transport hub at Watford Junction station, an Eastern Mobility Hub and secure cycle parking across the borough) which will improve accessibility and connectivity for residents to local facilities and services. The policies also encourage cycling and walking as an alternative travel option to using a private vehicle and promotes the use of electric vehicles and provision of parking for powered two wheel vehicles.
	Chapter 12	All the community policies either individually or collectively seek to protect existing community and cultural venues as well as supporting proposals for new, extended or improved cultural and community facilities. Policy HC12.2 also requires specific types of proposals to prepare a Health Impact Assessment in support of the planning application to ensure a higher quality of development.
SA4	Chapter 3	<p>Potential significant positive effects are predicted for all the housing policies as they individually or collectively:</p> <ul style="list-style-type: none"> • allocate sites for housing; • stipulate the housing mix required for all sites across the borough; • set out the requirements to provide affordable homes; • set out requirements to meet the growing need for accessible and adaptable homes for an ageing population; • support for student and co-living housing; • support for self-build and custom housebuilding and residential conversions; and • set out what is acceptable in relation to proposals for houses in multiple occupation. <p>A main modification has been proposed to Policy H3.1 that proposals for 5 dwellings or more ensure 20% of dwellings are family-sized homes. This change has been made for clarity but does not mean that fewer family sized dwellings will be delivered in the Borough. A further modification to policy H3.2 means the distribution of habitable</p>

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12

SA Objective	Chapters	Description
		rooms in a development can help deliver the type of affordable homes needed in the borough more effectively and contribute towards providing 20% family sized homes across a scheme.
SA5	Chapter 3	Policies HO3.1, HO3.2, HO3.5 and HO3.10 promote accessible and adaptable housing to support people with different needs. These set out design requirements for elderly people and those with disabilities and dementia with the aim for elderly people to be able to retain a good quality of life and continue to be active within the community. A potential significant positive effect is also predicted for Policy HO3.11 which promotes the provision of private and shared outdoor amenity space to encourage healthy home environments.
	Chapter 6	The policies in chapter 6 require all new residential buildings to be designed to achieve safe, healthy and attractive internal and external environments. Buildings should be designed to promote the use of the stairs, providing a well-lit and spacious internal space which allows social interaction as well as being comfortable for residents to walk up and down and to pass one another. Secure cycle parking should be provided in easily accessible and convenient locations. The policies also promote access to public open space, amenity and play spaces. Together, they will contribute to improving quality of life and healthier lifestyles.
	Chapter 9	The green and blue infrastructure and open space related policies promote the provision of enhanced access to open spaces and to sporting recreational facilities. This should help to encourage healthier lifestyles and improve quality of life for local residents.
	Chapter 11	The policies collectively promote the use of sustainable transport i.e. walking and cycling and the use of public transport as an alternative travel option to a private vehicle. This will encourage healthier lifestyles and help improve quality of life for local residents. Policy ST11.4 specifically requires provision of on-site infrastructure including cycle parking facilities and sets clear criteria all development proposals have to meet.

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12

SA Objective	Chapters	Description
	Chapter 12	All of the community policies, particularly HC12.1, promote healthy communities through higher quality environment and inclusive design and require new development to provide opportunities such as active play areas, food growing areas, easy access to health facilities.
SA7	Chapter 11	The policies collectively promote the use of sustainable modes of transport as well as to reduce the reliance on private vehicles. Policy ST11.5 Electric Vehicles, Car Parking and Car Clubs requires all development proposals to promote car clubs and to provide ready-to-use parking spaces for electric vehicles and for powered two wheelers as well as meeting the car parking standards.
SA8	Chapter 8	Policy CC8.4 supports development where it minimises emissions that would contribute towards a worsening of existing air quality and seeks to improve existing air quality.
	Chapter 11	The policies aim to promote and support the provision of sustainable transport infrastructure to reduce car use as well as to safeguard routes for Mass Rapid Transit which are likely to help minimise air pollution. It is therefore considered to have significant positive effects for this objective and is also likely to have minor positive cumulative effects by reducing air quality effects.
SA10	Chapter 8	All the climate change policies collectively aim to minimise CO2 emissions in the borough and achieve net zero carbon and promote the design and construction of energy efficient developments. Policy CC8.1 also encourages on-site low carbon and renewable technologies.
	Chapter 11	The policies collectively promote a significant change to the existing transport network through alternatives to the use of the private car in response to the borough declaring a climate emergency and ambition to become a sustainable travel town.

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12

SA Objective	Chapters	Description
SA11	Chapter 6	Policy QD6.5 in relation to taller buildings makes reference to the need for proposals to demonstrate significant sustainability benefits which include building design and construction. Policies QD6.1 and QD6.4 make reference to the need to mitigate the impacts of climate change in the design of developments and buildings. Policy QD6.2 requires new developments to be designed to minimise their impact on the environment and embrace sustainability principles. This should include measures to reduce the use of resources including energy, water and waste and incorporate soft measures to improve the environment such as green roofs, green walls and multifunctional green spaces. A potential significant positive effect is therefore predicted in relation to improving the resilience of the borough to climate change.
	Chapter 8	Potential significant positive effects are predicted for all of the climate change policies as they promote sustainable design and construction as well as resilience issues including overheating. Policy CC8.3 sets out what is expected of new developments in relation to energy and water efficiency and materials and waste management.
	Chapter 11	Policies ST11.1 and ST11.4 require proposals to demonstrate how they contribute towards the Council's Climate Emergency declaration through for example the design of new development.
SA12	Chapter 9	Potential significant positive effects are predicted for policies NE9.1, NE9.2, NE9.3, NE9.6, and NE9.7 which protect and enhance green and blue infrastructure, as well as setting out the requirements new developments are expected to meet in terms of new open space and biodiversity net gain. Policy NE 9.1 requires proposals to ensure that protected species and their habitats are a material consideration when determining planning applications and states that where the natural environment has not been appropriately assessed and considered with an application, planning permission will be refused.
SA13	Chapter 6	Policies QD6.1 and QD6.4 require new buildings to be appropriate to the existing or emerging character of the area and materials should sit comfortably with buildings in the area adding to local distinctiveness. Policy QD6.1 sets out clearly how development proposals within 'Protected Areas' will be more limited and design cues should be

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12

SA Objective	Chapters	Description
		taken from heritage assets and designations to inform and guide the character and identity of new development. If implemented, these measures will help to maintain and enhance historic and cultural assets and promote local distinctiveness and local identity.
SA14	Chapter 5	Policies VT5.1, VT5.2 and VT5.3 all work towards the concentration of development in Local, Town and District Centres, which will maintain or enhance existing functions and vitality in these centres. For example, Policy VT5.3 requires proposals to maximise the proportion of the ground floor fronting a street as a positive and/or active frontage which will respect and enhance local distinctiveness. Furthermore, Policy VT5.1 encourages the re-use of land and buildings by supporting proposals that optimise the use of land and floorspace within the District and Local Centres. Regeneration and investment into these town centre areas could help to improve local quality of life.
	Chapters 1 & 2	The implementation of the Spatial Strategy chapter should help to meet most sub-objectives. Quality of life should be improved through the improvement of local character, distinctiveness and access to services. The townscape of Watford should also be improved by the tailored approach of the Core Development Area policies, which aim to guide development closely within certain borough areas.
	Chapter 6	The Chapter 6 policies collectively aim to encourage high quality design making urban areas more attractive to live whilst also protecting and enhancing the borough's townscape and local sensitive landscapes.
	Chapter 7	The policies collectively aim to preserve the borough's historic environment and the setting of heritage assets. Via a modification to Policy HE7.3, identified sites with places and landscapes with heritage value will be protected and proposals will be required to demonstrate how they are positively contributing towards the heritage value to enhance local distinctiveness. This will help to protect and enhance the borough's townscape and local sensitive landscapes.

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12

SA Objective	Chapters	Description
SA15	Chapters 1 & 2	Policy CDA2.2 aims to improve the vitality of the Town Centre Strategic Development Area. This will be achieved through retaining and redeveloping current primary frontage and ground floor space. Linkages to open spaces and sustainable transport will also be encouraged.
	Chapter 5	Policies VT5.1, VT5.2 and VT5.3 all work towards the concentration of development in Local, Town and District Centres, which will maintain or enhance existing functions and vitality. Policy VT5.1 also discourages against the development of retail development outside of the town centre, which should aid in conserving the current town centre.
SA16	Chapters 1 & 2	Chapter 2: The Spatial Strategy focuses development on brownfield sites, and encourages a high density of development. This should help to increase land use efficiency.
	Chapter 3	Policies HO3.1, HO3.2, HO3.8 ensure the maximum use of previously developed land and buildings and the efficient use of land particularly through encouraging high density development and for existing sites designated to be used by Gypsies and Travellers unless it is demonstrated they are no longer required.
	Chapter 4	The policies support increased provision of employment land in the borough but also the increased intensification of employment floorspace through the efficient use of land and buildings. All proposed employment sites and Designated Industrial Areas are located on previously developed land, indirectly helping to protect greenfield land from development.
	Chapter 6	Policies QD6.1 and QD6.5 support high density development which meets the building height criteria set out in Policy QD6.5 and which is appropriate to a site and its surroundings.

Table 7.4: Potential Significant Positive Effects Identified in the Assessment of Chapters 1 to 12

SA Objective	Chapters	Description
SA17	Chapter 8	A significant positive effect is predicted for Policy CC8.3 for this objective as the policy promotes water efficiency including water saving measures and requires all residential developments to meet the technical standard for water efficiency of 110 litres a day as per the Building Regulations Part H (2013).
	Chapter 9	Policy NE9.3 includes requirements for developments which are close to a water course. Developments should contribute to the Thames River Basin Management Plan (TRBMP) in achieving 'good' ecological status and are encouraged to deliver channel enhancements. Policy 9.5 requires SUDS to protect and enhance water quality. Details of the requirements for buffer areas are also included and a Water Framework Directive assessment should be submitted as part of proposals and should include an assessment of the works to prevent future [channel] improvement, in addition to how the proposal will impact Water Framework Directive status. This SA objective also relates to water efficiency but this is addressed by Policy CC8.3 in Chapter 8 which requires developments to meet certain standards for water efficiency (see above).
SA18	Chapter 9	Policies NE9.4 and NE9.5 specifically deal with the need to identify and mitigate potential flood risks posed by new developments. Strategies to mitigate flooding risk also include the potential role green infrastructure can play.
SA19	Chapters 2 and 8	Criterion i within the Town Centre Strategic Development Area policy in Chapter 2 has been strengthened to state that proposals 'must demonstrate the provision of innovative waste management and recycling storage and collection systems, to reduce the need for service vehicles along the High Street'. Therefore, a potential significant positive effect has been recorded.
		A significant positive effect is predicted for Policy CC8.3 for this objective as the policy states that development proposals should reduce construction waste through the re-use and recycling of materials and as part of an application set out how waste management of the site is in accordance with the Hertfordshire Waste Local Plan.

7.4 Chapter 13 Site Allocations and New Development (Policy SA13.1)

Table 7.5 below summarises the SA scores for the site allocations in Policy SA13.1 Site Allocations and New Development which sets out 63 allocation sites along with development considerations for each site. The wording of Policy SA13.1 states that:

“planning permission will be granted for proposals that:

- a) Accord with the policies in the Local Plan;*
- b) Accord with any SPD, master plan or development brief that affects the site; and*
- c) Address the key development considerations for each site.”*

It has therefore been assumed within the assessments of the site allocations within Policy SA13.1 that all development proposals on these sites will comply with this wording. The wording of Policy SA13.1 has not been assessed separately. The assessment of all of the site allocations based on this assumption constitutes the assessment of Policy SA13.1.

Site references prefixed with HS are housing allocations, allocations prefixed with MU are mixed use sites, those prefixed with EM are employment sites and those with the prefix ED are potential sites for education facilities. One site is prefixed with GT and this is a gypsy and traveller pitch site. The assessment of each site allocation has been informed by the individual site RAG ratings (see Section 2.3.5 and Table 2.6). Potential cumulative effects related to the site allocations are reported in Section 8.

Site Ref	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
GT01	0	0	-	0	0	0	-	-	-	0	0	0	0	-	0	-	0	0	?
HS01	0	0	0	+	-	0	-	-	0	0	0	-	0	+	0	+	0	0	?
HS02	0	0	0	+	++	0	-	+	+	0	0	0	0	+	0	++	0	0	-
HS03	0	0	+	+	++	0	-	0	0	0	0	0	0	+	+	+	0	0	?
HS04	0	0	0	+	+	0	-	0	0	0	0	0	0	+	0	++	0	0	?
HS05	0	-	0	+	-	0	-	0	0	0	0	0	0	+	0	+	0	0	?
HS06	0	0	0	++	0	0	-	-	0	0	0	0	0	-	0	--	0	0	?
HS07	-	-	+	++	0	0	-	+	0	0	0	0	0	+	0	++	0	0	?
HS08	0	0	+	+	-	0	++	++	0	0	0	0	0	+	+	++	0	0	?
HS09	0	0	0	+	0	0	-	-	0	0	0	0	0	+	+	++	0	0	?
HS10	0	0	0	+	+	0	+	+	0	0	0	0	0	+	+	++	0	0	?
HS11	0	0	+	+	-	0	+	0	0	0	0	0	0	-	0	-	0	0	?
HS12	0	0	0	+	-	0	+	+	0	0	0	0	-	+	+	++	0	0	?
HS13	0	0	+	+	++	0	+	0	0	0	0	0	0	+	0	+	0	0	?

Table 7.5: Summary Performance of the Policy SA13.1 Site Allocations

Site Ref	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
HS14	0	0	+	++	++	0	+	+	0	0	0	0	0	+	+	++	0	0	?
HS15	0	0	+	++	++	0	+	+	0	0	0	0	0	+	+	++	0	0	?
HS16	0	0	0	+	++	0	-	-	0	0	0	0	0	++	0	++	0	0	?
HS17	0	0	+	+	-	0	+	+	0	0	0	0	0	+	+	+	0	0	?
HS18	0	0	0	+	-	0	++	+	0	0	0	0	0	0	+	++	0	0	?
HS19	0	0	0	+	-	0	++	0	0	0	0	0	0	+	+	+	0	0	?
HS20	0	0	0	++	0	0	++	+	0	0	0	0	0	-	+	++	0	0	?
HS21	0	0	0	++	0	0	++	++	0	0	0	0	0	+	+	++	0	?	?
HS22	0	0	0	++	0	0	++	++	0	0	0	0	0	+	+	++	0	?	?
HS23	0	0	0	+	0	0	++	0	0	0	0	0	0	+	+	++	0	?	?
HS24	0	0	0	+	-	0	-	-	0	0	0	0	0	+	0	++	0	0	?
HS25	0	0	0	+	0	0	-	0	0	0	0	0	0	+	0	++	0	0	?
HS26	0	0	0	+	0	0	++	0	0	0	0	0	-	+	0	++	0	0	0
HS27	0	0	0	++	0	0	-	-	0	0	0	?	0	--	0	--	0	0	?
HS28	0	0	0	++	+	0	++	+	0	0	0	0	?	++	0	+	0	?	?
HS29	0	0	+	+	+	0	++	+	0	0	0	0	0	++	0	+	0	0	0
HS30	0	0	+	+	++	0	++	+	0	0	0	0	0	0	0	++	0	0	0
HS31	0	0	+	++	+	0	++	+	0	0	0	0	0	0	0	+	0	0	0
HS32	0	0	0	+	-	0	-	-	0	0	0	0	0	+	0	-	0	?	?
MU01	0	0	0	+	-	0	-	0	-	0	0	0	0	+	0	+	0	0	?
MU02	0	0	0	+	+	0	-	0	0	0	0	0	0	+	0	+	0	0	?
MU03	0	0	0	+	+	0	-	0	0	0	0	0	0	+	0	+	0	0	?
MU04	0	0	0	+	+	0	-	-	0	0	0	0	0	+	0	+	0	0	?
MU05	+	+	0	++	0	+	++	++	0	0	0	0	0	++	+	+	-	0	?
MU06	+	+	0	++	0	0	++	++	0	0	0	0	0	++	+	++	-	0	?
MU07	+	+	0	0	0	0	++	+	0	0	0	0	0	++	+	++	-	0	?
MU08	+	+	0	++	0	0	++	+	0	0	0	0	0	++	+	++	-	0	?
MU09	+	+	-	++	+	0	+	+	0	0	0	0	?	++	+	++	-	0	?
MU10	0	0	+	++	+	0	++	+	0	0	0	0	0	0	+	+	0	0	?
MU11	+	0	0	++	0	0	++	+	0	0	0	0	?	++	+	++	0	0	?
MU12	+	0	+	+	0	0	++	+	0	0	0	0	0	+	+	++	0	0	?
MU13	+	0	0	++	0	0	++	+	0	0	0	0	0	+	+	++	0	0	?
MU14	0	0	0	+	0	0	++	+	0	0	0	0	0	++	++	++	0	0	?
MU15	+	+	0	+	0	0	++	+	0	0	0	0	0	+	+	++	0	0	0
MU16	+	+	0	++	0	0	+	+	0	0	0	0	0	+	+	++	0	?	?
MU18	0	0	0	++	0	0	0	0	0	0	0	0	0	+	0	++	0	?	?
MU19	0	0	0	++	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?
MU20	0	0	0	++	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?

Table 7.5: Summary Performance of the Policy SA13.1 Site Allocations

Site Ref	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
MU21	+	+	0	++	0	0	++	+	0	0	0	0	0	0	0	-	0	?	?
MU22	+	0	0	++	0	0	++	+	0	0	0	0	0	+	0	++	0	?	?
MU23	+	0	0	++	0	0	-	-	0	0	0	0	0	+	0	++	0	0	?
MU24	++	+	0	0	0	0	++	++	0	0	0	0	0	++	+	++	0	0	?
EM01	++	+	0	0	0	0	++	++	0	0	0	0	0	++	+	++	0	0	?
EM02	++	+	0	0	0	0	0	-	0	0	0	0	0	+	0	++	0	?	?
EM03	++	+	0	0	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?
EM04	++	+	0	0	0	0	0	-	0	0	0	0	0	+	0	++	0	0	?
ED01	0	0	+	0	0	0	+	+	0	0	0	0	-	-	0	--	0	0	0
ED02	0	0	+	0	0	0	-	-	0	0	0	0	0	++	0	+	0	0	?

7.4.1 Summary of Potential Significant Effects of Policy SA13.1 Site Allocations

Potential Significant Positive Effects of the Site Allocations

120 potential significant positive effects of the proposed site allocations have been identified in the assessment. Table 7.7 presents a summary of the potential significant positive effects by site.

Table 7.6: Potential Significant Positive Effects Identified in the Assessment of Policy SA13.1		
SA Objective	Sites	Description
SA1	EM01-EM04, MU24	All of the employment sites EM01 – EM04 and MU24 are predicted to achieve a significant positive effect in relation to economic growth by providing new specified employment space.
SA4	HS06, HS07, HS14, HS15, HS20, HS21, HS22, HS27, HS28, HS31, MU05-06, MU08–MU11, MU13, MU16, MU18-MU23.	24 of the allocation sites are predicted to result in significant positive effects in relation to delivery of housing that meets peoples’ needs. In particular these sites will provide 35% affordable housing.
SA5	HS02, HS03, HS13, HS14, HS15, HS16, HS30.	Seven of the allocation sites are predicted to result in significant positive effects because they are well located to essential services and facilities.
SA7	HS08, HS18, HS19, HS20-HS23, HS26, HS28-HS31, MU05, MU06, MU07, MU08,	24 of the site allocations are predicted to result in significant positive effects in relation to delivering more sustainable patterns of development and increasing the use of sustainable transport modes. This is due to the location of the site with good existing sustainable transport access as well as the development considerations identified for those allocation sites.

Table 7.6: Potential Significant Positive Effects Identified in the Assessment of Policy SA13.1

SA Objective	Sites	Description
	MU10-MU15, MU21, EM01.	
SA8	HS08, HS21, HS22, MU05, MU06, EM01.	Six of the site allocations are predicted to result in significant positive effects in relation to air quality because the sites all well served by sustainable transport modes and have the potential to create a modal shift due to the sizes of the developments proposed on those sites. This is identified in the assessments as having the potential to improve local air quality and result in a potential significant positive effect.
SA14	HS16, HS28, HS29, MU05-MU09, MU11, MU14, EM01, EM03, ED02.	13 of the site allocations are predicted to result in significant positive effects in relation to townscape and local distinctiveness in specific places such as the approach to the town centre, or, for example, they are currently a car park or derelict and redevelopment would improve the appearance of the site.
SA15	MU14	MU14 is identified in the assessment as having potential to result in a significant positive effect as it supports the vitality of the town centre and will redevelop and area which is currently used for car parking.
SA16	HS02, HS04, HS07- HS10, HS12, HS14- HS16, HS18, HS20- HS26, HS31, MU06- MU09, MU11-MU16, MU18-MU20, MU22, MU23, MU24, EM01- EM04	39 of the allocations sites are located on previously developed land and therefore should result in a significant positive effect in relation to the efficient use of land. Where contamination has been identified to be a potential issue, development considerations require contamination to be taken into account and remediated by developers.

Potential Significant Negative Effects of Site Allocations

4 potential significant negative effects of the proposed site allocations have been identified in the assessment. These effects relate to site allocations HS06, HS27, and ED01. Table 7.7 presents a summary of the potential significant negative effects by site.

Table 7.7: Potential Significant Negative Effects Identified in the Assessment of Policy SA13.1		
SA Objective	Site Ref	Description
SA14	HS27	Development of this site would result in the loss of green space, which currently acts a gap between Croxley Business Park and the houses surrounding Croxley View. This loss would be permanent and irreversible, altering the current townscape of this area.
SA16	HS27	Site HS27 is located on entirely greenfield land, therefore development of this site works against SA16, with permanent and irreversible effects. Planning permission has recently been granted for development of this site.
	HS06	Site HS06 is located on entirely greenfield land, therefore development of this site works against SA16, with permanent and irreversible effects.
	ED01	The site is located on entirely greenfield land, therefore development of this site works against SA16, with permanent and irreversible effects.

Uncertain Effects of Site Allocations

69 uncertain effects have been identified in the assessment of the site allocations. The uncertain effects are similar for a number of sites. A summary of the uncertain effects identified in the assessment of site allocations is provided in Table 7.8.

Table 7.8: Uncertain Effects Identified in the Assessment of Policy SA13.1		
SA Objective	Site Ref	Description
SA12	HS27	Development of site HS27 would result in the loss of 3.2ha of green infrastructure and a public right of way. Policy NE9.2: Green Infrastructure Network states that such access should not be lost through development and an alternative route identified. It is currently unclear if this will be possible. This site will also need to comply with Policy NE9.6: Protecting Open Space, which requires evidence that the space is surplus to requirements. An overall uncertain effect has been recorded for this SA objective, as it is unclear if this site will be identified as an area which is surplus to need.
SA13	HS28, MU09, MU11	Uncertain effects have been identified for SA13 mainly due to the location of these sites in relation to a nationally or locally Listed Building. Retention of the buildings may not be feasible. Details of this will not be available until site development details are shown within a proposal, and an uncertain effect is identified.
SA18	HS21, HS22, HS23, HS28, HS32, MU16, MU18, MU21, MU22, EM02.	Development of allocation sites located in Flood Zone 3 is at risk of flooding, of which the frequency and severity may increase as a result of climate change. Flood risk is acknowledged within the development considerations of such sites which require proposals to be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy. Local Plan Policy NE9.4 Flood Risk and Mitigation should ensure that development is adequately risk assessed for flooding effects prior to development and mitigated prior to development. However, without this evidence it is not certain that development of these sites can be delivered in a way which avoids increasing flood risk to residents. Therefore, an uncertain effect is identified for SA18 for these sites which are all located within the Colne Valley.

Table 7.8: Uncertain Effects Identified in the Assessment of Policy SA13.1

SA Objective	Site Ref	Description
SA19	All allocation sites apart from HS02, HS26, HS29, HS30, HS31, MU15, ED01.	55 of the allocation sites are located within a sand and mineral safeguarding zone. Development of the sites could therefore affect current reserves of exploitable minerals, although the actual effects are uncertain and therefore an uncertain effect of developing these sites has been identified.

8 Potential Cumulative Effects of the Local Plan

8.1 Introduction

This section presents the potential cumulative effects of the Final Draft Local Plan. All of the potential cumulative effects which have been identified are considered to be significant. The potential cumulative effects have been identified as a part of the assessment of policies and allocation sites (potential intra-plan cumulative effects) and also as a result from the implementation of the Final Draft Local Plan with modifications, working in combination with other local plans, programmes or projects (potential inter-plan cumulative effects).

8.2 Potential Intra-Plan Cumulative Effects

Tables 8.1 and 8.2 presents the potential intra-plan cumulative effects identified in the assessments of the Final Draft Local Plan policies (Chapters 1-12 of the Final Draft Local Plan) and the assessments of the Final Draft Local Plan site allocations (Chapter 13 of the Final Draft Local Plan).

Table 8.1: Potential Cumulative Effects - Final Draft Local Plan policies with modifications		
Potential Cumulative Effect	SA Objective	Description of Potential Cumulative Effects
Positive Cumulative Effect	SA1: Achieve sustainable levels of prosperity and economic growth	The policies within Chapter 4 of the Local Plan are likely to have a positive cumulative effect on economic growth, as it will enable appropriate employment sites to be developed in the borough which combined together, will help promote and support economic growth and diversity in the borough.
Positive Cumulative Effect	SA2: To ensure that local residents have employment opportunities and access to training	The policies within Chapter 4 of the Local Plan are likely to have a positive cumulative on employment provision within the borough, as it will enable appropriate employment sites to be developed in the borough which combined together, will help to support current jobs as well as providing further employment opportunities.

Table 8.1: Potential Cumulative Effects - Final Draft Local Plan policies with modifications

Potential Cumulative Effect	SA Objective	Description of Potential Cumulative Effects
Positive Cumulative Effect	SA4: Ensure that everyone has access to good quality housing that meets their needs	<p>The Spatial Strategy and Homes for a Growing Community chapters (Chapters 1 and 2) of the Local Plan are expected to result in a significant positive cumulative effect on the provision and quality of housing within Watford. Both chapters aim to increase the number of dwellings within the borough, and Chapter 3: Homes for a Growing Community, also specifies affordability and mixed tenure requirements for newly built dwellings. Therefore, a potential positive cumulative effect has been identified for SA4.</p> <p>The policies in Chapter 3 of the Local Plan are also predicted to contribute to a positive cumulative effect on SA4 as they will enable appropriate housing developments to occur which combined together will help ensure everyone in the borough has access to good quality housing and therefore contribute to a better quality of life.</p>
Positive Cumulative Effect	SA5: Encourage healthy lifestyles and improve quality of life for local residents	Potential positive cumulative effects are predicted for SA5 as a result of the policies within Chapter 3 of the Local Plan as they will enable appropriate housing developments to occur which combined together will help ensure everyone in the borough has access to good quality housing and therefore contribute to a better quality of life.
Positive Cumulative Effect	SA8: To achieve good air quality	A positive cumulative effect may occur as a result of a large proportion of development being directed into high sustainability areas, with good public transport links as a result of the implementation of Chapters 1 and 2. This could indirectly help to decrease emissions through alleviating reliance on private cars, thus aiding to maintain or improve air quality.
Positive cumulative effect	SA10: Reduce the borough's contribution to climate change	A potential positive cumulative effect is predicted as a result of the policies in Chapter 8 of the Local Plan in relation to other projects and plans if they work in combination together to ensure new development is more energy efficient.

Table 8.1: Potential Cumulative Effects - Final Draft Local Plan policies with modifications

Potential Cumulative Effect	SA Objective	Description of Potential Cumulative Effects
Positive cumulative effect	SA12: To protect and enhance biodiversity	<p>There is potential for a positive cumulative effect on biodiversity, arising from the implementation of Chapter 1 (specifically, policy SS1.1) in combination with Chapter 9: Conserving and Enhancing the Natural Environment. Both aim to decrease the impact of development on green spaces (and therefore biodiversity) within WBC. Hence, a potential positive cumulative effect has been identified.</p> <p>Potential cumulative effects are predicted for SA12 resulting from the policies in Chapter 6. The policies in Chapter 6 will enhance the green infrastructure network in the borough and help create more wildlife corridors with other adjoining or nearby new developments.</p>
Positive cumulative effect	SA14: Conserve and enhance the landscape and townscape, encouraging local distinctiveness	<p>There is potential for a positive cumulative effect to occur as a result of the policies within Chapter 4 of the Local Plan in combination with Chapter 13 as most of the development within the borough is focused on previously developed land. This should help to safeguard open spaces and protect sensitive landscapes, whilst maintaining the townscape.</p>
Positive cumulative effect	SA16: Maximise the use of previously developed land and buildings and the efficient use of land	<p>The policies in Chapter 6 are predicted to result in a potential positive cumulative effect for SA16, as high density development will maximise the efficient use of land and this will be enhanced further when combined with other similar development in the borough.</p>

Table 8.2: Potential Cumulative Effects - Site Allocations (Policy SA13.1) with modifications

Potential Significant Cumulative Effect	SA Objective	Description of Potential Cumulative Effects	Allocation Sites Contributing to the Potential Effect
Positive Cumulative Effect	SA2: To ensure that local residents have employment opportunities and access to training	The development of sites MU05, MU06 and MU07 has the potential to increase the level of employment space in the borough to meet current demand. Hence there is potential for a positive cumulative effect to occur.	MU05, MU06 and MU07
Positive Cumulative Effect	SA4: Ensure that everyone has access to good quality housing that meets their needs	A potential cumulative positive effect has been identified for SA4, as the proportion of affordable homes within the borough could be increased through the development of sites providing more than 10 new dwellings, which will have to provide 35% affordable housing in line with policy HO3.3: Affordable Housing.	HS02, HS06-HS08, HS14-HS16, HS19, HS20-HS23, HS25, HS27, HS28, HS31, MU01, MU02, MU04-MU06, MU08, MU09-MU16, MU18-MU23
Positive Cumulative Effect	SA7: To deliver more sustainable patterns of development, including	The locating of multiple large residential and mixed use development sites close to several sustainable transport modes should help to increase uptake in sustainable travel across the borough. Moreover, if these sites are also within walking distance of employment sites, then the need for private car travel is likely to be reduced. Therefore, a potential positive cumulative effect has been identified for this SA objective.	HS28, MU05-MU08

Table 8.2: Potential Cumulative Effects - Site Allocations (Policy SA13.1) with modifications

Potential Significant Cumulative Effect	SA Objective	Description of Potential Cumulative Effects	Allocation Sites Contributing to the Potential Effect
	employment and housing and increase the use of sustainable transport modes		
Positive Cumulative Effect	SA8: To achieve good air quality	A potential positive cumulative effect is identified in relation to air quality across the borough which could be improved through the development of multiple sites which are well connected to sustainable transport modes, thus reducing the number of private car journeys and associated air quality issues within Watford.	HS08, HS14, HS18, HS20-HS22, HS28-HS31, MU05-MU08, MU11-MU16, MU21, MU22, EM01
Positive Cumulative Effect	SA8: To achieve good air quality	The development of several sites which are currently used as car parks could help to reduce the number of private car journeys made throughout the borough by both residents and visitors. Moreover, the development of multiple sites with good transport connections is likely to increase the use of sustainable transport for journeys in the borough. Both should indirectly aid in decreasing vehicle related emissions, thus improving air quality. Therefore, a potential positive cumulative effect was identified.	HS08, HS18, HS19, HS30
Positive Cumulative Effect	SA14: Conserve and enhance the landscape and townscape, encouraging	The development of sites MU05, MU06 and MU07 would aid in increasing the number of homes and employment space available in the borough through the reuse of entirely previously developed land. This would help to increase the density of development in these areas and with good design, could make the	MU05- MU08

Table 8.2: Potential Cumulative Effects - Site Allocations (Policy SA13.1) with modifications

Potential Significant Cumulative Effect	SA Objective	Description of Potential Cumulative Effects	Allocation Sites Contributing to the Potential Effect
	local distinctiveness	area more aesthetically pleasing. Therefore, a potential positive cumulative effect has been identified.	
Positive Cumulative Effect	SA14: Conserve and enhance the landscape and townscape, encouraging local distinctiveness	The development of sites MU19 and MU20 in combination could help to improve the local townscape of Ascot Road locality, as both sites are currently derelict. Therefore, a potential positive cumulative effect has been identified.	MU19 and MU20
Positive Cumulative Effect	SA15: Revitalise the town centre to promote a return to sustainable urban living	There is potential for a positive cumulative effect to occur from the development of several sites within and around the town centre area.	HS14, HS15, HS21, HS23, MU05-MU08, MU15, MU16
Negative Cumulative Effect	SA16: Maximise the use of previously developed land and buildings	A negative cumulative effect of building on several sites of greenfield land has been identified. This would be a permanent and irreversible loss of such land.	HS06, HS11, HS27

Table 8.2: Potential Cumulative Effects - Site Allocations (Policy SA13.1) with modifications

Potential Significant Cumulative Effect	SA Objective	Description of Potential Cumulative Effects	Allocation Sites Contributing to the Potential Effect
	and the efficient use of land		
Positive Cumulative Effect	SA16: Maximise the use of previously developed land and buildings and the efficient use of land	A positive cumulative effect of building on mostly previously developed land has been identified, due to the high proportion of sites located on previously developed land.	HS01-HS05, HS07-HS10, HS12, HS14-HS26, HS28, HS29, HS32, MU01-MU04, MU07, MU10-MU15, MU16, MU18-MU20, MU22, MU23, EM02-EM04
Positive Cumulative Effect	SA16: Maximise the use of previously developed land and buildings and the efficient use of land	The development of sites HS31, HS32 and MU22 in combination should help to concentrate development in the Bushey Arches area, as well as increase the density of development, as these sites are all located within the Colne Valley Strategic Development Area. They are therefore subject to Local Plan Policy CDA2.6: Colne Valley Strategic Development Area, thus will have to comply with the objectives which specifically encourage high density development and increase land use efficiency. Hence, a potential positive cumulative effect has been identified in relation to SA16.	HS30, HS31 and MU22
Positive Cumulative Effect	SA16: Conserve and enhance the landscape and townscape, encouraging	The development of sites MU05, MU06 and MU07 would aid in increasing the number of homes and employment space available in the borough through the reuse of entirely previously developed land. This would help to increase the density of development in these areas and with good design, could make the	MU05-MU08

Table 8.2: Potential Cumulative Effects - Site Allocations (Policy SA13.1) with modifications

Potential Significant Cumulative Effect	SA Objective	Description of Potential Cumulative Effects	Allocation Sites Contributing to the Potential Effect
	local distinctiveness	area more aesthetically pleasing. Therefore, a potential positive cumulative effect has been identified.	
Negative Cumulative Effect	SA19: To minimise use and make efficient use of natural resources.	The development of multiple sites across the borough within the sand and gravel safeguarding zone has the potential to sterilise potentially exploitable mineral reserves and consequently may have a potential negative cumulative effect on resources. The only way to mitigate this effect may be to ensure resources are worked out before development or prevent development within such safeguarding zones, which may not be practicable within Watford due to the urbanised nature of the borough, the location of the allocation sites and the widespread nature of the reserves across the borough.	HS01-HS25, HS27, HS28, HS32, MU01-MU14, MU16, MU18-MU24, EM01-EM04

8.3 Potential Inter-Plan Cumulative Effects

The potential cumulative effects which could arise from the implementation of the Final Draft Local Plan with modifications, working in combination with other local plans, programmes or projects is detailed within Table 8.3 below.

Table 8.3: Potential Inter-Plan Cumulative Effects	
Plans, programmes or projects	Summary of cumulative effects of the Final Draft Local Plan development strategy with external plans, projects or policies
<p>Neighbouring Local Plans</p> <p><i>The adjacent authorities are Three Rivers, Hertsmere, and (minimally) St Albans, see Figure 3.1</i></p>	<p>Housing and employment growth are planned in the authorities immediately surrounding Watford, which may result in changes to existing travel patterns between Watford and neighbouring areas for work, services or leisure. Hertsmere²⁵ is planning an average of around 50 houses per year in the Bushey area, the settlement closest to Watford; Three Rivers²⁶ is projected to build an average of 180 homes a year, perhaps a third of which may abut the Watford council area.</p> <p>As the Watford Local Plan aims to promote sustainable communities with improved access to a wider range of local jobs, housing, high quality service and facilities, no potentially negative cumulative effects have therefore been identified between the Final Draft Local Plan and housing and economic growth within the neighbouring areas.</p> <p>Flooding: There is a potential negative cumulative effect from an overall increase in coverage of impermeable surfaces as a result of development, with potential impacts for flood risk and water cycle in the longer term. However, this is dependent on planning in adjacent areas; if comparable policies to those in the Watford Local Plan are adopted, the cumulative impact on flood resistance and resilience may be neutral or even beneficial.</p> <p>It is noteworthy that a combined Strategic Flood Risk Assessment²⁷ was published in 2019 for South West Hertfordshire, a combined Local Authority area which</p>

²⁵ Hertsmere Core Strategy 2013: <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Development-Framework/Core-Strategy-DPD-2013.pdf>

²⁶ Three Rivers Site Allocation Development Plan (Adopted November 2014): <https://www.threerivers.gov.uk/egcl-page/site-allocations-development-plan-document>

²⁷ South West Hertfordshire Level 1 Strategic Flood Risk Assessment (March 2019): https://www.watford.gov.uk/downloads/download/973/south_west_herts_strategic_flood_risk_assessment_stage_1_2019

Table 8.3: Potential Inter-Plan Cumulative Effects	
Plans, programmes or projects	Summary of cumulative effects of the Final Draft Local Plan development strategy with external plans, projects or policies
	includes Watford, St Albans, and Three Rivers. However, the cumulative impact of this partly depends on future policies adopted in the adjacent areas, implying a synchronised approach to flood risk, which can be expected to avoid negative cumulative effects on flood risk.
Local Transport Plan	<p>The Hertfordshire County Council's Local Transport Plan (LTP) (2018-2031) sets out various proposals regarding planned incremental improvements to roads, journeys and the cycling, rail and highway networks across Hertfordshire which could have potential positive cumulative effects on transport services and accessibility in Watford. These include the Watford North Curve, Metropolitan Line Extension (affecting Watford Junction and Watford High Street) and Station Upgrades (affecting Watford Junction). These proposals aim to improve three key corridors for which Watford is a part: Aylesbury-Watford-London; London-Watford-Luton-Milton Keynes; and Hemel Hempstead & Watford-St Albans-Harlow.</p> <p>Watford has also been designated by the Hertfordshire LTP as a Cycle Infrastructure Improvement Town.</p>
Minerals and Waste Plans ²⁸ .	<p>The Hertfordshire County Council's minerals and waste plans set out policies for minerals and waste planning in the county.</p> <p>Most of Watford Borough is covered by a minerals safeguarding zone. In addition, the Orphanage Road Goods Yard concrete batching plant within Watford Borough has permanent planning permission that safeguards it from development, however, there are no sites identified within Watford for minerals workings. Although the Orphanage Road Goods Yard batching plant could pose a constraint to development in this area, no potential cumulative effects have been identified in relation to the Minerals Plan.</p> <p>The waste plan makes provision for a network of waste management facilities in Hertfordshire that drive waste management practices up the waste hierarchy and are sufficient to provide adequate capacity for existing and future waste arisings within the county and for any agreed apportionment for waste arisings from outside the county. There are currently no waste management facilities within Watford Borough, however, Watford falls within a wider area of search for a new organic waste recovery facility. Should proposals come forward for such a facility within or close to Watford Borough, project-level Environmental Impact Assessment (EIA) will determine whether potential cumulative effects could arise with existing or planned development within Watford. Mitigation for any potential negative or uncertain cumulative effects would be put forward within an EIA.</p> <p>No potential cumulative effects have been identified in relation to local minerals and waste planning and the Watford Local Plan.</p>

²⁸ Hertfordshire Minerals and Waste planning policies: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/minerals-and-waste-planning.aspx>

9 Mitigation and Enhancement Measures

Mitigation was put forward for potential significant negative effects and uncertain effects identified within the assessment of policies and the inter-plan cumulative effects assessment at the Final Draft Local Plan stage.

The assessments have been updated to remove mitigation and enhancement measures for which further information has now been provided (e.g. the final Infrastructure Delivery Plan) or where measures have been accepted by the plan authors, resulting in an improvement in the sustainability of the policy or site allocation (incorporated into the assessment findings in chapters 7 and 8). Further details of the difference the SA mitigation and enhancement measures have made to the plan will be provided within the SA Adoption Statement which will be produced when the Local Plan is adopted.

The assessment of the Final Draft Local Plan suggested some enhancement measures in relation to the policies in Chapters 1 to 12. Table 9.1 has been updated to remove any enhancement measures which have been incorporated into modifications. Only one suggested enhancement measure, which could improve the sustainability performance of the policies in Chapter 10, remains and a response from WBC has been added to Table 9.1.

Table 9.1: Enhancement Measures - Final Draft Local Plan Policies

Chapter	Policies	SA objective	Enhancement identified	Response from WBC
Chapter 10	Supporting text	SA5	The assessment of Chapter 10 has identified that there is potential for some open spaces to be enhanced or created through its implementation, as Green Infrastructure is included as a consideration within policy supporting text. However, as this is only mentioned within supporting text, it is unclear if this will result in the delivery of green space, recreational and sporting facilities alongside developments to meet residents' needs. It is therefore recommended that policy wording is amended to specify the type of facilities developers should deliver if the need is identified.	The enhancement measure is not considered necessary because the introduction to Chapter 10 (paragraph 10.2 and figure 10.1) refers to green infrastructure to provide context that the term 'infrastructure' refers to more than just large items such as the transport network, education facilities and other forms of development needed to support growth. The requirements for green infrastructure are set out in Chapter 9 (Policies NE9.1, NE9.2, NE9.7, NE9.8) therefore not required in Chapter 10.

The potentially significant negative effects and uncertain effects identified in the assessment of the site allocations in Policy SA13.1 are listed in Table 9.2 along with the mitigation measures put forward to address them. Table 9.3 has been updated to indicate where modifications to the Final Draft Local Plan site allocations have incorporated mitigation measures put forward within the SA. Where the mitigation has not been incorporated into modifications, a response from WBC is provided.

Table 9.2: Mitigation - Site Allocations (Policy SA13.1)			
Site References	SA Objective	Explanation and Mitigation Measures to Minimise or Avoid Effects	Response from WBC
HS27	SA12	An uncertain effect has been identified for HS27, as this site is currently greenspace with a public footpath through the middle of the site. The uncertain effect identified cannot be mitigated without further assessment of the site use. This could demonstrate the site is currently used by residents of the borough, hence development here would be prevented through Policy NE9.6: Protecting Open Space.	There is an adjacent greenspace that provides for play and amenity use This is protected under Policy NE9.6.
HS28, MU09, MU11	SA13	Potential adverse impacts on the Locally Listed Buildings on site may be mitigated through the site considerations. However, retention of the current buildings may not be feasible. Details of this will not be available until site development details are shown within a proposal, hence the uncertain effects identified cannot yet be mitigated.	Proposed main modifications (M120, M122) to the supporting text and wording of Policy HE7.3 have increased the emphasis on protecting non-designated heritage assets. Proposed main modifications (M191, M209, M213) to the development considerations set out in Chapter 13 refer to the Heritage Impact Assessment undertaken for respective sites.
HS06,HS27, MU21, ED01	SA16	The only mitigation for the potentially significant negative effects of developing on greenfield land would be to not develop these sites. However, this may not be practicable due to the identified	Land availability to support Watford's development is significantly constrained. Proposed main modification (M181) includes

Table 9.2: Mitigation - Site Allocations (Policy SA13.1)

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

Table 9.2: Mitigation - Site Allocations (Policy SA13.1)			
Site References	SA Objective	Explanation and Mitigation Measures to Minimise or Avoid Effects	Response from WBC
MU16-MU24, EM01-EM04, GT01		of Local Plan policies. This would ensure potential to work out sand and mineral resources prior to development is considered.	considered necessary to cross reference the Mineral Plan for each site allocation.

The assessment of the Final Draft Local Plan allocation sites has also suggested some enhancement measures in relation to the allocation sites in Chapter 13. Table 9.3 has been updated to remove any enhancement measures incorporated into the modifications to the Local Plan site allocations. Where the suggested enhancement measures have not been incorporated into modifications, a response from WBC is provided.

Table 9.3: Enhancement Measures - Final Draft Local Plan Site Allocations (Policy SA13.1)			
Site	SA objective	Enhancement Identified	Response from WBC
HS01, HS03-HS05, HS09-HS13, HS17, HS18, HS24, HS26, HS29, HS30, HS32, MU03	SA4	Local Plan Policy HO3.3 could be amended to include affordable housing provision even at smaller sites. Even if a smaller percentage of housing was required to be affordable, an increase in affordable housing from current levels could be achieved.	The National Planning Policy Framework states that affordable housing should not be sought for residential developments that are not major developments (i.e. less than 10 dwellings).
MU23	SA5	Access to open space could be improved by creating a footbridge to Meridian Park, over the A41 (Colne Way). This could help to ensure there is safe walking access to the area.	There are no open spaces within 400m of the site and the A41 creates further severance. Proposals will be expected to comply with Policy NE9.7 and provide open

Table 9.3: Enhancement Measures - Final Draft Local Plan Site Allocations (Policy SA13.1)

Site	SA objective	Enhancement Identified	Response from WBC
			<p>space on site or set out a strategy to improve connectivity to other green spaces in the vicinity which may include Meridian Park or Lea Farm Recreation Ground to the north.</p> <p>Suggestion may be considered as part of the Sustainable Transport Strategy but is not identified in the IDP and is not considered necessary for the Local Plan.</p>
All sites	SA6	<p>A neutral effect has been identified for all sites in relation to SA6: Reduce both crime and the fear of crime. However, a design policy which requires streets to be overlooked could help to decrease fear of crime at larger development sites. It is therefore recommended as an enhancement measures that the wording of Policy QD6.2 Design Principles is amended to encourage designs to incorporate secure layouts in order to promote the safety and sense of security of residents.</p>	<p>The design chapter does not refer to Secured By Design standards, however, policies in the chapter have placed significant emphasis on creating a quality public realm that will encourage people to use public spaces. There, no amendment is considered necessary.</p>
HS30, HS31	SA7	<p>The addition of a cycle lane to the Bushey Arches Bridge roundabout would aid in increasing the safety and accessibility of the cycle network, helping to encourage more users.</p>	<p>This is being considered as part of the Sustainable Transport Strategy adopted in February 2022. Proposed main modification (M53) to Policy CDA2.3 refers to a future</p>

Table 9.3: Enhancement Measures - Final Draft Local Plan Site Allocations (Policy SA13.1)

Site	SA objective	Enhancement Identified	Response from WBC
			masterplan in the Lower High Street area and this will consider accessibility.
MU23	SA7	Access to Watford North train station could be enhanced by providing walking access through to Bushey Mill Lane from Oldham's Trading Estate. This would halve the distance to the station.	Requires landholder agreements as there are no site allocations or Public Rights of Way between Odhams Trading Estate and Bushey Mill Lane. May be possible should the employment area protected under Policy EM4.2 be redeveloped for industrial type uses, however, this is currently undeliverable and therefore lies outside of the Local Plan.

10 Proposed Monitoring Framework

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

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

Potential Effect	Description	Monitoring Indicators	Local Plan Target (where applicable)	Data Source
SA12: Uncertain effect	Development of site HS27 loss of green infrastructure and a public right of way.	Hectares of greenfield land lost to development.	No Local Plan target.	Planning applications.
		Percentage of completions on previously developed land.	90% employment, 80% residential.	Planning applications.
		Biodiversity net gain as per DEFRA biodiversity metric.	10% net gain.	Planning applications.
SA13: Uncertain effect	Uncertain effects have been identified for allocation sites HS28, MU09, MU11 against SA13 mainly due to the location of these sites in	Number of buildings / structures on the 'Heritage At Risk Register'.	Reduce number of buildings / structures on the Heritage at Risk Register.	Heritage England Heritage At Risk Register.

Table 10.1: Proposed Monitoring Framework for Residual Significant Negative and Uncertain Effects

Potential Effect	Description	Monitoring Indicators	Local Plan Target (where applicable)	Data Source
	relation to a nationally or locally Listed Building. Retention of the buildings may not be feasible.	Number of applications granted planning permission contrary to advice from Historic England.	No Local Plan target.	Planning applications.
SA14: Significant negative effect	Site HS27 loss of green space (currently acts a gap between Croxley Business Park and the houses surrounding Croxley View).	Gains and losses to the areas of designated green infrastructure.	No net loss of green infrastructure.	Planning applications.
SA16: Significant negative effect and significant negative cumulative effect	HS06, HS27 and ED01 loss of greenfield land.	Hectares of greenfield land lost to development.	No Local Plan target.	Planning applications.
		Percentage of completions on previously developed land.	90% employment, 80% residential.	Planning applications.
SA18: Uncertain effect	Flood risk. Sites HS21, HS22, HS23, HS28, HS32, MU16, MU18, MU21, MU22, EM02 (all located within the Colne Valley) and Designated Industrial Areas located within Flood Zone 3.	Number of applications granted planning permission contrary to Environment Agency advice.	No planning permissions granted contrary to the advice of the Environment Agency on flooding and water quality grounds.	Planning applications.

Table 10.1: Proposed Monitoring Framework for Residual Significant Negative and Uncertain Effects

Potential Effect	Description	Monitoring Indicators	Local Plan Target (where applicable)	Data Source
SA19: Uncertain effect and significant negative cumulative effect	Development of 55 allocation sites within a sand and mineral safeguarding zone.	Number of applications granted planning permission contrary to minerals planning authority (Hertfordshire County Council) advice.	No Local Plan target.	Planning applications.

11 Next Steps

This SA Report is being published alongside the Watford Local Plan proposed modifications following Examination hearings.

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

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

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