

## **Sustainability Appraisal Adoption Statement for the Watford Borough Council Local Plan 2021-2038**

### **Regulation 16 of the Environmental Assessment of Plan and Programmes Regulations**

#### Introduction

This statement has been prepared in accordance with the requirements of Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004. It will outline how environmental considerations have been integrated into the Local Plan, how the Sustainability Appraisal has been taken into account, how consultation responses have been taken into account, the reasons why the adopted Local Plan policies were chosen ahead of alternative options and the steps the Council will take to monitor the effects of the Local Plan.

The Watford Local Plan (2021-2038) was adopted on 17 October 2022. Further information relating to the preparation, examination and adoption of the Local Plan can be found on the Council's [website](#).

#### How environmental and sustainability considerations have been integrated into the new Watford Local Plan

The Sustainability Appraisal has been conducted in such a way that it meets the requirements of the EU Strategic Environment Assessment Directives (including through EU exit legislation) and UK Government guidance on the preparation of Sustainability Appraisals.

The Sustainability Appraisal has informed decision making at every stage of Local Plan development.

The first stage of the Sustainability Appraisal accompanied the Issues and Options consultation that was subject to consultation between 7 September and 18 October 2018. This report assessed the strategic options that were considered to be key and distinct issues that affect the Borough.

Seven key issues were identified for assessment:

- Housing Development
- Affordable Housing
- Types of New Housing
- Housing for an Ageing population
- Employment
- Tall Buildings
- Transport

Potential sustainability effects were identified against a set of 19 Borough specific sustainability objectives which make up the Sustainability Framework. The Framework was updated and amended in 2019 to reflect up to date sustainability issues identified during the scoping stage in 2018. This Framework is replicated below:

<b>SA Framework</b>	
<b>Objectives</b>	<b>Sub-objectives</b>
<b>SA1) Achieve sustainable levels of prosperity and economic growth</b>	<ul style="list-style-type: none"> <li>• To support existing businesses, attracting inward investment and encouraging new businesses start-ups through the creation of employment spaces.</li> <li>• To promote and support economic diversity, and particularly manufacturing and human health and care sectors.</li> </ul>
<b>SA2) To ensure that local residents have employment opportunities and access to training.</b>	<ul style="list-style-type: none"> <li>• To support the delivery of high-quality jobs within the borough.</li> <li>• To give greater focus to learning and skills through the provision / support of education and training facilities in order to meet needs.</li> </ul>
<b>SA3) To ensure ready access to essential services and facilities for all residents</b>	<ul style="list-style-type: none"> <li>• To improve everyone's access to high quality health, education, recreation, community facilities and public transport.</li> <li>• To ensure facilities and services are accessible by everyone, regardless of age or ability.</li> </ul>
<b>SA4) Ensure that everyone has access to good quality housing that meets their needs</b>	<ul style="list-style-type: none"> <li>• Promote a range of housing types and tenure.</li> <li>• To improve the provision of affordable housing.</li> </ul>
<b>SA5) Encourage healthy lifestyles and improve quality of life for local residents</b>	<ul style="list-style-type: none"> <li>• To promote walking and cycling and community-based activities.</li> <li>• To provide enhanced access to open spaces as part of the borough's Green Infrastructure network.</li> <li>• To provide access to sporting and recreational facilities.</li> <li>• To provide good quality play spaces to meet the needs of residents.</li> <li>• To provide health facilities to meet the needs of residents.</li> <li>• To provide opportunities for residents to grow their own food.</li> </ul>
<b>SA6) Reduce both crime and the fear of crime</b>	<ul style="list-style-type: none"> <li>• Improve community cohesion by reducing barriers between neighbourhoods and ensuring that everyone benefits from regeneration.</li> <li>• To plan new development to help reduce crime and the fear of crime through the design of the physical environment and by promoting well-used and over-looked streets and public spaces.</li> </ul>
<b>SA7) To deliver more sustainable patterns of development, including employment and housing and increase the use of sustainable transport modes</b>	<ul style="list-style-type: none"> <li>• To reduce the need to travel through closer integration of housing, jobs and services and promoting mixed use development.</li> <li>• To prioritise the use of sustainable modes of transport and reduce the reliance on private vehicles.</li> <li>• To help create safe and secure layouts which minimise conflicts between vehicle traffic, cyclists and pedestrians.</li> <li>• To support the expansion of electronic communications networks, including telecommunications and high-speed broadband.</li> </ul>

<b>SA Framework</b>	
<b>Objectives</b>	<b>Sub-objectives</b>
	<ul style="list-style-type: none"> <li>• Deliver more facilities for charging plug-in and other ultra-low emission vehicles.</li> </ul>
<b>SA8) To achieve good air quality</b>	<ul style="list-style-type: none"> <li>• To improve air quality across the borough and avoid exacerbating existing areas of poor air quality.</li> <li>• To minimise noise pollution and consider sensitivity of receptors to existing noise sources.</li> </ul>
<b>SA9) To minimise noise and light pollution</b>	<ul style="list-style-type: none"> <li>• To limit light pollution and promote and less invasive lighting sources, considering the balance between safety and environmental impacts.</li> </ul>
<b>SA10) Reduce the borough's contribution to climate change</b>	<ul style="list-style-type: none"> <li>• To minimise CO<sub>2</sub> emissions.</li> <li>• To promote the design and construction of energy-efficient developments and encourage the use of low-carbon and renewable energy where practicable.</li> </ul>
<b>SA11) Ensure that the borough is resilient to the effects of climate change</b>	<ul style="list-style-type: none"> <li>• To improve the resilience of the borough to climate change, particularly with respect to the design of new developments.</li> </ul>
<b>SA12) To protect and enhance biodiversity</b>	<ul style="list-style-type: none"> <li>• To protect and enhance designated wildlife sites (international, national and local);</li> <li>• To support the achievement of BAP targets;</li> <li>• To create habitats to ensure sustainable and linked species populations and protect and enhance the Green Infrastructure network in the borough;</li> <li>• To increase tree cover and protect existing woodland; and</li> <li>• To eradicate invasive non-native species from the borough.</li> </ul>
<b>SA13) To maintain and enhance historic and cultural assets</b>	<ul style="list-style-type: none"> <li>• To safeguard and enhance historic and cultural assets;</li> <li>• To promote local distinctiveness and local identity by repairing historic buildings and areas, and by encouraging the re-use of valued buildings;</li> <li>• Enhance understanding of the historic assets of the borough.</li> </ul>
<b>SA14) Conserve and enhance the landscape and townscape, encouraging local distinctiveness</b>	<ul style="list-style-type: none"> <li>• To encourage high quality design, which respects local context, and improves local character and distinctiveness;</li> <li>• To improve the quality of life in urban areas by making them more attractive places in which to live, work and visit;</li> <li>• To protect and enhance the borough's townscape and local sensitive landscapes;</li> <li>• To encourage the use of previously developed (brownfield) land and the re-use of derelict land and buildings; and</li> <li>• To identify, protect and improve quantity and quality of open spaces and public realm.</li> </ul>

<b>SA Framework</b>	
<b>Objectives</b>	<b>Sub-objectives</b>
<b>SA15) Revitalise the town centre to promote a return to sustainable urban living</b>	<ul style="list-style-type: none"> <li>• Create a viable and attractive town centre that has vitality and life and discourage competing out-of-town developments.</li> </ul>
<b>SA16) Maximise the use of previously developed land and buildings and the efficient use of land.</b>	<ul style="list-style-type: none"> <li>• To protect soils from pollution and remediate contaminated land;</li> <li>• To concentrate development through the reuse of previously developed land and buildings and urban extensions only where the development of greenfield land is unavoidable; and</li> <li>• To maximise the efficient use of land through encouraging high-density development.</li> </ul>
<b>SA17) Maintain and enhance water quality and limit water consumption.</b>	<ul style="list-style-type: none"> <li>• To encourage high water efficiency and conservation, including retrofitting older buildings;</li> <li>• To improve quality and flow of rivers and protect and improve groundwater quality; and</li> <li>• To ensure the borough has the appropriate wastewater and sewerage capacity to deliver any predicted new development.</li> </ul>
<b>SA18) Ensure that new development does not increase flood risk.</b>	<ul style="list-style-type: none"> <li>• To avoid development from being located in areas at risk of flooding taking account of climate change;</li> <li>• To ensure that green infrastructure schemes make space for water and reinstate floodplain; and</li> <li>• To promote sustainable urban drainage systems to reduce flood risk and water loss from natural systems.</li> </ul>
<b>SA19) To minimise use and make efficient use of natural resources.</b>	<ul style="list-style-type: none"> <li>• To minimise the production of waste and promote the re-use, recycling and composting;</li> <li>• To safeguard land for waste processing / disposal within the borough; and</li> <li>• To safeguard reserves of exploitable minerals from sterilisation by other development.</li> </ul>

Following the Issues and Options consultation, the Council then consulted on a Sustainability Appraisal alongside the first draft Local Plan between 27 September and 8 November 2019. This included appraisals of all the policy and site options considered through the preparation of the first draft Local Plan. Each option was assessed against the social, environmental and economic indicators in the SA framework, to establish whether they would have a positive or negative effect. The cumulative impact of the policies and sites was also considered to establish the overall effect of the Local Plan. These appraisals were then used to inform the progression of the plan to final draft stage consultation and submission of the Plan to the Secretary of State.

Following the consultation on the First Draft Local Plan, further work was undertaken to refine the Local Plan and further options were assessed. The Sustainability Appraisal Report was published with the Final Draft Local Plan (under Regulation 19 of the Town and Country Planning (Local Plans) (England) Regulations 2012) and was subject to consultation between 18 January and 18 March 2021.

The Report outlined the options assessed and made clear the reasons why alternative options had been discounted. The Report assessed each chapter in the Local Plan individually and cumulatively and in total, 32 potential significant positive effects were identified, one potential significant negative effect was identified as well as three uncertain effects.

The summary table of this assessment is shown below. The numbers along the top row align with the SA Framework set out above.

**Table 6: 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	+	+
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
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
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	++	0
Chapter 10	+	+	++	+	+	0	+	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

This Report also assessed each proposed site allocation in chapter 13 of the Plan.

Following the Regulation 19 consultation, the Sustainability Appraisal Report was submitted with all other relevant Local Plan documents to the Secretary of State for examination on 6 August 2021.

Following the public hearings which were held between 8 January and 19 February 2022, the Inspector concluded that ‘Main Modifications’ would be required to make the Local Plan sound in his report published on 20 September 2022. An Addendum to the Sustainability Appraisal was produced in order to assess whether any of these Main Modifications had an effect on the Sustainability Appraisal Report. The Main Modifications and the Sustainability Appraisal Addendum were consulted on between 1st May and 10th July 2020.

How the Sustainability Appraisal has been taken into account?

The policies and sites within the Watford Local Plan have been subject to Sustainability Appraisal along with reasonable alternative options. Each policy and proposal has been assessed against the social, environmental and economic objectives in the SA framework in order to establish the positive and negative effects that could result. Where significant effects were found, potential mitigation measures were identified wherever possible. The results of the appraisals were used to inform the decision making process and establish appropriate options to take forward into the new Local Plan.

Each stage of developing the Local Plan has included undertaking a Sustainability Appraisal to take account of new evidence and new policy options. These updates helped further refine the options to include in the Local Plan, and have enabled the Council to move forward with proposals.

The final Sustainability Appraisal Report included the individual appraisals for each policy option taken forward into the Local Plan as well as all of the reasonable alternative options considered.

The Report also included an overview of all of the policies included in the final draft Local Plan to show the cumulative impact of the policies (section 8). In most cases, the cumulative impact of the Plan on SA objective was found to have a positive effect.

#### How the results of consultation have been taken into account?

The Local Plan regulations require that opinions expressed by consultees be taken into account during the development of a plan before it gets adopted. The Sustainability Appraisal was consulted on alongside consultation on the draft Plan at every stage, including the consultation on Main Modifications after the hearings had concluded. All comments and representations were taken into account and used to further refine both the Plan and the Sustainability Appraisal.

All comments received, at all stages of Local Plan preparation, that referred to the accompanying Sustainability Appraisal were made available online after the consultation's had concluded.

All consultations were undertaken in accordance with the national requirements and with the Council's Statement of Community Involvement (SCI).

#### The reasons for choosing the Plan, as adopted, in light of reasonable alternatives that were considered

The various stages of developing the Sustainability Appraisal have provided a rational methodology for refining the different options that were considered throughout the Local Plan process. The various Sustainability Appraisal reports published during the preparation of the Plan have shown that reasonable and alternative options have been considered and evaluated. The SA reports show clearly that each option has been comprehensively assessed and a process of selection and rejection has been undertaken.

The full assessments and their results are included in the appendices of the Sustainability Appraisal Report. Section 6 of the SA shows the full results of this assessment of options. The options chosen performed better than others on the majority of sustainability criteria.

#### Measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan

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.

A monitoring framework is included in the final Sustainability Appraisal (section 10). This enables the significant effects of implementing the Local Plan sites and policies to be assessed and compared to those predicted in this Sustainability Appraisal report. It helps to ensure that any unforeseen adverse effects can be identified, and remedial action taken if required.

The Local Plan also includes a monitoring framework incorporating many of the indicators suggested in the SA. Some of these will be monitored annually, whilst others will be monitored less frequently when the data becomes available. Results for some indicators will change rapidly to show recent changes such as housing completions or employment figures. Others will show changes and trends over a longer timescale.

The Council will publish an Authorities Monitoring Report (AMR) annually which will report on a wide variety of measures with regard to the implementation of the Local Plan.

The new Watford Local Plan, the Adoption Statement, Sustainability Appraisal and this Sustainability Appraisal Adoption Statement are available on the Council's website at: [Watford Local Plan – www.watford.gov.uk](http://www.watford.gov.uk).

**Document Availability**

This Sustainability Appraisal Adoption Statement, alongside the Adoption Statement, Local Plan, Policies Map, Inspectors Report and associated schedule of main modifications, are available to view online at [www.watfordlocalplan.co.uk](http://www.watfordlocalplan.co.uk).

Alternatively they will be available to view in hard copy at the following locations during opening hours:

Venue	Address	Open Days	Opening Hours
Watford Borough Council Offices	Watford Town Hall, WD17 3EX	Monday, Friday Wednesday	9:00am-3.00pm 11:00am-5:00pm
North Watford Public Library	St Albans Rd, Watford, WD24 7RW	Monday-Wednesday Friday Saturday	9:30am-6:00pm 1:00pm-6:00pm 9:30am-4:00pm
Watford Public Library	Hempstead Road, Watford, WD17 3EU	Monday, Wednesday Tuesday, Thursday Friday (self-service only in morning) Saturday Sunday	9:30am-6:00pm 9:30am-7:00pm 9:30am-6:00pm 9:30am-4:00pm 1:00pm-5:00pm