

WATFORD BOROUGH COUNCIL

Planning and Compulsory Purchase Act 2004 The Town and Country Planning (Local Planning) (England) Regulations 2012

Commuted Sums for the Provision of Affordable Housing Supplementary Planning Document (SPD) – Consultation Statement

- 1.1 The Town and Country (Local Planning)(England) Regulations 2012 under Regulation 12(a) requires local planning authorities to prepare a statement, setting out:
 - i the persons the local planning authority consulted when preparing the supplementary planning document;
 - ii a summary of the main issues raised by those persons;
 - iii how those issues have been addressed in the supplementary planning document;
- 1.2 In accordance with this part, and Regulation 13 of the named regulations, the persons and organisations consulted as part of the process for preparing the Supplementary Planning Document are identified in Appendix A.
- 1.3 Public Consultation on the Draft Supplementary Planning Document took place from 22nd May to 3rd July 2017.
- 1.4 Copies of the draft Supplementary Planning Document were provided in Watford Library, North Watford Library and Watford Council Buildings. A press notice was issued in the Watford Observer on Friday 19th May 2017. Everyone on the Local Plan consultee list was notified of the consultation. Facebook and Twitter were also used to raise awareness of the draft Supplementary Planning Document consultation. Details of the consultation can be found here:

<https://watford.jdi-consult.net/localplan/>
- 1.5 Appendix A lists those who were notified of the consultation.
- 1.6 Appendix B identifies the responses received, the key issues identified by the named consultees and how the council addressed these issues.

Appendix A – Consultation with Organisations and Persons

Local Authorities and Town & Parish Councils

Dacorum Borough Council	Greater London Authority (Mayor of London)
Hertfordshire County Council	Hertsmere Borough Council
London Borough of Harrow	St. Albans City & District Council
Three Rivers District Council	Welwyn Hatfield Borough Council

Organisations

Abbots Langley Parish Council	Affinity Sutton Homes
Affinity Water	Age UK Hertfordshire
Ahmadiyya Muslim Association	Alban Wood Infant and Nursery
Aldenham Parish Council	Alliance Planning
AMEC Environmental & Infrastructure UK	Arcus Consultancy Services Ltd
Armstrong Rigg Planning	Ascot Road School
Association of British Drivers	Barratt Homes
Barton Willmore	be:here
Beechen Grove Baptist Church	Beechfield School
Bell Cornwell Partnership	Bellway Homes
Bidwells	Blackfriars Investment Ltd
BNP Paribas Real Estate	Boundary Way Residents Association
Bosnia and Herzegovina Community Association	Brasier Freeth
Boys & Girls Nursery	Bromet Primary
British Signs and Graphics Association	Canal and River Trust
Campaign for Real Ale	Carers in Herts (SW Herts)
Capita Lovejoy	Cassiobury JM School
Cassiobury Infant and Nursery School	Catesby Property Group
Cassiobury Residents' Association	Central Primary School
CB Richard Ellis	CGMS Consulting
Central Town Residents' Association	Chemsitree Pharmacy
Chater Junior School	Chessbrook School ESC
Cherry Tree Primary School	Citizens' Advice Bureau
Chris Thomas Ltd	Civix
Civil Aviation	Coates Way JMI & Nursery School
Classic Concerts Trust	Colliers CRE
Coda Planning Ltd	Consensus Planning Ltd
Collins Solicitors	CPRE Herts
Cushman & Wakefield	Croxley Green Parish Council
Dalton Warner Davis	Cyclists' Touring Club
Dean Lewis Estates	David Ames Associates
Defence Infrastructure Organisation	Decathlon UK Ltd
Derbyshire Gypsy Liaison Group	Department Of Transport
DLA Town Planning	Derek Horne & Associates Ltd

Dollshouse on the Hill	DLP Consultants Ltd
Draughtsman	Douglas Brodie Ltd
EE	Durkan
Environment Agenc	English Welsh & Scottish Railways Ltd
Estcourt Road Residents Association	ESFA
Fairview Homes	Evergreen
Field Junior School	Field Infant & Nursery School
Foxhill Tenants & Residents' Association	Firstplan
Francis Combe Academy	Framptons Planning
Friends of Cassiobury Park	Friends of Alban Wood
Friends of Harebreaks Wood	Friends of Garston Park
Fullerians Rugby Football Club	Friends of the Earth
Geraldeve	Garston Manor School
Gough Commercial Property Consultants	GL Hearn
Halkin	GVA Grimley
Heaton Planning Ltd	Hanson's The Caterers Ltd
Hertfordshire & N. Middlesex Ramblers Association	heronslea group
Hertfordshire Constabulary	Hertfordshire Biological Records Centre
Hertfordshire LEP	Herts & Middlesex Wildlife Trust
Herts Valleys CCG	Herts Prosperity
Highways England	Hightown Praetorian & Churches HA
Historic England	Hille Holdings
Holyrood RC Primary School	Holyrood RC Infant School
Homes and Communities Agency	Holywell Primary School
Horns Public House	Honary Freeman of the Borough
Iceni Projects	HSBC Bank Pension Trust (UK)Limited
Inland Homes	Indigo Planning Ltd
INTU	Ingleton Wood LLP
integrated accommodation team	Ivy House Residents Association
Jehovah's Witnesses	JLL
John Lewis	John Thompson and Partners
Jones Lang LaSalle	Kingswood Nursery School
Kingsway Infant School	Kingswood Residents Association
Knutsford School	Lambert Smith Hampton
LaSalle Investment Management	Laurance Haines School
Leavesden Green Primary School	Leavesden Green Residents' Association
Legal & General Property	Lemarie Centre Ltd
Littlebury Residents' Association	Local Dialogue
London Concrete Ltd	London Gypsy and Traveller Unit
London Midland	Market Traders Federation, Watford Branch
Marks & Spencers	Mineral Products Association
Mobile Operators Association	Montagu Evans LLP
Nascot Wood Junior School	Nathaniel Lichfield & Partners
National Federation of Gypsy Liaison Groups	Natural England
Network Rail	NHS England
NLP Planning	North Watford Church of the Nazarene

Oceana/Woohoo Night Club	Odyssey Markides
Office of Rail Regulation	Orchard Primary School
Orion Cassiobridge Limited	Oxhey Infants
Parkgate Infants and Nursery School	Parkgate Junior School
Peacock & Smith	Pendimo Land and Property Consultants
Persimmon Homes	Peter Brett Associates
Phase Planning and Development Ltd	Pioneer Property Services Ltd
Planning Potential	Planware Ltd
PowerHaus Consultancy	Primeplace Development Ltd
Project Centre Ltd	QCAG
Quod	Radlett Road Community Association
Raine & Co.	Rapleys
Religious Society of Friends (Quakers)	RG+P
Richard Harrington MP	Richborough Estates
RNArchitecture	RNOH
Roger Tym & Partners	Royal Mail Group
Royal Society for the Protection of Birds	Saint Gobain Delegation UK & Ireland
Savills	Sewell & Gardner
Shire Consulting	Shopmobility Watford
Shree Prajapati Association	Smith Street Residents Group
Soul Survivor	South West Herts Archaeological & Historical Society
Sport England	St Anthony RC Primary School
St Lukes Church	St Martins Church
St Marys Church	St Michaels Catholic High School
St Stephen's Parish Council	St William
Stewart M&PS Ltd	Stewart Ross Associates
Strutt and Parker	Suthergrey House Medical Centre
Sustrans	SW Herts Community Transport Scheme
Talking Newspaper	Tamil Union of Herts
Taylor Wimpey	Taylor Wimpey North Thames
Teesland iDG	Tellon Capital
Terence O'Rourke	Transport for London
Thames Water Utilities Ltd	The Architects Corporation
The Barton Willmore Planning Partnership	The Coal Authority
The Lawn Tennis Association	The Loan Partnership
The Theatres Trust	The Planning Bureau Limited
TJX Europe	Three mobile
Turley	Trustee CRA/Personal
Vicarage Village Residents Assoc	UK Power Networks
Wakelin Associates	Vodafone and O2
Waterfield Residents Association	Warner Bros.
Waterwise	Watford & Bushey Art Society
Watford & Three Rivers Locality of Herts Valleys CCG	Watford & Three Rivers Trust
Watford African Caribbean Association	Watford Arabic School
Watford Area Arts Forum	Watford BID Ltd

Watford Chamber of Commerce	Watford Community Housing Trust
Watford Cycle Hub	Watford Football Club
Watford General Hospital	Watford Grammar School for Boys
Watford Grammar School for Girls	Watford Indian Association
Watford Interfaith Association	Watford Mencap
Watford Mosque	Watford Multi-Racial Community Centre
Watford Museum	Watford Muslim Elders Association
Watford New Hope Trust	Watford Premier
Watford Rail Users' Group	Watford Rugby Club
Watford Town Centre Partnership	Watford Town and Country Club
Watford Women's Centre	Watford YMCA
WCHT	WDSA (UK)
WENTA	West Herts College
West Herts Hospitals NHS Trust	West Watford and Oxhey Garden & Allotment Society
West Watford Community Association	Westfield Community Technology College
Westfields Construction Limited	Weston Homes PLC
Woodland Trust	Woolf Bond Planning
WRAG/Hertfordshire Policy Authority	Wu Shu Kwan
WYG	

Members of the Public

Members of the public registered on the Watford Borough Council Planning Policy Consultee List as at May 22nd 2017.

Appendix B – Summary of issues raised in the consultation and how they have been addressed

A total of six responses were received. These consisted of ten comments. Several respondents stated they had ‘no comment’ and subsequently these are not included in the following table. There were several other responses which just said “no comment”.

Reference	Respondent	Organisation	Summary of comments	Change
1	Lucy Bird	St Williams	<p>Have an interest in brownfield site in SPA4, the former Gas Works site located on Lower High Street, to the south of Watford town centre & the opportunity to conserve and enhance listed Grade II building Frogmore house located there.</p> <p>Viability</p> <p>Recognise the need for transparency in the viability process but given the complex and sensitive nature of viability appraisals, it is important that viability is addressed at the right time, in a sensitive manner and flexibly to reflect the uniqueness of each development site.</p>	Text amended to clarify the need for viability appraisals and the information required.
2			<p>Disclosure of viability - information and assessment</p> <p>Notes that discussions will evolve over time during the pre-application stage of proposals given the nature, mix and scale of development therefore this will make proposals subject to change which may limit the extent to which viability can be discussed at pre-app stages.</p>	Viability assessments would only be published when they form part of a planning application, not during pre-application discussions. The Government’s general approach is to increase transparency in the planning process. This clarification informs

		<p>Also requests confidentiality in having to disclose commercially sensitive information publicly as not to compromise an applicant's commercial position.</p>	<p>potential applicants the submitted information will be published. Much of the information is available publicly through other avenues such as build costs, land purchase costs etc. Where clearly justified, the viability appraisal can have parts that deemed commercially sensitive redacted.</p>
3		<p>Benchmark Land Value: Recognises the council's preference for EUV 'plus' premium approach when determining land value and asks that market evidence should be used to advise on the premium as recommended in NPPG.</p> <p>Suggests AUV approach should also be considered to take into account specific site considerations, constraints or any specific development/investment cost associated within the sites. Also to be compliant with NPPF and accompanying NPPG: NPPG (para 024) recognises that the alternative use value approach offers more incentive for land owner to sell and for land owner to seek the highest sale price.</p> <p>Take into account site specific considerations and constraints – gives example of the Gas Works sites which is unique in both use and character.</p>	<p>The SPD does indicate the EUV as an aspect to be considered "amongst others". In line with the NPPF site specific considerations such as the cost of remediation would be taken into account where relevant.</p>
4		<p>Review Mechanism:</p>	<p>The SPD refers to the review</p>

			<p>Advanced stage review (60% of sales) should be exceptional rather than applied across the board. Single phased smaller schemes should be treated differently to larger multi-phased scheme. Is there evidence to justify the choice of a 60% figure</p> <p>Where growth assumptions are included in assessment it is not reasonable to include a review mechanism as this would effectively be double counting.</p>	<p>mechanism applying to particularly large schemes involving site wide infrastructure. It would not apply to smaller schemes. Paragraph requiring a viability reappraisal after 60% of a single phased development has been completed has been deleted.</p>
5	Alex Macgregor Mason	Nascot Residents Association	<p>Support the objective of creating mixed and balanced communities” so that no area becomes a quarter or enclave of any one type of housing; defined by tenure or wealth. Notes that the mixture of the housing stock (particularly in the southern area of Nascot) is a key factor not only in maintaining the unique physical character of the area but helps to add considerably to the social character as well.</p> <p>Also recognise that there may well be circumstances when a consolidation of affordable houses has other and competing priorities, so there may be a case for exceptions in order to take account of key worker requirements (around hospitals, for instance).</p>	<p>Comments noted – no change to document required.</p>
6	Mary Forsyth		<p>Supports the SPD overall and understands the pressures of council to provide more affordable homes for people. Comments that irrespective of calculations in terms of revenue generated there will still be considerable constraints to deliver enough homes due to the scarcity</p>	<p>Comments noted – no change to document required.</p>

			of the land. Also notes issues with the limited scope the council has to make more effective use of existing housing stock.	
7	Stephanie Mizen (Jones Lang Lasalle) on behalf of:	Orion (Cassiobridge) Limited, Berkshore Limited, Addison Investment Properties Limited	Agree that the SHMA should be used to inform the overall housing mix.	The SPD says that the type of affordable housing will be considered on a site by site basis – in discussion with the Council’s Housing Strategy team. Additional paragraphs provided for clarity.
8			The SPD says the housing mix should remain in accordance with Core Strategy Policy HS3 - instead it should be negotiated on a site by site basis based on viability of the site and the level of identified need for such provision in the local market area.	
			Viability Review mechanisms should only apply in special circumstances for major large scale phased developments. Agree that if it is found that a higher percentage of on-site affordable housing can viably be provided, this higher amount will only be applied to subsequent phases of the development and will not be applied retrospectively to those already completed. Agree the Council should accept a change in tenure for later phases to better meet local needs.	The SPD refers to the review mechanism applying to particularly large schemes involving site wide infrastructure. It would not apply to smaller schemes. Paragraph requiring reassessment when 60% of a single phase development has been removed.
9	Mr Mike Leslie		One Question, the word "affordable" what does that actually mean to house builders/ Watford Council or Herts County Council? for someone who pay is under the £17,000 per annum mark the word "affordable" is a joke, there is no way someone could afford to live in Hertfordshire (Watford) in a one bed flat pay the essential bills, run a car and food shop. I certainly	The term ‘affordable’ is defined by the Government and includes and includes different housing types. However, it is acknowledged there is some disparity between the definition and what is ‘affordable’ in real terms. No change.

			couldn't afford to do so, I remain living with parents because it's more "affordable" for me to do so. it's a joke for Government, Councils and Builders to class buildings as "affordable".	
10	Mr Ionut Murariu		I suggest that your document should include some Building for Life 12 information.	Building for Life is a useful benchmark to access new dwellings against, however, this is not applicable to this particular guidance document. No change.