

# Appendix 04: Pre 2024 Chronology with Watford Borough Council



## **17\_01\_2019 Duty to Cooperate Meeting between Hertsmere & Watford**

### **Local Plan Updates**

#### **Watford**

- Issues and options consultation completed in October 2018. Approximately 480 responses and 8,400 individual comments. Currently redacting responses before being put into the website (expected end of January). Key issues raised were related to housing numbers and infrastructure.
- Timetable: First draft Local Plan (preferred options) consultation in September 2019. Aiming for submission in March or June 2020 (pending Purdah).
- May need to go out to tender on consultation software prior to first draft local plan being issued for consultation.

#### **Hertsmere**

- Over 2,000 responses. To encourage responses, an 'Idiot's guide' explaining how to use Objective consultation software was published and distributed at exhibitions which worked well. Key issues raised were primarily related to housing, appropriateness of sites and Green Belt. Some responses suggesting to built on employment land to protect the Green Belt.

#### **Shared observations**

- Both authorities taken similar approaches to consultation. Big push on social media to publicise consultations.
- The need for new housing is starting to get through to the public.
- Both authorities embarked on a programme taking topic papers to internal working groups to discuss local plan issues and gain feedback on policy options

#### **Evidence Base Studies**

#### **CIL & Viability**

- Agreed that it would be useful to commission a study to update CIL jointly (SW Herts authorities). Some uncertainty about when the work should be commissioned:
  - Not commissioning a study yet would enable more time for clarity about locations, strategic sites and quantities of future growth; or
  - Commissioning study in the near future would enable the work secure consultants and enable the work to be more easily accommodated as part of a long term work programme increasing the likelihood of getting findings from consultants when required – likely three month lead in time from drafting the brief to appointing consultants. It could be useful to start the work early and progress at a slower speed.

- The CIL study could be consider in three parts:
  - Joint Strategic Plan (JSP) requirements (joint);
  - Local Authority Local Plan requirements (joint);
  - Local Plan viability assessment (individual).
- Watford offered to lead a joint CIL commission.
- Agreed for the issue to be raised for discussion at the next JSP meeting.

#### Economic Study Update (SW Herts)

- Waiting on the SHMA.

#### Green Belt (Stage II) (TRDC, WBC)

- Watford potentially going to commission Stage II work jointly with Three Rivers DC. This would mean all of the Green Belt surrounding Watford has been covered in Stage II assessments.
- Only a small, fragmented section of Green Belt overlaps between Watford and Hertsmere.
- Hertsmere has recognised the need to release some Green Belt land to meet housing need in the next plan period.

#### Gypsies and travellers (DBC, WBC)

- Watford part of the study has been completed.
- An issue that will need to be considered as part of the Joint Strategic Plan.

#### Housing and Economic Land Availability Assessment (HELAA) (WBC)

- Greater certainty about housing numbers that can be accommodated in Watford should be available in late March.
- Watford to send Hertsmere a copy of the HELAA methodology currently being used to assess housing and employment potential.

#### Retail (SW Herts)

- Watford has concerns about releasing retail study prior to the first draft Local Plan consultation. Hertsmere worried that not releasing the study could invite criticism that LPAs are sitting on documents for no justifiable reason. Given the similarities between the local plan timetables, it was agreed to not release study until it becomes urgent or the local plans go out for consultation (would also need to be agreed with SADC, TRDC).

#### Strategic Flood Risk Assessment (DBC, SADC, TRDC, WBC)

- Watford has recently declined an Environmental Information Request to release the work citing it as being incomplete (EIR Reg 12, Para 4).

#### Strategic Housing Market Assessment (SW Herts)

- No recent updates.

#### Water Study (SW Herts)

- Need to finalise the study. Potential implications for any Stage II work that may be required to support respective local plans.
- Hertsmere BC portfolio holder will not sign of the final local plan until the evidence base is in place.

Follow up should be made to John Rumble or higher management to progress the report. Could be useful for Chris Outtersides to broach the issue with HCC to put on a joint front (not agreed but to follow up).

## **Watford Growth Strategy**

- Growth Strategy options have been discussed with Watford Members as part of the Planning Policy Advisory Group (PPAG). Five options considered based on a distribution of high, medium and low sustainability areas with each being tied to a density band (i.e. high sustainability areas associated with high housing density and vice versa). These mapped sustainability areas will be overlapped with sites identified through the HELAA to give an indicative total housing capacity figure.

The density band is to be used as a starting point before considered site specific circumstances that may vary the housing capacity of a site (up or down).

## **Strategic Sites – Watford**

### Site Updates

- Watford Junction (public consultation (developer led) on scheme on 'The Range' part of the site, December 2018)
- Riverwell (permissions granted to date include 503 dwelling and a residential care home of 253 units, 2018)

Western Gateway (permission for 485 dwellings (including 23 storey tower) granted permission, 2017)

## **Housing**

### **Meeting Need**

#### Meeting Future Housing Need

Work to date clarifies that Watford will not be able to meet 10,000 new dwellings over the plan period to 2036. It was suggested that when Hertsmere consider housing sites in the new Local Plan, to have in the background, the possibility of having to consider up to 100 additional dwellings on their annual housing requirement to meet Watford's needs (the same suggestion will be made to other local authorities as part of this series of DtC meetings) – this information is not for wider discussion and will hopefully be clarified in late March

#### Housing Typologies:

- Need to consider distribution of housing types. For example, with higher density development in Watford a higher proportion of flats are likely to be delivered. This could represent an unbalanced housing mix across the borough with a

shortfall of family sized homes coming forward. This shortfall could potentially be met through lower density development in 'less urbanised areas' in neighbouring authority areas. For example, on Green Belt release sites of areas characterised by lower density development close to Watford such as Bushey. Agreed, this is an issue for further consideration.

## **Housing Mix**

### **Five-Year Supply**

- Watford to put its 5-year housing supply statement on to the website late January (up to November 1, 2018). This will be based on 2014 population projections.

## **6. Employment**

### Existing Employment Areas

- Watford identified the need to protect existing employment areas.
- Additional Article 4 directions were issued on January 16, 2019. The notices and letters to be forwarded to Hertsmere to support Hertsmere's work to prepare similar directions.

### Future Employment

- Much of Watford's employment need is likely to be B1 use. It is expected that much of this can be accommodated through redevelopment and intensification of existing employment areas such as Clarendon Road.

In Watford it will be difficult to allocate new employment land. This may be an issue for B2 and B8 uses. Once the HELAA and Economic Study Update are nearing completion Watford will be in a better position to ask neighbouring authorities if they could accommodate employment need is necessary.

## **Infrastructure**

### Infrastructure Delivery Plan

- Watford having 1-2-1 meetings with infrastructure providers to support the Local Plan preparation. Being led by Ellen Higginson in the Watford Planning Policy team.
- Hertsmere had sent out a schedule of 1-2-1 meetings with infrastructure providers to support the JSP preparation.

## **Education**

- Watford will likely be able to provide primary schools to support new development if approaches such as the multi-level school recently opened in Clarendon Road are the norm and get buy-in from Herts CC as the education authority. The borough will not be able to provide traditional schools or supporting playing fields unless this was provided at the expense of residential land. Recent experience indicates new primary schools in Watford area cost about £10m-£12m (less land requirement) to deliver. The St Albans Road scheme cost about £15m (less land requirement).
- It was noted by WBC and HBC that the HCC approach to new school sites involved considerably more land-take than might be necessary
- Watford and Herts CC recently explored potential for a new school in Hempstead Road area, however, the site found not to be suitable.
- Watford currently working with developers involved in part of the Watford Junction site to deliver a 5-storey, 2-form entry primary school on site. Some disagreement with the model being used to predict how many school places are required:
  - Herts CC using a traditional (more rural) model. Russell Monck is the Herts education contact for both Watford BC and Hertsmere BC.
    - [Update: Dan Hardy and Phil Brunt are the HCC education officers now covering Watford]
  - developer using an 'Outer London' model (the latter predicts few school places will be required and is considered by WBC to be a more suitable modelling approach for Watford). Sarah Williams, Department of Education, has been the contact for the developer using the Outer London model.
- Main issue in Watford will be the provision of a secondary school (probably two required) to meet growth in the new plan. A new secondary school near the border of HBC/TRDV/WBC could take some of this need, however, there will be a shortfall in the future. A school in the Bushey area could help meet some of this need for both local authorities.
- School provision considered to be an issue relevant for the JSP to cover.

New secondary school site acquired by HCC on border of Hertsmere and Three Rivers, near Carpenders Park

### **GP Surgeries**

- Likely to come forward when large sites (high number of dwellings) are brought forward.
- A new health centre is now available in Bushey which has some capacity for new residents, however, its location may not be best suited for Watford residents.

### **Community Facilities**

## Community Facilities

Important to consider the availability of facilities located across the local authority boundaries when assessing considering the positive and negative attributes of potential site allocations.

## Transport

### Connectivity

Watford raised the potential for a Park & Ride facility supported with an additional bus lane along Stephenson Way (in Hertsmere) to improve commuting into Watford Junction, Clarendon Road employment area and the Watford town centre. It was agreed that while this would benefit the area, this was not a new proposal and is a project likely to be considered in the long term rather than as part of the current local plans being prepared.

## Waste & Minerals

- Facility is protected by the Herts CC Minerals Local Plan, however, its location in Watford has sterilised a significant amount of land that could support high density housing in a sustainable location. Issues raised to clarify that Watford would support the relocation of the facility if any alternatives were available in the future.10. Neighbourhood Plans

### Neighbourhood Plans:

#### Oxhey

- Potential for a neighbourhood forum to be set up.
- Increasing concerns being raised by Oxhey residents about development coming forward in the Bushey area.

#### Hertsmere

Two neighbourhood plans (Radlett and Shenley) but unlikely to be any direct implications for Watford.

### Consultations

- If neighbourhood plans come forward that could affect adjacent areas, agreed neighbouring authorities will be consulted when brought forward for designation.

## **18\_06\_2019 Summary of Duty to Co-operate Meeting between Watford Borough Council and Hertsmere Borough Council**

### **Local Plan Updates**

#### **Watford**

- Preferred Options consultation scheduled for late September 2019, with publication aimed for May 2020.
- Policy direction: retain and intensify employment areas.
- North Hub Masterplan (north town centre regeneration) planned for mid-July 2019 consultation.
- Strategy uses sustainability zones to set housing densities (45–70, 55–95, 95+ d/ha, up to 350 d/ha).
- Watford unable to meet full housing need; policies around parking and separation distances being revised to increase capacity.
- Meeting planned with GLA; Hertsmere requested feedback.

#### **Hertsmere**

- Local Plan timetable aligns broadly with Watford's.
- 2018 Local Plan consultation responses now published; infrastructure was a key issue.
- A garden village is likely to form part of the borough's growth strategy, with Urban & Civic supporting higher densities.
- Councils to share consultation strategies.

## **2. HELAA (Housing & Economic Land Availability Assessment)**

#### **Watford**

- HELAA reduced 480 sites to approx. 50 developable sites. Supports approx. 6,500 dwellings + 1,200 windfall units (based on 70 units/year).
- Most sites fall within high sustainability (95+ d/ha) areas, affecting the housing mix.
- Identified a significant shortfall of B2/B8 land.
- Proactively writing to landowners due to limited supply.
- Will formally request neighbouring authorities to consider accommodating Watford's unmet need.

#### **Hertsmere**

- Using an accessibility mapping approach to identify suitable growth locations (also used in JSP work).
- Watford emphasised large sites should deliver densities above 40 d/ha to minimise Green Belt pressure.

### **3. Infrastructure**

#### **Infrastructure Delivery Plan**

- Watford progressing its IDP through 1-2-1 provider meetings.

#### **Education**

- Watford can likely deliver primary school places, subject to updated provision models with HCC.
- Watford cannot provide secondary school capacity for growth; cross-boundary solutions required.

#### **Health**

- Hertsmere requested an update on the Watford hospital position; Watford to follow up.

### **4. Transport**

- Workshops underway to explore options as an alternative to the Metropolitan Line Extension, led by Steer Consultants.

### **5. Evidence Base Studies**

- Green Belt Stage II (joint with Three Rivers): draft due July 2019.
- Playing Pitch Strategy: Watford commissioning in July, expected completion March 2020. Hertsmere preparing similar work jointly with Three Rivers and Dacorum.

### **6. Any Other Business**

- None.

### **7. Next Meeting**

- Scheduled for late August / early September, with Portfolio Holders invited.

## **12\_09\_2019 Letter from Watford Borough Council to Hertsmere Borough Council regarding Unmet Needs.**

### **Duty to Cooperate: Request to Consider Unmet Development Needs in Watford**

Watford Borough Council is progressing work on its new Local Plan. This will cover the period from 2020 to 2036. As part of this process, the council has been engaging with its neighbours and other stakeholders to consider a range of issues from the local scale to those of more strategic importance. The collaborative work on the South West Hertfordshire Joint Strategic Plan is part of this process. However, this will not be in place to inform the new Watford Local Plan but more likely be evidence to support a review later in the plan period.

There are a number of key issues that need to be considered in both the local and strategic contexts. This includes meeting identified needs for housing, employment and infrastructure (e.g. school provision). To inform the new Local Plan, Watford Borough Council has undertaken an assessment of potential land that is available for development to support the growth needs of the borough during the next plan period. The findings from the Housing and Economic Land Availability Assessment (HELAA) has indicated that Watford will not have enough land available that can be allocated to meet its growth needs for housing, employment (particularly B2 (General Industry) and B8 (storage and distribution)) and school provision.

In the event that a local authority cannot meet its growth needs the National Planning Policy Framework (para 60) states the following:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

Therefore, Watford Borough Council are requesting that Hertsmere Borough Council consider if they can accommodate some of the growth shortfalls identified by Watford Borough Council as part of their new Local Plan.

### **Work undertaken by Watford Borough Council**

A thorough examination of land available for new housing has been undertaken as part of the HELAA. This identifies potential land to support housing, employment and other forms of development such as community facilities. This process has undertaken a thorough review and considered all forms of land and these have been screened through several phases to conclude if they are suitable, achievable and available. The final outcome identified a range of deliverable sites for inclusion in the local plan.

An approach to new development will be set out in the new Watford Local Plan as part of an overarching growth strategy that reflects key principles of sustainability and its primary elements related to economic, environmental and social benefits.

## **Housing**

Government guidance stipulates that to identify local housing need the standard objectively assessment need methodology is to be used. The housing figure derived from this formula is to be the starting point. To deviate from this figure, it must be clearly demonstrated that this is not achievable.

Watford has an annual requirement for 793 dwellings per annum at present. Over the plan period this is equivalent to 12,688 new dwellings to be delivered in the borough. The Housing and HELAA has currently identified that approximately 7,600 new dwellings (including windfall development) can be delivered in Watford from 2020 to 2036.

This means there is an indicative shortfall of approximately 5,000 new homes (including its proportion of affordable housing). Work is continues on finalising the housing numbers, however, it is clear there will be a significant shortfall and consideration will need to be given as to how this could potentially be met. The Council will inform you of any change in this shortfall figure.

Watford Borough Council is not lightly requesting assistance to meet it shortfall. The council has recognised that it needs to exhaust its potential and do all it can to meet as much of the housing target as possible before making this request. A key principle to identify the capacity for new development was making the most effective use of land that is available. Based on this, the following steps have been taken as part of the process:

Setting out a growth strategy based on sustainability principles

- Intensification of existing built up areas when they come forward for development
- Identifying a windfall requirement reflecting past trends of small scale development, though this is currently being kept under review Page 3 of 5
- Identifying significantly increased housing densities for new development
- Identifying areas that are suitable for mixed use development where the uses are compatible
- Revising the adopted Watford Residential Design Guide Supplementary Planning Document to make better use of land and facilitate higher density development through good design
- Proactively scouring the entire borough area and contacting landowners to establish if a site is available for redevelopment (these may be used for alternative uses other than residential at present)

- The potential areas of land designated as Green Belt will be considered later in the year following an objective assessment (this is unlikely to be significant due to other 'non-Green Belt' related constraints).
- Engaging with the community to ascertain comments about issues and opportunities associated with higher density development
- Applying reduced parking standards to make more effective use of land and better reflect access to services and facilities.

The entire process has been detailed in the HELAA methodology which was sent to the local authorities in South West Hertfordshire in June 2019.

## **Employment**

Watford is a regional centre for economic and retail activity supporting the wider South West Hertfordshire area and provides an attractive alternative location for office based businesses that may not necessarily need to be located in central London. One of the key objectives of the new Watford Local Plan will be to strengthen the economic output of the area and support future growth and investment.

The draft South West Hertfordshire Economic Study Update (2019) has indicated that Watford may need to provide the following floor space requirements during the next plan period:

- 37,600 sqm for B1a/B1b uses (office/research and development)
- 27,000 sqm for B1c/B2 uses (industrial)
- 71,400 sqm for B8 uses (storage and distribution)

Watford economic strength is based on office based uses (B1a/B1b), primarily in the Clarendon Road area. This is complemented by other types of employment such as industry (B1c/B2 uses) and, to a lesser extent, storage and distribution uses (B8). A balance of uses supports a healthy economy, however, Watford will struggle to provide significant land to support B1c/B2 and B8 uses. It is likely Page 4 of 5 that Watford will be able to support the floor space need for office uses. The following steps have been taken to support economic prosperity and future growth:

- Setting out policies to support mixed use development where the uses are compatible
- Support intensification of existing employment areas
- A policy approach that requires no net loss of employment floor space when intensification of mixed use development comes forward
- Issuing article 4 directions to all properties located within designated employment areas to reduce the loss of floor space from employment uses to residential.

## **Secondary School Provision**

New development will require the provision of new education facilities. Watford Borough Council are involved in on-going discussions with Hertfordshire County

Council, the education provider. Watford Borough Council anticipates being able to meet its need for primary school provision, however, this will require a more innovative approach that facilitates new facilities on smaller plots of land than traditionally delivered in the area. The Watford Local Plan will not be able to provide secondary school places to support the new housing growth during the plan period. Therefore, a request is being made to consider through collaborative work with the education authority, on how best to provide secondary education facilities and places to meet Watford's growth (this includes growth within its administrative boundary and growth associated with unmet need outside of its boundary).

### **Identifying how much need can be accommodated**

How much of Watford's unmet housing, employment and education needs can be accommodated should be identified through capacity related work being undertaken to inform your respective Local Plan. In this regard, Watford Borough Council is not setting out specific figures as part of our request. Watford Borough Council would like to request, that due diligence be given to how your respective Local Plan can support unmet needs from Watford as part of the growth trajectory of the South West Hertfordshire region through the following considerations:

- **Housing**
  - Allocating land for residential use where this is suitable, achievable and available identified through urban capacity related work
  - Making efficient use of land through the use of appropriately set higher development densities than traditionally delivered
  - Providing a housing mix that would complement future residential growth in Watford area that will contribute towards balanced communities Page 5 of 5
  - Any additional housing need to be provided be merged into the overall housing target (including affordable housing)
  - Proportional parking standards to make most effective use of land and reflect patterns of sustainable development
- **Employment**
  - Allocate additional employment land to support B1c/B2 (industrial) and B8 (storage and distribution uses) to complement existing economic strengths identified in the local area that could support the wider SW Herts economy if land is potentially identified as available through the urban capacity work
  - Support intensification and mixed use development where this is appropriate
- **Education facilities**
  - Consider the number of schools and respective sizes (forms of entry) allocated to support new residential growth
  - Location of secondary schools in the proximity of Watford (distance and accessibility using public transport)

The issues outlined in this letter and the subsequent request will be discussed through continued collaboration to meet the requirements of the Duty to Co-operate

while also undertaking an approach reflective of good practice. Please note, that while you have received this request, an equivalent request will also be made to local authorities located nearby.

If you have any queries relating to this request please contact me to discuss.

**15\_07\_2019 – Email sent from Hertsmere Borough Council to Watford Borough Council.**

Thank you for your letter and we will consider its contents further over the coming weeks and months, in consultation with our Portfolio Holder.

We note that your letter refers to the fact that ‘potential areas of land designated as Green Belt will be considered later in the year following an objective assessment’. Although you have indicated this is unlikely to yield any significant outcomes due to other constraints, we would be grateful if you could keep us informed of this additional consideration as it has the potential to impact on Hertsmere in terms of both how we might respond to your request and more broadly, in land use planning terms given the proximity to Hertsmere.

**06\_12\_19 Email from Hertsmere Borough Council to Watford Borough Council regarding IDP**

Hertsmere Borough Council has appointed consultants ARUP to prepare an Infrastructure Delivery Plan (IDP) to establish the level of infrastructure provision (and associated cost) required to support growth in the Borough to 2036.

The IDP will also provide a basis for developing our new Infrastructure Funding Statement (IFS), which will set out the Council’s spending priorities for infrastructure projects to be funded through money we have collected from developer contributions (both via our Community Infrastructure Levy and through S106 agreements).

In order to make our Infrastructure Delivery Plan as comprehensive as possible we are contacting duty to cooperate bodies to ask for any input that they have. If there are any cross-boundary infrastructure issues or other relevant information you think we should be made aware of please let us know.

The council would be happy to receive any comments that you have by email but if you would like to speak to our consultants about the IDP and any concerns that you can also book a time slot to speak with them. Please refer to the tables below and let us know your availability.

If you could please send any comments by Friday 20 December 2019 or if you would like a call instead, your availability as soon as possible.

Organisation	
Contact Name	
Job Title	
Contact Email	
Contact Phone	

Time	Mon 09 Dec	Tue 10 Dec	Wed 11 Dec	Thu 12 Dec	Fri 13 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					
15:00 – 17:00					

Time	Mon 16 Dec	Tue 17 Dec	Wed 18 Dec	Thu 19 Dec	Fri 20 Dec
09:00 – 11:00					
11:00 – 13:00					
13:00 – 15:00					
15:00 – 17:00					

Thank you for your time and cooperation.

## **December 2019 - Watford Local Plan DtC Request and Hertsmere Borough Council Response**

Thank you for your letter of 12 July 2019 requesting consideration of the unmet development needs in Watford.

Please note that this letter represents an informal response based on officer opinion only, and should therefore be considered as such. The purpose of the letter is to help inform Watford of the process being conducted in Hertsmere to meet its own development needs, and whether we have the capacity and capability to meet some of Watford's identified unmet development needs.

Hertsmere is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036.

As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. In November, Hertsmere consulted on the Potential Sites for Housing and Employment (PSHE) document. This identified and summarised site proposals put forward by landowners and developers for possible inclusion within our Local Plan. In total, over 2,100 individual responses were received. Documents summarising the responses received from the both the general public and, site promoters, statutory bodies, and local interest groups can be found online.

### **Housing**

The Borough's adopted Local Plan is made up of the Core Strategy (adopted in January 2013), the Elstree Way Corridor Area Action Plan (adopted in 2015) and most recently, the Site Allocation and Development Management Plan (adopted in 2016). The Local Plan sets out the requirement for housing provision for the Borough between 2012 and 2027, which equates to 266 dwellings per annum. The Council's strategic policies were five years old as of January 2018, towards the end of the 2017/18 monitoring year.

During this time, a new NPPF and PPG have been released and subsequently updated. One of the most substantive changes in the revised framework and PPG is the new standard method for determining the minimum number of homes needed in local areas, which has resulted in a significant increase in the housing delivery targets. The government recently advised that the 2014 sub-national population projections are to be used as the basis for calculating housing need rather than the 2016 projections. For Hertsmere this equates to a further increase in need, amounting to 714 homes per year or 12,852 homes over an 18 year plan period (plus a 5% buffer).

Hertsmere's housing capacity is considered to be solely that which can be developed on urban land, and includes all sources on land not covered by Green Belt designation. There is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13). This new advice applies in any event to ensure the most effective use of land and applies as a preliminary requirement prior to

assessing where the Green Belt land needs to be taken and whether exceptional circumstances exist for doing so.

Given this consideration, and the requirements within the NPPF Feb 2019, the updated HELAA (2019) reassessed the council's brownfield land allocation, to ascertain Hertsmere's housing capacity and ensure that urban land was maximised. This included:

- 1) Reviewing the densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- 2) Assessing the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
- 3) Reviewing the achievability and deliverability of Hertsmere's owned assets.
- 4) Contacting owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

This process concluded that there is still a significant shortfall between the potential capacity of Hertsmere's urban land and the level of identified need. Hertsmere is therefore unable to consider Watford's unmet housing needs as this capacity is not sufficient to meet our own need.

It is only once we identified this shortfall against housing need that the Council has considered looking at Hertsmere's Green Belt to see whether "exceptional circumstances" exist to justify release. There remains the possibility of asking neighbouring authorities to take some of the growth shortfalls identified within Hertsmere but it is recognised that most authorities within the Housing Market Area (HMA) are already having to consider Green Belt release to meet demand. In regards to the neighbouring London Boroughs of Harrow, Enfield, and Barnet, we will be writing to them to enquire whether they have any additional capacity to meet Hertsmere's identified need.

However, in the absence of a joint plan for the South West Herts Authorities which would involve a comprehensive and comparative assessment of Green Belt land, the Council considers that exceptional circumstances do not exist for Hertsmere to release some of its Green Belt to meet the housing requirement of neighbouring authorities.

## **Employment**

The letter identifies that Watford does not have enough land available to meet its growth needs for employment (particularly B2 (general Industry) and B8 (storage and distribution)), and that the draft Economic Study update provides the following floor space requirements:

- 37,600 sqm for B1a/B1b uses (office/research and development)

- 27,000 sqm for B1c/B2 uses (industrial)
- 71,400 sqm for B8 uses (storage and distribution)

According to the Economic Study this would equate to approximately 28.5 ha of employment land (3.8ha B1a/b, 6.8ha B1c/B2 and 17.9ha B8) and we will look to prioritise the meeting of our own employment needs. Your letter indicates that Watford anticipates meeting its need for office use but that you will struggle to provide significant land to support B1c/B2 and B8 uses. However, given that our HELAA identified a shortfall of urban sites to meet future jobs growth, we will need to demonstrate that exceptional circumstances exist to justify green belt release for economic development.

The scope, scale and location of employment-led development is still being considered but deliverable land has been promoted on the edge of Hertsmere's designated employment areas (including Centennial Park, Otterspool Way and Elstree Way) for the potential allocation of any additional employment land for B1a/B1b, B1c/B2 and B8 uses. These new allocations will need to

complement the existing employment areas nearby which would typically include

- firms within the creative industries
- scientific research and development
- finance and business services

## **Education**

Hertsmere accepts that any new development will require additional provision of new educational facilities and discussions have been ongoing with Hertfordshire County Council (HCC), as Local Education Authority, to establish the scale of demand and the quantity of new schools required.

Through our discussions with HCC, the need for and possible locations for secondary schools within the borough have been identified, which includes locations within Bushey. Whilst ideally the council would want for schools to be located within proximity of the residents which they serve, we recognise that parental choice and the wide range of education providers, means that secondary schools serve a wider catchment.

Further discussions would need to be held in order to establish the level of demand from Watford which cannot be met within your local authority area and whether additional school capacity could meet this need within Hertsmere. We would be happy to invite you to these discussions along with consideration of how the required infrastructure for these schools facilities will be funded and delivered.

The council will continue to discuss the issues covered in this response through continued collaboration with all relevant parties as part of the Duty to Co-operate requirements and the emerging joint strategic plan for South West Hertfordshire.

This informal letter provides a direction and basis for discussions going forward and we look forward to further engagement with Watford in relation to the production of both authorities' Local Plans.

## **Hertsmere Response to Watford Draft Local Plan (2020–2036) Summary**

To Watford Local Plan Team,

Thank you for consulting Hertsmere Borough Council. The following letter comprises an informal response based on officer opinion only, and should therefore be considered as such. The content of this letter is in response to the consultation on Watford's Draft Local Plan which will run from 2020 to 2036.

### **Duty to cooperate and collaborative working**

Hertsmere encourages collaborative working between neighbouring authorities, and acknowledges that it is part of both the Housing Market and Functional Economic Market Areas for South West Herts, and thereby shares a responsibility for creating an environment that meets the demands for growth in the area.

The NPPF encourages councils to first address their own identified need, which equates to 714 homes per year or 12,852 homes over an 18 year plan period (plus a 5% buffer) for Hertsmere, and the implications of this level of development. Bearing in mind that Hertsmere's current housing capacity is considered to be solely that which can be developed on urban land, and therefore does not include any sources of land covered by Green Belt designation.

The council feels that the wording used within the collaborative working section of the Local Plan suggests that any of Watford's unmet need should automatically be met by the rest of the districts within the Housing Market and Functional Economic Market Areas. Hertsmere would ask for further clarification to be provided on this point with an acknowledgement, in line with the NPPF, that the starting point is for local authorities to address their own needs. We also recognise the requirement to consider addressing the unmet need of neighbouring authorities across the longer term and this work is also progressing through the Joint Strategy Plan for South West Hertfordshire.

### **Housing density**

In light of the above, we welcome the focus on optimising the use land and recognise that Watford has insufficient land to meet its level of need. However, we would suggest that Policies H4.1 and DC7.1 are clearer about how densities will be maximised outside of allocated sites, given that the lower end of high sustainability zones (other than SDAs) is relatively modest at 95 dwellings per hectare. Although this is a minimum standard, it may invariably become the default acceptable density in high sustainability locations.

### **Strategic development areas**

The Draft Local Plan defines a number of Strategic Development Areas, including Bushey Station and Lower High Street. Both of these sites are in close proximity to

Hertsmere and in particular Bushey. Whilst Hertsmere recognises that both these sites represent opportunities for growth in accessible and sustainable locations, the council would like for further clarification into the infrastructure provision for both of these sites. Hertsmere supports Watford's proposals for higher density development in sustainable locations and proposals to reduce the reliance on the road network. Nevertheless, the mode of delivery for key services, with particular reference to healthcare and secondary school provision, to support these growing communities needs further explanation given that facilities in Bushey serve a wider catchment. Hertsmere would therefore want to be included as part of the process relating to developer contributions (S106 and CIL) and infrastructure provision.

## **Conclusion**

Overall, Hertsmere supports the key principals within Watford's new Draft Local Plan, including the redevelopment and intensification of land in sustainable locations. The council appreciates that Watford have taken to significant steps to address their identified need, and accept that there is unlikely to be enough suitable land to meet their targets. As part of the duty to cooperate Hertsmere will be open to further discussions about how long term growth requirements can be addressed across the wider Housing Market and Functional Economic Market Areas

## **31\_01\_2020 - DtC Letter to Watford Borough Council from Hertsmere Borough Council (Summary)**

### **Hertsmere Local Plan**

Hertsmere Borough Council is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036.

As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. The standard national methodology for assessing housing need has resulted in an annual requirement of 750 homes per annum (incorporating a 5% buffer, as required by the NPPF) or 13,500 homes over the plan period. By comparison, our current Local Plan which was adopted 2013, has an annual housing requirement of 266 homes. That Plan is now more than five years old and therefore deemed to be 'out of date' in determining our future strategic growth requirements.

We recognise that there is an agreement in principle to progress a joint plan for the South West Herts Housing Market Area, which would involve a comprehensive and comparative assessment of Green Belt land. Clearly this will not be in place in time to inform our new Local Plan and there remains a need for Hertsmere to bring forward this new plan without delay.

Following a Call for Sites, we have consulted on a Potential Sites for Housing and Employment document which identified and summarised the site proposals initially put forward by landowners and developers. Hertsmere's current housing and employment land capacity is considered to be solely that which can be developed on previously developed land and includes all sources on land not covered by Green Belt designation. We also recognise that there is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13) as a preliminary requirement prior to assessing where Green Belt land might be taken and whether exceptional circumstances exist for doing so. Given these requirements and to ensure that previously developed land is maximised, we have set out to:

1. Review the housing densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
2. Assess the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
3. Review the achievability and deliverability of Hertsmere's own land assets.
4. Contact owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

Our Housing and Economic Land Availability Assessment (HELAA), published in 2019, points to a capacity of less than 2,500 homes on previously developed land. This includes an allowance for windfall development and existing commitments. We

are hopeful that around two-thirds of our employment requirement of over 25ha of employment can be accommodated within land which has previously been safeguarded for such purposes in our current Local Plan.

There is therefore a very significant shortfall between the potential housing capacity of Hertsmere's previously developed land and the level of identified need, as well as a clear deficit of land required to meet employment needs over the plan period. As an authority with almost 80% of its area designated as Green Belt, we are therefore asking you whether your authority is able to accommodate some of the growth shortfall identified within Hertsmere. A similar request has also been sent to all neighbouring authorities and other authorities within our HMA.

We are intending to arrange a Duty to Co-operate workshop in due course to discuss our emerging plan and potential cross boundary issues arising, and will be in contact again with more details about this event. In the meantime, I would be grateful for a response to this letter at the earliest opportunity.

If you have any queries relating to the above request, please do not hesitate to get in contact.

## **10\_02\_2026 Email from Hertsmere Borough Council to Watford Borough Council regarding the IDP.**

As mentioned at a recent SW Herts meeting I was wondering if you or a colleague were able to rely to the email below, sent by my team on behalf of consultants ARUP, who are carrying out an update to our Infrastructure Delivery Plan (IDP)?

In particular they are keen to know your thoughts on the following questions:

1. To what extent do you consider there to be cross-boundary infrastructure linkages with Hertsmere, e.g. transport corridors, education flows, shared reliance on utilities?
2. Are there any notable infrastructure improvements in the pipeline in your local authority area that might be of relevance to Hertsmere?
3. Is there any infrastructure within Hertsmere which you will potentially be reliant upon to accommodate future growth within your local authority area?

I have taken the liberty of advising them as follows, but please let me know if there is anything I have missed. Alternatively, if you would like a more detailed chat, please contact Rob Webster at ARUP direct (cc'd into this message).

- Water – potable (general issue across county) and waste (future capacity issues at Blackbirds and especially Maple Lodge Waste Water treatment works)
- Strategic Road network – particular importance of the M1, M25 and A414 to transport movements within the area. A41 also a key corridor
- Local road network – local pressures and congestion
- Secondary schooling – complicated cross boundary relationships due to parental choice based on selection / faith / OFSTEAD ratings and lack of space for school expansion / new schools in Watford. Issue particularly affects the Bushey area.
- Rail – Whilst not on the same line as stations in Hertsmere, the Watford / Euston line is well used by residents on the western side of the Borough.
- Green Infrastructure – general links
- Health – Watford is the closest hospital for many Hertsmere residents. I would expect there to also be strong movements between residents of Watford and Bushey in terms of where they also access GP provision.

**19\_05\_2020 – Watford Borough Council Response to Hertsmere Borough Councils Letter regarding Unmet Housing need.**

**Re: Hertsmere Local Plan**

**Thank you for your letter dated 31 January 2020 with regard to the request for assistance to help meet some of Hertsmere Borough Council's unmet development needs.**

The Government's methodology to calculate the housing figure for respective local authorities across the country has placed many development challenges for local council's to address. Watford Borough Council has recently undertaken an assessment of the development capacity within its administrative area as part of a Housing and Economic Land Availability Assessment (HELAA) prepared to support Watford's first draft Local Plan consulted upon in autumn 2019. A significant shortfall in excess of 5,000 homes and more than 98,000 sqm of employment floorspace is identified as part of this work.

Watford is currently reviewing its HELAA in response to consultation representations and further contact with landowners. However, the unmet need within Watford remains and will likely be carried forward into the final draft Local Plan anticipated later in the year. Therefore, Watford Borough Council will be unable to help support Hertsmere Borough Council's request related to unmet need.

We welcome the ongoing engagement between our two authorities with regards to our respective local plans and as part of the South West Hertfordshire Joint Strategic Local Plan being progressed to meet the development challenges ahead.

## **26\_01\_2021 Email from Hertsmere Borough Council to Watford Borough Council**

I hope this email finds you well. To introduce myself, I am the Strategic Sites Officer for Hertsmere's Local Plan team. I am currently working on the new sporting provision to be provided across the Borough as a result of projected levels of new growth.

Within the Bushey settlement, as highlighted within our KKP PPS and from liaison with Hertfordshire County and Sport England, we are planning to provide a new secondary school and 3G football pitch purposed to also serve the Watford catchment. In addition to this this, off-site contributions generated by Bushey's growth for cricket and rugby will be allocated towards clubs within the Watford Borough boundary.

We were therefore hoping that in turn, football and other contributions generated by your growth could be put towards facilitating the Bushey 3G pitch and secondary school?

I look forward to hearing from you.

## **12\_02\_2021 Summary Duty to Co-operate Meeting Between Watford Borough Council and Hertsmere Borough Councils**

### **HBC Local Plan update**

An update on progress on the HBC Local Plan was given. The most noticeable change from previous information was the new Employment 'Call for sites' that runs until 18<sup>th</sup> March.

If any significant new sites emerge the programme for the Local Plan may need to be reviewed, but at present it remains as per the published LDS.

### **WBC's publication plan**

#### ***Approach to meeting housing needs***

WBC outlined their approach to housing numbers and the work supporting windfall assumption that forms part of this overall figure. HBC Officers agreed that they were satisfied with the explanation given for the 2k plus unit assumption and evidence supporting this.

#### ***Addressing other unmet needs***

It was noted that WBC's Publication Plan over-provides office space and under-provides on industrial / storage and distribution needs compared to the district level split recommended in the SW Herts Economy Study. It was agreed that the two authorities would liaise further after the 18<sup>th</sup> March when HBC's call for employment sites process ends, to establish if that process has generated any potential opportunities for HBC to assist meeting any of WBC's unmet needs. It was noted that any additional sites were expected to be within the Green Belt, so exceptional circumstances would need to be demonstrated to support their release. It was however agreed that it was important to try to meet SW Herts needs across the FEMA, if district-level figures were not able to be met due to accepted land constraints and varying market conditions operating within the FEMA.

**Action:** *ALL to ensure issue is articulated through the SW Herts level SoCG, as well as any SoCG between the two councils.*

#### ***Other matters***

HBC advised that when informally briefed on HBC's emerging spatial strategy, some Members had raised questions about the need for a new secondary school to be provided in the Bushey area to help meet HBC's and WBC's future needs, as there was a perception that there were suitable sites within the Watford area. JC explained with reference to the Publication Plan policies maps that there were very few strategic-scale sites and those there are were either being allocated for housing development, or were subject to existing permissions. This included the areas

around the football club, hospital and retail parks. All other larger areas of open space are within flood zones and therefore kept development free. HBC Officers were satisfied that no potential secondary school sites remained unexplored.

**Action:** JG to provide further information on Riverwell site for HBC Officers to share with their Members if required.

WBC explained that their approach to new residential development is for it to be able to be adapted to zero-carbon, rather than achieve zero carbon immediately. This was based on the outcome of the viability testing and desire not to affect the ability of sites to deliver affordable housing. Lots of the climate change mitigation measures were being achieved via other policies i.e. sustainable transport and GI policies: it's not all about energy reduction. HBC advised they were currently exploring these viability issues with BNP Paribas, as the clear Member steer was for an absolute zero carbon requirement for new developments.

WBC explained the wording of their affording housing policy has been developed with input from housing colleagues and the wording left intentionally flexible (i.e. no specific reference to First Homes) to avoid it becoming out of date if Government definitions and priorities change regarding different tenure types. The priority of the affordable housing policy wording is to secure 60% of total affordable units as social rent, with the remaining 40% as an unspecified tenure, to allow for viability. The concept of tying affordable rent levels to housing allowance payments had been considered, as suggested by the SW Herts Local Housing Needs Assessment, but proved overly complicated. A 450 unit threshold for Build to Rent reflected evidence that this type of provision was not viable on smaller sites.

HBC noted that the WBC plan was a very well presented and articulated document. HBC's response was expected to be of general support with a limited number of (non-soundness) issues noted, including:

- The policies map is very hard to read across the borough boundary i.e. it is hard to establish the location of sites within Watford to land outside as roads etc are now shown beyond WBC's boundary.
- The reference to the SW Herts JSP being a 'non-statutory' document is incorrect in para 1.6. It should instead refer to it not being a statutorily required document.

**Action:** HBC to formally respond to the WBC plan.

### **Potential for cross boundary developer contributions to support growth**

The potential for cross boundary developer contributions was discussed – both in terms of what could be spent and collected in the two areas as a result of development with cross boundary implications for things such as sports provision and schooling.

WBC accepted that new residential schemes in the eastern part of Watford would be passed to HCC for use in funding a new secondary school in Bushey, as the areas were within the same secondary school planning zone. It was also noted that Bushey was an 'attractor' of people to local sports clubs.

WBC advised that their Playing Pitch Assessment indicated no additional 3G pitch needs, so it may be hard to justify a contribution to a 3G pitch in the Bushey area, especially as there was a new 4D pitch on the other side of Watford. Catchment areas would need to be checked and advice taken from Sport England.

**Action** – HBC, WBC and Sport England to liaise re pitch provision and location issues.

### **Other cross boundary matters**

None.

### **SoCG update**

It was agreed that a SoCG would be prepared, and that this would be based on the document template currently being trialled by WBC and DBC. A first draft had been prepared, but it was expected this could be simplified and refined in terms of content. Officers to liaise further.

### **AOB**

WBC advised that they had failed the Housing Delivery Test so were working on developing an Action Plan. This would focus on internal processes and review mechanisms.

## **March 2021 Summary of Hertsmere Borough Council's Response to Watford Borough Council Regulation 19 Local Plan**

Thank you for consulting Hertsmere Borough Council. The content of this letter sets out HBC's response to the consultation on Watford's Final Draft Local Plan which will run from 2018 to 2036. Its content have been informally agreed with Cllr Harvey Cohen, Planning Portfolio Holder.

### **1. A spatial strategy for Watford**

Hertsmere encourages collaborative working between neighbouring authorities, and acknowledges that both authorities form part of the Housing Market and Functional Economic Market Areas for South West Herts, and thereby share a responsibility for creating an environment that meets the demands for growth in the area.

Hertsmere understands that the limited space available within Watford presents challenges when addressing large scale growth; in particular the provision of new infrastructure. The provision of new high quality infrastructure will be vital to ensuring that Watford meets its sustainable development objectives, and given Watford's key role within South West Herts it is important the suitable consideration is given to improving the connectivity between Watford and the neighbouring boroughs. The South West Hertfordshire Joint Strategic Plan will help to address help to address cross-boundaries issues towards the later phases of the Local Plan period and as Local Plans are reviewed. However, it is important the current relationships between the different districts are fully considered at the beginning of this Local Plan period along with the potential implications of any planned growth.

Paragraph 1.6 relating to the JSP does require amending as it does not reflect intentions. Rather than referring to the JSP not being a 'statutory document,' it should refer to it not being a 'statutorily required' document.

### **2. Core development areas**

Hertsmere supports Watford's proposals for higher density development in sustainable locations and proposals to reduce the reliance on the road network. Nevertheless, the mode of delivery for key services, with particular reference to healthcare and education provision, to support these growing communities would benefit from further explanation. The supporting text makes reference to community infrastructure proposals however the onus has been put on applicants to identify land and it would be helpful to further articulate how this will be secured and brought forward in a timely manner.

Currently there is little reference to the interrelationship between facilities within Watford and neighbouring boroughs. Further information is required to establish the connection between existing neighbouring facilities and Watford. Hertsmere would want to be included as part of ongoing discussions relating to developer contributions (S106 and CIL) and infrastructure provision.

The Draft Local Plan defines three Core Development Areas, which will support 80% of the allocated development, including The Colne Valley. This area is in close proximity to Hertsmere and in particular Bushey. Whilst Hertsmere recognises that this area represents opportunities for growth in accessible and sustainable locations, the council would like for further clarification into the infrastructure provision for both of these sites. Policy CDA2.3 states that a new primary school will be provided as part of the development parcel and Hertsmere would seek further information on the size, location and timetable for this development.

All three Core Development Areas include the provision of public transport priority routes. Hertsmere support proposals to improve the public transport to the key facilities within these areas including to Watford Junction, Watford Town Centre, Vicarage Road Stadium, Watford General Hospital and Watford High Street Station. All of these facilities have large catchment areas which draw a significant proportion of residents from the neighbouring boroughs. Opportunities should be considered on how best to integrate these improvements into existing and/or new public transport improvements in the wider area. Growth in these locations will have to be carefully designed and managed to ensure access to these key strategic facilities isn't inhibited.

### **3. Homes for a growing community**

Watford's Local Plan makes provision for 14,988 additional homes. Hertsmere supports the fact that Watford will be looking to fully address the identified local need through the government's standard methodology. Although the windfall assumptions within the plan are high, we consider that these are sufficiently justified by evidence.

The Local Plan proposes at least 35% affordable housing and a minimum of 60% of new affordable homes as homes for social rent. Whilst Hertsmere supports the principle of delivering a high number of homes for social rent, it is important to ensure that these levels are viable. It is understood that BNP Paribas have advised on this matter – and are also similarly advising HBC. For information, Hertsmere are considering a 40% requirement for affordable housing on schemes within Bushey. It is assumed that 40% has been proven to be unviable in Watford?

Whilst the Local Plan is clear about how the overall housing number is going to be met it lacks detail in terms of how the various different types of housing are going to be brought forward, and how the various needs of different groups are going to be met including:

- Specialist and care housing
- Student, Co-Living and Non Self Contained Accommodation
- Gypsies and Travellers

### **4. A strong economy**

Watford's Local Plan makes provision for 111,175sqm of office floorspace and 40,759sqm of industrial floorspace. Hertsmere understands that limited land supply makes it difficult to meet the requirements for industrial floorspace. The overprovision of office floorspace needs to be balanced with wider needs for all types of employment space across the Functional Economic Market Area.

Hertsmere accepts that Watford is an important employment hub however evidence suggests that the need for office uses exists elsewhere within the SW Herts area. The strategy should look to also provide suitable employment facilities across South West Herts, reflecting the demand for employment space close to all areas of population.

## **5. A Vibrant Town**

Hertsmere recognises the importance of Watford as a sub-regional retail centre. It is therefore important that any development gives due consideration to impact on existing linkages between Watford and the wider area, and the need for improved accessibility for those travelling from slightly further afield. Furthermore Bushey High Street is in close proximity to Watford and we ask that any impact assessment fully considers the potential implications on all local facilities not just those within the Borough Council boundary.

## **6. An Attractive Town**

Hertsmere supports Watford's proposals for high density development within Core Development areas, and recognises the potential benefits that high density development can bring. Nevertheless, suitable measures should be included to ensure that a high level of accessibility is retained for those travelling to or from places outside of Watford.

## **8. A climate emergency**

Along with Watford, Hertsmere declared climate emergency in September 2019. The council are encouraged by proposals within the Local Plan to tackle climate change. Where appropriate the Local Plan should consider the potential for cross boundary initiatives including resource management, transport improvements, waste management, and health and well-being initiatives.

## **9. Conserving and enhancing the environment**

The level of growth suggested is going to generate additional pressures on the natural environment. A number of important natural habitats exist along the border between Hertsmere and Watford including the River Colne. It is important that all development considers the wider impact on these areas and that the cumulative impact of development along this boundary is fully considered. Hertsmere support Watford's proposals for a strategic green infrastructure link along the Borough boundary. Hertsmere would want to be included as part of any discussions relating to habitat and environmental enhancements along this route and any measures that relate to the wider green and blue infrastructure networks including any potential water management schemes along the River Colne.

## **10. Infrastructure**

Details of Watford's infrastructure requirements are set out within Watford Infrastructure Delivery Plan (IDP). HBC consider that the Local Plan could benefit

from transferring across some of that detail to explain more fully exactly what infrastructure improvements are being proposed, both in terms location and size of facility, to enable the growth scenario to be delivered. For example, the policy map shows land allocated for education facilities yet this is not referenced within the plan, and whilst the site specific site policies provide detail on where new facilities are likely to be located it would be useful to have a summary table and map showing the level of provision and the potential locations.

Hertsmere understand that constraints on land generate additional complications when securing the land required for infrastructure improvements. However, further information is required to address role that services and facilities outside of Watford play in meeting the needs of local Watford residents. Ongoing discussions between Hertsmere and Watford will be encouraged so to better understand the connections between neighbouring facilities and Watford and how these may evolve over time. Hertsmere would want to be included as part of the process relating to developer contributions (S106 and CIL) and infrastructure provision.

### **11.A sustainable travel town**

Whilst Watford's compact form does generate significant potential for more walking and cycling within the town centre consideration needs to be given to improving commuter flows and trips to key regional infrastructure from locations outside of Watford. The South West Herts Growth and Transport Plan (2018) make reference to the linkages between the wider area and particular Watford and Bushey and this should be reflected within the wider transport strategy. Given the location of Core development Areas this could have a detrimental impact on the accessibility of the town centre for Hertsmere residents unless suitable transport improvements are brought forward. Policy ST11.3 highlights this point and Hertsmere would want to be included as part of the process relating to sustainable transport initiatives for major development on the eastern side of Watford with particular reference to the Colne Valley and Bushey Arches. These are known congestion hotspots that could have significant impacts on some of the major links between Watford and Hertsmere; this especially important given the correlation between the location and provision of key facilities and movement patterns.

Hertsmere supports Watford's proposals for sustainable travel, modal shift, reduced car dependency and the use of Hertfordshire's transport hierarchy. Policy ST11.2 suggests the protection and enhancement of certain routes within Watford with a number of these areas forming part of wider routes from Watford to other large settlements including Bushey and Borehamwood. Consideration should be given to how these improvements could link into the wider route network for the area. The plan also includes the provision of shared mobility initiatives and Hertsmere would be open to having discussions about how these services could be facilitated within the wider area including Bushey and Borehamwood.

### **12.A healthy community**

Hertsmere supports Watford's health and well-being policies and consideration sider benefit these schemes can have on the local area. Where cultural and community facilities are being provided the catchment areas of these facilities should be fully

considered and efforts should be made to improve accessibility of these facilities by public transport to serve residents travelling from slightly further afield.

### **13. Site allocations and new development**

The site allocations policy lists all of the proposed sites to be allocated within Watford's Local Plan. In terms of presentation it would be beneficial if the site references were displayed on the policies map (including the interactive map). Whilst Hertsmere appreciate that it is difficult to predict the exact build out rates of development parcels, it would be useful to get some further clarification in terms of the timeframes for development coming forward, so that suitable consideration can be given to how this may affect the programme works for Hertsmere. This is particularly important when it comes to programming infrastructure projects and community facilities.

#### **Summary**

Hertsmere supports the key principles within Watford's new Draft Local Plan, including the redevelopment and intensification of land in sustainable locations, and in terms of presentation the document reads very well and is clear and concise.

Hertsmere appreciates that Watford have taken to significant steps to address their identified need, and accept that there is unlikely to be enough suitable land to meet their employment targets. As part of the duty to cooperate Hertsmere will be open to further discussions about how long term growth requirements can be addressed across the wider Housing Market and Functional Economic Market Areas.

Hertsmere encourages continual close collaborative working with Watford on strategic planning matters and highlights the importance of new high quality infrastructure in ensuring that Watford meets its sustainable development objectives. Given Watford's key role within South West Herts it is important the suitable consideration is given to improving the connectivity between Watford and the neighbouring boroughs. The Local Plan makes reference to a number of promising initiatives to address this and Hertsmere would wish to engage further with Watford to establish how these could potentially have wider cross boundary benefits. Further linkages between the IDP and Local Plan documentation would also be useful in order to present a clear picture of the level of infrastructure improvements being provided to address the issues generated by the proposed growth scenario.

## **August 2021 - Summary of the Statement of Common Ground between Hertsmere Borough Council and Watford Borough Council**

### **Purpose of the SoCG**

- Prepared to demonstrate cooperation under the Duty to Cooperate and National Planning Policy Framework (2021).
- Documents how HBC and WBC will work together on cross-boundary strategic planning matters, particularly housing, employment, education, and infrastructure.

### **Working Relationship**

- Long-standing collaboration, including formal DtC meetings, SW Herts Duty to Cooperate group, and Joint Strategic Plan (JSP) work.
- Cooperation also extends to jointly commissioned evidence and ongoing liaison with Hertfordshire County Council on transport and education.

### **Strategic Geography**

- HBC and WBC are neighbouring authorities within the South West Herts Housing Market Area (HMA) and Functional Economic Market Area (FEMA).
- Strong functional linkages exist, with Watford serving as a major centre for employment, retail, and services.

### **Local Plan Context**

#### **Hertsmere**

- Current Local Plan: 2013–2027; new Reg 18 draft scheduled for Oct 2021.
- Significant housing need (714 dpa + 5% buffer ≈ 750 dpa).
- Insufficient urban land supply—**Green Belt release will be required.**

#### **Watford**

- New Local Plan (2018–2036) progressing; highly constrained, densely populated borough.
- Housing target: 14,988 homes, including substantial windfall (2,095 units).
- Strategy focuses on higher-density development in the Core Development Area.

### **Housing – Key Points**

- Both councils intend to meet their own housing needs fully using the government's standard method.

- Both requested assistance from each other regarding unmet need, but neither authority is able to take any of the other's unmet housing requirement due to significant constraints.
- Both accept the need for continued dialogue through the JSP.

### **Employment – Key Points**

- SW Herts Economic Study (2019) shows:
  - Surplus of office space across SW Herts.
  - Significant industrial floorspace deficits, especially in Watford.
- HBC: Able to meet its own employment needs; will require some Green Belt release for future industrial/office space.
- WBC:
  - Oversupply of offices but shortfall of ~59,000 sqm of industrial floorspace.
  - Requested help from HBC, but HBC not able to assist at present.
- Both agree to continue working together, including on strategic employment solutions through the JSP.

### **Education**

- Secondary school capacity is a key cross-boundary issue:
  - Watford cannot accommodate new secondary schools within its boundary.
  - HBC and HCC are examining potential locations in Bushey, which serves both areas.
  - WBC developments may need to contribute financially to provision in Bushey.

### **Infrastructure & Transport**

- Joint work ongoing on water, transport, and education through SW Herts evidence.
- No immediate major shared transport infrastructure requiring specific Local Plan action, but collaborative working will continue, led by Hertfordshire County Council.

### **Other Matters**

- No minerals or waste issues affecting the two councils directly; these are handled by the County Council.
- Additional cross-boundary strategic matters will be addressed through the SW Herts Joint Strategic Plan.

### **Joint Strategic Plan (JSP)**

- Covering 2036–2050; provides strategic framework for SW Herts.

- Focuses on coordinated delivery of housing, employment, and infrastructure.
- Issues & Options consultation expected Spring 2022.

### **Review and Updates**

- The SoCG will be kept under review.
- Triggers for revision include Local Plan consultations, emerging development proposals, or progress on the JSP.

## August 2021 - Summary of the Duty to Co-operate Statement of Compliance

### Purpose of the Document

The statement sets out how **Watford Borough Council** has met its *legal Duty to Co-operate* (Localism Act 2011) during preparation of its emerging Local Plan. It summarises engagement with neighbouring authorities and strategic bodies on issues that cross administrative boundaries.

### Strategic Geography

Watford is a dense, highly urban borough with strong transport connections and major growth pressures due to proximity to London.

Key characteristics:

- ~67% of the borough is developed.
  - Only ~11% of land is undeveloped and much of this is constrained.
  - 20% is Green Belt.
- These constraints shape cross-boundary discussions on housing, employment, transport and infrastructure.

### Cooperation on Strategic Issues

#### 1. Housing

- Housing need increased sharply with the national standard method; Watford's need trebled.
- Jointly commissioned SW Herts Local Housing Needs Assessment confirmed the figure as the starting point for Local Plans.
- Stage 1 HELAA showed a major land shortfall; Watford sought assistance from neighbours to take unmet need—all confirmed they could not.
- Through proactive site identification, Watford identified allocations for 8,748 homes plus a windfall allowance for 2,095 homes.
- Watford will meet its full housing need, **B** cannot take unmet need from neighbouring authorities.
- Neighbours (except St Albans) also reported they cannot meet their own needs and asked Watford to take unmet need—Watford confirmed it could not due to land shortages.
- Outcomes are reflected in shared Statements of Common Ground.

#### 2. Employment

- SW Herts authorities form a Functional Economic Market Area (FEMA) and carry out joint economic studies.
- Watford can meet and exceed its office floorspace needs but has a major industrial land shortfall (~57,600 sqm).

- Watford asked neighbours to assist; Dacorum, Three Rivers, Hertsmere cannot; St Albans may consider some unmet need.
- Watford will support 68,000 sqm of office floorspace that benefits the FEMA, including taking on some unmet office need from Dacorum.
- Ongoing cooperation includes strategic Green Belt discussions (e.g., around Colne Way, Warner Bros. Studios).

### **3. Transport & Infrastructure**

- Long history of joint work with Hertfordshire County Council and neighbouring districts.
- Joint transport modelling using both Watford's Paramics model and HCC's COMET model to identify capacity issues.
- Collaboration on major schemes, including regeneration of Watford Junction/Gateway and future mass rapid transit safeguarding following cancellation of the Croxley Rail Link.
- A Sustainable Transport Strategy is being jointly prepared with HCC.
- Transport providers (Network Rail, Highways Authority, etc.) are routinely engaged.

### **4. Education**

- Watford has the highest primary school growth in SW Herts, with limited land available for new schools.
- Long-term cooperation with HCC Education has identified new school sites (e.g., Former Meriden School, Bill Everett Centre).
- Secondary school capacity cannot be met in-borough; provision will rely on neighbouring authorities.

### **5. Waste & Minerals**

- Close working with Hertfordshire County Council as Minerals and Waste Authority.
- The concrete batching plant near Watford Junction is safeguarded and shown on the Policies Map.
- Ongoing cooperation ensures safeguarding aligns with strategic development areas.

### **6. Health**

- Engagement with Herts Valleys CCG strengthened health policy in the Local Plan (e.g., adding a dedicated Healthy Communities chapter).
- CCG input has shaped requirements for health provision in major strategic development areas.
- CCG to be consulted on major applications going forward.

### **Joint Studies and Evidence Base**

Watford collaborates widely on key studies including:

- SW Herts Economic Study
  - Retail & Leisure Study
  - Green Belt Reviews (Stages 1 & 2)
  - Local Housing Needs Assessment
  - SFRA Level 1
  - Water study
- These support consistent cross-boundary planning and a shared evidence base.

### **Joint Working Groups**

Watford participates in multiple strategic forums:

- Hertfordshire Infrastructure Planning Partnership (HIPP)
  - Hertfordshire Planning Group (HPG) – Planning and Development Plans subgroups
  - SW Herts Duty to Co-operate Group
- These forums help address cross-boundary issues such as unmet need, Green Belt, climate change, evidence base consistency and Local Plan timetables.

### **South West Herts Joint Strategic Plan (JSP)**

- A joint plan for Watford, Dacorum, Hertsmere, Three Rivers and St Albans covering 2036–2050.
- Aims to align housing, employment, transport, education, health, and utilities at a strategic level.
- Governance includes Strategic Members Planning Group (SMPG) and Strategic Officers Planning Group (SPOG).
- Designed to provide a stronger platform for coordinated infrastructure delivery.

### **Overall Conclusion**

Watford Borough Council has undertaken extensive, regular, and constructive engagement with neighbouring authorities and statutory bodies.

The Council has:

- Established shared evidence bases,
- Documented agreements in Statements of Common Ground,
- Demonstrated ongoing collaboration on housing, employment, transport, education, health, and minerals/waste.

The statement provides clear evidence that the Duty to Co-operate has been met in preparing the Watford Local Plan.

## **December 2021 – Summary of Hertsmere Borough Council’s Hearing Statement for Watford Local Plan Examination.**

### **Matter 2 – Amount of Development Needed**

- HBC references the SW Herts Economic Study Update (2018), which identifies office, industrial, and warehousing needs across the Functional Economic Market Area.
- Watford’s Local Plan proposes 85,488 sqm of office space and 25,206 sqm of industrial floorspace, which HBC notes results in a shortfall of industrial and warehousing land, and seeks clarification on how WBC intends to address this shortfall.
- HBC emphasises it does not intend to accommodate Watford’s unmet industrial need and questions whether Watford’s employment split reflects post-Covid changes to the economy.
- HBC explains its own allocations focus on specialist employment sites (e.g., film studios, aerodrome), which do not address unmet warehouse/industrial needs.

### **Matter 9 – Economic Development**

- HBC acknowledges Watford’s constraints but stresses every effort should be made to meet local employment needs within Watford, rather than relying on neighbouring authorities.
- HBC confirms that Green Belt release in Hertsmere to serve Watford is not a reasonable alternative.
- While recognising Watford’s strong office market, HBC questions the justification for the scale of additional office floorspace, noting demand also exists elsewhere in SW Herts.
- HBC seeks clarity on achieving a balanced employment offer and whether proposed designations (e.g., protecting industrial areas) are justified.

### **Matter 13 – Infrastructure**

- HBC supports modifications requiring pre-application engagement on infrastructure capacity and suggests widening discussions to include cross-boundary stakeholders.
- Education:
  - HBC requests clearer evidence on primary and secondary school demand resulting from Watford’s growth.
  - Notes ongoing joint work with Hertfordshire County Council to identify potential secondary school sites but emphasises no suitable site has yet been confirmed.
  - Requests confirmation that Watford has fully explored all internal secondary school options, including reviewing pupil yield assumptions and potential for higher-density school design.

- HBC cannot identify sites to support Watford without a fuller strategic understanding of the demand profile.
- Transport:
  - Supports sustainable travel measures and references the SW Herts Growth & Transport Plan (2018).
  - Requests that improved cross-boundary walking, cycling, and transport links, especially between Watford and Bushey, are fully considered.

### **Overall Position**

HBC broadly supports the technical improvements to the Watford Local Plan but requests further justification and clarity in three core areas:

1. How Watford will address its shortfall in industrial/warehouse floorspace.
2. How education needs (especially secondary) generated by Watford's growth will be met.
3. How cross-boundary transport and infrastructure issues will be incorporated into policy implementation.

**19\_07\_2022 - Hertsmere Borough Councils Response to Watford Borough Council Main Modifications**

Main modification number	Response
M57	If 1,218 units are on sites which are allocated but have been granted/consented, it is unclear why they haven't been included as a commitment. It is unclear whether they are still included in the total allocations of 8,604 but to avoid confusion or any perception that double counting may have occurred, it may simply be clearer to have a separate category of 'homes on allocated sites which have pp'.
M59	The windfall allowance, which we previously noted was high (but justified) has increased by 36% pa to 158 dpa. The basis for this increase needs to be more clearly justified.
M61	Although the plan period has only been reduced by one year, the overall housing requirement is reduced by 1,660 which equates to over two years' worth of housing requirement. The basis for this reduction needs to be more clearly justified.
M73/M255	<p>Supported living accommodation within the Housing Market Area should, subject to viability, should be required to contribute towards Affordable Housing where applications are submitted through private developers. HBC recognises that there are different costs and models associated with the delivery of specialist housing and that such provision may be best secured through a financial contribution.</p> <p>We note that M255 (Glossary) includes age-restricted general market housing for people aged 55 and over. This form of housing, in particular, can constitute C3 housing in its own right and we are of the view that 55+ age restricted housing within the Housing Market Area should not be exempt from the need to meeting AH requirements.</p>
M83	We note the reduction in office and industrial floorspace provision including the increased shortfall, against SW Herts identified requirements, for industrial. Such a reduction needs to be clearly justified within the context of the wider SW Herts FEMA.
M84	HBC will continue to work collaboratively with Watford and other neighbouring authorities under the Duty to Co-operate (and any successor arrangements arising from the Levelling Up and Regeneration Bill). However, we would reiterate that Hertsmere is heavily constrained by Green Belt and we have

	<p>previously advised WBC of the challenges in accommodating our own employment needs over the plan period, let alone those arising from any of our neighbouring authorities.</p>
M154	<p>We are of the view that in light of the responses to our own R18 plan last year, where local infrastructure concerns were highlighted, it is particularly important to demonstrate that options for secondary school provision have been fully explored within Watford. We consider that this should include an assessment of the scope for existing secondary schools in Watford to expand and would suggest this be covered through an update of the IDP. At the same time, the requirement in Policy IN10.2 that developments must demonstrate how they have explored existing infrastructure capacity, should be broadened to cover the extent to which <i>existing</i> facilities could be expanded. This is particularly the case with regard to secondary education. We would also seek acknowledgement that Hertsmere will be included as part of ongoing discussions relating to developer contributions (S106 and CIL) and infrastructure provision, where cross-boundary infrastructure matters arise.</p>
n/a	<p>We have previously highlighted that paragraph 1.6 of the plan relating to the Joint Strategic Plan (JSP) does require amending. Rather than referring to the JSP as <u>not</u> being a 'statutory document,' it should refer to the fact that it will have statutory status.</p>