



**WATFORD
BOROUGH
COUNCIL**

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11 January 2021

Dear [REDACTED]

Request to consider unmet development needs in Watford

Watford Borough Council continues to progress the final draft Local Plan and expects to consult on this document from January 2021 for a period of 6 weeks. This will meet the requirements set out in Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

In July 2019, the Watford Borough Council issued a letter requesting Three Rivers District Council consider if it would be able to accommodate a proportion of Watford's unmet housing and employment need. In response, Three Rivers stated that this would be challenging due to its own development needs that have to be met, particularly given that a significant proportion of the district is designated as Green Belt. Since this time, Watford has made further progress to identify land for new housing. However, employment land, more specifically for industrial uses, has proved to be more challenging given the constraints of the borough.

Housing need

As part of the final draft Local Plan, a housing target of 14,988 units is set out. This is based on 14,274 units calculated using the government's standard method and a 5% buffer of 714 units should some of the allocated sites not come forward as anticipated. The total housing figure of 14,988 units consists of:

- 4,145 units from existing planning permissions and completions
- 8,748 units on sites allocated for development, and
- 2,095 units coming forward through windfall development.

Historically, Watford has delivered approximately 70 dwellings per year on sites of less than 5 units. This is expected to contribute 1,260 units over the plan period through windfall development. The remaining 835 units are projected to come forward on sites not allocated for development, or potentially on allocated housing sites but at a density that is higher than used to calculate the housing capacity of the borough as part of the Housing and Economic Land Availability Assessment (2020). This is also considered to be windfall development. The inclusion of a buffer is to address the possibility that some allocated sites may not come forward as anticipated. However, windfall development inherently has an element of uncertainty.

The Council intend to publish the final draft Local Plan setting out the intention to meet its housing need in full. However, should the appointed Planning Inspector consider that providing 835 homes, inclusive of the 5% buffer, through windfall development is not appropriate, Three Rivers District Council is asked if it could consider if it has the capacity to accommodate a proportion, or all, of the 835 homes identified as windfall over the plan period to 2036 as their Local Plan is progressed.



Employment need

The SW Herts Economic Study Update (2019) identified a need 188,000sqm of office floorspace and 481,500sqm of industrial floorspace across SW Herts. The final draft Watford Local Plan has sought to find a balance between office and employment land uses that will maximise opportunities for economic investment based on the attributes of the area, access to services and facilities, including transport infrastructure, and more strategically will help deliver the objectives of the Local Plan and support sustainable growth in the wider SW Herts area.

For industrial land uses, given the constraints of the borough, the final draft Local Plan has focused on intensification of existing employment areas. Several allocations have been included in the draft Plan that seek to deliver 40,759sqm of industrial floorspace. This figure falls short of the need identified for industrial uses in the Economic Study (110,988sqm). Three Rivers' previous response to this request was that land was not available to support the provision of industrial land in addition to meeting its own needs.

It is recognised that Three Rivers are facing their own challenges to meet identified industrial employment need, as indicated in your letter dated 6 March 2020 and on-going Duty to Co-operate discussions between the SW Herts authorities. However, while mindful of this, Watford Borough Council asks; if there has been progress since our last request in July 2019 on the evidence base to support your next Local Plan, including the Housing and Economic Land Availability Assessment that could help address Watford's unmet industrial development needs? Additionally, if further work is being undertaken to identify land for development as part of your next Local Plan, could the authority take Watford's unmet industrial development needs into consideration for the next plan period?

Education need

Since our previous letter requesting assistance related to a lack of land available for new education facilities, the Council have been working with the Education Authority to identify how sites can be brought forward. The County's approach to primary school provision is to provide these in close proximity to where new development is located, while secondary school provision has a wider catchment. These larger catchments extend across district boundaries and are thereby more strategic in its nature. For secondary school provision, Watford is unable to provide site allocations in the draft Local Plan to meet this need.

Where possible, the draft Local Plan has included the requirements for primary school provision that will provision for new households. The unmet need relates to a shortfall of land available for development as identified in the Housing and Economic Land Availability Assessment. The approach to housing and employment has, where possible, been addressed through higher building and floorspace densities, however, this is not possible for school provision, particularly secondary schools. A detailed Green Belt assessment has also been undertaken and demonstrated that Watford has little Green Belt land that does not perform functions identified in the National Planning Policy Framework and could be released to meet development needs.

In collaboration with the Education Authority, Watford would ask Three Rivers District Council to consider how education needs generated by new development could support growth not just within its own administrative

boundaries but also development taking place outside but in proximity to them, and if provision can be made for unmet need within Watford.

Continued collaborative working

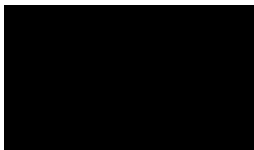
Other strategic issues will be addressed in greater detail as part of the SW Herts Joint Strategic Plan which will inform the next iteration of the Watford Local Plan. As part of this, Watford Borough Council has welcomed the collaborative working and discussions to date and look forward to this continuing in the future to prepare a successful Joint Strategic Plan.

Watford would like to recognise the on-going Duty to Co-operate discussions that have been taking place between the two authorities and how this will inform not only our respective Local Plans but also the Statement of Common Ground to support these.

A similar request will also be made to the other local authorities within SW Herts to help meet our identified unmet development needs and contribute towards sustainable growth in the SW Herts area.

If you are able to respond to this request by 31 January 2021, it would greatly help with the on-going preparations of the draft Watford Local Plan. Should you have any queries about this request and other issues related to the draft Local Plan, please do not hesitate to contact me.

Sincerely,

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