



**WATFORD
BOROUGH
COUNCIL**

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12 July 2019

Dear [REDACTED]

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 Three Rivers District 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

- 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

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

- 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.

Yours Sincerely,

[Redacted Signature]

[Redacted Title]
Planning Policy [Redacted]