

Watford's Local Development Framework Core Strategy Preferred Options

Response by CPRE – The Hertfordshire Society

CPRE – The Hertfordshire Society have the following comments on the above document.

Housing

In accordance with the East of England Plan, Secretary of State's Proposed Changes, Watford is expected to provide for at least 5,200 new dwellings in the period up to 2021. We welcome the statement in draft Policy BWP1 that this housing allocation "... is capable of being met without recourse to development on greenfield land". This is supported by the housing trajectory data in the Annual Monitoring Report 2007, which shows projected annual completions for the period 2007/08 to 2020/21 totalling 4037 dwellings, and by the fact that total completions from April 2001 to March 2007 numbered 1652. This means that it should not be necessary to allow any housing development on greenfield or Green Belt land in Watford to meet the target requirement for 2021.

The Evidence Base

We are concerned, however, that the various surveys and assessments necessary to underpin the Council's conclusions on housing provision are out of date and incomplete. As acknowledged in the section on Evidence Base on pages v and vi of the Introduction to the Strategy, all five of the supporting studies on Housing are historical and "due to be updated". This hardly constitutes a "robust and credible evidence base". Given that the Council expects the *Strategic Housing Land Availability Assessment* to be completed in April 2008, the *Strategic Housing Market Assessment* to be available in May 2008 and the *Development Economics Study* to be available at some unspecified future date, we would have expected publication of this Core Strategy to be deferred until that evidence was available.

We would be particularly concerned if, when the up-to-date evidence is available, it does not support the conclusion that sufficient sites can be found to meet the housing requirement without recourse to greenfield land. This would undermine the credibility of the Preferred Options, and might lead to the Submission version of the Strategy containing policies and proposals on which there had not been an appropriate level of public consultation. In the event of the Council arriving at conclusions that vary significantly from those in the Preferred Options, we would expect there to be a further round of consultation on the relevant issues before the Submission document is prepared, in accordance with the spirit of PPS12 paragraph 4.13 which calls for "consensus through continuous community involvement".

Similar comments can be made about Employment, where the *South West Herts Employment Floor Space Study* is still to be undertaken; Infrastructure where the *Joint Infrastructure and Investment Strategy* is not due to be finalised until September 2008; Transport where the *South West Herts Transportation Study* is expected in April 2008 and Open Spaces where the *Open Spaces Study* is due to be completed later this year. Without the results of these studies, it is difficult to give meaningful assessments of the respective policy proposals.

Key Centre for Development and Change

We are surprised by the interpretation that the Council appears to have put on the concept of Key Centres for Development and Change, as put forward in the East of England Plan. Policy SS3 of that Plan identifies Watford as a Key Centre for Development and Change (KCDC),

and Policy LA4 sets out what this means for the Borough. Yet according to Policy SS2 and the Key Diagram in the draft Core Strategy, the Council has chosen to define the KCDC as comprising the town centre and specified areas around the central part of the Borough, rather than applying that designation to the Borough as a whole. In our view, this is not consistent with the intentions of the Regional Spatial Strategy.

Our concern with this is that the Council's interpretation of the KCDC has been carried forward into the Housing and other policies in the draft Core Strategy, and may have the effect of distorting those policies in inappropriate ways.

General comments

Finally, we are greatly concerned that many of the "policies" put forward in this consultation document are not, in fact, expressed as policies, but are merely declarations of intent to produce policies along certain, vaguely defined lines. For example, Policy BWP1 Housing states that the factors that will act in favour of a site being allocated for residential development and those that will act against its allocation will be set out, but those factors are not clearly defined, no relative priorities are indicated, and no likely outcome in terms of the types of site or areas is given. Similarly, Policy BWP2 Employment states that the policy will set a suitable target for jobs which is sustainable and appropriate for Watford, but it does not say what that target will be. This comes back, of course, to the fact that the necessary studies and surveys have not yet been carried out.

The downside from our point of view is that, generally speaking, the Preferred Options are not sufficiently detailed and robust for us and other consultees to be able to make meaningful comments on them. PPS12 paragraph 4.12 states that the Preferred Options "must be of sufficient detail for the type of development plan document envisaged, to enable meaningful community involvement and the sustainability appraisal [sic]". In our view, this requirement is not being satisfied in this consultation document.