

Watford Borough Council comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

Watford Borough Council welcomes the opportunity to comment on the draft London Plan. While not part of the Greater London Area (GLA), the Borough is located on the urban fringe and is directly affected by the approach set out within the draft Plan.

The draft London Plan sets out an approach to deliver the significant amount of growth required to meet the needs of a growing population and global economy. The draft Plan sets out policies which in many cases are positive and forward thinking that will help facilitate development to support local communities.

To deliver its aspirations, clearer detail within the framework to support the preparation for new Local Plans in the GLA could be set out to ensure there is a clear understanding about achieving the balance between new development and retaining the character of local communities that together contribute towards the vision for London and the wider south east region.

The parameters of what is required here are unclear without a Statement of Common Ground in place. In principle, collaborative working will assist with creating and delivering a long term strategic approach to development for housing and economic growth. However, there are concerns about what is expected beyond the scope of the draft London Plan should a situation evolve where the housing figures are not being met within the GLA.

Suggested change: Clarify how the draft London Plan will be used to work collaboratively with key stakeholders including urban fringe local authorities outside of the GLA. Make clearer reference key strategic issues that may need to be considered.

Watford Borough Council is concerned that the scale of London growth will be difficult to accommodate within the GLA despite the push for higher densities. The London Plan suggests about 65,000 units per annum to be delivered which is equivalent to almost two Boroughs the size of Watford a year over a twenty year period.

Without a clear approach as to how these housing numbers will be delivered within London's boundaries, this could place additional pressure on areas outside of London which are already under pressure, particularly with the constraints of the green belt. If any of London's required housing growth had to be accommodated outside of its boundaries this will require further investment in infrastructure (above that required to support a respective local authority's growth) and if this pressure comes from London, then London should be expected to contribute towards it.

For all intents and purposes this section acknowledges the difficulties in delivering the scale of housing needed. It also infers that some of this may be needed beyond the GLA boundary. Watford welcomes the opportunity to work collaboratively and constructively for the long term benefit of the wider area.

Watford recognises that infrastructure investment is required in many areas across the city to support the growing population and deliver strategic objectives, however, the recent nullifying of the potential Metropolitan Line Extension scheme by the London Mayor is considered to be counter-productive.

If the draft London Plan suggests that some of the growth may have to take place outside London then logically areas outside London that are taking this growth will need investment in infrastructure to complement it. The abandonment of the Metropolitan Line Extension as a scheme had been supported by the Department for Transport undermines confidence that this will be the case. This can only act to reduce the incentive of areas outside the GLA to co-operate in providing for London's growth.

It will be important to decide if local authority areas outside but close to London are to be interconnected, in which case why scrap the MLX as benefitting only non-residents of the capital, or this is not to be the case, London should look to provide all of its growth within its own boundaries.

Suggested change: Include the Metropolitan Line Extension as a key infrastructure project in the London Plan.

The draft London Plan sets out an approach which makes an assumption that developers will provide high quality schemes on their own accord. This will be true in some instances but not in others. Of growing concern, is an ever increasing number of examples of schemes being granted planning permission and then developers coming back with proposals to reduce the quality of a scheme to the detriment of an area in the long term citing viability concerns having established planning permission in principle. The uncertainty about design and the weight that should be given to it could be set out more clearly, particularly where applicants return with an amended scheme that compromises the integrity of the original permission.

Clarity about how the 'best use of land' is to be applied would benefit the supporting text to the policy. This will vary between different character areas and to protect these developments should be of a scale that is complementary to its surroundings (although this can also support change). Watford has some concerns that the 'best use of land' could lead to over development (cramming) of sites that will ultimately compromise the character of some areas and in turn affect the approach developers take to other areas which may not be suitable to significant intensification such as suburban areas near the urban fringe.

Suggested change: In the supporting text to the policy, clarify the amount of weight that should be given to 'best use of land' and 'design' when considered in the context of retaining or complementing the existing character of an area.

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London is a relatively low density city compared other key global centres. Intensification will contribute towards making more effective use of land, however, it should be noted that approaches will need to reflect local character. This is an issue that is likely to be in conflict with the overall aspirations of the London Plan.

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While Watford is outside of the GLA it is still subject to the potential impacts of the approaches to development within it. The Council's concern is that if the housing numbers are not delivered as the plan period progresses there are no clear alternative options being considered at the strategic level. Working collaboratively with adjoining local authorities would be of benefit to London and other stakeholders to help reduce the risk of decisions being made that do not maximise development opportunities, infrastructure requirements and development phasing in the long term (e.g. long term benefits the Metropolitan Line Extension would provide to Watford and connections with residential and economic areas in north west London).

Suggested change: It could be useful to set out what additional approaches there are to development in the GLA and the wider south east region.

Page: [Policy H1 Increasing housing supply](#)

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Para 4.1.3 of the Plan states:

*“To achieve these housing targets the overall average rate of **housing delivery** on both large and small sites will need to approximately double compared to current average completion rates.”*

This is a bold statement but it is unclear how realistic this is when the GLA is constrained by green belt. It is also subject to factors outside of the planning system. While areas outside of the GLA are administered by other local authorities, the draft Plan could be stronger about how it will seek to work with other stakeholders and the anticipated growth is likely to affect the wider south east region.

Para 4.1.4 states how the step change in delivery is expected:

*“In particular, the **London Housing Strategy** sets out the Mayor’s proposals for working with boroughs and other partners to deliver the step change in housing supply required, through **proactive intervention in London’s land market** to unlock and accelerate housing delivery, including on public land and through compulsory purchase and other forms of land assembly, **increased and better-targeted investment** to de-risk development, **diversification of the housebuilding industry, tackling the construction skills gap** and modernising construction methods.”*

All of the above are problematic, however, greater clarity could be useful about where the housing could be delivered. Housing has been shared out for each District in Table 4.1 but the respective Strategic Housing Land Availability Assessments have not been published. This suggests the capacity of each borough is uncertain which could compromise the overall objective of the draft London Plan. This is reflected in comments set out in paragraphs 1.4.3 and 1.4.5 of the draft Plan. In this context there are concerns about how this approach could affect boroughs on the urban fringe and smaller settlements outside of it which are more susceptible to change and the positive and negative affects this can have.

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The draft Plan is confident the housing numbers set out can be delivered. However, there is a need to consider how it will affect areas on the fringe of the city. Concentrating development in areas close to key transport nodes is supported, however, it is unclear how the draft Plan will support growth that is in keeping with existing character while supporting the high levels of housing growth. This raises concerns about how growth in the outer boroughs will affect development pressure on areas outside of London's boundaries which are generally low level and often more rural in character.

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If the housing numbers cannot be achieved as anticipated there is a risk of increasing pressure on areas that are located on the fringe, or within the green belt. These areas have a different character to the GLA and are subject to different constraints. There is concern that an approach that does not adequately consider how the boroughs outside of London will grow (e.g. districts with significant amounts of green belt) and how these could adversely affect boroughs on the urban fringe such as Watford. A potential impact is that new development could continue to leapfrog the green belt into boroughs which are facing their own increasing development pressure. This would ultimately act to increase commuting distances and the pressure on infrastructure that is already struggling to cope.

Experience in Watford suggests that only so much can be delivered on brownfield sites without greatly increasing densities. Intensification in some areas may not be reflective of the historical development of a settlement which could compromise its character and sense of identity.

Suggested change: Provide more information about how London's growth will affect the south east and how the London Plan will consider the increasing development pressure at a strategic level.

Page: [Policy E1 Offices](#)

Section: [E1](#)

The draft Plan could usefully consider the strategic and economic links between centres that are closely connected with the GLA such as Watford. Growth should be complementary to maximise the benefits of shared economic and housing areas including commuter networks and supply chains.

Suggested change: This would be appropriately addressed in the supporting text to the policy.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [Figure 6.1](#)

The map could be more reflective of the local economic area and the relationships between economic areas. This would help demonstrate the inter relationships between centres and how economic areas can benefit from, and contribute towards, economic growth in the GLA and wider region.

Suggested change: Identifying the location of significant economic centres outside, and in the vicinity of, the GLA.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: [E7](#)

Support the objective but this will need to be supported by infrastructure investment that would improve connectivity to surrounding economic and housing areas to benefit the wider area.

Suggested change: This would be appropriately addressed in the supporting text to the policy.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: [6.7.6](#)

Collaborative working should also include boroughs outside of London that contribute towards the wider economic and housing area.

Suggested change: This would be appropriately addressed in the supporting text to the policy.

Page: [Policy E8 Sector growth opportunities and clusters](#)

Section: [E8](#)

Creative clusters also operate outside of the London boroughs. These actively support the wider creative industries such as the film industry. This should be recognised as an opportunity to support economic development more widely.

Suggested change: This would be appropriately addressed in the supporting text to the policy.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [Figure 7.1](#)

Suggested change: The maps could usefully identify heritage assets in areas outside but near to the GLA to provide more context. This would help to highlight the need to consider cross boundary issues such as networks of heritage assets and waterways.

Page: [Policy G1 Green infrastructure](#)

Section: [G1](#)

Is this policy intended to relate specifically to green infrastructure or green and blue infrastructure"?

G1A Generally support the aspiration of the policy, however it would be useful to list a few green features in the Policy Part A. It is difficult to have an exhaustive list of all green infrastructure as some features may be left out.

Suggested change: Identify key green infrastructure features.

G1B Strategies are a good idea, however, this list is more lengthy and should be more similar to Part A which has is more Development Management orientated.

Suggested change: Consider a list similar to that in Part A of the policy.

G1C It is important for development plans/ opportunity areas to address green infrastructure, so this should include large applications sites too that have masterplans etc. Development Plans and Opportunity Areas are very high level. Every regeneration/ development opportunity has potential to provide for the features identified in Parts A and B of the policy.

Page: [Policy G1 Green infrastructure](#)

Section: [8.1.1](#)

The description here is good but ecological functions also include waterways. It is a minor issue but may be worth identifying blue infrastructure too.

Suggested change: Reference blue infrastructure.

Page: [Policy G1 Green infrastructure](#)

Section: [8.1.2](#)

Mention biodiversity or environmental value.

Suggested change: Add text along the lines of 'Besides the environmental value, Its economic and social value has become increasingly evident across all of London...'

Page: [Policy G2 London's Green Belt](#)

Section: [8.2.1](#)

The green belt is essentially defined by what it is preventing, urban sprawl. Therefore, this should be mentioned as the key reason for it. "Growing food" and "Space for Recreation" is purely an added bonus/ beneficial repercussion of having green belt. This paragraph should be reworded to emphasis this point, as the purpose of the green belt's importance is somewhat diminished if it is considered mostly in terms for 'softer' benefits such as food production and leisure, although important, the strength of the greenbelt is, as mentioned, preventing extensions and encouraging the intensification of brownfield sites.

Suggested change: Change wording to identify preventing sprawl as the key function of the greenbelt of designation.

Page: [Policy G5 Urban greening](#)

Section: [8.5.4](#)

The example needs to be slightly better explained.

Suggested change: Review the explanation of the calculation

Page: [Policy G7 Trees and woodlands](#)

Section: [8.7.1](#)

Might be useful to mention carbon sequestration in the role of trees and woodlands here.

Suggested change: Insert carbon sequestration to the list of roles.

Page: [Policy G7 Trees and woodlands](#)

Section: [8.7.2](#)

Caution against links that do not have specific guidance or policies.

Suggested change: Review links for suitability.

Page: [Policy G8 Food growing](#)

Section: [G8](#)

Whilst the protection of allotments is welcome, there may be exceptional circumstances where they may need to be relocated (e.g. if there was significant and reasonable justification and they should be reprovided.)

Suggested change: Insert wording that exceptional circumstance is required to remove / change allotments.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [SI2](#)

The wording in this policy is somewhat aspirational. Although it is well intended, it may be difficult to enforce.

Page: [Policy T1 Strategic approach to transport](#)

Section: [T1](#)

It is notable that the list of projects does not include the Metropolitan Line Extension from Croxley to Watford Junction. £285m has been set aside for the project, £30-40m has already been spent on enabling works and the Department for Transport has offered £73m to meet the project shortfall. The risk of this project are now very low and the Mayor should set about delivering this vital link so that Watford can set about delivering the homes so needed in the outer London area for people unable to afford a home in the GLA area.

Suggested change: Include the Metropolitan Line Extension in the list of projects with a clear assurance by the Mayor that the project will be delivered by 2021.

Page: [Policy T2 Healthy streets](#)

Section: [T2](#)

Watford Borough Council supports schemes which contribute to the Healthy Street agenda and indeed is implementing the ideas in Watford.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [T3](#)

We broadly agree with the direction of this policy with the exception of the omission of the Metropolitan Line Extension and that given the scales of growth being promoted in the outer boroughs that bolder solutions are needed. We already know that many commuter radial routes are extremely full at peak times. By the Mayor seeking to increase the population in the suburbs this will only make the commuting experience worse a situation further aggravated by the population increase expected in the home counties and in the Oxford Cambridge Growth Corridor. More lines and services are needed in North West London to meet need other than those identified along with an orbit rail system around outer London reducing the need for people to travel in and out of Central London to make connections.

Suggested change: Include the Metropolitan Line Extension in section D of projects with a clear assurance by the Mayor that the project will be delivered by 2021. Look again at developing an outer orbit rail for London.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [Table 10.1](#)

Watford Borough Council broadly supports the projects listed but notes the lack of the Metropolitan Line Extension between Croxley Green and Watford Junction Station. This project has an Act of Parliament, £350m funding, a commitment from the previous London Mayor along with Government support.

Suggested change: In the Public Transport section of the table, add 'Metropolitan Line Extension' to the list of projects.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [10.3.1](#)

Suggested change: In the Public Transport section of the table, add 'Metropolitan Line Extension' to the list of projects.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [10.3.2](#)

Growing numbers of trips will require bold decision making in outer London as well as in the London authorities. Watford would welcome the opportunity to work with the Mayor on progressing cross boundary schemes.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [10.3.6](#)

Transport for London continues to provide bus services to Watford and beyond. Watford would be willing to engage more to ensure adequate bus routes are maintained and network made more resilient.

Page: [Policy T5 Cycling](#)

Section: [T5](#)

Watford Borough Council would take the opportunity to work with the GLA family to remove barriers to cycling by improving the cycle networks in outer London and beyond.

Page: [Policy T6 Car parking](#)

Section: [10.6.1](#)

By limiting the number of parking spaces there would be less traffic and congestion and pollution. This would be supported by Watford as it would help to limit the increase in the number of vehicles in the road.

Page: [Policy T9 Funding transport infrastructure through planning](#)

Section: [T9](#)

Watford Borough Council supports the approach proposed by the Mayor in terms of funding infrastructure.