# Maxwell Community Centre, Guide Hut and Maxwell Park Open Space

# Maxwell Hillside Park Borehamwood, Hertfordshire

# Planning and options appraisal on behalf of Hertfordshire County Council June 2013

prepared by Vincent and Gorbing



# MAXWELL PARK, BOREHAMWOOD

CONTENTS		PAGE
1.0	INTRODUCTION	1
2.0	BACKGROUND AND CONTEXT	2
3.0	SITE DESCRIPTION	3
4.0	ACCESSIBILITY ASSESSMENT	6
5.0	PLANNING POLICY CONTEXT	8
6.0	DETAILS OF THE ILLUSTRATIVE LAYOUTS	22
7.0	PLANNING AND HIGHWAYS APPRAISAL OF OPTIONS	26
8.0	SUMMARY AND CONCLUSIONS	44

# **DRAWINGS**

5011/001
5011/002
5011/003
5011/004
5011/006
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5011/010A
5011/011A

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# 1.0 INTRODUCTION

- 1.1 Vincent and Gorbing has been instructed to carry out a planning and options appraisal for land at Maxwell Park, Borehamwood. The land involves the Maxwell Park Community Centre, Guide Hut and Maxwell Park public open space (Maxwell Hillside Park).
- 1.2 Section two describes the background and context to this appraisal.
- 1.3 Section three of the report gives a description of the site.
- 1.4 Section four considers the accessibility of the Maxwell Park site in relation to transport and facilities.
- 1.5 Section five sets out the planning policy context for the site, and highlights the Local Plan and Core Strategy policies which are relevant.
- 1.6 Section six describes some of the key aspects of the three illustrative layouts.
- 1.7 Section seven is a planning and highways appraisal of the three options.
- 1.8 Section eight sets out the summary and conclusions.

# 2.0 BACKGROUND AND CONTEXT

- 2.1 Maxwell Park Community Centre, Guide Hut and Park are located at the southern end of Maxwell Road off Elstree Way in Central Borehamwood.
- 2.2 The freehold interest to Maxwell Park Community Centre is owned by the County Council who in turn have leased the premises to the Trustees of the Maxwell Park Community Centre.
- 2.3 It is anticipated that the current activities at the Maxwell Park Community Centre will be relocated when a new facility is completed at 96 Shenley Road, a development further west in Borehamwood. It is anticipated that the Maxwell Park Community Centre will become vacant circa autumn 2013.
- 2.4 The Guide Hut at Maxwell Park is owned by Hertsmere Borough Council.

  Access rights have been granted by Capital and Counties and HCC. It is understood that the community activities provided within the Guide Hut have been re-provided elsewhere.
- 2.5 Maxwell Park is an area of public open space providing a "pocket park" with rights of way through to housing areas south of Elstree Way. The park itself is owned by Hertsmere Borough Council.

# 3.0 SITE DESCRIPTION

### SITE LOCATION

3.1 The site defined by the client and the subject of this feasibility report is Maxwell Park which is located at the southern end of Maxwell Road off Elstree Way in Central Borehamwood. (5011/001)

### SITE SIZE

3.2 The site is 1.46 ha in extent.

### SITE ACCESS

- 3.3 The existing Community Centre vehicular access is at the southern end of Maxwell Road, with the Guide Hut access further east of this, at the end of the road. Pedestrians can also access the site from Bullhead Road via a public footpath along the edge of the site. (5011/002)
- 3.4 The corridor between the houses is approximately 7m wide. Pedestrians may also informally access the site from Hillside Avenue across the southern part of the park, although no formal path is present to facilitate this.

# **BUILDINGS AND USES**

3.5 The site currently contains the Maxwell Park Community Centre, a Guide Hut and a public park. (5011/003)

#### **CAR PARKING**

3.6 There is currently an informally laid out car park to the west of the Community Centre. The Guide Hut has a further smaller car park to the south of it. Part of the car park for the community centre, on land adjacent to Elstree Studios, is not within the boundary of the site the subject of this report.

# **RIGHTS OF WAY**

3.7 Footpath No. 18 runs along the western and south-western boundary of the park.

### **OPEN AREAS**

3.8 The land to the south of the Maxwell Park Community Centre and Guide Hut is open space and used as a public park.

#### **VEGETATION**

3.9 The site has small number of individual trees within the site. On the eastern boundary there is a mix of individual trees and shrubs, as has the boundary around the Guide Hut site. (5011/003 & 5011/004)

### **SURROUNDING AREA**

- 3.10 To the west of Maxwell Road is Imperial Place, a large office complex, with a multi-storey car park adjacent to the road serving this site, and a further multi-storey private car park associated with Imperial Place at the end of Maxwell Road adjacent to the Guide Hut.
- 3.11 To the east of the road at the southern end is a six storey residential block with private underground parking. The car parking for both the office and residential premises are accessed from Maxwell Road by means of simple priority tee-junctions.
- 3.12 North of this residential development on the eastern side of Maxwell Road is a fire station which is accessed from Elstree Way.

### **EXISTING TRAFFIC CONDITIONS**

3.13 The High Level Transport Assessment (May 2013) carried out by Stomor has concluded that the background levels of traffic on Elstree Way are already quite high, especially in the morning peak, that Maxwell Road exhibits tidal flows due to the presence of a large amount of office parking being accessed from it, and that there is very limited on street parking in the area of Maxwell Road/ Elstree Way at present, and what is available appears to be well used.

MSW/5011/JUNE 2013

# 4.0 ACCESSIBILITY ASSESSMENT

4.1 The site at Maxwell Park is being considered for either a 2FE school or residential development on part of the site. Due to the potential for residential development on the site, consideration needs to be given to the location of surrounding facilities.

# **Public transport**

- 4.2 The site has a high degree of accessibility by modes other than the motor car. The nearest bus stops to the site are located on Elstree Way, about 150m to the north east of the site. These are served by Routes 107, 292, 398, 615 and B3.
- 4.3 The routes provide regular services to: Barnet, Edgware, Colindale, Potters Bar, and Hatfield.

# Pedestrian and cycle access

- 4.4 Pedestrian access is available from Maxwell Road, by means of footways adjacent to each of the two vehicular accesses.
- 4.5 There is a comprehensive network of footways on both sides of the roads surrounding the community centre. The footways are generally between 1.8m and 3.0m wide, although sections of the footways on Maxwell Road are overgrown by adjacent trees and bushes.
- 4.6 There is a footway link to Bullhead Road through the Maxwell Park site. This tarmacked path is public footpath number 18 and is lit. There are cycle lanes along Elstree Way which consist of a combination of on-street and off carriageway facilities on both sides of the road.

# **Retail and community facilities**

- 4.7 The site is well located relative to a wide range of retail and community facilities.
- 4.8 There are a number of shops and food and drink places on Shenley Road to the west of the site. The Borehamwood Shopping Centre is approximately 900m north-west of the site and easily accessible on foot or by bus along Shenley Road.
- 4.9 There is a Tesco store approximately 300m to the south-west of the site.
- 4.10 The closest primary school to the site is the Monksmead Primary School approximately 350m to the south of the community centre.

# **Employment opportunities**

4.11 There are a large number of offices and other employment premises within close proximity to the site; on Elstree Way, Shenley Road and around Chester Road, Warwick Road and York Way area.

# 5.0 PLANNING POLICY CONTEXT

#### NATIONAL PLANNING POLICY GUIDANCE

# **Implementation**

- 5.1 In March 2012 the National Planning Policy Framework (NPPF) was published and in doing so it replaced many documents including all Planning Policy Guidance Notes and Planning Policy Statements. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. Annex 1 of the NPPF provides guidance of how existing local plan policies which have been prepared prior to the publication of the NPPF should be treated.
- Paragraph 214 states that for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework. However this only applies if the development plan has been adopted in accordance with the Planning and Compulsory Purchase Act 2004.
- 5.3 Accordingly the advice at paragraph 215 of the NPPF applies which states that only due weight should be afforded to the relevant policies in the adopted local plan according to their degree of consistency with this framework.
- 5.4 The NPPF states that the 'presumption in favour of sustainable development' is at the heart of the planning system, and that:

For decision-taking this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

# **Promoting sustainable transport**

5.5 The promotion of sustainable transport is dealt with in section 4. At paragraph 32 it states that:

Plans and decisions should take account of whether:

the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;

safe and suitable access to the site can be achieved for all people; and

improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

# Requiring good design

- 5.6 The government attaches great importance to the design of the built environment, and this is dealt with in section 7 of the NPPF. Design is considered to be one of the key aspects of sustainable development.
- 5.7 Paragraph 61 states that:

'..planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

5.8 While paragraph 64 goes on to say:

'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

# **Promoting healthy communities**

5.9 Paragraph 70 seeks to protect social, recreational and cultural facilities and services and:

'guard against the unnecessary loss of valued services and facilities where this would reduce the community's ability to meets its day-to-day needs'.

5.10 Paragraph 72 highlights the importance that is placed on the provision of school places and specifically states that:

'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.'

5.11 They should:

'give weight to the need to create, expand or alter schools; and

work with school promoters to identify and resolve key planning issues before applications are submitted.'

# Delivering a wide choice of high quality homes

5.12 Section 6 of the NPPF has the aim of 'delivering a wide choice of high quality homes' and encourages local planning authorities to:

'approve planning applications for change to residential use ... where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.'

# 5.13 Paragraph 50 states that:

*'...local planning authorities should:* 

Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes.'

# Conserving and enhancing the historic environment

5.14 Conserving the natural environment is dealt with in section 11, and the framework re-iterates the government's previous policy by stating at paragraph 111 that:

'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.'

# **DEVELOPMENT PLAN**

5.15 Section 38 of the Planning and Compulsory Purchase Act requires that planning applications should be determined in accordance with the prevailing development plan unless material considerations dictate

otherwise. The current development plan framework for this planning application is:

- Hertsmere Borough Local Plan adopted 2003
- Local Plan Core Strategy adopted January 2013

# **Hertsmere Borough Local Plan (adopted December 2003)**

- 5.16 Under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Act 2004, policies in the Local Plan were due to expire on 27 September 2007, unless the Council requested their extension from the Secretary of State for Communities and Local Government. By direction of the Secretary of State, a number of policies in the adopted Local Plan have not been 'saved', and are therefore no longer material considerations.
- 5.17 All the policies summarised in the following paragraphs were 'saved' by Hertsmere Borough Council from the 27<sup>th</sup> September 2007.

### **Local Plan notation**

- 5.18 The whole site is within the Town and District Centre of Borehamwood in which **Policy T2 Town and District Centre Regeneration Proposals** applies and states that:
- 5.19 'The Council will, in association with other agencies from within the public and private sectors, pursue initiatives to assist the regeneration of its Town and District Centres..'.
- 5.20 That part of the site which does not include the community centre and the Guide Hut is designated as Urban Open Land, in which **Policy L3 Urban**Open Land Areas applies and states that:

- 5.21 'All development proposals within the Urban Open Land Areas, as designated on the Proposals Map, will be required to retain the essentially open character of the site.'
- 5.22 Development will not permitted unless it meets a number of criteria, and a detailed statement will be required demonstrating the benefits that will accrue to the wider community.
- 5.23 The local plan notations described above will clearly be relevant to any planning application made on this site, and in particular the urban open land designation.

# **Local Plan policies**

5.24 In addition to the local plan notations there are likely to be a number of other general policies in the local plan which the planning authority would consider relevant and would take into account when determining a residential application or an application for a 2FE school. Those which are considered most relevant, either because of the uses proposed or the details of the site are listed below.

# 5.25 **Policy H8 Residential Development Standards** states that:

'The design and layout of the proposed development should be of a high standard which complements the character of existing development in the vicinity of the site and maintains a harmonious street scene. In addition account will be taken of the following...'

- 5.26 **Policy H9 Redevelopment for Apartments in Existing Urban Areas** requires compliances with Policy H8, the retention of existing garden areas and the provision of secure parking for cycles.
- 5.27 **Policy L5 Recreational Provision for Residential Developments** sets out that developers are required to make provision for the additional recreational

demand they create, in accordance with the Council's Supplementary Planning Guidance. Such provision will be secured through the use of planning conditions and obligations to ensure the provision and subsequent maintenance of related areas, equipment or facilities, as appropriate.

- 5.28 **Policy M2 Development and Movement** supports development in locations with good access to passenger transport services, pedestrian and cycle routes, and where the highway network can accommodate the development.
- 5.29 **Policy M12 Highway Standards** provides that development proposals should comply with the advice set out in the County Council's 'Roads in Hertfordshire A Design Guide' (or as amended). Where appropriate, contributions may be sought via planning obligations for off-site highway works, demand management and other non-car based transport improvements.
- 5.30 **Policy E2 Nature Conservation Sites Protection** states that development which would have an adverse impact on wildlife sites will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the nature conservation or geological value of the site.
- Policy E7 Trees and Hedgerows Protection and Retention sets policy relating to the protection and retention of hedgerows. It is relevant in as much as it states that:
  - 'If development is approved which would result in the removal of trees and/or hedgerows, equivalent and appropriate replacement planting will be required.'
- 5.32 **Policy E8 Trees, Hedgerows and Development** sets the requirement for planting and landscaping proposals, which are relevant.

- 5.33 Policy D3 Control of Development Drainage and Run off Considerations states that planning permission will not be granted for development within areas at risk of flooding unless it incorporates appropriate flood protection measures.
- 5.34 Policy D5 Water Supply & Sewerage Facilities for New Development states that in considering proposals for development account will be taken of the availability of water and adequacy of sewerage systems and the impact of the development on them. Drainage requirements must be agreed with the relevant drainage authority to avoid mis-connecting foul water into the surface water system. Where necessary, contributions to improvements to utility infrastructure, related and appropriate to the development, will be required.
- 5.35 **Policy D21 Design and Setting of Development** states that developments must:

respect or improve the character of their surroundings and adjacent properties in terms of scale, massing, materials, layout, bulk and height;

retain, enhance or create spaces, views, landmarks or other townscape and landscape features which make a material contribution to the character of the area;

not impact adversely on prominent ridge lines, or other important topographical, ecological or landscape features; and

create safe and accessible environments.

5.36 **Policy D23 Access for People with Disabilities** refers specifically to access to buildings. It requires that proposals for new buildings must comply with minimum access requirements to allow people with disabilities satisfactory access.

### **LOCAL PLAN CORE STRATEGY**

- 5.37 The following general policies of the Local Plan Core Strategy are considered to be the most relevant and are likely to be taken into account by the planning authority when determining planning applications on the site.
- 5.38 **Policy SP1 Creating Sustainable Development** states that the LPA will seek to ensure that:

'new development will be required to prioritise the efficient use of brownfield land in delivering the land use requirements of the private sector, local service providers and the different needs of the hierarchy of settlements across the Borough.'

- 5.39 The policy goes on to specify that there will be a focus on prioritising development opportunities in Borehamwood. All development will be required to ensure a safe, accessible and healthy living environment for residents; seek to mitigate the environmental impact of transport by promoting alternatives to the car and opportunities for linked trips; be of high quality design and appropriate in scale, appearance and function to the local context and settlement hierarchy, taking advantage of opportunities to improve the character and quality of an area; avoid prejudicing, either individually or cumulatively, characteristics and features of the natural and built environment; and minimise and mitigate the impact on local infrastructure and services, among other things.
- 5.40 **Policy SP2 Presumption in Favour of Sustainable Development** states that the Council will take a proactive approach to development proposals and grant planning permission wherever possible.
- 5.41 **Policy CS4 Affordable Housing** requires delivery at a level of either 35% or 40% on sites of more than 5 dwellings and/or over 0.2ha.

- 5.42 **Policy CS7 Housing Mix** seeks to provide an appropriate mix and size of new homes in terms of housing size and type within each tenure.
- 5.43 **Policy CS12 The Enhancement of Natural Environment** requires all development proposals must conserve and enhance the natural environment of the Borough.
- 5.44 **Policy C16 Environmental Impact of New Development**, as well as seeking to minimise risks of detrimental environmental impacts, the policy states that:

'proposals will be required to incorporate sustainability principles, minimising their impact on the environment and ensuring prudent use of natural resources...'

- 5.45 by a number of specified measures.
- 5.46 **Policy CS19 Key Community Facilities** states that:

'Proposals for the provision or dual use of key community facilities, including educational, healthcare and recreational facilities, will be supported, subject to any environmental constraints and other relevant policies. The loss, reduction or displacement of facilities and sites will not be permitted unless it can be demonstrated that they are surplus to the needs of the local community or are no longer fit for purpose. It should also be demonstrated that there is no reasonable scope for alternative community uses to be provided and that any required, replacement accommodation elsewhere is satisfactory for all of its users, having regard to the provisions of Policy CS21.'

5.47 **Policy CS21 Standard Charges and other Planning Obligations** states that up until April 2014, or whenever the Council adopt a CIL charging schedule, provision for on and off-site facilities, services and improvements, for which a need is known to arise from new residential development will be secured

through the use of individually negotiated planning obligations and / or any standard charges.

5.48 Policy CS22 Securing a High Quality and Accessible Environment states that:

'the Council will require all development to be of high quality design, which ensures the creation of attractive and usable places. Development proposals should take advantage of opportunities to improve the character and quality of an area...'.

- 5.49 It also states that the Council will take account of the cumulative impact of new development, including the impact arising from residential intensification and redevelopment. Life time homes will be sought where 'practicably possible'.
- 5.50 **Policy CS23 Elstree Way Corridor** states that residential development on appropriate sites will be accepted, in accordance the Elstree Way SPG and any subsequent guidance or agreed masterplan.
- 5.51 **Policy CS25 Accessibility and Car Parking** states that parking will be provided for all modes of transport on new developments based on an assessment of a number of factors.

# 5.52 **Policy CS26 Promoting Alternatives to the Car** states that:

'New developments will be assessed in terms of their accessibility by a range of transport modes and where appropriate, measures to promote alternatives to the car will need to be provided as part of a proposed scheme...'

# DRAFT ELSTREE WAY CORRIDOR AREA ACTION PLAN

5.53 Elstree Way Corridor is an area in Borehamwood which is a mix of businesses, commercial units, public sector services and housing.

- 5.54 The Council has prepared an Area Action Plan (AAP) for the Elstree Way Corridor. The preparation of an AAP will put in place planning policies to guide development proposals, along with details of how these proposals will be delivered.
- 5.55 The Elstree Way Corridor has been identified within the Local Plan Core Strategy as being able to deliver at least 800 residential units, a significant level of housing to meet the needs of the borough. The redevelopment of the Corridor is an opportunity to improve the physical fabric of the area as well as environmental improvements to existing buildings, street and open spaces.
- 5.56 The Elstree Way Corridor AAP is an emerging document and still in draft form. A period of public consultation on the first draft ran from 7 January 2013 to 18 February 2013. All representations received during this period will be reported to the Council Executive and full Council, and where appropriate amendments made to the draft Plan. A revised Plan will undergo a further period of public consultation prior to a public Examination by a Planning Inspector. The next round of consultations will afford the County Council the opportunity to make representations on the plan.

### WILDLIFE SITES - A GUIDE FOR LANDOWNERS AND DEVELOPERS

- 5.57 This SPG has been prepared to further develop and explain the application of wildlife protection policies within the Hertsmere Local Plan. It was adopted in February 2003 and updated in November 2003.
- 5.58 The Maxwell Hillside Park is included in Appendix A, in the Schedule of Wildlife Sites within Hertsmere, has reference number 86/036 and is identified as a 'Wildlife Site'.
- 5.59 In describing the nature conservation policies in the adopted Local Plan, the SPG states at paragraph 3.5 that:

'The policies aim to prevent as far as possible damaging developments. Where damage is unavoidable, the approach taken is to seek minimisation of any harm and re-creation or replacement as appropriate through the use of planning conditions attached to any planning permission granted or planning obligations.'

# **GREEN SPACES AND AMENITY LAND REPORT – DECEMBER 2010**

- 5.60 The objectives of the study were:
  - To rate each green space in terms of its value and quality to the Borough;
  - To review existing urban open land sites for future designation or reallocation;
  - To suggest sites for the new local green spaces designation;
  - To identify any other types of green spaces, including highway verges
     and how best to treat these within a planning policy context; and
  - To make policy recommendations for the forthcoming Site Allocations and Development Management Development Plan Documents (DPDs) policies.
- 5.61 The Maxwell Hillside Park is identified in two parts (BW 013 & BW 032) as a park which is open to the public. It has been allocated into the category of 'Major Green Space'. Major Green Space is the highest categorisation based on its quality and value.
- 5.62 The report recommends some minor changes to policy L3 Urban Open Land from the adopted local plan, including re-naming UOL 'Major Green Spaces'.

MSW/5011/JUNE 2013 PAGE NO: 21

# 6.0 DETAILS OF THE ILLUSTRATIVE LAYOUTS

- 6.1 We have been instructed to prepare three indicative layouts on the Maxwell Park site comprising:
  - Residential development on the Community Centre site (Land parcel
     A)
  - Residential development on the Community Centre, Guide Hut site and adjacent land (Land parcel B)
  - A 2FE primary school and nursery on the combined site and park (whole site)
- 6.2 The land parcels are show on drawing **5011/006**.

# OPTION 1 - DISPOSING OF THE MAXWELL PARK COMMUNITY CENTRE SITE FOR HOUSING (5011/010A)

# **Housing mix**

6.3 The layout includes flats only as set out below.

Type of unit	No. of units
1 bed flat	4
2 bed flat	13
	17

# **Density**

6.4 The density of the development is 106.25 dwellings per hectare (43 dwellings per acre).

# **Public open space**

6.5 The layout provides no on-site open space, though private amenity space is provided and meets 99% of the requirements of the Hertsmere Borough Council minimum standards.

# Affordable housing

6.6 The scheme would be required to provide 35 or 40% affordable housing which would equate to 5-6 units.

# **Car parking**

- 6.7 The car parking provision is in line with the Council's parking standards, taking account of the site's position in Residential Accessibility Zone 3, in which 50-100% of the maximum standard may be acceptable.
- 6.8 The scheme provides 17 spaces which is 53% of the maximum parking standard.

# OPTION 2 - DISPOSING OF THE MAXWELL PARK COMMUNITY CENTRE, THE GUIDE HUT SITE AND ADJACENT LAND FOR HOUSING (5011/011A)

# **Housing mix**

6.9 The layout includes flats only as set out below.

Type of unit	No. of units
1 bed flat	10
2 bed flat	29
	39

# Density

6.10 The density of the development is 105.40 dwellings per hectare (42.66 dwellings per acre).

# **Public open space**

6.11 The layout provides no on-site open space, though private amenity space is provided and meets 89% of the requirements of the Hertsmere Borough Council minimum standards.

# Affordable housing

6.12 The scheme would be required to provide 35 or 40% affordable housing which would equate to 13-15 units.

# Car parking

- 6.13 The car parking provision is in line with the Council's parking standards, taking account of the site's position in Residential Accessibility Zone 3, in which 50-100% of the maximum standard may be acceptable.
- 6.14 The scheme provides 39 spaces which is 53% of the maximum parking standard.

# OPTION 3 - PROVIDING A NEW 2 FE PRIMARY SCHOOL WITH NURSERY (5011/007A)

- 6.15 Option 3 is the provision of a 2FE primary school for 420 pupils and a day care nursery for children.
- 6.16 The 2FE primary school is a part two storey and part single storey building, some 2,000 sq. m. in floor area. In addition to the school building, the site would include:
  - Informal hard play areas (1500 sq. m.)
  - Playing field including sports pitches (7100 sq. m.)
  - Team game marked play areas (900 sq. m.)
  - Car parking (33 spaces)

- 6.17 The site size is below the recommended site area for a 2FE primary school with a nursery as calculated using BB99. The site area is 1.46ha, while the recommended site area for a 2FE primary school with a nursery using BB99 would be approximately 2.13ha-2.33ha.
- 6.18 The recent changes to Government guidance on school sites, in The School Premises (England) Regulations 2012, means that the amount of outdoor space provided must now be 'suitable' rather than based on BB99.
- 6.19 However, the County Council intend to design school sites taking account of the Education (School Premises) Regulations 1999, as amended by the School Premises (England) Regulations 2012, but some flexibility will be required on smaller urban sites.

# 7.0 PLANNING AND HIGHWAYS APPRAISAL OF OPTIONS

7.1 This section of the report considers the planning and highways issues which the three options would raise and gives an assessment of these matters. In addition this section states whether the options proposed are likely to be considered acceptable in planning and highway terms.

# OPTION 1 - DISPOSING OF THE MAXWELL PARK COMMUNITY CENTRE SITE FOR HOUSING (5011/010A)

7.2 Option 1 is the residential redevelopment of the existing Maxwell Park Community Centre site. The proposal involves 17 X one and two bed flats in a part three and a half storey and part four and a half storey L shaped block. Parking, bin/cycle storage and private amenity space are also provided.

# Loss of community facilities

7.3 Policy CS19 Key Community Facilities of the adopted Core Strategy states that:

'The loss, reduction or displacement of facilities and sites will not be permitted unless it can be demonstrated that they are surplus to the needs of the local community or are no longer fit for purpose. It should also be demonstrated that there is no reasonable scope for alternative community uses to be provided and that any required, replacement accommodation elsewhere is satisfactory for all of its users...'

- 7.4 It is clear therefore that any development proposal on this site will have to justify the loss of the community centre, taking account of Policy CS19.
- 7.5 It is understood that the community centre is to be relocated to 96 Shenley Road. However, justification will still have to be included with the proposal as to why the community centre is no longer fit for purpose and could not be used by other community users.

# Impact on residential amenity and character of area

- 7.6 The closest residential dwellings to the site are within a six storey block of flats to the north (Foster House). The end elevation of the proposed westerly block would be some 16m from the adjacent flats, while the main elevation of the easterly block would some 23m from the flats.
- 7.7 These distances are consistent with Hertsmere Borough Council's standards on distances between residential properties, and are considered acceptable.
- 7.8 The character of the area is mixed and includes: six storey flats, multi-storey car parks, two storey houses to the east, offices and film studios.
- 7.9 The proposed flats would take their cue from the adjacent six storey block of flats. They would be lower than those adjacent, which is appropriate as they are closer to the park. It is considered that flats in this location are an appropriate use and would have no adverse impact on the character of the area.
- 7.10 Some consideration however will have to be given to the visual impact of the development in relation to park to the south in particular.

# Previously developed land

7.11 Paragraph 111 of the NPPF encourages the re-use of previously developed land (PDL) providing that it is not of high environmental value. The proposal would re-use PDL which is not of high environmental value and thus is consistent with the NPPF.

# Impact on highway

7.12 A High Level Transport Assessment (May 2013) has been carried out by Stomor Ltd to inform this planning and options appraisal. The report

concludes that this proposal would result in 9 vehicle movements from the site in peak AM period which would be easily accommodated on the surrounding highway network.

- 7.13 The Elstree Way Corridor Area Action Pan, (EWCAAP) described in section 5, includes proposals to improve facilities for pedestrians and cyclists along Elstree Way as well as to possibly signalise the junctions of Elstree Way with:
  - Maxwell Road, with a new link to the north at this point;
  - Brook Road, replacing the existing roundabout
  - Eldon Avenue/ Tesco, replacing the existing roundabout.
- 7.14 Proposals in the EWCAAP to signalise the junction between Maxwell Road and Elstree Way are unlikely to be significantly affected by housing development on the site as traffic generation will be relatively low.

# **Environmental impacts**

- 7.15 Other than the High Level Transport Assessment no other technical work has been carried out relating to this site and its redevelopment for housing. Should a planning application be submitted then a number of technical reports would be required to ensure that there are no unacceptable environmental impacts which cannot be mitigated.
- 7.16 However, based on available information it appears that there are few obvious environmental constraints:
  - The site is not in or adjacent to a conservation area.
  - The Indicative Floodplain Map obtained from the Environment Agency website shows that the site lies within Flood Zone 1 – Low Probability of Flooding.

- The site does not lie within a groundwater source protection zone.
- The site is not on or close to any former landfill sites.
- It is unlikely that there are any listed buildings adjacent to the site, although this would need to be checked through a heritage assessment.
- There are no trees or any other vegetation on the site of any importance.

#### **Nature conservation**

- 7.17 One environmental impact which will need to be addressed is the impact on ecology. The whole of Maxwell Hillside Park is designated as a County Wildlife Site. The boundary of the CWS goes beyond the site area of this proposal, to the south and south-west, but the vast majority of the proposal site area is within the CWS.
- 7.18 The residential redevelopment of the Community Centre site would involve the loss of a very small area of the CWS to the south-east of the building.
- 7.19 Any development which involves the loss of part of the CWS will need to be considered against policy E2 Nature Conservation Sites Protection, in the adopted Local Plan.
- 7.20 The policy states that proposals which effect such sites:
  - '..will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the nature conservation or geological value of the site.'
- 7.21 Development proposals based on any of the options in this report will need to be accompanied by an ecological survey, which assesses the ecological importance of the site and recommends appropriate mitigation.

- 7.22 The policy also mentions the possibility that an Environmental Statement may be required where:
  - "..proposed development could have an adverse impact on such a site."
- 7.23 It is considered unlikely that development on this site would require an Environmental Impact Assessment. However, it is recommended that a screening opinion is requested from the planning authority prior to the submission of any proposal.

# Consistency with the Draft Elstree Way Corridor Area Action Plan (EWCAAP)

- 7.24 The Draft EWCAAP states that the area has the potential to deliver at least 800 residential units. These dwellings are to be provided within the area defined on the proposal map (Figure 1) as the 'identified area of opportunity'. The sites in Options 1 and 2 are within the identified area of opportunity and as such residential development is acceptable in principle.
- 7.25 The key factors which have been taken into consideration from the EWCAAP are the guidance on height of buildings, density, and mix of development.
- 7.26 At the request of the client the housing proposals in Options 1 and 2 go beyond that which is envisaged in the EWCAAP and so technically are contrary to certain policies in the AAP.
- 7.27 Appropriate building heights are set out in Figure 4 and in Policy EWC8-Building Heights. The site is identified in an area which is suitable for buildings of 3-4 storeys. The supporting text at 6.15 states that:
  - 'The 3-4 and 1-2 storey building heights on sites not fronting Elstree Way will help maximise the number of homes which can be provided and will also respect the lower building heights of Bullhead Road and Shenley Road.'

7.28 As stated at 7.2 above, the two blocks proposed are three and a half and four and a half storeys in height. As such the westerly block is slightly higher than is envisaged in the policy, which states that:

'Development proposals are to adhere to general building heights.'

- 7.29 Whilst the scheme would exceed slightly the height guidelines, due to the fact that the flats opposite are six storey and the two storey houses on Bullhead Road are a significant distance away, a case could be made for a slightly higher scheme.
- 7.30 The density of development is dealt with in Policy EWC3-Housing Density and Distribution and in Figure 2. The site is within an area identified as suitable for 50-80 dwellings per hectare (DPH) and which is described as:

'Predominantly residential area lower density at interface with existing residential dwellings and Maxwell Park.'

# 7.31 Policy EWC3 states that:

'Proposed densities should be within these ranges and follow the principle set out above in distributing density within the development zone. Developments should be designed to take account of the amenity of adjacent sites.'

- 7.32 The proposal in Option 1 is 106 dph and so well above the 50-80 dph guidelines. Whilst the density of Option 1 is higher than that identified in Figure 2, it is significantly below the density of the six storey flats opposite.
- 7.33 However, a justification would need to be made to accompany a planning application for a higher density scheme, which demonstrated that no harm would result and an exception could be made to Policy EWC3.
- 7.34 Policy CS7 of the Core Strategy requires developments over 10 units (gross) to contain some variation, and Policy EWC4-Housing Mix states that:

'A mix of types of homes will be provided within the Elstree Way Corridor. Housing developments in excess of 25 units (gross) will contain some variation in housing mix and should include a proportion (approximately 30%) of 3 bed units.'

7.35 It could be argued that the scheme is consistent with Core Strategy Policy CS7 as it provides one and two bedroom units.

# OPTION 2 - DISPOSING OF THE MAXWELL PARK COMMUNITY CENTRE, THE GUIDE HUT SITE AND ADJACENT LAND FOR HOUSING (5011/011A)

7.36 Option 2 is the residential redevelopment of the existing Maxwell Park Community Centre site, the Guide Hut site and land to the east of the Guide Hut site. The proposal involves 39 X one and two bed flats in a part two and a half storey, part three and a half storey and part four and a half storey development. Parking, bin/cycle storage and private amenity space are also provided.

# Loss of community facilities

- 7.37 The same issues raised in paragraphs 7.3-7.5 above will also apply to Option2, which would involve the loss of two community facilities.
- 7.38 It is understood that the community activities provided within the Guide Hut have been re-provided elsewhere, but some justification will still be required if the site is to be redeveloped for housing.

# Impact on residential amenity and character of area

- 7.39 The potential impact of the proposed blocks on the former community centre site is dealt with in paragraphs 7.6-7.10 above.
- 7.40 The proposal on the Guide Hut site consists of three blocks which are directly opposite a multi storey car park. There would no residential

amenity issues to the north. To the east of the site there are existing two storey dwellings. These dwellings face onto Bullhead Road, with their rear gardens facing the site.

- 7.41 The properties on Bullhead Road have extremely long rear gardens, some 45m. The closest point between the proposed easterly block and the end of a rear garden is 15m. Therefore the closest distance between the easterly block and the rear of a property on Bullhead Road is some 60m
- 7.42 This distance is significantly above Hertsmere Borough Council's standards on distances between residential properties, and is considered acceptable.
- 7.43 Although this distance is more than comfortable for even a tall building, the easterly block has been kept to two and half storeys only.
- 7.44 As discussed in paragraph 7.8 above the location is mixed area and flats on the site would not be out of character.

# Previously developed land

7.45 As discussed about the NPPF encourages the re-use of previously developed land, and the proposal on the Guide Hut site would do so.

# Impact on highway

- 7.46 The High Level Transport Assessment (May 2013) concludes that this proposal would result in 20 vehicle movements from the site in peak AM period which would be easily accommodated on the surrounding highway network.
- 7.47 Proposals in the EWCAAP to signalise the junction between Maxwell Road and Elstree Way are unlikely to be significantly affected by housing development on the site as traffic generation will be relatively low. Signalisation may provide improved access to Maxwell Road to serve the

development, but predicted traffic flows associated with development would need to be taken into consideration in the design of the lights.

#### **Environmental impacts**

- 7.48 The environmental impacts discussed in paragraphs 7.13/7.14 above would be similar whether it is Option 1 or Option 2. The only apparent difference is that the site of the Guide Hut and adjacent land contains some trees and other vegetation and that more the CWS would be lost.
- 7.49 A number of trees would have to be removed to develop the Guide Hut site and adjacent land. An arboricultural survey would be required to ascertain the quality of the trees on or adjacent to the site. The trees appear to relatively immature in comparison to the three significant trees to the south of the site, which are within the park, and discussed under Option 3.
- 7.50 As another area of the CWS would be lost as a result of this Option, further justification and mitigation may be required.

#### Consistency with the Elstree Way Corridor Area Action Plan (EWCAAP)

- 7.51 The EWCAAP is discussed above in paragraph 7.16 where it is stated that the key factors which have been taken into consideration from the EWCAAP are the guidance on height of buildings, density, and mix of development.
- 7.52 The points made in relation to Option 1 are similar in relation to Option 2.
- 7.53 The two blocks proposed on the Guide Hut site are two and a half, three and a half and four and a half storeys in height.
- 7.54 Like Option 1, Option 2 would exceed slightly the height guidelines in the EWCAAP.
- 7.55 However, as described above, the closest distance between the rear of properties on Bullhead Road and the easterly block is some 60m. The

closest block to these properties is only two and a half storeys. The four and a half storey block is even further from the properties on Bullhead Road and is considered to be acceptable.

- 7.56 The proposal in Option 2 is 105.40 dph and so well above the 50-80 dph guidelines. However, for the reason set in relation to Option 1 it is considered that a case could be made for a scheme higher than 50-80dph range.
- 7.57 As stated previously Policy EWC4 Housing Mix states that:

'A mix of types of homes will be provided within the Elstree Way Corridor. Housing developments in excess of 25 units (gross) will contain some variation in housing mix and should include a proportion (approximately 30%) of 3 bed units. Flatted development will take place along Elstree Way and houses will be developed where new development meets the existing residential areas of Shenley Road and Bullhead Road.'

- 7.58 As it stands Option 2 is contrary to this policy as there are no three bed units. In addition the land adjacent to the Guide Hut site to the east, should possibly be developed for houses taking account of the second sentence of Policy EWC4. However, this sentence does not tie in with the fact that Figure 4 of the EWCAAP identifies the site as suitable for buildings up to four storeys high, which suggests flats rather than houses.
- 7.59 As stated earlier the proposals in both Options 1 and 2 go beyond that which is envisaged to be acceptable in the EWCAAP, in relation to height, density and mix of dwellings.
- 7.60 Pre-application advice therefore should be sought from the Hertsmere Borough Council prior to the submission of any planning application for a scheme based on either Option 1 or Option 2. This will clarify the

willingness of the planning authority to relax the standards in the EWCAAP to enable a larger number of dwellings to be provided on either site.

# OPTION 3 - PROVIDING A NEW 2 FE PRIMARY SCHOOL WITH NURSERY (5011/007A)

- 7.61 Option 3 is the provision of a 2FE primary school for 420 pupils and a day care nursery for children. The 2FE primary school is a part two storey and part single storey building, some 2,000 sq. m. in floor area. In addition to the school building, the site would include:
  - Informal hard play areas (1500 sq. m.)
  - Playing field including sports pitches (7100 sq. m.)
  - Team game marked play areas (900 sq. m.)
  - Car parking (33 spaces)

#### Loss of community facilities

7.62 The same issues raised in Option 1 and Option 2 above related to loss of community facilities will also apply to Option 3. The groups which use the community centre and the Guide Hut are being provided for elsewhere, but the buildings themselves will be removed. Justification for this will be required in all three options, but there will be greater justification in Option 3 due to the fact that the existing community facility buildings will be replaced by another community facility.

#### Impact on residential amenity and character of area

7.63 As described in the sections on Option 1 and 2, the only residential properties around the site are to the east, on Bullhead Road, and to the

- north at Foster House. Consideration of the impact on residential amenity from the school will be, therefore related to these dwellings.
- 7.64 There will inevitably be more activity at certain times of day outside the properties which front the park, and which will now be opposite the school access. It is not considered that there is any other suitable location for the access which would be further from the properties in Foster House.
- 7.65 The proposed main school buildings are some 40-60m from the closest elevation of Foster House. The closest part of the building contains the core services and would be only single storey. However, due to the distance away from the closest dwellings there would appear to be no reason why it could not be built at two storeys if that were required.
- 7.66 The properties on Bullhead Road are a significant distance from the proposed school buildings. The long gardens (45m) of the properties on Bullhead Road back on to the eastern boundary of the park, and the closest distance between the school building and one of these properties is some 85m. It is not considered that the school would have any adverse impact on any properties on Bullhead Road.
- 7.67 An area for team games is identified to the east of the school building, and would be some 3m from the end of the rear gardens of numbers 28-36 Bullhead Road. This area will create some noise at certain times of day but due to the length of the back gardens involved it is not considered that this relationship should be unacceptable.
- 7.68 As stated previously the area has a mix of uses and building types. The school would be a mixture of large single and two storey buildings and open areas for sports and play.
- 7.69 The proposed school buildings would be larger in footprint than the proposed flats in Options 1 and 2, but would be lower in height than in

these options. The footprint of the school buildings is more akin to the adjacent flatted block at Foster House, the buildings at Elstree Studios and the multi-storey car parks to the north of the site. Therefore it is not considered that a school of this scale should be considered out of character with the area.

7.70 In addition, much of the park will be retained open in nature due to the provision of sports and play facilities on site.

#### Previously developed land

7.71 This option will involve the re-use of previously developed land, although part of the development will be on urban open land (see below)

#### **Urban Open Land**

- 7.72 As stated in section 5 of this report, Maxwell Park, excluding the community centre site and the Guide Hut site, is identified in Policy L3 of the adopted Local Plan as Urban Open Land (UOL).
- 7.73 The policy states that:

'All development proposals within the Urban Open Land Areas, as designated on the Proposals Map, will be required to retain the essentially open character of the site.'

- 7.74 Development will not be permitted unless it meets a number of criteria, and a detailed statement will be required demonstrating the benefits that will accrue to the wider community.
- 7.75 Option 3 involves built development in the area designated as UOL. Part of the turning area and the vast majority of the proposed school building will be within the UOL.

7.76 It would not be possible to provide all the built requirements of a 2FE school outside the UOL. Therefore, the proposed school development would need to meet one of the criteria in Policy L3 which allows some development in the UOL or, if that is not possible, then a justification would need to be advanced which may overcome the requirements of Policy L3 in this instance.

#### 7.77 Criterion (iv) of the policy states that:

'it would provide recreational / leisure / community facilities to meet an identified community need within that particular area subject to compliance with the guidance on the intensity of recreational uses referred to in Policy L1 of this Plan.'

- 7.78 There may be scope to argue that the proposal is consistent with this part of Policy L3, based on the pressing need for school places, and no other more suitable site being available in the right location.
- 7.79 However, it is envisaged that the loss of a publicly available park will be controversial and is likely to raise local objection.

#### Loss of playing pitches

- 7.80 The site has one football goal located to the south of the Guide Hut. There does not appear to be a second football goal, somewhere opposite the first one, thus creating a football pitch.
- 7.81 It should be ascertained whether a sports pitch does exist now on the site, and if not whether one did in the past. Depending on the outcome of these inquiries, Sport England may need to be approached to discuss the impact of a school development on this site.

#### Impact on highway

7.82 The Stomor High Level Transport Assessment has considered the impact of a2FE primary school on the local highway network, although a more detailedTA will be required to accompany a planning application.

#### 7.83 The report concludes that:

The background levels of traffic on Elstree Way are already quite high, especially in the morning peak. Maxwell Road exhibits tidal flows due to the presence of a large amount of office parking being accessed from it. There is very limited on street parking in the area of Maxwell Road/ Elstree Way at present, and what is available appears to be well used.

- 7.84 The report considers that Maxwell Road and Elstree Way could accommodate the traffic flows associated with staff and visitors, but the larger impact would be from the parents.
- 7.85 Assuming a trip rate for cars of 40% and a car sharing ratio of 1.4 pupils per car for the 420 pupils + 60 nursery pupils, 137 car trips may be generated, and it is considered that Maxwell Road may be able to accommodate these movements in terms of width, but parent's vehicles would need to be accommodated on site.
- 7.86 It is anticipated that the school is likely to serve the local needs of the Elstree Way Corridor and this may have a beneficial impact on reducing the number of trips.
- 7.87 With respect to the access at Elstree Way, it is anticipated that the parent's vehicles could generate significant additional queuing from the west, waiting to turn right into Maxwell Road. This may be a significant factor if a 2 FE school was to be provided.
- 7.88 The report suggest options to alleviate the traffic impact, such as park and stride from the Civic Centre Car Park and/or Tesco and an entry only access from Bullhead Road, with the exit being onto Maxwell Road.

- 7.89 Signalisation of the junction between Maxwell Road and Elstree Way, as identified in the EWCAAP would help to manage flows into and out of Maxwell Road during the peak periods. However, it is assumed that in analysis of the potential for signalisation of this junction, that potential school traffic generation has not been allowed for to date.
- 7.90 The considerable school traffic generation would impact upon the suitability and arrangement of signalisation in this location as it would affect the through flow of traffic along Elstree Way.
- 7.91 It is clear that the impact of a 2FE school in this location will not be insignificant and the potential impacts and possible mitigations will have to be considered in more depth.

#### **Environmental impacts**

- 7.92 Should a planning application be submitted then a number of technical reports would be required to ensure that there are no unacceptable environmental impacts which cannot be mitigated, and should include amongst others, a trees survey and a phase one ecology assessment.
- 7.93 However, based on available information it appears that there are few obvious environmental constraints:
  - The site is not in or adjacent to a conservation area.
  - The Indicative Floodplain Map obtained from the Environment Agency website shows that the site lies within Flood Zone 1 – Low Probability of Flooding.
  - The site does not lie within a groundwater source protection zone.
  - The site is not on or close to any former landfill sites.

 It is unlikely that there are any listed buildings adjacent to the site, although this would need to be checked through a heritage assessment.

#### **Protecting trees**

- 7.94 One potential environmental impact is on some mature trees which are located centrally on the site.
- 7.95 The preliminary layout drawings prepared by the County Council for a school on this site (HP 2083A and HP 2083B) did not take sufficient account of some mature trees on the site. In the case of version A, no account was taken at all, and the trees were completely removed.
- 7.96 Our illustrative layout shows three large, mature trees in the centre of the site retained. Although no tree survey has as yet been carried out, it is clear from a site inspection that these trees are important specimens and make a significant contribution to the area and should be retained. The illustrative layout we have prepared therefore has worked around these trees.
- 7.97 The retention of these trees means that part of the site is sterilised, but this is unavoidable as we do not consider that the planning authority would allow a development which involved the removal of these trees.

#### **Nature conservation**

- 7.98 The other obvious potential environmental impact is on ecology (see paragraphs 7.15-7.21 above).
- 7.99 The development of the site for a 2FE primary school with nursery will have a more significant impact on this CWS than the residential proposals. A far

larger area of land will be built on, and significant parts of the site would become playing fields and team game areas, which will also have an impact on the site.

7.100 A more comprehensive justification and package of mitigation measures would be required to accompany a planning application for this level of development on the site.

# Consistency with the Draft Elstree Way Corridor Area Action Plan (EWCAAP)

- 7.101 The boundary of the EWCAAP includes the community centre and Guide Hut sites and Maxwell Park. Maxwell Park however, is not within the 'identified opportunity area'.
- 7.102 The EWCAAP, as currently drafted therefore does not envisage that Maxwell Park should be an area for development. At paragraph 3.3, the general principles of the EWCAAP includes the following:

'With a redesigned and improved Maxwell Park and additional open space..'

7.103 Paragraph 4.4 goes on to state that:

'Maxwell Hillside Park is located off Maxwell Road and Bullhead Road, and is within the EWC. The park provides an important open space function within the EWC and could be enhanced during the plan period.'

7.104 It is clear therefore that the redevelopment of the site for a 2FE primary school will be inconsistent with this aspect of the draft EWCAAP.

#### 8.0 SUMMARY AND CONCLUSIONS

- 8.1 This planning and options appraisal has considered three options for development on the Maxwell Park site, those being:
  - Residential development on the Community Centre site
  - Residential development on the Community Centre, Guide Hut site and adjacent land
  - A 2FE primary school and nursery on the combined sites and part of the existing Maxwell Park
- 8.2 The principle of residential development on the community centre site, or the community centre and Guide Hut site should not be an issue, subject to the community facilities policy of the adopted local plan being satisfied.
- 8.3 The client requested that the parameters of the two residential options exceed somewhat those envisaged in the Elstree Way Corridor Area Action Plan (ECWAAP).
- 8.4 The residential proposals in Options 1 and 2 are a mixture of flatted blocks between two and a half storeys and four and half storeys high. The height, density and mix of dwellings in these proposals are not strictly consistent with the relevant policies in the draft EWCAAP. However, it is considered that development which goes beyond the parameters in the ECWAAP could be acceptable, but this should be the subject of pre-application advice from the Hertsmere Borough Council.
- 8.5 There does not appear to be many significant environmental constraints on the Community Centre site and Guide Hut sites, but technical investigations should be carried out to ensure that there are no environmental impacts which cannot be mitigated.

- 8.6 It is not considered that there are likely to be any adverse impacts on the amenity of adjoining residential dwellings or on the character of the area as result of Options 1 and 2.
- 8.7 However, it is envisaged that the loss of a publicly available park will be controversial and likely to raise local objection.
- 8.8 A 2 FE school could be provided on the whole park site, though there are potentially more planning and highways constraints on this development than on the residential developments. Those constraints include:
  - Site is below the recommended site area for a 2FE primary school with a nursery as calculated using BB99
  - Mature trees on the site
  - Impact on the local highway network of additional traffic
  - Policy restriction related to the Urban Open Land designation
  - Possible loss of playing fields
  - Loss of publicly available local park
  - Loss of a significant areas of a County Wildlife Site
- 8.9 With regards to the impact on the County Wildlife site, as stated in the 2003 SPG, damage to such sites should be prevented where at all possible, but mitigation may be acceptable where some damage is unavoidable.
- 8.10 The conclusion of the report, however, is that all the options appraised are potentially achievable and may be considered to be acceptable in planning and highway terms, subject to further technical investigations, the formulation of appropriate mitigation strategies and discussions with local planning authority.

- 8.11 As stated in section 5, the EWCAAP will be out for publication again prior to submission to the Secretary of State. There is therefore an opportunity for the County Council to make representations on the draft document.
- 8.12 As has been discussed in section 7, in a number of ways the proposals in this report go beyond that which is envisaged in the EWCAAP, in particular related to height of buildings, density and dwelling mix.
- 8.13 Clearly the more consistency there is between any planning proposal and the EWCAAP when it is adopted, the better. As such the County Council should consider making representations on the next round of consultation on the EWCAAP.
- 8.14 Those representations could include promoting an increase in the height of buildings and density allowable in the area including the site, or a change to the wording which allows some flexibility where these guidelines are exceeded.
- 8.15 In addition the representations may request that the changes to the highway in the vicinity of the site take account of the potential traffic impacts of a 2FE school on the site.



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PROJECT TITLE

Maxwell Park Community Centre, BOREHAMWOOD Hertfordshire

DRAWING TITLE

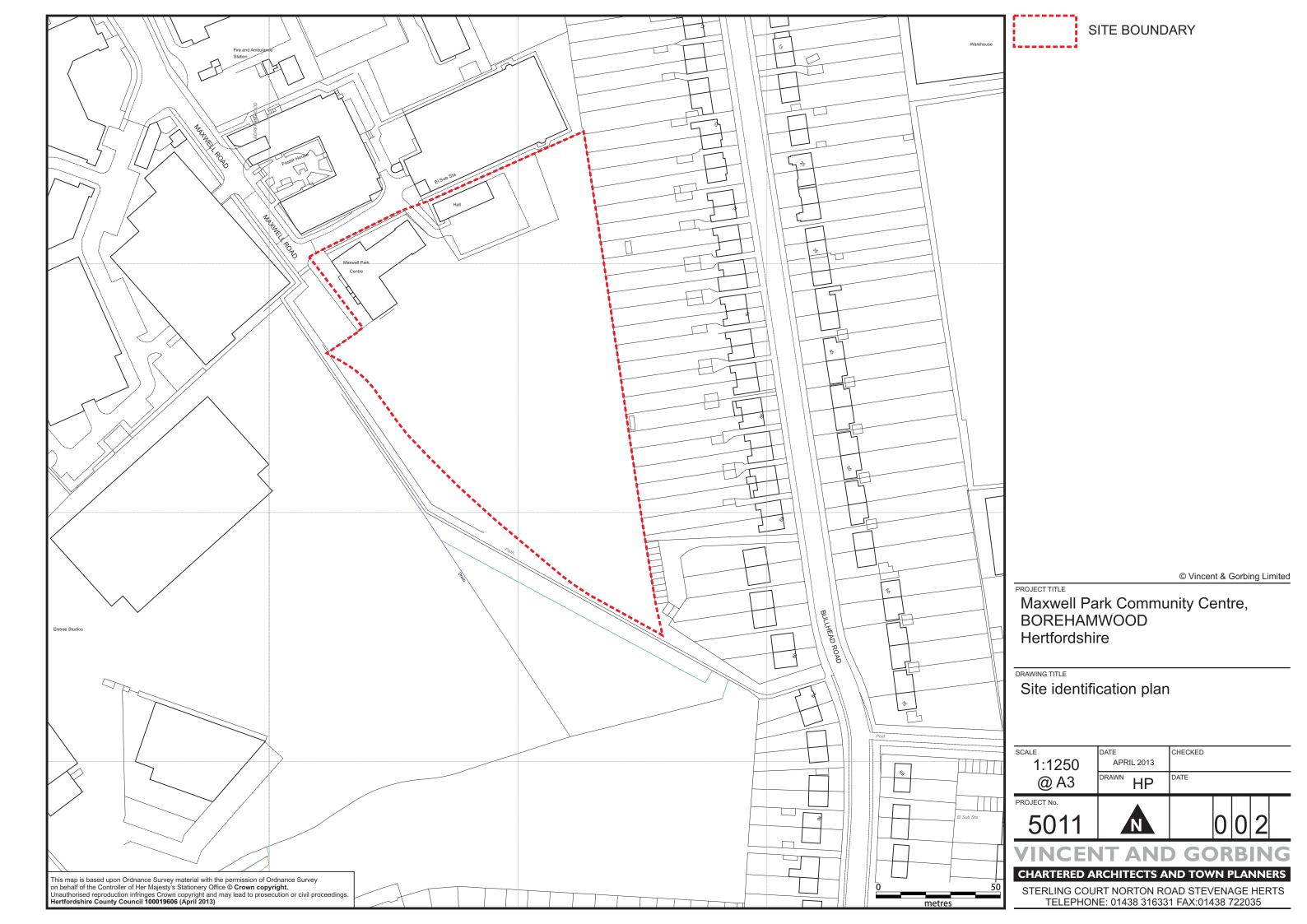
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Maxwell Park Community Centre, BOREHAMWOOD Hertfordshire

DRAWING TITLE

Aerial photograph (photograph date 24.4.10)

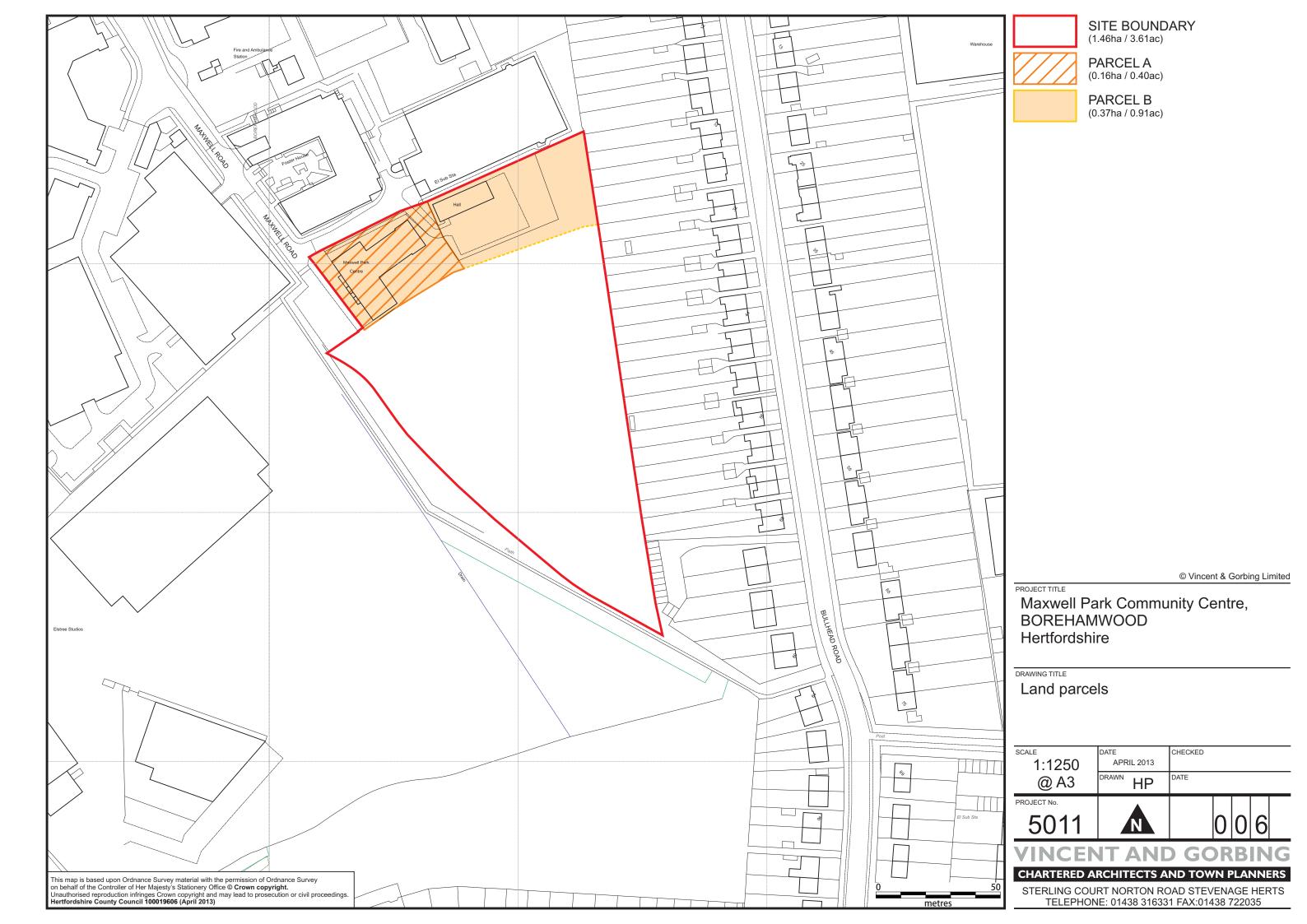
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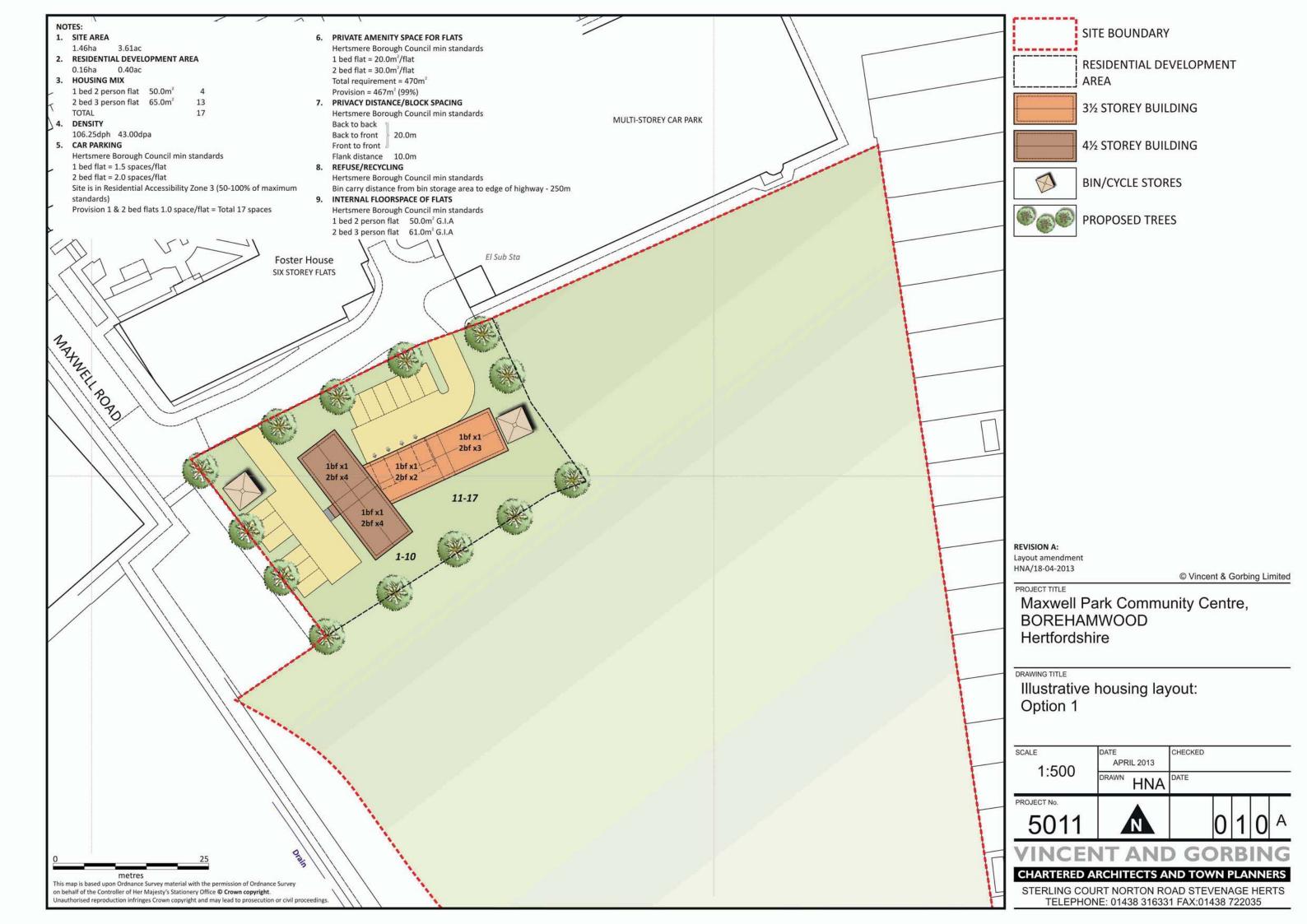
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