Rep 46 00993/1



14 March 2014

Planning Policy Team Hertsmere Borough Council Civic Offices Elstree Way Borehamwood WD6 1WA

Dear Sirs

Elstree Way Corridor Area Action Plan

Having read you flyer on the Elstree Way Corridor Action Plan my main concern is infrastructure. If you are planning to build this many homes, will this be taken into account by the Thameslink train service. The trains are already overcrowded during the rush hours and some trains are still only four carriages during this period.

I agree that the roundabout near the station should be fitted with lights (when I first moved to Borehamwood, it did have traffic lights).

Yours falthfully









31 March 2014

Mr Matthew Wilson
EWC Consultation Team
Planning Department
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Hertfordshire
WD6 1WA

Dear Mr Wilson

ELSTREE WAY CORRIDOR CONSULTATION

I am writing to comment on some of the proposals in the EWC AAP that concern me and I believe are also a concern to many residents who live in and adjacent to Borehamwood and use its facilities.

EWC 1 3.3b) With improved connectivity and accessibility with the town centre and employment area with significant highway improvements

Traffic in and around Borehamwood is a major concern already. With a minimum of 800 additional homes being planned for the 'corridor' it is difficult to see what can be done to update and improve the existing road network.

As so often happens with residential developments of this size, the infrastructure to meet the new demands for roads, schools, healthcare and social/community requirements comes later if at all.

The Council must ensure that funding, perhaps using s.106 money, is available to provide the infrastructure before the residential components of the 'corridor' come on stream.

Also, we are all aware that the homes planned for the 'corridor' are a minimum and there are several other sites within the curtilage of Borehamwood that will significantly increase the residential numbers and the pressure on the existing infrastructure.

EWC 2 4.3 National guidance encourages the efficient use of land, and to optimise the potential of development sites, the AAP proposes ranges of development density. Sites fronting Elstree Way are most suited to higher density flatted development. Sites set away

from Elstree Way, including those on Manor Way will be houses of a scale and form which respects existing residential areas and minimises visual intrusiveness.

The densities proposed for the 'corridor', 100 to 180 dph, are high, perhaps unacceptably so, and will not result in a sustainable or pleasant living environment unless good design and provision for off street parking (secure underground perhaps) and access to 'green spaces' are provided.

Space standards for homes in this country are already well below the European average. The AAP must set out minimum space standards otherwise developers will provide what they think they can 'get away with'.

Hertsmere Borough Council's Planning and Design Guide SPD does provide guidance for internal floor spaces but this is little more than aspiration. Therefore the Council should prescribe minima and must ensure that all residential development within the AAP achieve those minimum areas rather than just 'expecting' developers to achieve them because otherwise they will not.

EWC 4 4.12 Should, as preferred, an alternative site for a Primary School be found within Borehamwood, the open space will remain in use as such. However, any loss, reduction or displacement of the Girl Guide Hut and Maxwell Park Community Centre will not be permitted unless (1) it can be demonstrated that they are surplus to the needs of the local community or are no longer fit for purpose and (2) any required equivalent reprovision nearby, within an existing or new building (single or multi-use), is satisfactory for all of its users.

I share the concern of residents in Borehamwood that the Maxwell Park Community Centre/Winn Everett Guide HQ may be lost to provide a primary school.

It is unlikely that the activities provided at Maxwell Park can be accommodated at 96 Shenley Road so the solution must be to build the school elsewhere, probably as part of the redevelopment of the Hertswood Academy site at Cowley Hill.

With more and more people moving into the area, these social/community facilities are becoming ever more essential to a balanced quality of life and must be safeguarded.

As a final comment, I note that Hertsmere Borough Council quite rightly recognizes 'a significant weakness of the EWC is the lack of quality and consistent public realm in keeping with the area's significance as a gateway into Borehamwood town centre' and has set out policies to guide that improvement. However, the EWC is not the only 'gateway' to the town and others such as Theobald Street, where the green spaces give way to the urban fringe are becoming increasingly 'uglified'. The latest addition to this area is a quite incongruous and unnecessary electronic traffic sign which I have previously written to my local County Councillor about.

I trust you will take the above matters into consideration when the AAP is finalized.

Yours sincerely



Elstree Way Corridor Area Action Plan

For office use only

Reference No:31094/1/00 Date received: 29/65/14

Representations can be made using this form:

Please return to Hertsmere Borough Council by 5pm on 31st March 2014

By post:

Policy and Transport team, Planning and Building Control Unit,

Hertsmere Borough Council, Elstree Way, Borehamwood, Herts, WD6 1WA

By email:

elsteewaycomdor@hertsmere.gov.uk

This form has two parts:

Part A - Personal details (only needed once)

Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal detalls*	2. Agent details (if applicable)
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone number		
Email address		

^{*}If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Please note that all representations received will be made publically available and cannot be treated as confidential.

For office use only Part B Ref No: support: Please use a separate sheet for each representation object: Name or organisation: omission: 3. To which part of the Area Action Plan does this representation relate? **Policy** Paragraph - 11 4. Do you consider the Area Action Rian is: (1) Legally Compliant DO NOT KNOW (2) Sound If you have entered 'no' to 4(2), please continue to Q5, in all other circumstances, please go to Q6. 5. Do you consider the Area Action Plan is unsound because it is not: (1) Justified (2) Effective (3) Consistent with national policy DO NOT KNOW 6. Please give details of your answer to question 4 or 5 and why you have responded in this way. Page 12 Paragraph 4:11 states that the area comprising the Gulde Hut and Maxwell Park Community Centre has been RESERVED

for a Primary School. Page 26 key to map indicates it has been ALLOCATED for a primary school. Policy WEC4 further states that

Maxwell Park Community Centre will be reprovided for on Sheniey Road along with the Ubrary. Not only is this a poor choice of

position for a school, due to the lack of access and egress to the site, it will mean that most of the regular weekly activities currently

provided for by Maxwell Park Community Centre will be lost. Enquiries have already been made at 96 Shenley Road and we have

been told that there is no way they can accommodate all of our groups or provide the required storage and parking for those who

could find a time-slot.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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Pla ab ma abl	in legally col ove where the ke the Area e to put forv	ut what change(s) you con mpliant or sound, having re ils relates to soundness. Y Action Plan legally complia vard your suggested revise ossible.	egard to the test yo ou will need to say ant or sound. It wil	ou have identified at 5 why this change will Il be helpful if you are
for to to the country of the country	or its activities of the removed of	redevelop the Maxwell Park Coat 96 Shenley Road needs completely from the plan as a sloriteria, which states elopment has to make provisionaties. 96 Shenley Road is already the Library, the Museum, the Storb Maxwell Park Community Guide Hut. The suggestion of the nunity use is also not feasible if be allowed on-site during school.	ite for redevelopment n for, or support, <u>imp</u> y replacing unday School and You e proposed primary so	The plan has already failed roved and additional th Connexions shop. It chool having shared facilities
8. I	f your repre	sentation is seeking a chai e oral part of the examinat No, I do not wish to participate at the oral examination	nge, do vou consid	Yes, I wish to participate at the oral examination
9. i	f you wish to consider th	o participate at the oral part	rt of the examination	on, please outline why
thos	e who have i	inspector will determine the indicated that they wish to pa	most appropriate prarticipate at the oral	part of the examination. $29.03.2014$



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First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone number		
Email address		

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Part B

Please use a separate sheet for each representation Name or organisation:

For office use only Ref No: support: object: omission:

3. To which part of the Area Action Plan does this representation relate?					
Paragraph [Para 3.3b	Policy	Policy EW	C 1	
4. Do you co	nsider the Area Ac	tion Plan is:	HVPF		
(1) Legally Co	empliant Ye	s 🗸	No		
(2) Sound	Ye	s	No	✓	
If you have ente	ered 'no' to 4(2), plea	se continue to Q5.	In all other	circumstances, please go to Q6.	
5. Do you co	nsider the Area A	ction Plan is uns	sound bec	ause it is not:	
(1) Justified					
(2) Effective		1			
(3) Consisten	t with national polic	у 🗔			
6. Please give details of your answer to question 4 or 5 and why you have responded in this way .					
Roads within the town were built in the 1930s and will remain narrow and unfit for traffic in the 21 st Century. No matter what work is carried out on existing road networks there will continue to be traffic congestion for most parts of the day. Getting out of the EWC in the morning is a nightmare with the option of going North on the A1 being the only route free of massive congestion.					
Although near to	public transport routes	;			
Persuading residents to give up their cars is aspirational not a reality. Routes do not necessarily correspond with where people need to go or want to travel.					
Rail transport to and from the town leaves much to be desired and travel to and from the station adds considerably to the congestion, particularly in the morning and evening. In a recent survey First Capital Connect who run the rail service, in a recent Which Report, were rated 17th out of 19 companies for customer satisfaction. This clearly adds to the frustration of commuters living in the EWC. The lack of parking at the station is another bone of contention.					

(continue on a separate sheet if necessary)

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Stakeholders in transport matters are outside the planning authority control.

7. Please set out what change(s) you consider necessary to make the Area Action Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.			
Before any develop plans set in place, v	oment takes place, it is critical that with timescales to ensure that they	the transport requirements need to be identified and y proceed in parallel.	
	he oral part of the examina No, I do not wish to participate at the oral	Yes, I wish to participate at the oral	
	examination to participate at the oral pa	examination art of the examination, please outline why	
		(continue on a separate sheet if necessary e most appropriate procedure to adopt to hear participate at the oral part of the examination.	
tnose wno nave	indicated that they wish to		

GUIDANCE NOTES

Introduction

These guidance notes have been produced to assist anyone who wishes to make a formal representation on the published Elstree Way Corridor Area Action Plan submission document, which is subject to a period of representations from 17th February 2014 to 31st March 2014. The Area Action Plan is published in order for representations to be made prior to the submission for public examination. The representations will be considered alongside the submitted Area Action Plan, by a independent Planning Inspector.

The Planning and Compulsory Purchase Act 2004¹ (the 2004 Act) states that the purpose of the examination is to consider whether the Area Action Plan complies with legal requirements and is 'sound'. The representations supporting, objecting or commenting more generally should be made within this context.

Soundness

Soundness is explained fully in the National Planning Policy Framework², in paragraph 182. The Inspector has to be satisfied that the Area Action Plan has been positively prepared, is justified, effective and consistent with national policy. To be sound the Area Action Plan should be:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 1) If you are seeking to make representations on the way in which the Local Planning Authority (LPA) has prepared the published Area Action Plan it is likely that your comments or objections will relate to a matter of legal compliance.
- 2) If it is the actual content on which you wish to comment or object it is likely it will relate to whether the Area Action Plan is justified, effective or consistent with national policy.

Please note that all respondents must complete their personal details as it is not possible for representations to be considered anonymously. Respondents should also note that representations are not confidential and that they will be published on the Council's website and copies will be placed at appropriate venues across the borough for public inspection, although the names and addresses of representations from individuals will be removed.

¹ View the Planning Act online at http://www.legislation.gov.uk/ukpga/2004/5/contents

² View the National Planning Policy Framework online at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Legal Compliance

The Inspector will first check that the Area Action Plan meets the legal requirements under Section 20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making representation on a legal compliance:

- The Area Action Plan should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the documents it proposes to produce over a set period. It sets out the key stages in the production of any documents the Council propose to bring forward for independent examination. The LDS is published on the Council's website and available at their main offices.
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- The Council is required to publish a Sustainability Appraisal Report when they
 publish the Area Action Plan. This should identify the process by which the
 Sustainability Appraisal has been carried out, and the baseline information used
 to inform the process and the outcomes of that process. Sustainability
 Appraisal is a tool for appraising policies to ensure they reflect social,
 environmental, and economic factors.
- The Area Action Plan should have regard to national policy.

General advice

Representations are only valid if your name and address are supplied. Agents should please state the full name or organisation of who they are representing.

If you wish to make a representation seeking a change to a Area Action Plan or part of an Area Action Plan you should make clear in what way the Area Action Plan or part of the Area Action Plan is not sound having regard to the legal compliance check and four tests set out above.

You should try to support your representation by evidence showing why the Area Action Plan should be changed. It will be helpful if you also say precisely how you think the Area Action Plan should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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Where there are groups who share a common view on how they wish to see the Area Action Plan changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

KCP 49

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First name	ard	
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Part B Please use a separate sheet for each representation

For office use only Ref No: support: object: omission:

Name or organisation:					omission:
3 To which p	art of the Area	Action	n Plan does t	his renres	entation relate?
_	Para 6.23		Policy	Policy EW	
4. Do you con	sider the Area	Actio	n Plan is:	or statement	Mental Language of the Control of th
(1) Legally Cor	mpliant	Yes	_	No	
(2) Sound		Yes		No	✓
					circumstances, please go to Q6.
(1) Justified					
(2) Effective			/		
(3) Consistent	with national p	olicy			
6. Please give responded in		ur ans	wer to questi	on 4 or 5 a	and why you have
district nurses, o		ial worl	kers or delivery	men. Althoເ	family, GPs, health visitors, ugh we would want to encourage on not a reality

(continue on a separate sheet if necessary)

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Make the car parking allocations realistic	C.
8. If your representation is seeking a participate at the oral part of the exar	(continue on a separate sheet if necessary) a change, do you consider it necessary to mination?
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the or you consider this to be necessary:	al part of the examination, please outline why
	(continue on a separate sheet if necessary)
	ne the most appropriate procedure to adopt to hear h to participate at the oral part of the examination,
Signature:	Date: 29th March 2014
If you wish to be informed of Secretary of State, please tick	the date of the submission of the document to the c this box

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REP 50

To whom it may concern,

I am writing this letter with regard to the developments planned for Borehamwood. My family have lived in Borehamwood for over 60 years and obviously we have seen the town change a considerable amount within this period.

I strongly oppose, as does everyone I know in Borehamwood, the planned developments for this area. Borehamwood does not possess the infrastructure to support such developments, and never will, as it is a small town that is already full to capacity. Simply trying to drive through the village or surrounding area is already a nightmare as the roads were not designed to accommodate so much traffic.

Another issue is schooling; we once had four secondary and one grammar school here, we now have one mainstream school. I still do not understand why Yavneh College was built in this area as it only serves a very small number of local people rather than the vast majority of the community. Why was this land not used for a non-religious school or for housing development? This may have been of far greater benefit to the community. Although there are plans to build another school, this would have to serve the new influx of people; these plans have not been thought out, it is too little too late.

Maxwell Park Community Centre is a thriving place that is booked most days of the week and widely used by the community. The notion that all the activities that take place there could be relocated to 96 Shenley Road is absolutely ludicrous; many of the activities there necessitate high volume sound, how will this fit into a library? Plus customers having to pay for parking with the higher cost of renting the library hall will eventually destroy most of the established groups already using the community centre.

Further issues arise with licensed establishments in Borehamwood. During the last ten years we have seen four public houses close and developed on/or development planned for them. Now there are plans to close the Directors Arms and the Three Ways in order that the land can be used for the building of more flats. Enough is enough; this community is being destroyed and turned in to a town full of houses, flats, cars and businesses with no community.

It is understandable that more houses are needed, but why is Borehamwood the main focus for most of the planned developments that are being blamed on government directive? I and many others have decided the only way to halt these planned developments is to vote out the present council and re-elect one that is going to fight for this community or has alternative ideas.

I look forward to your response.



