

31st March 2014

Elstree Way Corridor Public Consultation
Policy & Transport Team
Hertsmere Borough Council
Civic Offices
Elstree Way
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Dear Matthew,

Elstree Way Corridor Area Action Plan Consultation Response

Thank you for consulting Heronslea Group on the draft Area Action Plan (AAP). As an active developer in Hertsmere, Heronslea Group welcome the principle of the AAP and the commitment by the Council to deliver residential dwellings in the Elstree Way Corridor.

The AAP will put in place planning policies to guide development proposals along the corridor, along with details of how these proposals will be delivered. The draft document gives increased certainty to potential investors, and developers and sets a clear path forward. This is imperative to the success of the AAP.

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. As a key local developer with a vested in Hertsmere we welcome the aspirations of the council and those set out in the AAP and Core Strategy.

A number of sections of the AAP have evolved since the previous consultation, which Heronslea commented on, these include:

- **Inclusion of a reserved site for use as a primary school.**
- **"Safeguarding" of land for a health facility.**
- **Retention of the Shenley Road and Tesco roundabouts.**
- **Change of community facility policy.**
- **Extension of the EWC area to include part of Manor Way.**
- **An increased number of residential dwellings / density** As a consequence of extending the EWC boundary to encompass part of Manor Way, the potential for increased residential densities through modification to Policy EWC3, a greater number of dwellings could be delivered which has the potential to give rise to impacts on social and physical infrastructure. Potential capacity to accommodate an upper limit of 1,200 dwellings.
- **Parking Standards.** modified to reduce the levels of car parking that will be allowed for residential development.
- **Further information on Developer Contributions.**

Whilst some of the amendments are welcomed, other changes create uncertainty and dilute the ability of the Elstree Way Corridor. This means the current draft fails the tests of soundness as explained in paragraph 182 of the National Planning Policy Framework. The Area Action Plan has to be positively prepared, justified, effective and consistent with national policy.

Extension of the AAP area - Policy EWC1

The AAP has been extended up Manor Way. Which appears to respond to Taylor Wimpey's representation. The potential to extend the Corridor is acknowledged, this must meet the requirements of the NPPF and the recently published NPPG. Whilst these sites have the potential to be converted under PD. There is no real evidence that the sites are no longer fit for purpose, surplus to requirements or actively available. The deliverability of this area is questionable, most of the sites are not included in the Hertsmere SHLAA.

Whilst Instalcom House has been known in the market for some time, there is no evidence that these sites are available or deliverable within the plan period. The extension includes, Meteor House, Devonshire House, Capital Business Park, Manor Place Industrial Estate and Instalcom House. Instalcom House is included in the SHLAA and Meteor House is being offered in the market for rent. The loss of the employers to the Hertsmere economy is significant, is there sufficient compensatory land which is available within the plan period? No evidence is provided to demonstrate this.

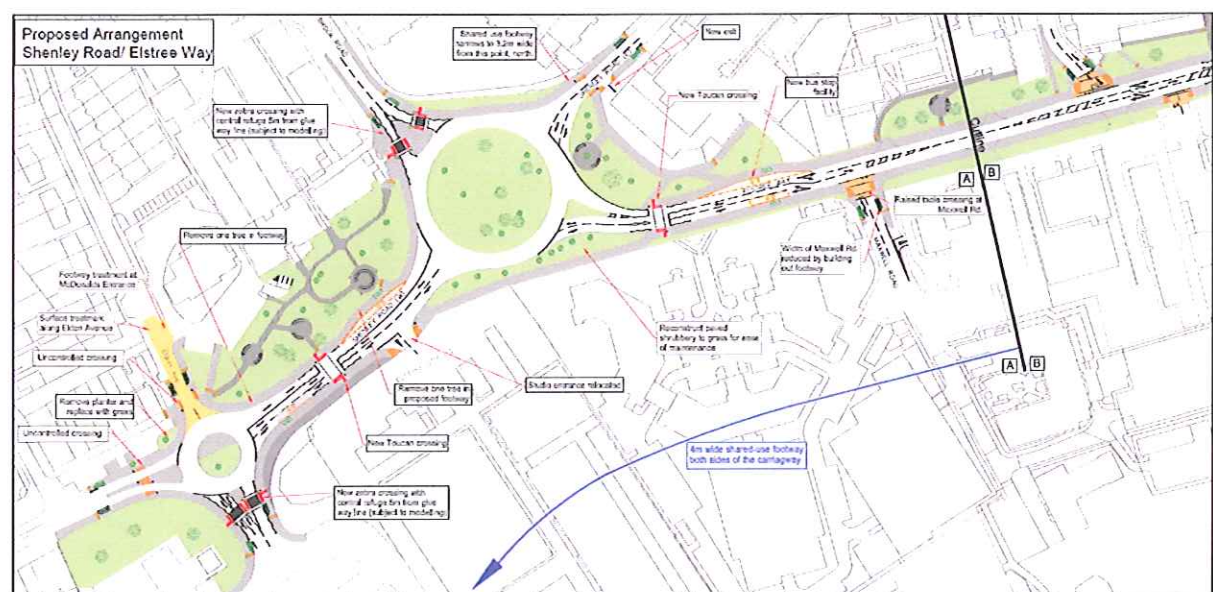
There is a reliance on land that may not necessarily be available. This area is also outside of the transport modelling work area, the addition of another potentially 400 houses could have serious implications on the infrastructure capacity. This appears not to have been considered within the highways statement.

The potential extension has not been demonstrated to be deliverable, achievable or based on justified evidence, as a result it is unsound.

Infrastructure (EWC 5)

One matter of discussion on all redevelopment scheme is the ability of infrastructure to cope with any additional demand. A key aspiration of the AAP has been to improve the quality of the street scene and public realm. It is understood that a number of evidence base studies have been undertaken. However, the plan keeps changing. At the public meetings held late in late 2013 Figure 1 was shown.

Figure 2: Road Network From Submission Draft EWC AAP



The road network has changed considerably with the roundabouts remaining. The NPPF requires that DPDs are justified and effective. As a result this needs to be demonstrated. The 'Transport Statement' a single side of text, states that in Section 3.0 Next Steps "Traffic modelling is to be undertaken to allow any refinements to the scheme to be identified" surely this should have been done prior to the submission of the document. No explanation is provided why the road network has changed so significantly. The document needs to illustrate how this level of development meets Policy SP1 of the Hertsmere Core Strategy, how will it minimise and mitigate the impact on local infrastructure and services.

Within the Core Strategy Inspectors Report it states:

The Council is working jointly with Hertfordshire County Council to ensure that work is completed on the detailed phasing and costing of the highways infrastructure improvements and this will inform the AAP and justify the scope and level of contributions required from developers. It has been confirmed that the essential enabling infrastructure including the proposed removal of the Shenley Road roundabout will predominantly although not exclusively be funded by developer contributions.

At current the plans have appeared to changed, and there is no detailed phasing and costing which has been published to support the submission draft document.

In addition the document and its limited evidence base fail to illustrate whether the impact of the potential development of Hertswood School, which has undertaken its own consultation, and is a potential site allocation for residential has been considered. An additional 250-300 houses, adjacent to the Elstree Way Corridor will have a significant impact on the local roads.

At current this policy is not sound. Robust evidence is needed to support this Policy. Such evidence should have been produced in advance of the publication, and not retrofitted around the document.

Community Facilities EWC4

Policy EWC4 and the supporting text lack a clarity. It is hard to understand the mechanism for the delivery of the doctors surgery. Three potential sites are highlighted and ranked in order, however, surely the owners of two of the sites will want to deliver residential on these sites to maximise the values. There is nothing to oblige them to provide the facility. In addition the 'safeguard' is not referenced in the policy. This approach lacks deliverability, and is not justified. No evidence is demonstrated of any positive discussions with the landowners.

The locations identified for the delivery of medical facilities would limit the potential delivery of the corridor, as developable area would be lost for community facilities, as a result this would undermine EWC3.

There is also some potential constraints within the corridor which would affect the delivery of the health services. Elstree Way is characterised by a wide verge. Under this verge is the main water services and energy sources for Borehamwood. The ability to build over this is highly limited.

The policy also seeks the potential of a new primary school in Maxwell Park, however, the leader of the Council appears to be suggesting an alternative approach. In a recent article in the Borehamwood Times he said this was the least preferred option. As a result the AAP should include the other options being considered by the Council.

http://www.borehamwoodtimes.co.uk/news/11106826.Maxwell_Park_is_the__least__preferred_option_for_a_new_school/

At current this policy is unsound as it is not clear or deliverable. A clear delivery plan for the medical facility and school is required to justify the Policy.

Housing Density and Distribution EWC3

This policy has the aspiration to deliver a minimum of 800 dwellings. It is an important element of the Hertsmere housing land supply. However there is no clear master plan of how 800 dwellings can

be achieved. No master plan demonstrates how sites can be delivered within the requirements of EWC7, density levels, and the Planning and Design Guide Part D. Whilst EWC2 seeks to deliver development comprehensively there is rightly nothing to stop sites coming forward in a piecemeal manner. There has been no obvious attempts to assemble land comprehensively. As a result there is a high likelihood of piecemeal development which will not result in the yield of development hoped for by the Council. The corridor has to provide a number pieces of infrastructure, including a new fire station, and meet the requirements of pages 27-28, this will further limit the developable area.

To make this sound a clear master plan of how the 800 dwellings will be delivered within the constraints, other policies should be produced. This should also be supported with by a delivery strategy.

Conclusion

We welcome the principle of the redevelopment. However we have concerns that the area will not be able to deliver 800 dwellings within the identified opportunity area as illustrated on Figure 1. The level of required community infrastructure such as the school, health facilities, and fire station will limit the ability of the identified area to deliver at least 800 dwellings. When coupled with the development constraints of the services, density and height constraints, and other design policies, the ability to deliver 800 dwellings is doubtful.

Comprehensive development is required to get anywhere close to 800 dwellings. The document is not supported by a master plan to demonstrate how the envisage level of development can be achieved. There is no clear mechanism or land assembly, there is a high chance that development will be piecemeal. This will further dilute the ability of the corridor to achieve its aspirations.

All DPDs must be supported by a clear evidence base which justifies the approach and principle within them. This is not the case with this DPD. The transport statement equates to a single page. It fails to provide any modelling or any substance behind the work. It fails to demonstrate why the highway approach has fundamentally changed. The evidence fails to demonstrate the impact of other developments in the area such as the highly publicised Hertswood School. This will surely test the highway infrastructure. The document is not justified by evidence.

We would be happy to provide additional information as part of the examination process, and to be like to attend the Examination in Public.

If there is any additional information you require, or any matters of clarifications you require on these representations please do not hesitate to contact me.

Yours sincerely,



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