

INTERNATIONAL BIBLE STUDENTS ASSOCIATION

IBSA House, The Ridgeway, London NW7 1RN
Telephone 020 8906 2211

Planning Policy Team
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood WD6 1WA
By email to: elstreewaycorridor@hertsmere.gov.uk

28 March 2014

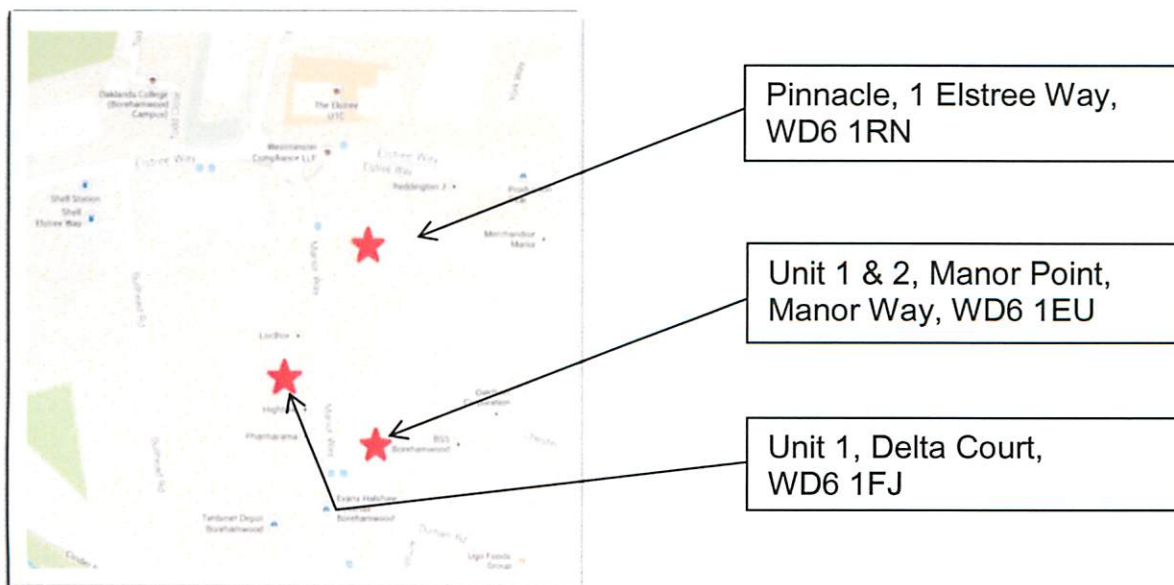
Dear Sir / Madam

HERTSMERE BOROUGH COUNCIL LOCAL DEVELOPMENT FRAMEWORK Elstree Way Corridor Area Action Plan Proposed Submission

Thank you for the opportunity to comment on the above document. The following representation has been prepared on behalf of the International Bible Students Association (IBSA) in response to the Elstree Way Corridor Area Action Plan (EWCAAP) Proposed Submission Consultation.

IBSA's interests

IBSA owns three sites: the former Cardiff Pinnacle building on Elstree Way/Manor Way junction, Manor Point Units 1& 2, and Delta Court Unit 1 on Manor Way (as shown on the map below). Delta Court is already located within the proposed boundary of the EWCAAP (as revised). Pinnacle and Manor Point are located immediately adjacent but outside the proposed EWCAAP boundary. All of IBSA's sites are currently in employment use. However, IBSA is considering relocating away from the area in order to consolidate its operations onto one site. As a result, it may be possible to bring forward these sites for residential use, should that be the Council's aspiration.



Context

Section 2 of the Proposed Submission EWCAAP sets out the Strategic Vision for the Elstree Way Corridor (EWC). Paragraph 2.2 states that the EWC *“has the potential to deliver at least 800 residential units”* by 2027. The delivery of this number is crucial in a borough in which 80% of land is in the Green Belt and whose Council has focused on providing housing from within built up areas (in line with the NPPF). The importance of the EWCAAP is underlined further by the fact that the Council's Core Strategy (2012 – 2027) has identified a minimum target of 3,990 homes to be delivered within that 15 year period, and only 4,000 homes worth of supply identified. Therefore, the Council's wider housing targets would be undermined without the EWCAAP delivering its target housing numbers.

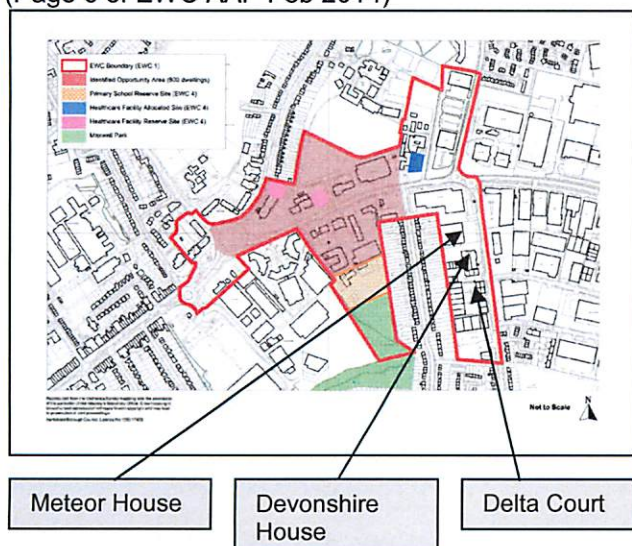
Previous Boundary Change

During the public consultation of the draft EWCAAP, representations were made by the developer Taylor Wimpey to enlarge the area boundary to include properties to the rear of Gemini House and west of Manor Way. The developer had undertaken a feasibility study which indicated that it would be “extremely unlikely” that 800 dwellings could be achieved in the defined area in view of other policy requirements such as infrastructure provision. The Council appears to have accepted the validity of Taylor Wimpey's representation because its response was to extend the red-line boundary of the submission draft AAP to include Meteor House, Devonshire House, and Delta Court as shown in Figure 1 from the EWC AAP Feb 2014 below.

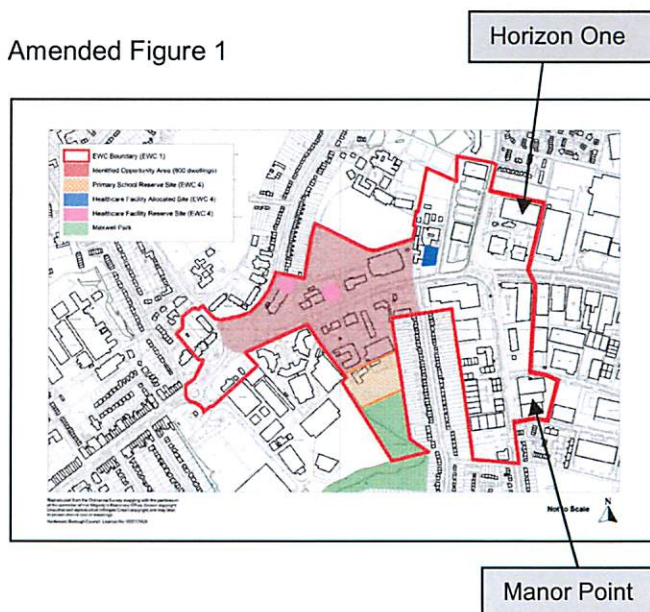
Further Proposed Extension

IBSA would like the Council to consider further extending the boundary of the EWCAAP to encompass sites east of Manor Way from Horizon One to the north to Manor Point in the South, as shown in the Amended Figure 1 below.

Figure 1: EWC Policies Map
(Page 6 of EWC AAP Feb 2014)



Amended Figure 1



Reasons for Proposed Boundary Change

1. Housing Numbers

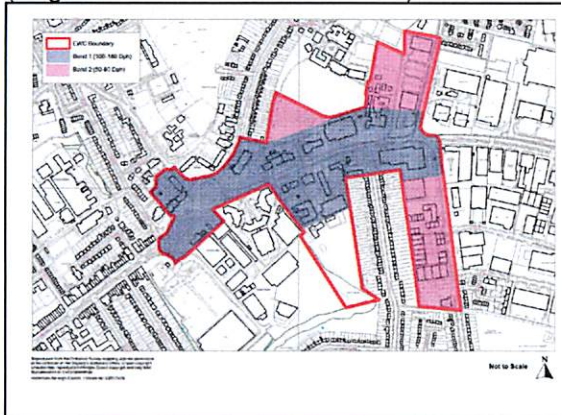
As already highlighted, the inclusion of further land within the AAP increases the prospects of the Council's housing targets being delivered, and delivered in line with a specific policy aspiration.

Based on extrapolating the density area figures (as shown from Figure 2 and Amended Figure 2 below) the sites IBSA requests to be considered for inclusion in the EWCAAP could potentially yield in the region of 294 dwellings in total. Excluding Horizon One which already has permission, the extension could deliver a net increase of 164 dwellings through the development of Pinnacle and Manor Point. This would be a significant contribution to delivering the 800 residential unit target of the EWCAAP, particularly if the more central areas of the area take longer to come forward due to their complexity.

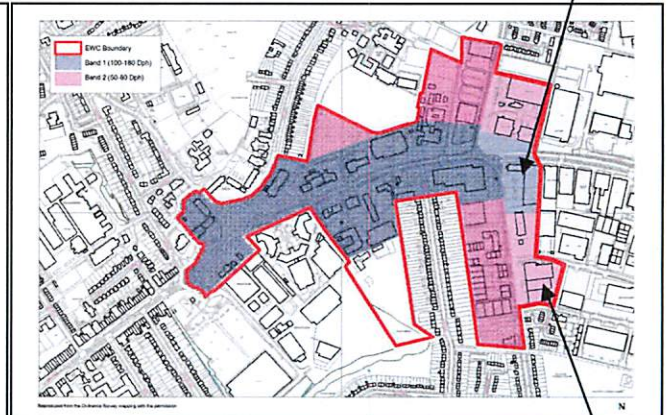
The above suggested increase in dwellings has been estimated as follows:

- Pinnacle: 60-108 dwellings (0.6ha, 100-180 dph)
- Manor Point: 35-56 dwellings (0.7ha, 50-80 dph)
- *Horizon One: 130 dwellings (existing planning application)*

Figure 2: Density Areas
(Page 11 of EWC AAP FEB 2014)



Amended Figure 2: Density Areas



2. Ownership

One of the key challenges facing the Council in delivering the EWCAAP will be assembling sites and ensuring they will be developed in accordance with the AAP. In the Colin Buchanan Elstree Way Corridor Feasibility Study June 2010 (page 52), stakeholders identified the key issue stating:

“the strongest reservation was in terms of deliverability and complex land deals required to enable the first phases of implementation.”

The proposed sites for inclusion are in IBSA's freehold ownership and given its desire to relocate in order to consolidate its uses in one location, would be potentially deliverable in the short term. Conversely, if IBSA was unable to dispose of the Pinnacle/Manor Point buildings due to a lack of market for employment use, this could affect the deliverability of Delta Court for housing whilst IBSA waited to find a buyer for all three sites simultaneously.

3. Employment supply

In the draft Site Allocations Development Management Policies, the Council have safeguarded an area of land between the A1 and Rowley Lane for employment use in anticipation that some sites within the defined Elstree Way Employment Area will, over the plan period, be used for alternative purposes. Moreover, certain sites have been removed from employment allocation as they gain residential permission in a piecemeal manner. For those reasons, the inclusion into the EWCAAP of IBSA-owned sites east of Manor Way is not considered to affect employment land supply. Rather, it meets a more immediate need for housing close to Borehamwood town centre.

4. Urban Design

It has been suggested that Manor Way represents a natural physical boundary for the EWCAAP, demarcating residential uses from the employment areas. This appears to be based on the initial feasibility study (2010) which identified different character areas. However, this may be too simplistic for the following reasons:

- a) There are existing residential dwellings on the eastern side of Manor Way (south of Manor Point). Allowing for lower density residential development at Manor Point could create a better transition into the 2 storey semi-detached houses further south along either side of Manor Way, and harmonise with the residential character of that part of Manor Way.
- b) In the four years since the publication of the Feasibility study, the character of areas (and their potential) has changed due to the economic downturn and the relaxation of permitted development. For example, there is an approved planning application for Horizon One, also on the eastern side of Manor Way/Studio Way to the north. As such, demarcation at Manor Way/Elstree Way is not necessarily representative of the area's character.
- c) An alternative approach is that residential development at Pinnacle and Manor Point could form a cluster of higher density residential development around the roundabout and lower density residential development along either side of Manor Way. This is considered to be more advantageous because Gemini House would then be mirrored by another higher density residential development thereby creating an increased sense of community and a residential environment. This would also create a less dramatic end to the residential area of the EWC.
- d) Including Pinnacle and Manor Point in the EWCAAP potentially gives the Council more control over the design of any residential developments thereon than a piecemeal or permitted development approach.

Conclusion

The redevelopment of the EWCAAP accounts for a significant proportion of Hertsmere Council's housing targets. The deliverability of the plan to achieve the level of dwellings envisaged requires a coordinated approach. Taking into consideration the national changes to permitted development rights, the lack of demand for some employment uses and the availability of land between Rowley Lane and the A1, the expansion of the EWCAAP would

increase the deliverability of housing targets whilst allowing a more comprehensive redevelopment of the EWC.

We trust these representations will be taken into consideration as part of the continuing development of the EWC AAP. Should you wish to discuss any of the points raised in this letter in more detail, please do not hesitate to contact Steve Canning on 0791 323 6057 or Erin Seah on 0774 257 5755.

Yours sincerely,



Paul S. Gillies
Director



Elstree Way Corridor Area Action PlanFor office use only

Reference No:

Date received:

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: elsteewaycorridor@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 details*	2. Agent details (if applicable)
Title		Mr
First name		Steve
Last name		Canning
Job title (where relevant)		
Organisation (where relevant)		IBSA
Address		Unit 1, Manor Point, Manor Way
Post Code		WD61EU
Telephone number		020 8906 2211 0791 323 6057
Email address		Scanning@jw.org

*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.

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

Fig.1 & Fig.2,.

Policy

EW C1, EW C2, EW C7

4. Do you consider the Area Action Plan is:

(1) Legally Compliant

Yes

☐

No

☐

(2) Sound

Yes

☐

No

☒

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

☐

6. Please give details of your answer to question 4 or 5 and why you have responded in this way .

PLEASE SEE LETTER AS ATTACHED. RELEVANT EXTRACT BELOW.

Reasons for Proposed Boundary Change

1. Housing Numbers

As already highlighted, the inclusion of further land within the AAP increases the prospects of the Council's housing targets being delivered, and delivered in line with a specific policy aspiration.

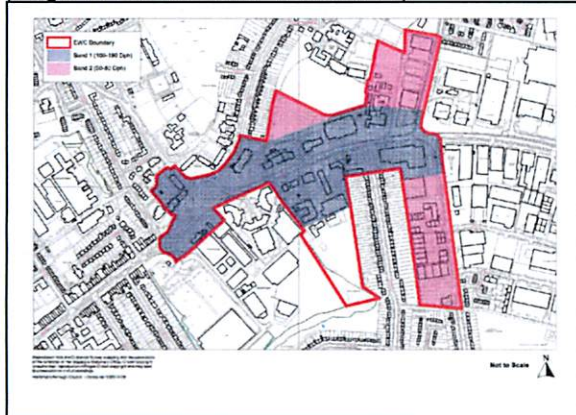
Based on extrapolating the density area figures (as shown from Figure 2 and Amended Figure 2 below) the sites IBSA requests to be considered for inclusion in the EWCAAP could potentially yield in the region of 294 dwellings in total. Excluding Horizon One which already has permission, the extension could deliver a net increase of 164 dwellings through the development of Pinnacle and Manor Point. This would be a significant contribution to delivering the 800 residential unit target of the EWCAAP, particularly if the more central areas of the area take longer to come forward due to their complexity.

The above suggested increase in dwellings has been estimated as follows:

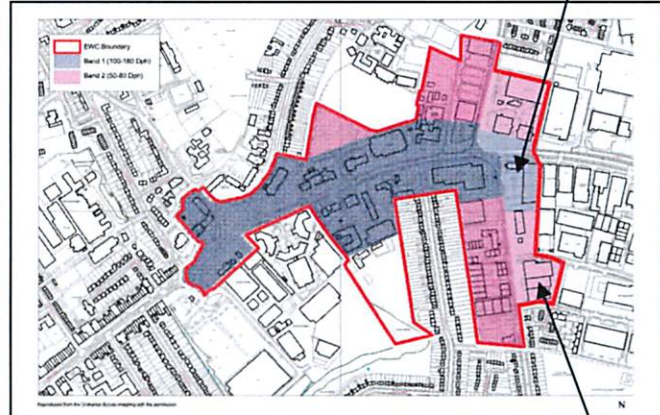
- Pinnacle: 60-108 dwellings (0.6ha, 100-180 dph)
- Manor Point: 35-56 dwellings (0.7ha, 50-80 dph)

- Horizon One: 130 dwellings (existing planning application)

Figure 2: Density Areas
(Page 11 of EWC AAP FEB 2014)



Amended Figure 2: Density Areas



2. Ownership

One of the key challenges facing the Council in delivering the EWCAAP will be assembling sites and ensuring they will be developed in accordance with the AAP. In the Colin Buchanan Elstree Way Corridor Feasibility Study June 2010 (page 52), stakeholders identified the key issue stating:

“the strongest reservation was in terms of deliverability and complex land deals required to enable the first phases of implementation.”

The proposed sites for inclusion are in IBSA's freehold ownership and given its desire to relocate in order to consolidate its uses in one location, would be potentially deliverable in the short term. Conversely, if IBSA was unable to dispose of the Pinnacle/Manor Point buildings due to a lack of market for employment use, this could affect the deliverability of Delta Court for housing whilst IBSA waited to find a buyer for all three sites simultaneously.

3. Employment supply

In the draft Site Allocations Development Management Policies, the Council have safeguarded an area of land between the A1 and Rowley Lane for employment use in anticipation that some sites within the defined Elstree Way Employment Area will, over the plan period, be used for alternative purposes. Moreover, certain sites have been removed from employment allocation as they gain residential permission in a piecemeal manner. For those reasons, the inclusion into the EWCAAP of IBSA-owned sites east of Manor Way is not considered to affect employment land supply. Rather, it meets a more immediate need for housing close to Borehamwood town centre.

4. Urban Design

It has been suggested that Manor Way represents a natural physical boundary for the EWCAAP, demarcating residential uses from the employment areas. This appears to be based on the initial feasibility study (2010) which identified different character areas. However, this may be too simplistic for the following reasons:

- a) There are existing residential dwellings on the eastern side of Manor

Way (south of Manor Point). Allowing for lower density residential development at Manor Point could create a better transition into the 2 storey semi-detached houses further south along either side of Manor Way, and harmonise with the residential character of that part of Manor Way.

- b) In the four years since the publication of the Feasibility study, the character of areas (and their potential) has changed due to the economic downturn and the relaxation of permitted development. For example, there is an approved planning application for Horizon One, also on the eastern side of Manor Way/Studio Way to the north. As such, demarcation at Manor Way/Elstree Way is not necessarily representative of the area's character.
- c) An alternative approach is that residential development at Pinnacle and Manor Point could form a cluster of higher density residential development around the roundabout and lower density residential development along either side of Manor Way. This is considered to be more advantageous because Gemini House would then be mirrored by another higher density residential development thereby creating an increased sense of community and a residential environment. This would also create a less dramatic end to the residential area of the EWC.
- d) Including Pinnacle and Manor Point in the EWCAAP potentially gives the Council more control over the design of any residential developments thereon than a piecemeal or permitted development approach.

(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.

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.

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.

THIS RELATES SPECIFICALLY TO PAGES 6,11,20,26 & 28 OF THE EWC AAP SUBMISSION DOCUMENT DATED FEBRUARY 2014

PLEASE SEE PROPOSED AMENDED FIGURES AND REVISED TEXT AS SHOWN ON THE SEPARATE PAGES BELOW.

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

☒

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 oral part of the examination, please outline why you consider this to be necessary:

N/A

(continue on a separate sheet if necessary)

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

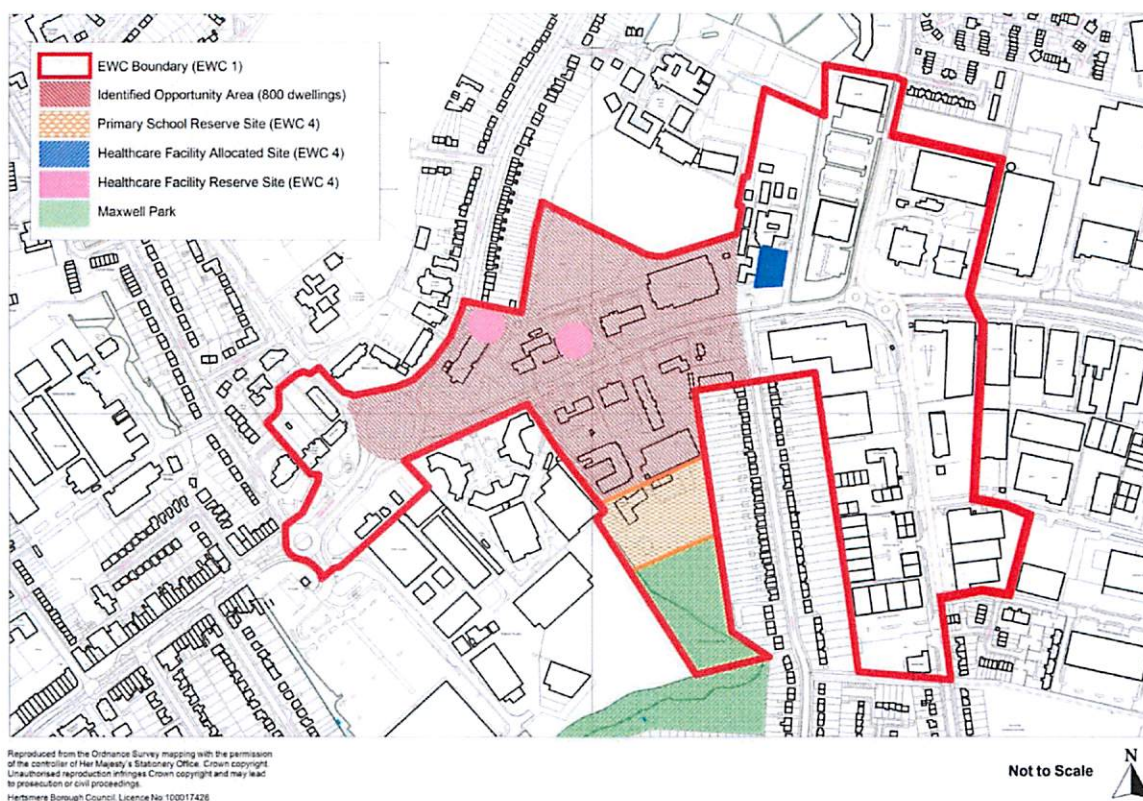
Signature: _____

Date: _____

☒

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box

Amended Figure 1: EWC Policies Map (Page 6 of EWC AAP FEB 2014)



Amended Figure 2: Density Areas (Page 11 of EWC AAP FEB 2014)

