Rep41

# Elstree Way Corridor Area Action Plan

For 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

b	1. Personal details*	2. Agent details (if applicable)
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address	4	
Post Code	3	
Telephone number	4	
Email address	4	•

<sup>\*</sup>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:

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Ref No:
support:
object:
omission:

3. To which part of the Area Action Plan does this representation relate?
Paragraph 4.12, 4.17, A1.6 Policy
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 .
Reference is made in these paragraphs to the possible loss of the existing Girl Guide hut and Maxwell Park community centre, and — separately - to the new building at 96 Shenley Road in the context of the relocation of various community activities. But this building is outside the Elstree Way corridor and therefore of no dire relevance to the proposals in this document, except to the extent that the library has now moved there, releasing the site it formerly occupied for an alternative use.
Paragraph 4.12 states that "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."
Condition (1) is a theoretical future possibility, but not one for which it is necessary to provide in this plan, are not a situation which Hertsmere could prevent were it (and the buildings) to become victim(s) of force majeur on the part of HCC or the government.
Condition (2), while welcome in itself, would only be relevant if the situation envisaged in condition (1) arises It could not be met by the building at 96 Shenley Road (which is not suitable in terms of space and layout fo accommodating all of the activities which would be at risk of displacement from the hut and the centre, and

(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.

does not have the necessary storage capacity).

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. Delete all references to the possible loss of the Girl Guide hut and the Maxwell Park community centre, and to conditions which would have to be satisfied in order for Hertsmere to agree to this. Reword paragraph 4.12 thus: "The Girl Guide hut and Maxwell Park community centre are valuable public amenities, and the loss, reduction or displacement of the facilities they provide will not be permitted." (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? Yes, I wish to No, I do not wish to participate at the oral participate at the oral examination examination 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: (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. Date: 31.4.14 Signature: If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box

#### **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 17<sup>th</sup> February 2014 to 31<sup>st</sup> 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.

10.19

The Planning and Compulsory Purchase Act 2004<sup>1</sup> (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 Framework<sup>2</sup>, 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.

<sup>&</sup>lt;sup>1</sup> View the Planning Act online at <a href="http://www.legislation.gov.uk/ukpga/2004/5/contents">http://www.legislation.gov.uk/ukpga/2004/5/contents</a>

<sup>&</sup>lt;sup>2</sup> 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.
- The process of community involvement for the Area Action Plan should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI is a document that sets out the Council's strategy for involving the community in the preparation and revision of planning documents and the consideration of planning applications.
- The Area Action Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012<sup>3</sup>. On publication, the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and on their website. The Council notify statutory consultees and any persons who have requested to be notified.
- 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.

<sup>&</sup>lt;sup>3</sup> View the Planning Regulations online at <a href="http://www.legislation.gov.uk/uksi/2012/767/contents/made">http://www.legislation.gov.uk/uksi/2012/767/contents/made</a>

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.

#### Part B

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

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omission:

		n Plan does this		
Paragraph 4.11, 4.12		Policy		
4. Do you consider the A	rea Actio	n Plan is:		
(1) Legally Compliant	Yes	?	No	
(2) Sound	Yes		No	<b>√</b>
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 A	rea Actic	on Plan is unso	und bed	cause it is not:
(1) Justified		[-		
(2) Effective				
(3) Consistent with national	al policy			
6. Please give details of responded in this way .	your ans	wer to question	4 or 5	and why you have

The document states that the level of development envisaged by the Core Strategy would require a new 2FE primary school to be provided, and that if HCC is unable to find a suitable alternative site, the land occupied by the Girl Guides hut and Maxwell Park community centre has been "reserved" for this purpose.

But the current occupants of those premises have made it clear that they have no desire to move, and that they believe that the nature of some of the activities which take place there (often during the day) would not be compatible with a school while it is in use — not least because of the need for unfettered public access. For this reason, they believe that the statement in paragraph 4.11 that if a school is built on this site, Hertsmere will "require the facilities (buildings and outdoor space) to be designed in such a way [as?] to be capable of accommodating a range of community activities through a dual use arrangement" is a promise which is incapable of being delivered.

HCC's stance is tantamount to blackmail. It has sold off three school sites in Boreham Wood for other uses in the recent past, including housing development, and now finds to its surprise – though no one else's - that it is short of school places. So it proposes to snatch other public amenities from their users in order to meet its obligations.

Paragraph 3.2 states that "HCC have [should this be "has"?] advised that they [it?] would object to the AAP, on the grounds of a lack of supporting infrastructure, if provision is not shown for education facilities." But HCC is still the owner of extensive landholdings within the town. It should look to these to find room to accommodate additional school places. Hertsmere council should resist such bullying on the part of another authority, particularly when HCC is seeking to deprive existing community organisations of the use of long-established facilities merely in order to make amends for its own previous lack of foresight. If HCC objects, let it defend itself at the examination.

(continue on a separate sheet if necessary)

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#### PART A

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Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address	4	
Post Code	24	
Telephone number	6	
Email address		

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Delete all references continuing in their co	s to designating the sites at Maxwe urrent use.	ll Road for a possible	future school, and show them as
		(continue on	a separate sheet if necessary)
	sentation is seeking a chan le oral part of the examinati		ider it necessary to
<b>✓</b>	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
	o participate at the oral par is to be necessary:	t of the examinat	ion, please outline why
			inue on a separate sheet if necessary)
	inspector will determine the indicated that they wish to pa	most appropriate	procedure to adopt to hear
Signature:		Date: _	_31.4.14
	wish to be informed of the da ary of State, please tick this b		on of the document to the

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#### **PART A**

	1. Personal details*	2. Agent details (if applicable)
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address	35 10	
Post Code	1	
Telephone number		
Email address	44	

<sup>\*</sup>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 p	oart of the Area	Action P	lan does t	his repres	entation relate?
Paragraph	6.23		Policy		
4. Do you co	nsider the Area	Action F	Plan is:		
(1) Legally Co	mpliant	Yes ?		No	
(2) Sound		Yes		No	✓
If you have ente	ered 'no' to 4(2), p	lease cor	ntinue to Q5.	In all other	circumstances, please go to Q6.
5. Do you co	nsider the Area	Action	Plan is un	sound bec	ause it is not:
(1) Justified					
(2) Effective					
(3) Consisten	nt with national po	olicy			
6. Please giv responded in		r answe	r to quest	on 4 or 5 a	and why you have
for 1 to 3 bed un	proposes to adopt ar its, and 1.5 car park	ing spaces	per 4 bed u	nits or more.	r parking space per residential unit These rates are the equivalent to [a?] exceeded wherever possible."
providing fewer of		s the best			d share the council's view that nts to use more sustainable means of
	g level set, and sugg				ctively encourages developers to its author as to what exactly this
					cement. In the absence of this, ion at the (former) library, and in

(continue on a separate sheet if necessary)

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		- 2 °

Party Committee	ALC: U	Market Contract Contract		HE SHOP STREET	120
Fletron	May	Corridor	Aros	Action	Plan
LISUEE	wway	Comingor	MICA	MULIOII	LIGIT

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to control and the second	Mark the control of t	of A Transport Control of Control		and the second state of th
3. To which	part of the Area Ac	tion Plan does	his repres	entation relate?
Paragraph	1.2, 1.7, 1.10, 3.4, 3.5, 4. 4.11, 4.19, 7.4, 8.1, A.15	Policy		
4. Do you co	onsider the Area A	tion Plan is:		We will your property and the property
(1) Legally C	compliant Ye	s ?	No	
(2) Sound	Ye	s	No	✓
If you have er	ntered 'no' to 4(2), plea	se continue to Q5	. In all other	circumstances, please go to Q6,
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(2) Effective				
(3) Consiste	ent with national polic	sy 🗀		
6. Please g responded	ive details of your a	inswer to quest	ion 4 or 5	and why you have
dwellings eithe physically reloc	r "coming forward" or be	ng "brought forward	". For someth	eas/proposals/developments/ ning to come forward, it needs to be it means that the time when
	e meanings appears to t here is no proposal litera			exts in which these expressions are hing.
	documents are seldom wrong to judge them by		s, or written by	y anyone capable of composing one,
	n English is an aid to cle lld not be followed in this		er understand	ling. There is no reason why its
			(continue	on a separate sheet if necessary)

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Choose a more elegant and meaningful alternative, which "happen", or "be proposed".	- depending on the context - could simply be
	***
	(continue on a separate sheet if necessary)
<ol><li>If your representation is seeking a change participate at the oral part of the examination</li></ol>	
No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
If you wish to participate at the oral part of you consider this to be necessary:	of the examination, please outline why
	(continue on a separate sheet if necessary)
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Organisation (where relevant)		
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Post Code	4	
Telephone number		
Email address		

<sup>\*</sup>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:

	4.12, 7.3	1	Plan does this	Allahan manasana	
Paragraph	4.12,7.0		Policy		
4. Do you co	onsider the Ar	ea Actior	Plan is:	湯斯思斯	
(1) Legally C	ompliant	Yes	?	No	
(2) Sound		Yes		No	<b>~</b>
and the second second			ontinue to Q5. In n Plan is unsou		circumstances, please go to Q6.  ause it is not:
(1) Justified					
(2) Effective					
(3) Consiste	nt with nationa	I policy			
<ol><li>Please gi responded i</li></ol>		our ansv	ver to question	4 or 5 a	and why you have
	ohs contain the wo			n", which	does not exist, except possibly in the
	documents are se vrong to judge the			written by	anyone capable of composing one,
					ing. There is no reason why its ld not be followed in this instance.

(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.

Plan legally compliant or sound, having above where this relates to soundness. make the Area Action Plan legally comp	onsider necessary to make the Area Action gregard to the test you have identified at 5. You will need to say why this change will pliant or sound. It will be helpful if you are ised wording of any policy or text. Please be
Choose a less ugly replacement, such as "relocate	;" or "provide elsewhere".
8. If your representation is seeking a c participate at the oral part of the exami	(continue on a separate sheet if necessary)  change, do you consider it necessary to ination?
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 you consider this to be necessary:	part of the examination, please outline why
	(continue on a separate sheet if necessary)
Please note the inspector will determine those who have indicated that they wish t	the most appropriate procedure to adopt to hear to participate at the oral part of the examination.
Signature:	Date:31.4.14
0	e date of the submission of the document to the

5 6 6 20

# Elstree Way Corridor Area Action Plan

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

<sup>\*</sup>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: 3. To which part of the Area Action Plan does this rep

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

3. To which part of the Area	Action Plan does t	nis represer	ntation relate?
Paragraph 4.7	Policy		
4. Do you consider the Area	Action Plan is:	gain the parties	
(1) Legally Compliant	Yes ?	No	
(2) Sound	Yes	No	✓
If you have entered 'no' to 4(2), p. 5. Do you consider the Area			
(1) Justified			
(2) Effective			
(3) Consistent with national po	olicy		
6. Please give details of you responded in this way .	ır answer to questi	on 4 or 5 an	d why you have
A candidate for inclusion in The Gua	rdian's homophone corn	er?	
			4,0

(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.

#### **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 17<sup>th</sup> February 2014 to 31<sup>st</sup> 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 2004<sup>1</sup> (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 Framework<sup>2</sup>, 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.

<sup>&</sup>lt;sup>1</sup> View the Planning Act online at <a href="http://www.legislation.gov.uk/ukpga/2004/5/contents">http://www.legislation.gov.uk/ukpga/2004/5/contents</a>

<sup>&</sup>lt;sup>2</sup> View the National Planning Policy Framework online at https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/6077/2116950.pdf

make the Area Action Plan legally complia able to put forward your suggested revise as precise as possible.	egard to the test you have identified at 5 You will need to say why this change will ant or sound. It will be helpful if you are ad wording of any policy or text. Please be
Replace "sort" with "sought",	
	(continue on a separate sheet if necessary)
8. If your representation is seeking a char participate at the oral part of the examinat	
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 pa	rt of the examination, please outline why
<ol><li>If you wish to participate at the oral pa you consider this to be necessary:</li></ol>	rt of the examination, please outline why
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	rt of the examination, please outline why  (continue on a separate sheet if necessary
you consider this to be necessary:	(continue on a separate sheet if necessary most appropriate procedure to adopt to hear
Please note the inspector will determine the	(continue on a separate sheet if necessary most appropriate procedure to adopt to hear

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.

#### 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.
- The process of community involvement for the Area Action Plan should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI is a document that sets out the Council's strategy for involving the community in the preparation and revision of planning documents and the consideration of planning applications.
- The Area Action Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012<sup>3</sup>. On publication, the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and on their website. The Council notify statutory consultees and any persons who have requested to be notified.
- 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.

<sup>&</sup>lt;sup>3</sup> View the Planning Regulations online at <a href="http://www.legislation.gov.uk/uksi/2012/767/contents/made">http://www.legislation.gov.uk/uksi/2012/767/contents/made</a>

#### Dear Sir



As a Borehamwood resident for 34 years I wish to voice my objection to demolishing the Maxwell Park Community Centre as part of the Elstree Way Corridor development.

I expect you've had a lot of letters about the Centre itself but I would like to give you a personal view as a user of one of the 40 weekly activities that take place there.

Every week I attend the Wednesday evening line dance club. This club has been at Maxwell Park for about 15 years and previous to that it was at another hall in Borehamwood which belonged to GEC Elliot and was demolished when they left the town.

There are about 50 regulars at the club mostly from Borehamwood and some from Shenley. A good proportion are pensioners and 2 to 3 hours of line dancing is not only good exercise for the body but also for the mind as you have to learn the steps of continually changing dances.

The charge for the evening is £4 which is affordable to pensioners, other classes in surrounding areas who have to pay for more expensive halls charge as much as £7 which is too much especially for couples.

If the hall is demolished then the club will probably be forced to close as the hire charge at the replacement hall at 96 Shenley Road is so much more expensive that the club entrance fee will have to increase resulting in pensioners not being able to afford it and then there won't be enough people to make it viable.

Great shame after nearly 20 years so I hope that the hall can be saved.

yours faithfully





I would like to comment on the Elstree way corridor area action plan.

Rep43

Although I understand the need for more housing in Hertsmere I have several comments 1. The idea of building on the car park at the back of the Venue and replacing the car park with a multistorey car park. This will be a big problem in terms of access. Currently access to the car park is via two narrow roads. These would not cope with the increase in traffic that would result.

- 2. Multi storey car parks are also very ugly and are likely to be a magnet for any crime in the area. Much more of a magnet than open spaces where any crime or anti social behaviour can be easily seen by residents and pedestrians.
- 2. The density of housing is far too high both in terms of traffic density which is already a problem on Shenley Road, and the character and feel of the town as a whole.
- 3. Instead of planning more open space and communal facilities which building large numbers of flats will make neessary, the plan is to build a school on parts of Maxwell park thus reducing communal facilities even further. The new school (which is required) needs to be built on land which would otherwise to used for housing and a park with play areas needs to be added to the plans.







30<sup>th</sup> March 2014

Elstree Way Corridor Public Consultation Policy and Transport Team Hertsmere Borough Council Civic Offices Elstree Way Borehamwood WD6 1WA

**Dear Sirs** 

# Comments on the Elstree Way Corridor Area Action Plan

Hertsmere Borough Council have asked for comments on the above plan and, as I am unhappy about the development proposed, I attach my thoughts below:

# Paragraph 3.3b Policy EWC 1

I am very concerned about our existing roads coping with all the extra traffic emerging from in excess of 1,000 new properties in the EWC. It is very busy now during the morning and evening rush hours in the EWC and I would dread driving in that area in the future. The provision of public transport would need to be increased vastly in order to entice new and existing residents out of their cars. The majority of drivers are using the A1 so more provision of bus routes would be needed as the 292 and 107 bus routes are not reliable enough in my opinion now. Parking in Borehamwood is very difficult for commuters who use the rail services from Elstree and Borehamwood Station. The car park for the station needs to be doubled in size if we are expecting a large increase in population. Again, local bus services would need to be improved to transport people from along the EWC as they will not be able to park anywhere near the station with the Controlled Parking Zones that are in place. I commuted into London over a period of 15 years and the trains were packed every morning and evening and I was pleased to give up this journey. First Capital Connect try their best but unless the number of trains stopping at Elstree increase vastly, commuting will be even more of a nightmare than it is now. Please consider the impact of more cars in our town and make the appropriate improvements before any developments goes ahead.

#### Paragraph 4.11 and 4.1 Policy EWC 4

Maxwell Community Centre is not suitable for a primary school as it has poor access onto an extremely busy road. The school grounds would encroach onto a valued green space. What would happen to all the clubs and societies that use it now? I do not think that all these clubs could be accommodated within a school especially with

its opening hours etc. Parking would also be another problem. A solution to this issue would be to increase the number of pupils at neighbouring primary schools, i.e. St Teresa's. Saffron Green, Kenilworth, Monksmead which could accommodate another class per year. In addition, it would be sensible to site a possible primary school on the Hertswood Academy site at Cowley Hill.

#### Para 4.19 EWC 4

I am concerned about the provision of health care bearing in mind the large increase in the population of Borehamwood concentrated around and in the EWC. Please consider the provision of a polyclinic, such as the one I visit in Rayners Lane with my mother for her palliative care. A polyclinic could provide the facilities that our town needs so that less strain is placed on Barnet Hospital and Watford General. I note the two sites you have earmarked on Elstree Way. Please make enough provision for our residents and not just another GP practice.

## Para 1 Policy EWC 9

Isopad House and Hertsmere House were not in the original plan but were added after a planning application slipped through for a 12 storey building of 150 dwellings with 150 car park spaces. It has breached the design conditions for the EWC of 5 or 6 storeys. This 12 storey building is not a gateway to our town but an insult to local residents who were not properly consulted. I am sure that residents of other towns in our Borough would have been fully consulted before such a large development went ahead and makes me believe that Borehamwood residents are treated as second class citizens. Could the developers be encouraged to go for their back up option of change of use to 40 dwellings instead which would have a lesser impact on the surrounding area.

Many thanks for giving me the opportunity to comment on the proposed development of the EWC.

Yours faithfully



Nop 45

#### **ELSTREE WAY CORRIDOR CONSULTATION**

My main concern is the rush into building all these new homes etc without any thought for the infrastructure problems that already exist in Elstree Way. Any one who uses this road to goin and out of Borehamwood knows that it is regularly congested espescially in the morning and afternoon rush hours.

#### ROAD TRANSPORT & PARKING.

No where in the plan does it show any improvements to this main road which is still the same size as it was in the 1950's. Other than a couple of mini roundabouts there have been no attempts to improve traffic flow at all. Surely even though the council wants to impose car sharing, cycling and public transport use on the residents it cannot ignore the fact that the population likes to have cars for ease, safety and comfort when they travel, this can be seen by the number of cars in the councillors car park at meetings. I do not understand why you have made no attempt to improve the road access in this plan. Yes there are a few things to make the area alongside the road look pretty but it will just be pretty and congested unless you decide to take some action about the traffic congestion. I note that you are deliberately reducing the number of car parking spaces in these developments, this shows a lack of understanding of the people who will live in these dwellings most of whom will want a car as will their wives and children. If you are only going to have 1 space for a car on houses up to 3 bedrooms where are the other 2 cars going, presumably on the roads and pavements of the new developments. You must not discount the car parking spaces just so the developers can get more units in and make more profit.

If you want to stop people having cars you should come out up front and say so instead of allowing developers reductions in parking spaces.

The developments that have taken place so far already have cars parked all over them, so perhaps a rethink of the car parking discount is necessary to provide better loking developments and reduce congestion.

I assume the increase in CPZ is another attempt to tax car owners and bring more money in to the

Why are you waiting until later to increase the car parking spaces in the civic offices car park this should be done immediately.

#### AMENITIES.

Your intended plan is to reduce the Maxwell Park and get rid of the Guide Hut and Community Hall therein is shameful. We are going to need lots more parks for the poor people stuck in the tower blocks you envisage along Elstree Way.

#### **SERVICES**

You say that you have identified space for a medical facility, when will this be built. 1 GP practice in the town has already closed their list and others are close to doing so, where are you going to get the Doctors from. Many years ago there was talk of Borehamwood having its own Hospital with all these extra people we are going to need medical facilities up and running before the poplation increases not afterwards, as a council you should be thinking of these things before the event not afterwards. Can the Fire Brigade deal with fires in the high blocks you are allowing to be built, will they be providing an extra fire engine and crew?

Similarly the Police will need more officers and space with a larger population so why have the moved into a few rooms at the civic offices when they have a proper Police station on Elstree Way. Will the sewers and drains be able to cope with the increasing numbers of people, what about our water supply will that cope? None of these sort of questions have been asked in the plan.

#### CONCLUSION

The whole plan just seems to be a way of pushing all the new housing in the borough int Borehamwood without thinking of the consequences, I assume that this is to take the building away fromareas such as Elstree and Radlett where the more expensive housing is. I would have thought that our councillors would have been fighting to get ifrastructure in place first before all the homes arrive. However all we hear from them is that it is the County Council's job to provide roads and infrastructure, they say they haven't got any money so its the governments fault. It just seems a hame that instead of improving Borehamwood our elected councillors just want to build more and more with no real thought for the people who live here already.

