Elstree Way Corridor Area Action Plan REP86

For office use only
Reference No: 01039/1/001
Date received: 31/03/14

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: 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	[redacted]	
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address	[redacted]	
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.

Part B

Please use a separate sheet for each representation

Name or organisation: [redacted]

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

3. To which part of the Area Action Plan does this representation relate?

Paragraph 4 - 11 **Policy** EWC4

4. Do you consider the Area Action Plan is:

(1) Legally Compliant **Yes** ☐ **No** ☐ Do Not Know

(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 ☐ 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 Guide 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 Shenley Road along with the Library. 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
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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.

The proposal to redevelop the Maxwell Park Community Centre Guide Hut Site, and to provide for its activities at 96 Shenley Road needs
to be removed completely from the plan as a site for redevelopment. The plan has already failed to meet its own criteria, which states
that all new development has to make provision for, or support, improved and additional community facilities. 96 Shenley Road is already replacing
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Signature: [redacted] **Date:** 31/3/14

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

Elstree Way Corridor Area Action Plan	For office use only Reference No: 01040/1/001 Date received: 31/03/14

Representations can be made using this form: REP 87

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Paragraph 4-11 **Policy** WEWC 4

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Representations can be made using this form: REP 88

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Rep 89

[redacted]

28th March 2014

Objections to Elstree Way Corridor proposals

Dear Planning officer

I moved to Borehamwood and have lived here for many years with my wife and 3 children. I am dismayed at what is being proposed for Borehamwood. We have an inadequate road system and poor local GP services. Waiting times to see a GP are far too long.

While all these proposals may comply with the law they are not well thought through and cannot be justified for the size of the town.

I attach the objections as I fully agree with them

01042/1

Yours sincerely

[redacted]

Objections to EWC PROPOSALS

Para 3.3b Policy EWC 1

No matter what work is carried out on existing road networks there will continue to be traffic congestion for most parts of the day. Our roads were built in the 1930s and will remain narrow and unfit for the 21st century. 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;
- the 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.

Stakeholders in transport matters are outside the planning authority control.

Solution: Before any development takes place, it is critical that the transport requirements need to be identified and plans set in place, with timescales to ensure that they proceed in parallel.

Para 4.11 & 4.12 Policy EWC 4

The site is not suitable for a primary school. It is too small, has poor access and has a busy main road separating the catchment area. The school grounds would encroach onto a valued green space against the SADM policy.

The activities that take place at present at Maxwell Community Centre & Guide HQ could not be accommodated within a school. To comply with safeguarding of children, people would not be allowed on school premises in term time, during school sessions or after school activities. Regular classes could not be run as there would be no guarantee of continuity. Parking, too, would be a problem. Shared use would not work for either the community or the school.

Solutions

- To build the new school on the Hertswood Academy site at Cowley Hill;
- To change 1FE schools into 2 FE schools and absorb the extra pupils that way. St Teresa's, Saffron Green, Kenilworth, Monksmead and St Nicholas are all 1FE.

It is noted that Herts County Council have not set aside any money to purchase sites for new schools.

Para 4.16 & 4.17 Policy EWC 4

96 Shenley Road does not and could not replace 7 current buildings. The Library, the Museum, Youth Connexions Shop, Village Hall, Church Sunday School and Guide HQ activities were all expected to move to 96 and help to pay the running costs. All these buildings provided important recreational and leisure activities for the Town.

The Library and the Museum have moved into smaller accommodation at 96. Storage is a big problem for the Museum. It is hard to get to and cannot open when the Library is closed.

The main Hall at 96 is too small for some activities e.g. indoor bowls and table tennis, neither could their equipment be stored at 96. The main hall at 96 can be divided with a partition but it would require 2 quiet or silent activities to take place.

The activities at Maxwell cannot be accommodated at other community centres for many reasons, lack of parking, cost, availability and storage are all factors.

Loss of green space at Maxwell Park would be a travesty.
Solution; Build the school elsewhere and allow Maxwell and the Guide hut to remain

Para 6.23 policy EWC 8
There is not enough parking allowed for residents, visitors, friends, family, GPs, health visitors, district nurses, care workers social workers or deliverymen. Although we would want to encourage less cars and make more use of public transport that is an aspiration not a reality.

Solution: Make the car parking allocations realistic.

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 breached the design conditions for the EWC of 5/6 storeys.

A 12-storey building is not a gateway to the Town but an affront to residents. Residents were not properly consulted about this.

Solution; Encourage the developers to go for their second back up option of change of use to an accommodation of 40 dwellings.

Rep 90

OBJECTIONS AND COMMENTS TO THE EWC PROPOSALS

Para 4.11 and Para 4.12 EWC page 12 "Education, Retail and Other Uses "

I am writing to object to the potential loss of the north east section of Maxwell Hillside Park.

This is wrong for a number of reasons:

1. It involves the loss of a community facility which goes against Policy CS18. The replacement of the Maxwell Community Centre by the new centre at Building 96 Shenley Road is not adequate as it is not like for like. There is no single large open space for dance classes. The Maxwell Community Centre is home to 18 organisations and clubs. This was a building donated in good faith to the local community. It has been suggested that the Centre could move into an existing school but this is impractical as many activities takes place during the day and having adults who are not CRB checked on a school site is prohibited.
2. The site itself is too small for establishment of a school according to the Local Development Plan Section 4 para 4.5, albeit this an idealised prescription, and the overspill will impinge into Maxwell Park itself. This is a high quality area of low fertility neutral grassland which is kept long on a linear axial belt running north to south amongst old specimen Oak Trees. This is high quality wildlife habitat with high visual appeal set amongst a generally low quality environment. This land is valuable grazing land for birds and fits in nicely with the adjacent woodland belt. Uncommon species such as Bullfinch, linnet and House Sparrow (all 3 are Red Data species and the 1st 2 are priority UK BAP species) still are still found in this local area. In the light of the proposed re-development of the back of Elstree studios and the loss of the scrubland and ruderal habitat, any further loss of this habitat will go against the Core Policy of the council CS12for the enhancement of the natural habitat.

Hertsmere School in Thrift Lane; site H6 in the SADMP DPD document is a good site for a new primary school. There is already a school on the site and the site has been identified as a possible re-development site for local housing. Instead it can be used for a new primary school which will go some way towards satisfying the need for school provision.

The document at no point discusses how sustainable the development will be. There is no method for measuring the effects of the development on air quality in the EWC. It is not the list of AQMS monitoring areas but the inevitable increased density in the town centre will mean poorer air quality.

Poor air quality means early deaths especially for those with existing respiratory health problems. This goes against the Core Srategy CS7 and CS9. The developers should be made to cover the costs of analysis. There is no point making a Sustainability Assessment if one cannot measure the actual changes.

There is no mention of SUDS or biodiversity enhancement in the EWC document although there is in the Sustainability Assessment. The SA just refers to the Core Stategy which just contains vague statements. There is no provision for permeable surfaces. The provision of flood prevention measures at present are not positive ones. In the example of isopad House as long as the 1 in a 100 year floodrisk probability was taken into account it was enough. SUDS should be a consideration in 100% of all applications according to the Sustainability targets.

A more positive approach would be to include biodiversity improvement potential at an early stage.

Biodiversity improvement does not have to be large scale.

Here are some suggestions:

1 . The provision of gaps of hardstanding. That is instead of having solid hard structures in landscaping, have infilled soil. Instead of infilling the gaps with ornamental planting, leave it to develop it's own flora or plant it with native species with differing flower structure to suit a variety of invertebrates. Having bare soil encourages soil nesting invertebrates. Leaving such areas to develop their own flora is more economic.

2 . Green or Brown roofs. This increases green space without taking ground level space and at the same time increasing biodiversity.

3. Ponds or temporary waterbodies can act as soakaways.
4. Swift nest boxes – can be included as part of the built environment

http://www.swift-conservation.org/Nestboxes&Attraction.htm

5. The maximisation of planting and street trees will provide shade and absorbtion of air pollution.