

## Christine Whyte

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**From:** ESEAH@jw.org  
**Sent:** 14 September 2015 16:35  
**To:** Local Plan  
**Subject:** SADM - IBSA Representations  
**Attachments:** Feasibility Study Submission.pdf; SADM IBSA Response Sept 2015.pdf

Dear Officer,

Thank you for the opportunity to respond to the Site Allocation Development Management Document.

Please find attached a copy of the representations and an associated document which has been referenced within.

If you have any queries or require any further details please do not hesitate to contact me.

Regards,

Erin Seah

Design Development  
(Planning)

0208 9062211 Ext: (952) 43219





# Site Allocations and Development Management Policies Plan (SADM)

## Publication Stage Representation Form

For office use  
only

Reference No:

Date received:

**Please use this form to make Representations**

**Please return to Hertsmere Borough Council by 5pm on Monday 14 September 2015**

**By post:** Policy and Transport Team, Planning and Building Control, Hertsmere Borough Council, Civic Offices, Elstree Way, Borehamwood, Herts, WD6 1WA.

**By email:** [local.plan@hertsmere.gov.uk](mailto:local.plan@hertsmere.gov.uk)

This form has three parts:

**Part A** – Personal details (only needed once).

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

**Part C** – What information you want the Council to provide you with about future progress of SADM (only needed once).

**Please read the guidance notes at the end before completing this form. They explain the terms used and will help you make your representation(s).**

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	IBSA House, The Ridgeway	IBSA House, The Ridgeway
Post Code	NW7 1RN	NW7 1RN
Telephone number		020 8906 2211 [REDACTED]
Email address		<a href="mailto:Scanning@jw.org">Scanning@jw.org</a>

\*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 publicly available and cannot be treated as confidential. This means that the names of all those making representations will be publicly available. Other personal information relating to private individuals, including Contact details, will not however be made publicly available.

## Part B

Name or organisation:

IBSA

For office use only

Ref No:

support:

object:

change:

**IMPORTANT: Please use a separate Part B form for each representation**

### 3. To which part of SADM ('the Plan') does this representation relate?

Paragraph

Policy

SADM

Policies Map

Other part  
of Plan  
(specify)

### 4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:

Please tick which boxes apply

4(a) Legally Compliant Yes ☐ No ☐ no comment to make ☒

4(b) Compliant with the Duty to Co-operate Yes ☐ No ☐ no comment to make ☒

4(c) Sound Yes ☐ No ☒ no comment to make ☐

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

### 5. If you consider the Plan to be unsound is this because it is not:

5(a) Positively prepared

☐

Please tick which box(es) apply

5(b) Justified

☒

5(c) Effective

☐

**6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.**

**If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.**

1 Elstree Way WD6 1RN and Manor Point, Manor Way WD6 1EU should be removed from the current employment use (SADM6) designation, and not safeguarded as employment land. In order to be 'justified', the most appropriate strategy must be selected when considered against the reasonable alternatives. It is submitted that the exclusion of the two relevant sites from the designation as housing land is not appropriate and that these areas should be removed from the employment area for the following reasons:

- The Council has accepted the future suitability of both sites for residential development or mixed use development. In response to the information submitted by IBSA for the January 2015 call for sites, the Council made the following identical assessment of both the Elstree Way and Manor Point sites: "While the western part of the Elstree Way Employment Area has been allocated for residential development this site falls within the retained employment boundary. However given the proximity to the town centre, should a future review of employment land seek to change the nature of the area the site may become suitable for residential development as part of a mixed scheme." This demonstrates that Hertsmere Council agree that the sites are suitable for a residential use. Therefore, its lack of inclusion within the SADM is considered inappropriate.

2. Additionally, the 'achievability' of the site for residential uses has been accepted by Hertsmere Borough Council in the assessment of the call for sites application. The site is outside the flood plain, in close proximity to Borehamwood Town Centre and highly accessible to services such as shops, schools, employment, highways access, and public transport. It is also not in close proximity to hazardous substances or contamination, and will not have an adverse impact on the landscape and wider environment.
3. 1 Elstree Way and Manor Point are under a single freehold ownership and the owner has fixed plans to relocate from the premises by the end of 2019. (Unit 3 Manor Point has a different owner but negotiations are well advanced and agreement has been achieved to enable Manor Point to be delivered in its entirety.) To that end, a site has been purchased in Chelmsford, Outline Planning Permission has been granted by Chelmsford City Council (14/01971/OUT), site set-up works have already commenced, and reserved matters will shortly be submitted. At the same time, the owner is undertaking design work to ensure that 1 Elstree Way and Manor Point can be delivered early within the plan period (15 years). These design development drawings will inform the pre-application process and form part of the planning application that is to be submitted shortly. For this reason the site is considered to be available and residential development achievable on it in the short term. These design studies are included with this submission and is entitled 'Feasibility Study'.
4. The proposed sites comply with the Core Strategy Policy CS1 and have an initial estimated capacity of 110 units (Elstree Way 165 dwellings/ha x 0.67ha site) and 49 units (Manor Point – 80dwellings/ha x 0.61 ha site). Both sites satisfy the requirements of sites to be allocated as housing only if they have an estimated capacity of 10 or more units. (SADM Paragraph 2.8)
5. The proposed sites are located within the urban areas of Borehamwood. The demand and need for housing has been identified as high in these areas. Use of a brownfield site for housing will help to keep the pressure off green belt sites.
6. Despite its acceptance of the site's potential future suitability and availability and its current achievability, the Council did not consider that the site should be allocated. This seems to have been on the basis of its allocation as employment land. However, the western boundary of the Elstree Way Employment Area has recently lost sites for the construction of the technical college and Horizon One (housing) on Studio Way/Elstree Way. Therefore, allocating the submitted sites would represent positive planning and prevent the piecemeal incursion into employment land through the grant of permission or office to residential permitted development.

**7. Please set out as precisely as possible what change(s) you consider necessary to make the Plan**

- **legally compliant or**
- **sound (having regard to the criteria you ticked at 5 above relating to soundness).**

**You will need to say why this change will make the 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.**

1 Elstree Way and Manor Point, Manor Way should be included within Policy SADM1 - Housing Allocation as it is unlikely to be delivered as employment.

The following wording is suggested:

Ref	Site	Site specific requirements	Estimated no. of dwellings
H13	Elstree Way	Residential / Residential led mixed use development	110
H14	Manor Point, Manor Way	Residential / Residential led mixed use development	49

**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 for further submissions based on the representation you are currently making. **After this current publication stage, further submissions will only be able to be made at the Inspector's request, based on the matters and issues he/she identifies for Examination.**

**8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?**

Yes ☒ No ☐

**9. If your representation is seeking a modification/change to the Plan, 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

☒

**10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:**

To provide any further information that is required to support 1 Elstree Way and Manor Point, Manor Way being allocated as residential or residential led mixed use.

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

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Part C

(Only needed once)

Name (Print): \_\_\_\_\_ Steve Canning \_\_\_\_\_

☒

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

☒

If you wish to be informed of the recommendations of the Inspector appointed by the Secretary of State to carry out the independent Examination of the Plan, please tick this box.

☒

If you wish to be informed of the adoption of the Plan by Hertsmere Borough Council please tick this box.

☐

If you no longer wish to receive communications from the Council on SADM please tick this box.