

Survey:

What is your name? **Justin Mills**

What is your organisation (if applicable)? **Rensale Limited (c/o Contour Planning)**

1. Which part of the Plan are you commenting on?

Policy:	<input type="text" value="BSESA"/> <input type="text" value="18"/>	Paragraph:	<input type="text"/>	Table:	<input type="text"/>	Map:	<input type="text"/>
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2. Do you consider the Plan is:

Legally compliant?	Yes:	<input type="text"/>	No:	<input type="text" value="X"/>
Sound?	Yes:	<input type="text"/>	No:	<input type="text" value="X"/>

3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared	<input type="text" value="X"/>
Justified	<input type="text" value="X"/>
Effective	<input type="text" value="X"/>
Consistent with national policy	<input type="text" value="X"/>

4. Please give reasons for your objection or support:

The draft policy under-estimates the potential of the site to provide a high density development (aimed at supporting the vitality of the town centre and meeting a local housing need) and places unnecessary restrictions on future development which conflict with the NPPF and draft London Plan's requirement for the intensification of development in highly sustainable locations (including in town centres).

In addition, the policy as worded encourages a full range of industrial uses (e.g. B1c, B2 and B8) uses which would neither improve the environmental quality of the area, nor reduce amenity impacts on adjoining residential properties (which is purported to be a key objective of Policy BSESA18 and Policy BP6).

5. What change(s) do you consider necessary to make the Plan legally compliant or sound?

Indicative Capacity: Significantly underestimates the number of residential units that could be achieved on the site. Initial investigations by the site owner have identified the site has potential to accommodate over 100 units (and potentially up to 200 units).

Timeframe for Delivery: The site is likely to be available sooner than the dates specified in the policy. Potentially with at least 50% of the units being delivered in 0-5 years, with the remaining units in 5-10 years (i.e. before the '10+ years' currently specified).

Planning Considerations: Erroneously refers to 'Policy B6(p)' when it should be referring to 'Policy BP6(q)'.

Policy BSESA18's requirement for the development of employment uses on the site are far more onerous than those referred to in Policy BP6 (the latter merely supports the removal of the vehicle workshops on Hassop Road, whereas the former specifically requires them to be removed).

The range of employment uses suitable for development on the west side of Hassop Road should be amended such that only appropriate (low impact) B2 and B8 uses are acceptable. In addition, B1a (offices) should be encouraged given the site's close proximity to nearby residential properties and given the policy's desire to "improve amenity for neighbouring residential units". Furthermore, B1a (offices) are appropriate given the site's edge of town centre location (having regard to the preferred location for offices set out in draft London Plan Policy E1).

Design Principles: Whilst the site owner acknowledges that the latest wording in Policy BSESA18 is more flexible towards the height of development that can be achieved on the site (the latest draft referring to the need to "respond to the height and proportions of adjoining 3 storey development" compared to the earlier draft's requirement to "reflect" the height of the adjoining three storey buildings), the policy should go further in promoting suitably designed taller building heights in this highly sustainable town centre location, which meets the NPPF and London Plan's requirements for intensification and higher density development.

Justification: The range of uses deemed acceptable on the site should be expanded with the policy referring to "A mixed use development including housing and/or other forms of residential accommodation would help support the vitality of the town centre and meet a local housing need." (underlining identifies new text to be added to policy)

Reference to the replacement of existing vehicle repair garages with use classes B1c, B2 and B8 should be amended, since some business falling within these categories would not help reduce amenity impacts for adjoining residents (which is a key requirement of both Policy BSESA18 and Policy BP6). B1 uses (including offices) should also be supported in this location.

6. If your representation is seeking a change, do you wish 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

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

Since the Policy BSESA18 (and Policy BP6) has a direct impact on the nature and scale of development which Ravensale may be able to achieve on their Cricklewood Broadway/Hassop Road site, and since the draft policy conflicts with advice the Council has provided in relation to a formal pre-application. Accordingly, the Ravensale wishes to orally present their case as to why the currently worded policy could affect the redevelopment potential of the site.

If you would like to comment on additional policies, please fix another sheet to this.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

- Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.