

CHAPTER 19 – DEVELOPMENT IN RESIDENTIAL AREAS

19.1. USING THE POLICY STATEMENT

Objection

Rep No
2901

Name
British Waterways

Key Issue

- (a) Whether reference should be made to the canal-side land in paragraph 2.7.13 of Part 4 Section 9. (2901)

Inspector’s Conclusion

General issues

- 19.1.1. I have commented throughout my report on the excessive length and complex format of the Plan, which in my view reduces its clarity and readability. It is also contrary to the advice in PPG12, which indicates that policies in development plans should avoid excessive detail and concentrate on those matters which are likely to provide the basis for considering planning applications. Paragraph 3.14 of PPG12 states that “local authorities should consider the use of supplementary planning guidance as a means of setting out more detailed guidance on the way in which the policies in the plan will be applied in particular circumstances or areas”.
- 19.1.2. In this context I have serious concerns about the suitability of the residential Character Area appraisals. As I indicate in my general comments at the beginning of this report, I believe that this section of the Plan is neither necessary nor appropriate in a Local Plan (see paragraph 1.1.18). The overall strategy of the Plan would not suffer from the omission of these detailed statements, nor would the Council’s ability to effectively control development during the Plan period. In my view the residential Character Area appraisals provide background information that could usefully be published in the form of supplementary planning guidance (SPG). Indeed, this is the format in which they were originally published (see CD64), and I believe it to be the correct approach. I therefore recommend that Part 4: 9 be deleted from the Plan.
- 19.1.3. In the remainder of this chapter I shall deal briefly with the objections made to the residential Character Area appraisals. Because there is greater scope for discretion in the level of detail provided if they are published as SPG, I have not examined them in depth. Instead I have confined my comments to those matters raised by the objectors.

(a) Canal-side land

- 19.1.4. British Waterways suggests that the reference to ‘public landscaping’ should include canal-side land in addition to roadside verges. As the Council points out, this section is the glossary of terms, and roadside verges are merely used as an example of the types of location where public landscaping might occur. In these circumstance I do not consider that the inclusion of canal-side land would add anything of benefit to the Plan, and I recommend no change in response to this objection.

Recommendation

19.1.5. **The Plan be modified by the deletion of Part 4: 9 “Development in Residential Areas” which should be published instead as supplementary planning guidance.**

NOTE: All the subsequent recommendations in this chapter are based on the premise that the residential Character Area study will not form part of the adopted Plan.

19.2. HCA2: FIELDS END

Counter Objection

To pre-inquiry change 258

Rep No

Name

5558PC

CPRE - The Hertfordshire Society

Key Issue

- (a) Whether the sentence relating to H34 and H51 should be deleted from the ‘Through routes and flows’ section of HCA2. (5558PC)

Inspector’s Conclusion

19.2.1. This is one of many objections by the CPRE to the inclusion in the Plan of a major residential allocation at West Hemel Hempstead. The decision on whether or not the reference to these sites should remain in the residential Character Area assessment is wholly dependent on the decision about these sites in the Housing chapter. As I am recommending that the Council consider deleting these sites, the reference may no longer be appropriate.

Recommendation

19.2.2. **The Council considers whether the reference to Housing Sites H34 and H51, as proposed by PIC258, is appropriate in the light of its decision about the deletion (or otherwise) of these sites from the Plan.**

19.3. HCA4: FELDEN WEST

Objection

Rep No

Name

3116 Dr D G Parsons

Key Issue

- (a) Whether the boundaries of residential Character Area HCA4 should be extended to include land indicated by the objector. (3116)

Inspector’s Conclusion

- 19.3.1. This objection is associated with the principal objection to the inclusion within the Green Belt of a small area of land at London Road, Boxmoor, which adjoins the urban area of Felden. I have considered this matter under Policy 3 in Chapter 4, where I conclude that an adjustment to the Green Belt boundary would not be appropriate. It follows that the boundary of residential Character Area HCA4 should not be amended to include the objection land.

Recommendation

- 19.3.2. **No modification be made in response to this objection.**

19.4. HCA6: GADEBRIDGE

Objection

| | |
|---------------|----------------------------|
| <i>Rep No</i> | <i>Name</i> |
| 1496 | HCC Environment Department |

Key Issue

- (a) Whether reference should be made to Warners End Wood wildlife site in the text of the character study to HCA6. (1496)

Inspector’s Conclusion

- 19.4.1. This is one of a number of objections from the County Council that argues that the existence of a wildlife site within a residential Character Area should be acknowledged within the appraisal. Although not specifically stated, I assume that the objector would wish to see a reference to the wildlife site in the ‘open space’ part of the amenity section. In my view this raises the important question of consistency in the treatment of open space in the character appraisals.
- 19.4.2. In HCA6, the reference to open land *adjacent to Warners End valley and south of Halsey Park...(being) a very important feature of the area* seems from the Proposals Map to relate to land that is entirely outside the Area boundary. This is contrary to the way that the appraisal reads, for the text implies that the open space is within the Area. On the other hand, the two areas of open space that are within HCA6, part of Warners End Wood and some school playing fields, are not mentioned. I fully appreciate that the large peripheral open spaces may contribute significantly to the character of the Area, but in terms of the accuracy of the appraisal I find it difficult to accept that the open spaces within it do not deserve a mention. I recommend that the Council look again at the treatment of the ‘open space’ element of the appraisals, with a view to ensuring that those significant open spaces that lie within an Area are separately identified from any external open spaces that contribute to its character.
- 19.4.3. Turning now to the specific matter raised by the objector, I believe that it is preferable to acknowledge that an identified open space is a wildlife site. The Council indicates

in the Environment section in Part 3 of the Plan the importance of local nature reserves and other wildspace to the urban populations of the Borough, and an acknowledgement in the character appraisal would help to increase public awareness of such sites. More importantly, it would also provide a useful indicator of the character of a particular open space, distinguishing it from spaces such as playing fields and contributing to the overall appraisal of the residential area.

- 19.4.4. I conclude that the small part of Warners End Wood that lies within HCA6, and the school playing fields, both warrant a mention in the appraisal. In addition, the wildlife status of the wood should be acknowledged. Consequently, I consider that the ‘open space’ part of the HCA6 character appraisal would be more appropriately phrased along the following lines:

“Limited to school playing fields and part of Warners End Wood nature reserve. Area fringed by extensive linear open spaces of Warners End valley and Gadebridge Park, which create a very important setting. In addition, open country lies to north.”

As an alternative, if the Council so wished, the boundary of the residential Character Area could easily be re-drawn to exclude the wood from the Area.

Recommendation

- 19.4.5. **The Council looks again at the ‘open space’ element of the residential Character Area appraisals, with a view to achieving a consistent treatment. In particular, significant open spaces that lie within an Area should be separately identified from any external open spaces that contribute to its character.**
- 19.4.6. **In relation to HCA6, either a reference should be made to the Warners End Wood wildlife site, or the boundary of the Area should be drawn to exclude the wildlife site.**

19.5. HCA7: BOXMOOR

Objection

Rep No
1497

Name
HCC Environment Department

Key Issue

- (a) Whether the open space at Boxmoor should be included within the area of HCA7, and whether reference should be made to the ecological value of the wildlife sites within HCA7. (1497)

Inspector’s Conclusion

- 19.5.1. The Council has assumed that the objector wishes to see a reference to Harrison’s Moor and Boxmoor Trout Fishery wildlife sites included in the text to HCA7. However, my reading of the objection is that the Boxmoor open area and the lake should not be

included within this residential Character Area if major open spaces are left out of other Areas, as is often the case.

- 19.5.2. I agree with the objector that the main issue here is consistency. The Council argues that open space at Boxmoor is a key part of the character of HCA7, acting as a focal point rather than separating the two parts of HCA7. I find this somewhat surprising, particularly as the Grand Union canal and the River Bulbourne create a physical barrier to movement across this large open space. The fact that the housing on each side of Boxmoor may have similar characteristics is not sufficient reason, in my view, for denoting as one Character Area two discrete localities separated by such a strong physical feature. In my view it would be more consistent if the areas were separately defined and Boxmoor remained outside them both.
- 19.5.3. Turning to a reference to the ecological value of wildlife sites that are included within residential Character Areas, this would clearly not be appropriate if Harrisons Moor and the Boxmoor Trout Fishery are excluded from HCA7. Nevertheless, as a matter of general principle, I agree with the Council that it is not necessary to describe the ecological value of wildlife sites that are included within such Areas. Wildlife sites are already adequately protected by Policy 103, and the particular nature of the ecological interest is not likely to have a bearing on the residential character. As I indicate in the preceding section, the existence of a wildlife site as part of the open space within a residential Character Area merits a mention, but further detail does not.

Recommendation

- 19.5.4. **The Council considers identifying the two discrete residential localities on either side of the Boxmoor open space as separate residential Character Areas, with the open space being excluded from them both.**

19.6. HCA12: APSLEY

Counter Objections

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------------------|-------------------------|---------------|-----------------------|
| To pre-inquiry change 259 | | | |
| 5648PC | Apsley Developments Ltd | 5776PC | Felden Park Farms Ltd |
| To pre-inquiry change 260 | | | |
| 5647PC | Apsley Developments Ltd | 5777PC | Felden Park Farms Ltd |

Key Issue

- (a) Whether reference to proposal sites TWA6, TWA7, TWA17 and TWA18 should be retained in the 'Through routes and flows' section of HCA12. (5647PC, 5648PC, 5776PC, 5777PC)

Inspector's Conclusion

- 19.6.1. These counter-objections are part of the overall opposition to the deletion in the Composite Draft of the residential expansion originally proposed for the Manor Estate. The decision on whether the references should remain part of the residential Character Area appraisal is wholly dependent on the decision reached on Housing Proposal Sites

TWA6 and TWA7. I recommend in chapter 17 that these sites should be retained in the Plan, so it follows that PICs 259 and 260 should not be adopted.

Recommendation

19.6.2. PICs 259 and 260 be not adopted.

19.7. HC20: HIGHFIELD

Objection

| | |
|---------------|----------------------------|
| <i>Rep No</i> | <i>Name</i> |
| 1498 | HCC Environment Department |

Key Issue

- (a) Whether reference should be made to the Nicky Line as a wildlife site in the text of the character study to HCA20. (1498)

Inspector’s Conclusion

19.7.1. This objection is similar to many others made by the County Council, and again a consistent approach is required. In this case, unlike some others, the existence of the Nicky Line is referred to in the appraisal. If the Council accepts my recommendations elsewhere that wildlife sites should be mentioned, the reference sought by the objector should also be included here. It would simply involve inserting the words “and wildlife site” after “a footpath/cycleway”.

Recommendation

19.7.2. HCA20 be modified by including the words “and wildlife site” after “a footpath/cycleway” in the Open Space section of the appraisal.

19.8. HCA21: BENNETTS END

Objection

| | |
|---------------|----------------------------|
| <i>Rep No</i> | <i>Name</i> |
| 1499 | HCC Environment Department |

Key Issues

- (a) Whether reference should be made to Rant Meadow Wood as a wildlife site in the text of the character study to HCA 21. (1499)
- (b) Whether reference should be made to a site opposite Rant Meadow Wood that meets wildlife site status. (1499)

Inspector’s Conclusions

(a) *Rant Meadow Wood wildlife site*

- 19.8.1. Identical arguments to those made above apply here, for Rant Meadow is included within the description of the open spaces within this residential Character Area. Again, for the sake of consistency, the words “, a wildlife site.” should be inserted after “Rant Meadow”.

(b) *Site opposite Rant Meadow Wood*

- 19.8.2. It would not be appropriate, in my view, to afford the same status as Rant Meadow Wood to land which has not yet been designated as a wildlife site. I recommend no change in response to this objection.

Recommendation

- 19.8.3. **HCA21 be modified by inserting the words “, a wildlife site” after “Rant Meadow”.**

19.9. HCA 22: ADEYFIELD SOUTH

Objection

| | |
|---------------|----------------------------|
| <i>Rep No</i> | <i>Name</i> |
| 1500 | HCC Environment Department |

Key Issue

- (a) Whether reference should be made to Maylands Wood wildlife site in the text of the character study to HCA22. (1500)

Inspector’s Conclusion

- 19.9.1. Another objection which requires a consistent approach to this issue. Maylands Wood is mentioned as an open space, and merits the inclusion of the phrase “, a wildlife site.”

Recommendation

- 19.9.2. **HCA22 be modified by inserting the words “, a wildlife site.” after “Maylands Wood”.**

19.10. HCA24: HIGH STREET GREEN

Objection

| <i>Rep No</i> | <i>Name</i> |
|---------------|----------------------------|
| 1501 | HCC Environment Department |

Key Issue

- (a) Whether reference should be made to Widmore Wood in the text to HCA24 of the character study. (1501)

Inspector’s Conclusion

19.10.1. This is a similar situation to that at Gadebridge (see HCA6 above). The open space part of the High Street Green appraisal refers to land outside the residential Character Area, but omits two sizeable areas within it, Widmore Wood and a playing field to the south. If these two areas are to remain within the Area then they deserve a mention, and Widmore Wood should be referred to as a wildlife site.

Recommendation

19.10.2. **Either a reference be made to the Widmore Wood wildlife site and a playing field within HCA24, or the boundary of the residential Character Area be re-drawn to exclude these open space areas.**

19.11. HCA25: LONGDEAN PARK

Objection

| <i>Rep No</i> | <i>Name</i> |
|---------------|--------------------------------------|
| 5008L | Longdean Park Residents’ Association |

Key Issues

- (a) Whether reference should be made to legal covenants that would prohibit infill development. (5008)
- (b) Whether reference to potential redevelopment opportunities at HCA25 should be deleted as a result of legal covenants. (5008)
- (c) Whether Proposals Map 4 contains a typographical error. (5008)

Inspector’s Conclusions

- (a) *Reference to legal covenants*

19.11.1. The Council recognises that legal covenants imposed by a landowner can restrict the opportunity for development within particular residential areas. It proposes to add a paragraph to the general text at the beginning of the chapter to address this matter (PIC257). I support this pre-inquiry change.

(b) Redevelopment opportunities at HCA25

- 19.11.2. The objector indicates that legal covenants exist on all the properties at Longdean Park which effectively prevent further development. For this reason it is argued that the statements in the policy relating to limited greenfield opportunities and the potential for infilling and conversion cannot be realised, and should be omitted. The Council has proposed FC178 to acknowledge the existence of covenants in this area, but points out that its assessment is based solely on land use planning issues.
- 19.11.3. In my view the residential Character Area study warrants an objective and consistent assessment of the planning merits of development opportunities. As the Council points out, legal covenants could be removed or changed over the life of the Plan. Whilst the existence of a covenant could prevent a particular proposal being implemented, that is not sufficient reason to deny that such a development opportunity might otherwise be appropriate when assessed against the policies of the Plan. Other than endorsing FC178, I recommend no change in response to this objection.

(c) Map error

- 19.11.4. The objector points out that the appearance of the words “Leverstock Green” in the middle of the Longdean nature reserve is incorrect. The Council agrees, but indicates that this is an error in the underlying Ordnance Survey base map. Whatever the reason behind this error, to avoid further confusion it should be corrected when the final version of Proposal Map 4 is prepared.

Recommendation

19.11.5. **The Plan be modified in accordance with PIC257 and FC178.**

19.11.6. **Proposals Map 4 be modified to remove the words “Leverstock Green” from the middle of the Longdean nature reserve.**

19.12. HCA27: LEVERSTOCK GREEN CENTRAL**Objections**

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------|----------------------------|---------------|----------------------------|
| 4755 | Mr & Mrs M R & B A Chapman | 4756 | Mr & Mrs M R & B A Chapman |

Key Issues

- (a) Whether 17th and 18th century buildings should be referred to in the ‘Age of buildings’ section of HCA27, and whether the Leather Bottle PH should be included in the ‘Non-residential buildings’ section. (4755, 4756)
- (b) Whether ‘Westwick School’ should be replaced by ‘Leverstock Green JMI’ in the text to HCA27. (4755, 4756)

Inspector’s Conclusions

(a) *Existence of 17th and 18th century buildings and Leather Bottle public house*

19.12.1. The Council accepts that the appraisal should be amended as suggested by the objectors, and proposes PICs 261 and 263 to address these matters. I support these pre-inquiry changes.

(b) *Correct name for school*

19.12.2. The Council acknowledges that it did not use the correct name for the school, and amends it with PICs 262 and 263. I endorse these changes.

Recommendation

19.12.3. The Plan be modified in accordance with PICs 261, 262 and 263.

19.13. HCA28: LEVERSTOCK GREEN EAST

Objections

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------|--------------------------------------|---------------|----------------------------|
| 1502 | HCC Environment Department | 3173 | Mr John Baker |
| 3025 | Leverstock Green Village Association | 3174 | Mr & Mrs M Gouch |
| 3092 | Mr & Mrs A G Playle | 3188 | Mr & Mrs M R & B A Chapman |
| 3168 | Mr P Dawood | 4200 | Mr & Mrs A G Playle |
| 3169 | Mr R M Basterfield | 4757 | Mr & Mrs M R & B A Chapman |
| 3170 | Elizabeth DeMarco | 4758 | Mr & Mrs M R & B A Chapman |
| 3171 | Mrs G Cox | 4759 | Mr & Mrs M R & B A Chapman |
| 3172 | Rev M B Tingle | | |

Key Issues

- (a) Whether reference should be made to Holy Trinity Church as a wildlife site in the text of the character study to HCA28. (1502)
- (b) Whether 17th century buildings should be referred to in the ‘Age of Buildings’ section of HCA28. (3188, 4757, 4758, 4759)
- (c) Whether ‘Westwick School’ should be replaced by ‘Leverstock Green JMI’ in the text to HCA28. (4757, 4758, 4759)
- (d) Whether land at Westwick Farm should be referred to as H50 as opposed to H58. (3188, 4757, 4758, 4759)
- (e) Would infilling and redevelopment be consistent with the policy statement for HCA28 which states ‘maintain defined character’, or would such development be detrimental to the character of the area. (3025, 3035, 3092, 3168, 3170, 3171, 3172, 4200)
- (f) What are the consequences of considering HCA28 as an ‘Area of Opportunity’ in terms of development pressure and the destruction of greenfield sites. Alternatively, should HCA28 be designated as an ‘Area of Very Limited Opportunity’ or an ‘Area of Minimal Change’. (3025, 3092, 3168, 3169, 3170, 3171, 3172, 3173, 3188, 4200)
- (g) Whether the increase in population caused by infilling and redevelopment would unacceptably

- increase pressure on services and infrastructure in the area. Are the roads able to accommodate the extra traffic, and would traffic pollution increase to unacceptable levels. (3169, 3170, 3171, 3174)
- (h) Whether existing listed buildings within HCA28 would be changed as a result of infilling and redevelopment. (3171)
- (i) Whether other areas should be redeveloped instead of permitting redevelopment within HCA28. (3170)

Inspector’s Conclusions

(a) *Reference to Church as wildlife site*

- 19.13.1. Another objection from the County Council to the omission of a reference to the designation of Holy Trinity Church as a wildlife site. For the reasons I have already discussed I consider that a consistent approach is required, and I recommend that this open space be identified accordingly.

(b) *Existence of 17th century buildings*

- 19.13.2. The Council accepts that the appraisal should be amended as suggested by the objectors, and proposes PIC264 to address this matter. I agree with the change.

(c) *Correct name for school*

- 19.13.3. The Council acknowledges that it did not use the correct name for the school, and amends it with PIC265. I endorse this change.

(d) *Numbering of allocation site*

- 19.13.4. The error in the numbering of this allocation site is corrected by PIC266, which I support.

(e) *Impact of in-filling and redevelopment on character of HCA28*

- 19.13.5. The character appraisal describes Leverstock Green East as having very low density housing, with mature landscaping giving it a semi-rural feel and providing a green entrance to the urban area from the south-east. The objectors argue that infilling and redevelopment would be inconsistent with the policy aim of maintaining the defined character of the area. Whilst I appreciate the apparent contradiction if these two aspects are considered in isolation, I believe that the application of the ‘development principles’ element of HCA28 should ensure that the defined character is maintained. This section indicates, for example, that detached, medium to large houses are encouraged, as is the extensive use of private landscaping. I recommend no change in response to these objections.

(f) *Appropriate classification of development opportunities*

- 19.13.6. The objectors strongly oppose the identification of Leverstock Green East as an ‘Opportunity Area’ for redevelopment, plot amalgamation and infilling. They believe that its existing spacious, semi-rural character would be destroyed by a significant level of development, and argue that the resulting increase in density would be

contrary to the objective of maintaining the defined character of the area. Many objectors argue that it should be designated an ‘Area of Minimal Change’, whilst one believes that it should be an ‘Area of Very Limited Opportunity’.

- 19.13.7. I can understand the concern of the objectors, for the implication of identifying the locality as one with development opportunities is that a significant amount of change is likely to take place. However, as I indicate in the preceding sub-section, the ‘development principles’ element of HCA28 should ensure that any infilling or redevelopment maintains the spacious, semi-rural character of the area. The classification by the Council is entirely opportunity-based, and reflects the fact that Leverstock Green East contains some areas of low density, irregularly orientated dwellings with scope for redevelopment. Indeed, the Council identified one such area as Housing Proposal Site H23 in the Deposit Draft. Although this is now to be deleted as a firm proposal, it nonetheless remains as one of the opportunity sites within the locality.
- 19.13.8. The only doubt I have about the classification is whether the area should be an ‘Opportunity Area’ or an ‘Area of Limited Opportunity’. There is very little evidence upon which I can base my conclusion, apart from a study of the maps of the locality and my visits to the area. It appears that much of the area is developed at approximately the same density as the neighbouring Leverstock Green Central (HCA27), which is categorised as an ‘Area of Very Limited Opportunity’. I accept that there are more potential infill and redevelopment sites in Leverstock Green East, but I question whether these are sufficiently numerous and extensive to warrant classification as an area with the greatest scope for residential development. Without knowledge of the assessment criteria I am unable to make a decision on this issue, so it is a matter that I shall ask the Council to re-assess.

(g) *Pressure on services and effects on road capacity and pollution*

- 19.13.9. One objector is concerned that the increase in population as a result of infilling and redevelopment would stretch the already limited facilities in the area. Others argue that the roads are unsuitable for an increase in traffic and pollution, and believe that the country lanes would have to be widened to accommodate the extra traffic.
- 19.13.10. The Council points out that any development would have to satisfy the requirements of Policy 9 of the Plan, the general policy which includes criteria relating to the suitability of existing roads, the avoidance of harm from pollution, and the capacity of local services. In addition it seems to me that the scope for a significant increase in population is limited in the light of the overall requirement to maintain the defined character of the area. In the absence of any direct evidence that there is insufficient capacity to accommodate the very modest growth that is likely, I recommend no change in response to these objections.

(h) *Impact on listed buildings*

- 19.13.11. The objector believes that the anticipated scale of development would have a detrimental impact on the listed buildings and heritage sites within the area. I share the Council’s view, however, that sites and buildings which are identified as having some special architectural, historic, archaeological or wildlife interest are subject to

adequate protection from the specific policies in Part 3 of the Plan. I recommend no change in response to this objection.

(i) Other areas more suitable for redevelopment

19.13.12. The objector believes that there are many under-developed areas near the centre of Hemel Hempstead that would be more appropriate for development than Leverstock Green East. This is undoubtedly the case, and the Plan makes a number of specific allocations where infill and redevelopment opportunities can be clearly identified. As the Council points out, however, the purpose of the residential Character Area appraisal is to guide the nature of any unplanned development that may be proposed for the locality. Effectively the study is imposing detailed, area-specific guidance for all residential parts of the Borough, as a supplement to the general Borough-wide policies in Part 3 of the Plan. Consideration of the opportunities that may exist in alternative locations is not therefore a matter for a particular Character Area. I recommend no change in response to this objection.

Recommendation

19.13.13. The Plan be modified in accordance with PICs 264, 265 and 266.

19.13.14. HCA28 be modified by inserting the words “(a wildlife site)” after “Holy Trinity Church”.

19.13.15. The Council re-assess the classification of HCA28 as an ‘Opportunity Area’, either satisfying itself that the development opportunities are sufficient to warrant this classification, or re-classifying the area as an ‘Area of Limited Development Opportunity’.

19.14. HCA29: LEVERSTOCK GREEN NORTH

Objections

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------|----------------------------|---------------|----------------------------|
| 4760 | Mr & Mrs M R & B A Chapman | 4761 | Mr & Mrs M R & B A Chapman |

Key Issue

- (a) Whether land at Buncefield Lane/Green Lane should be referred to as H16 as opposed to H19. (4760, 4761)

Inspector’s Conclusion

19.14.1. The error in the numbering of this allocation site is corrected by PIC267, which I endorse.

Recommendation

19.14.2. **The Plan be modified in accordance with PIC267.**

19.15. HCA32: GROVEHILL**Objection**

| | |
|---------------|---------------|
| <i>Rep No</i> | <i>Name</i> |
| 2141 | Miss M Fraser |

Support

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| 3075 | Miss A Fraser |
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Key Issues

- (a) Whether it is correct to refer to parking on St. Agnells Lane as ‘light’ in the text of the character study to HCA32. (2141)
- (b) Whether Henry Wells Square should be included in the ‘views and vistas’ section of HCA32. (2141)

Inspector’s Conclusions**(a) *Parking on St Agnells Lane***

19.15.1. This objection is part of Miss Fraser’s opposition to the designation of Site C3 for a new church and meeting rooms. I have dealt with the substantive matters raised by the objection in my consideration of Site C3 in chapter 11 of the report. In relation to the Grovehill residential Character Area appraisal, the objector questions whether it is correct to describe on-street parking along St Agnells Lane as ‘light’.

19.15.2. The Council justifies its description of on-street parking by reference to photographs taken late on a week-day morning, which show very few parked cars. Miss Fraser produces photographs that show a much higher incidence of on-street parking. From my visits to this locality it is clear that there are relatively few cars parked on the street during most weekdays, but that there is a noticeable increase during the evenings as people return from work. In these circumstances I have some sympathy with the views of the objector, for the Council’s description does not give a full picture of the parking situation. Whilst not wishing to unduly complicate the appraisal, I do believe that it would be preferable if the sentence was amended to reflect the differences between day-time and overnight levels of on-street parking.

(b) *Reference to Henry Wells Square*

19.15.3. The objector suggests that Henry Wells Square should be included within the ‘Views and vistas’ part of the appraisal. However, I agree with the Council that this local centre is not visually prominent in the Character Area as a whole, being a low-rise development that is only visible from close by. The appraisal does acknowledge that Henry Wells Square is the area’s focal point, thereby recognising its function. I recommend no change in response to this objection.

Recommendation

- 19.15.4. The ‘On-street parking’ section of the HCA32 appraisal be modified to reflect the differences between day-time and overnight levels of on-street parking on the main distributor roads.

19.16. HCA33: WOODHALL FARM**Objections**

| <i>Rep No</i> | <i>Name</i> |
|---------------|----------------------------|
| 1503 | HCC Environment Department |

Key Issue

- (a) Whether reference should be made to High Wood as a wildlife site in the text to HCA33. (1503)

Inspector’s Conclusion

- 19.16.1. This is another of the County Council’s objections to the lack of recognition given to wildlife sites in the residential Character Area appraisals. I have indicated previously that it would be beneficial for open spaces that are wildlife sites to be referenced in this way, and the same applies here. I recommend that the Plan be amended accordingly.

Recommendation

- 19.16.2. The ‘Open Space’ element of the HCA33 character appraisal be modified to indicate that High Wood is a wildlife site.

19.17. HCA34: MANOR ESTATE**Counter Objections**

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------------------|----------------------------------|---------------|-------------------------|
| To pre-inquiry change 268 | | | |
| 5559PC | CPRE - The Hertfordshire Society | 5646PC | Apsley Developments Ltd |
| To pre-inquiry change 269 | | | |
| 5560PC | CPRE - The Hertfordshire Society | 5778PC | Felden Park Farms Ltd |
| 5645PC | Apsley Developments Ltd | | |

Key Issue

- (a) Whether pre-inquiry changes 268 and 269 should be retained in the Plan. (5559PC, 5560PC, 5645PC, 5646PC, 5778PC)

Inspector’s Conclusion

19.17.1. These counter-objections are part of the overall opposition to the deletion in the Composite Draft of the residential expansion originally proposed for the Manor Estate. The decision on whether the references should remain within the HCA34 Character Area appraisal is wholly dependent on the decision reached on Housing Proposal Sites TWA6 and TWA7. I recommend in chapter 17 that these sites should be retained in the Plan, so it follows that PICs 268 and 269 should not be adopted.

Recommendation

19.17.2. **PICs 268 and 269 be not adopted.**

19.18. BCA3: BANK MILL

Objection

| Rep No | Name |
|--------|-------------------|
| 2902 | British Waterways |

Key Issue

- (a) Whether the text of the character area should make reference to the fact that new development should face the canal and respect its environment. (2902)

Inspector’s Conclusion

19.18.1. British Waterways welcomes the reference to the Grand Union Canal running through this area, but objects to the absence of an indication that development should face the canal and respect its waterside setting. However, I believe that a requirement to face the canal would be unduly restrictive, and could potentially be contrary to the interests of achieving a high quality design and making the most efficient use of land. As the Council points out, Policy 112 already requires a positive contribution to be made to the canal-side environment, so there is no need to repeat this matter in the character study. I recommend no change in response to this objection.

Recommendation

19.18.2. **No modification be made in response to this objection.**

19.19. BCA6: BILLET LANE

Objection

| Rep No | Name |
|--------|-------------------|
| 2903 | British Waterways |

Key Issue

- (a) Whether the text of the character area should make reference to the fact that new development should face the canal and respect its environment. (2903)

Inspector’s Conclusion

- 19.19.1. This is an identical objection to that in the preceding sub-section. The issues are also the same, as is my conclusion. I recommend no change to the Plan.

Recommendation

- 19.19.2. **No modification be made in response to this objection.**

19.20. BCA15: TUNNEL FIELDS

Objection

| <i>Rep No</i> | <i>Name</i> |
|---------------|----------------------------|
| 1504 | HCC Environment Department |

Key Issue

- (a) Whether reference should be made to wildlife sites within the description of each character area. (1504)

Inspector’s Conclusion

- 19.20.1. The County Council argues that because there is a reference to the Tunnel Fields Meadow wildlife site in this Character Area appraisal, similar references to other wildlife sites should be made wherever they are included within residential Character Areas. I have already addressed this matter in my consideration of the Gadebridge Character area (HCA6). I conclude there that it is preferable for the wildlife interest to be acknowledged, as it helps to increase public awareness and to establish the particular character of the open space.
- 19.20.2. I appreciate that there are specific reasons for the reference to the nature conservation interest in the somewhat unusual circumstances of this case. Nevertheless, that does not alter my judgement about the desirability of making similar references in other instances. Consequently I agree with the objection, and I have made appropriate recommendations for changes in those Character Areas where there is a wildlife interest. However, no change is necessary to this part of the Plan.

Recommendation

- 19.20.3. **No modification be made in response to this objection.**

19.21. BCA17: VALLEY ROAD**Objection**

| <i>Rep No</i> | <i>Name</i> |
|---------------|-------------------|
| 2904 | British Waterways |

Key Issue

- (a) Whether the text of the character area should make reference to the fact that new development should face the canal and respect its environment. (2904)

Inspector’s Conclusion

19.21.1. This is another identical objection to those made to BCA3 and BCA8. I consider that the issues are the same and, for the reasons I set out in BCA3, so is my conclusion. I recommend no change to the Plan.

Recommendation

19.21.2. No modification be made in response to this objection.

19.22. BCA18: NEW ROAD**Support**

| | |
|------|-------------------|
| 2905 | British Waterways |
|------|-------------------|

19.23. TRING**Objections**

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------|-------------|---------------|---------------|
| 4308 | Mrs B Lea | 4716 | Mrs B J Brown |

Key Issues

- (a) Is there an inconsistency between paragraphs 5.1 and 2.6.13 of the Plan. (4308)
- (b) Are the character area appraisals sufficiently accurate. (4308)
- (c) Should development in Tring Character Areas be restricted to minimal or no change in the light of available services;
- (d) Does Tring have a ‘reasonable’ amount of open space and good access to the open countryside. (4308)
- (e) Should the Miswell Lane open space area be identified as part of a green corridor. (4308)
- (f) Whether TCC network should be referred to in the Tring Character Areas. (4716)

Inspector’s Conclusions

(a) Is the Plan inconsistent

- 19.23.1. The objector argues that the reference in paragraph 5.1 to the central area of the town, known locally as the ‘triangle’ is inconsistent with the advice in section 2.6 of Development in Residential Areas, which deals with the operation of the Area Policies. Paragraph 2.6.13 states clearly that Conservation Areas are not included within the defined residential Character Areas but the ‘triangle’ falls within the Tring Conservation Area.
- 19.23.2. Paragraphs 5.1 to 5.4 give a brief general description of the town of Tring. The description starts in paragraph 5.1 with the central part of the town, including the part that lies within the Conservation Area, and then moves on in paragraph 5.2 to address the subsequent expansion of the town. In my view this description is merely intended to set the context for the individual area appraisals. It does not seek to define the residential character areas. More importantly, none of the character areas for Tring cover or overlap with the Tring Conservation Area. As such I do not consider the reference to the ‘triangle’ is inconsistent with the advice in paragraph 2.6.13. I, therefore, recommend no modification should be made in response to this element of objection 4308.

(b) Accuracy of the appraisals

- 19.23.3. Mrs Lea expresses surprise as to how many matters are not included in the appraisals. There is also a lack of consistency in that issues such as bus routes are covered in some areas but not in others. Another example is the fact that the shops at Miswell Lane/Western Road are not mentioned but those at Silk Mill are. The Hemel Hempstead and Berkhamsted character area appraisals appear to give more information than those for Tring do. The Council argues that this section of the Plan is a broad-based study related to urban design principles. It therefore concentrates on identifying those issues which are relevant to design considerations.
- 19.23.4. While the Miswell Lane/Western Road local shopping centre may be important to local residents it lies outside any of the residential character areas. In contrast the shops at Silk Mill Way are located in the centre of TCA11. I can understand therefore why the latter are mentioned whereas the former is not. I do not consider it reflects an inconsistency of approach.
- 19.23.5. I am rather more concerned about the issue of bus routes. The Council says that Silk Mill Way is mentioned as a bus route in TCA11 because it forms a central route through the area. In contrast it is argued that the route through TCA5 only passes through part of the area. However, while I understand the logic behind the Council’s argument I find it a little hard to follow. The route along Betty’s Lane through TCA8 for instance also passes through the centre of the character area, albeit it is shorter in length, and yet the appraisal makes no mention of it. I am concerned, therefore, that this could be viewed as inconsistent.
- 19.23.6. To add references to all possible bus routes which pass through residential character areas would I accept add unduly to the length of the appraisals. In any case the relevance of including references to bus routes is in my view questionable bearing in

mind the primary objectives of the residential character areas are to highlight opportunities and set design parameters for new residential development. I consider therefore that the most sensible way to achieve consistency would be to amend TCA11 and any other relevant character area by deleting all references to bus routes. I recommend that the Plan be modified accordingly.

(c) *Extent of change*

- 19.23.7. This objection is related to the many of the objections made by Mrs Lea to other parts of the Plan. It is based on her belief that the existing infrastructure in Tring, particularly local schools, is unable to support additional development.
- 19.23.8. I have accepted earlier in my report that Tring is close to capacity in terms of its ability to accommodate further housing. Care will therefore have to be taken in allowing further infill development to ensure that cumulatively it does not put an unacceptable strain on existing services and facilities. However, I do not consider that this justifies making major changes to the residential character area policy statements for Tring.
- 19.23.9. Of the 19 residential character areas in Tring there are only 2 which are identified as “opportunity” areas and one of these I have recommended the Council should reconsider (*see paragraph 19.36.26*). The remainder are described as either having “limited” or “very limited” opportunities for further residential development or being appropriate for minimal change. There would appear therefore to be fairly limited scope for further development within them. Even within the “opportunity” areas paragraph 2.7.16 of this section of the Plan makes clear that the scope for further development can still be quite constrained. Consequently, I am not persuaded that overall the Plan’s approach to development in the residential character areas of Tring would lead to inappropriate “town cramming” or place an intolerable strain on the existing infrastructure. I, therefore, recommend no modification in the light of this aspect of objection 4308.

(d) *Quantity of open space in Tring and access to the open countryside*

- 19.23.10. Concern is expressed about the accuracy of the phrase “*Tring possesses a reasonable level of good quality open space*” in paragraph 5.5 of the introduction to the Tring Character Areas. The Council maintains that it is a fair general description given the findings of the Study of Catchment Areas (CD130) which was prepared as a background paper to the previous local plan.
- 19.23.11. The assessment of open space in Tring indicates that it meets the NPFA standards in respect of formal open space. While there is a deficiency in informal open space this would be largely met if the land at Dundale were made available as an ecological park (*see paragraphs 7.62.27-7.62.55 and section 12.26*). Even without this land it is clear that almost 70% of the population would be within 400 metres of public open space. Overall therefore I consider that it is not inappropriate to describe Tring as having a reasonable level of open space provision.
- 19.23.12. I appreciate that the distance from some parts of the town to Tringford Reservoir or Tring Park is significant. However, it is clear that there are a number of footpaths leading out into the countryside from the northern, western and southern sides of the town as well as a number of rural roads. I consider therefore that it is reasonable for

paragraph 5.5 to state that there is good access to the open countryside. Accordingly I see no need for any modification to be made to paragraph 5.5.

(e) Miswell Lane open space

19.23.13. It is suggested that the Miswell Lane open space forms part of a green corridor that should be recognised in the Plan. I have already addressed this issue in section 13.16 of my report. While the Miswell Lane open space is clearly important I am not satisfied that it forms part of a green chain as the footpaths which link this area to surrounding residential areas and the countryside beyond are not flanked by green spaces. Consequently, I find no justification for the Plan to be modified in this respect.

(f) Reference to TCC network

19.23.14. The objector argues that the ‘Through routes and flows’ element of the Development Principles section of the Character Area studies should acknowledge the desirability of providing cycle routes. She points out that cycle route proposals have been submitted for Tring, which is an ideal town for cycling, and their implementation would contribute to traffic reduction and diminished parking demand.

19.23.15. I share the Council’s view that it is not the purpose of the character study to identify transport proposals in every instance. Instead its function is to identify the urban design characteristics of an area, and to use these to establish principles which guide future residential development. The Council uses the ‘Through routes and flows’ element primarily to direct traffic from new housing development to particular routes in cases where this is considered necessary.

19.23.16. The proposals for cycle routes are set out in the Transport chapter in Part 3 of the Plan, and cover significant areas of Hemel Hempstead and certain parts of Tring. There is nothing to suggest that the implementation of these cycle routes would impose a particular design requirement on residential development within the Character Areas. In these circumstances I do not consider that it is necessary for cycle routes to be identified within the character studies. I recommend no modification in response to this objection.

Recommendation

19.23.17. **Development in Residential Areas be modified by the removal of references to bus routes in TCA11 and any other Character Area in which they appear.**

19.23.18. **No other modification be made to the Plan in response to these objections.**

19.24. TCA2: MISWELL LANE

Objections

| | |
|---------------|-------------|
| <i>Rep No</i> | <i>Name</i> |
| 4309 | Mrs B Lea |

Key Issues

- (a) Should the trees on Miswell Lane open space be mentioned in the views and vistas paragraph. (4309)
- (b) Whether reference should be made to bus routes and parking congestion. (4309)
- (c) Are there other matters that should be covered in the appraisal. (4309)

Inspector’s Conclusions

(a) *Trees on Miswell Lane open space*

- 19.24.1. I accept that the trees along the eastern edge of Miswell Lane open space form an important feature from within the open space area. No doubt they are also visible from a number of houses along the eastern side of Miswell Lane. However, they have very little impact on the majority of TCA2 as they are visible from very few public vantage points within this area. In the circumstances, I do not consider that they are of sufficient importance to the overall character of TCA2 to merit a specific mention in this section. I therefore recommend that no modification should be made to the Plan in response to this element of objection 4309.

(b) *Bus routes and parking congestion*

- 19.24.2. Although Miswell Lane is a main bus route I am not satisfied that this is critical to the character of TCA2. As for parking the appraisal already refers to a higher incidence of on-street parking in the older southern part of the area. However, I saw that on-street parking is also very high along Beaconsfield Road. I consider therefore that it would be appropriate to make a minor change to the wording of the traffic section to reflect this. I recommend that it should be modified accordingly.

(c) *Other matters*

- 19.24.3. The objector also suggests that reference should be made to the Western Lane local centre and to the need for highway improvements to Miswell Lane. Since the Western Lane local centre lies outside the Character Area and functions as a local centre for more than one area I do not consider it would be appropriate for it to be referred to within TCA2. The need for highway improvements is not an issue that is appropriately addressed within the residential Character Areas in my view. Finally the objector contends that in the light of the Council’s proposed further change in respect of TCA4 the text of TCA2 should also be amended to refer to the footpath links to the Miswell Lane open space. However, as the Miswell Lane open space is already specifically referred to in the appraisal I do not consider adding a reference to the footpaths is necessary. Consequently, I see no need for any changes to be made to TCA2 in response to any of these points.

Recommendation

- 19.24.4. **The wording of the section of TCA2 Character Appraisal relating to “Traffic” should be modified by amending the section relating to on-street parking as follows:-**

“On-street parking: High incidence of on-street parking throughout the area but this is worst in the older (mainly the southern) part where off-street provision is generally lacking and road widths are narrow.”

19.25. TCA3: OKELEY LANE

Objection

| <i>Rep No</i> | <i>Name</i> |
|---------------|-------------|
| 4310 | Mrs B Lea |

Key Issues

- (a) Should the trees on Miswell Lane open space be mentioned in the views and vistas paragraph. (4310)
- (b) Should reference be made to Miswell Lane open space as a focal point. (4310)
- (c) Would it be appropriate for reference to be made to the longer distance views of Stubbings Wood. (4310)
- (d) Whether reference should be made to bus routes and parking congestion. (4310)

Inspector’s Conclusions

(a) Trees on Miswell Lane open space

19.25.1. Again I find that views of these trees are largely limited to the top part of Highfield Road. Consequently, they do not constitute a primary focal point for the area. I am not satisfied that the appraisal would benefit from including a reference to them. I recommend therefore that no modification should be made to TCA3 in relation to the trees on Miswell Lane open space.

(b) Miswell Lane open space

19.25.2. Miswell Lane open space effectively separates TCA2 to the west from TCA5 to the east. The footpath links to it from TCA3 are narrow. As such I do not consider that it plays a key role in the visual character of TCA3. I, therefore recommend that no modification should be made to the “*Landmarks and focal points*” section of the appraisal for TCA3.

(c) Longer distance views

19.25.3. I accept that there is a view of Stubbings Wood from Donkey Lane. However, as this lies on the extreme western edge of the area, with most of the lane falling within TCA2, I do not consider that this view makes a significant contribution to the overall character of TCA3. I see no need therefore for it to be referred to in the appraisal.

(d) Bus routes and parking congestion

- 19.25.4. As the bus route flanks the eastern edge of the area I do not consider it merits being referred to in the appraisal. I note the objector’s view that more emphasis should be put on the fact that parking in front gardens is becoming the norm. However, the appraisal already refers to on-street parking being high and to parking provision being made within private curtilages. I see no need for any additional reference to this issue. Accordingly, I recommend that no modification should be made to TCA3.

Recommendation

- 19.25.5. No modification be made to TCA3 in response to objection 4310.

19.26. TCA4: GOLDFIELD**Objections**

| <i>Rep No</i> | <i>Name</i> |
|---------------|-------------|
| 4311 | Mrs B Lea |

Key Issues

- (a) Should the trees on Miswell Lane open space be mentioned in the views and vistas paragraph. (4311)
- (b) Is the Miswell Lane open space an important focal point for the area. (4311)

Inspector’s Conclusions**(a) Trees on Miswell Lane open space**

- 19.26.1. Again the trees are only visible from a single viewpoint within TCA4 and then only over the roof of a single storey building. I am not satisfied that they are of such importance to the character of the area to merit specific mention in the appraisal.

(b) Contribution of Miswell Lane open space to character of area

- 19.26.2. In response to the objector’s contention that the Miswell Lane recreation ground should be mentioned the Council proposes to modify the appraisal, under the provisions of FC113, to refer to the footpath link from Goldfield Road to the open space. The objector argues that it would be better just to refer to the open space.
- 19.26.3. I appreciate the reasons for FC113. However, I accept that referring to footpath links to the open space rather than to the open space itself is inconsistent with the way it has been treated in relation to other Character Areas. I appreciate that it is slightly more remote from the area than it is from TCA2. Nevertheless I consider the Council’s alternative suggestion that the open space section should refer instead to “*Miswell Lane open space to north west*” would be more consistent and therefore preferable. I recommend that TCA4 be modified accordingly.

Recommendation

19.26.4. TCA4 be modified by inserting the phrase “Miswell Lane open space to the north west.” after the words “Open land at Goldfield Infants’ School to the north.”

19.26.5. FC113 be not adopted.

19.27. TCA5: CHRISTCHURCH ROAD & DUNDALE ROAD**Objections**

| | |
|---------------|-------------|
| <i>Rep No</i> | <i>Name</i> |
| 4312 | Mrs B Lea |

Key Issues

- (a) Should part of Christchurch Road and the side roads off it be defined as a separate character area. (4312)
- (b) Should the trees on Miswell Lane open space be mentioned in the views and vistas paragraph. (4312)
- (c) Would it be appropriate for reference to be made to the longer distance views of the Aylesbury Vale. (4312)
- (d) Whether reference should be made to bus routes. (4312)
- (e) Is it correct to say that there is a higher incidence of on-street parking. (4312)
- (f) Should reference be made to other non-residential buildings. (4312)

Inspector’s Conclusions***(a) Creation of a separate character area***

19.27.1. The objector argues that the lower half of Christchurch Road and the adjoining roads has a distinctly different character to the rest of TCA5. The houses in this area are generally large detached properties while the northern part of the area consists of large areas of mainly semi-detached houses. The Council accepts that there are a greater number of detached houses in the southern part of the area but points out that there are also detached houses on Dundale Road in the northern part. The area is therefore mixed in character.

19.27.2. I acknowledge that the southern part of this area has a much higher proportion of detached houses than the northern part of the area. However, there are also detached houses in the northern part of the area. The appraisal clearly recognises that the area is made up of both detached and semi-detached dwellings and notes that spacing varies throughout. I am not persuaded that the two areas identified by the objector are so distinctive in character to warrant splitting the area in to two. I therefore recommend no modification should be made in response to this element of objection 4312.

(b) *Trees on Miswell Lane open space*

- 19.27.3. Although the trees are not visible throughout the area they are visible from a number of points on Christchurch Road and from the various cul-de-sacs to the west, such as Okeford Drive. When these are considered in conjunction with the trees along Christchurch Road itself I consider that together they form a distinctive feature within the southern half of TCA5. I consider, therefore, that it would be reasonable for them to be referred to in the appraisal. However, in my view, it would make more sense for the reference to be included in the section on “*Landscaping and planting*” rather than under “*Landmarks and focal points*” as the trees are clearly not a landmark for the whole area. I recommend that TCA5 should be modified accordingly.

(c) *Longer distance views*

- 19.27.4. Mrs Lea argues that as well as the views south to Tring Park and Stubbings Wood there are also views northwards to the Aylesbury Vale. The Council points out that these are limited to the very top of Christchurch Road and are partially obstructed by the hedgerow along the northern side of Icknield Way.
- 19.27.5. The views from within the area northwards to the Aylesbury Vale are restricted to an extremely short stretch of Christchurch Road, owing to the topography and the intervening hedgerow. In contrast the views southwards towards Tring Park and Stubbings Wood are prominent from virtually the entire length of Christchurch Road. In the circumstances, I am not satisfied that the view northward towards the Aylesbury Vale is of similar importance to those referred to in the appraisal. I therefore see no justification for reference being made to the view of the Aylesbury Vale. I recommend no modification should be made to TCA5 in response to this element of objection 4312.

(d) *Bus routes*

- 19.27.6. Although I accept that the existing bus route passes through a significant part of TCA5 I do not consider that this is of critical importance to the character of the area. I therefore see no need for it to be referred to.

(e) *On-street parking*

- 19.27.7. Of more concern is the reference to a higher incidence of parking in the southern part of the area. The evidence from the objector would suggest that this is not in fact the case and this appeared to be borne out by what I saw on my visits to the area. I would therefore recommend that the wording of the section on on-street parking should be amended to reflect this.

(f) *Non residential buildings*

- 19.27.8. The objector suggests that reference should be made to Bishops Wood School and the Temperance Hall. However Bishops Wood School lies outside the area and is already referred to in TCA7. The Temperance Hall would also appear to lie outside the area covered by TCA5. I therefore recommend that no modification should be made to TCA5 in relation to this point.

Recommendation

19.27.9. TCA5 be modified by :-

(a) Inserting the following phrase in the section on “*Landscaping and planting*”:-

“Trees along Christchurch Road and adjoining the Miswell Lane open space are important features within the southern part of the area.”

(b) Amending the section on “*On-street parking*” to read as follows:-

“Some on-street parking with slightly higher levels occurring in the older part of the area where off-street provision is generally lacking.”

19.28. TCA6: BUNSTRUX

Objection

| | |
|---------------|-------------|
| <i>Rep No</i> | <i>Name</i> |
| 4313 | Mrs B Lea |

Key Issues

- (a) Should the trees on Miswell Lane open space be mentioned in the views and vistas paragraph. (4313)
- (b) Would it be appropriate for reference to be made to the longer distance views of the Ashridge Hills. (4312)

Inspector’s Conclusions

(a) *Trees on Miswell Lane open space*

19.28.1. Although the trees are just visible above the houses on Christchurch Road the only view from within TCA6 is on the very western edge of the area. I am not satisfied therefore that the visual impact of these trees on the character of the Bunstrux area is of such significance as to warrant them being referred to.

(b) *Longer distance views*

19.28.2. There is a view of the Ashridge hills from within TCA6. However, this is limited to the top third of the area. As such I am not convinced that it is of such significance to the overall character of the area to warrant being specifically mentioned in the character appraisal for TCA6. I therefore recommend that no modification should be made to TCA6 in response to objection 4312.

Recommendation

19.28.3. No modification be made to TCA6 in response to objection 4312.

19.29. TCA10: WOODLAND CLOSE

Objection

| | |
|---------------|---------------|
| <i>Rep No</i> | <i>Name</i> |
| 4338 | Mrs A J Nobbs |

Key Issue

- (a) Whether houses in TCA 10 should be referred to as ‘post-war’, rather than inter-war as it currently states. (4338)

Inspector’s Conclusion

19.29.1. The Council proposes a correction to the text (FC166) in response to this objection, which I endorse.

Recommendation

19.29.2. The Plan be modified in accordance with FC166.

19.30. TCA12: NEW MILL EAST

Objection

| | | | |
|---------------|-------------------|---------------|---------------|
| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
| 2906 | British Waterways | 4717 | Mrs B J Brown |

Key Issues

- (a) Does the phrase “May be acceptable according to Development Principles” invite developer speculation that would lead to the virtual destruction of the existing environment. (4717)
- (b) Would the encouragement for developers to speculate lead to extra expense for the Council if applications were challenged. (4717)
- (c) Should reference be made to the Wendover Arm of the Grand Union Canal and to the design principles for canal-side housing in the text to TCA12. (2906)

Inspector’s Conclusions

(a) *Developer speculation and impact on existing environment*

19.30.1. Mrs Brown considers that it is undesirable to identify a residential area as having scope for redevelopment and infilling ‘according to Development Principles’. She considers that this will invite developer speculation, despite the general proviso that even in ‘Opportunity Areas’ there will not be total development freedom. If successful, she believes that this developer speculation would lead to the virtual destruction of the existing environment.

19.30.2. The objection is made to the Area Proposals relating to “Station and Grove Roads, Mortimer Hill and Cow Lane”. I am not convinced, therefore, that the area of concern

extends to the New Mill area of Tring. However, the objection raises issues of general principle that apply equally to other areas. In a town where the pressure for development is already high, it is reasonable to assume that developer speculation already exists. The most likely effect of the residential Character Area appraisals on this speculation, in my view, is to focus pressure on those areas where the potential is indicated to be greatest. Nevertheless, even in these ‘Opportunity Areas’ it seems to me that the application of the Development Principles would normally have a restrictive influence.

- 19.30.3. Instead of inviting uncontrolled redevelopment and infilling, these Principles generally seek housing which respects and maintains the form, character and density of the immediate locality. Indeed, the prime objective of the Character Area studies is to tailor the general policies in Part 3 of the Plan to discrete residential areas, so as to give a more detailed level of control over the extent, layout and appearance of new development. Rather than destroying the existing environment, it seems to me that the guidance in these studies should help to ensure that the inevitable pressure for development is handled in a way that minimises its impact on the locality. Consequently, I recommend no change in response to this objection.

(b) *Potential for challenges to the Council*

- 19.30.4. As I indicate in the preceding sub-section, I do not believe that the Character Area appraisals are likely to have a significant effect on the level of developer speculation in Tring, though they might focus it on particular areas. Contrary to the views of the objector, I suspect that any challenges to decisions based on the appraisals are likely to focus on the degree of restriction they seek to impose, particularly in the light of current guidance in PPG3. In any event, the implications for the workload of the Council are not matters that should have any bearing on the content of a development plan. I recommend no change in response to this objection.

(c) *Wendover Arm of canal*

- 19.30.5. As the Wendover Arm of the Grand Union Canal does not run through or alongside the New Mill East Character Area, I agree with the Council that any reference to it would be unjustified. I recommend no change in response to this objection.

Recommendation

- 19.30.6. **No modification be made in response to these objections.**

19.31. TCA13: NEW MILL WEST

Objection

Rep No
2907

Name
British Waterways

Key Issue

- (a) Should reference be made to the Wendover Arm of the Grand Union Canal and to the design principles for canal-side housing in the text to TCA13. (2907)

Inspector’s Conclusion

- 19.31.1. British Waterways objects to the absence of any reference to the Wendover Arm of the canal, which runs alongside the New Mill West Character Area. The Council agrees that an indication of the presence of the canal would be appropriate, and proposes to include this with FC185. I support this further change.
- 19.31.2. The objector also considers that the appraisal should include design guidance stating that development should face the canal and respect its waterside setting. However, I believe that a requirement to face the canal would be unduly restrictive, and could potentially be contrary to the interests of achieving a high quality design and making the most efficient use of land. As the Council points out, Policy 112 already requires a positive contribution to be made to the canal-side environment, so there is no need to repeat this matter in the character study.

Recommendation

- 19.31.3. **The Plan be modified in accordance with FC185.**

19.32. TCA15: BROOK STREET

Objection

| | |
|---------------|---------------|
| <i>Rep No</i> | <i>Name</i> |
| 4718 | Mrs B J Brown |

Key Issues

- (a) Does the phrase “May be acceptable according to Development Principles” invite developer speculation that would lead to the virtual destruction of the existing environment. (4718)
- (b) Would the encouragement for developers to speculate lead to extra expense for the Council if applications were challenged. (4718)
- (c) Should the high incidence of pollution on Brook Street be referred to in TCA15. (4718)

Inspector’s Conclusions

- (a) *Developer speculation and impact on existing environment*

- 19.32.1. Mrs Brown has made an identical objection to a number of residential Character Areas in Tring, and I have addressed this matter in detail under TCA12, New Mill East (see paragraphs 19.30.1 to 19.30.3 above). I conclude that, rather than destroying the existing environment, the guidance in these studies should help to ensure that the

inevitable pressure for development is handled in a way that minimises its impact on the locality. I recommend no change in response to this objection.

(b) *Potential for challenges to the Council*

19.32.2. This is another identical objection to others made earlier, and is considered in paragraph 19.30.4 above. Whatever the effect of the guidelines, the implications for the workload of the Council are not matters that should have any bearing on the content of a development plan. I recommend no change in response to this objection.

(c) *Reference to pollution on Brook Street*

19.32.3. I agree with the Council that it would not be appropriate for the Character Area appraisal to include a reference to air pollution monitoring statistics for Brook Street. Such a matter is not part of the physical characteristics of the area, and would not contribute anything meaningful to the urban design principles. I recommend no change in response to this objection.

Recommendation

19.32.4. **No modification be made in response to these objections.**

19.33. TCA16: STATION ROAD

Objections

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------|-------------------------|---------------|---------------|
| 1189 | Mr C H Gray | 4719 | Mrs B J Brown |
| 3123 | Tring Liberal Democrats | | |

Key Issues

- (a) Does the phrase “May be acceptable according to Development Principles” invite developer speculation that would lead to the virtual destruction of the existing environment. (4719)
- (b) Would the encouragement for developers to speculate lead to extra expense for the Council if applications were challenged. (4719)
- (c) Did the character study undergo public consultation. (1189)
- (d) Is it appropriate to designate TCA16 as an ‘Opportunity Area’ which would lead to an increase in density. Alternatively, should it be re-designated as an ‘Area of Very Limited Opportunity’. (1189, 3123)
- (e) Should the character study be reviewed and development areas reassigned. (3123)

Inspector’s Conclusions

(a) *Developer speculation and impact on existing environment*

19.33.1. This is another in the series of identical objections from Mrs Brown to residential Character Areas in Tring. I address this matter in detail under TCA12, New Mill East

(see paragraphs 19.30.1 to 19.30.3 above). I conclude that, rather than destroying the existing environment, the guidance in these studies should help to ensure that the inevitable pressure for development is handled in a way that minimises its impact on the locality. I recommend no change in response to this objection.

(b) *Potential for challenges to the Council*

- 19.33.2. A further identical objection to others made earlier, which I consider in paragraph 19.30.4 above. Whatever the effect of the guidelines, the implications for the workload of the Council are not matters that should have any bearing on the content of a development plan. I recommend no change in response to this objection.

(c) *Public consultation*

- 19.33.3. The Council points out that consultation with the general public and representative organisations was carried out in 1996, as indicated in paragraph 1.3.2 of the Character Study part of the Plan. No amendment is therefore necessary in response to this objection.

(d) *Appropriate classification of development opportunities*

- 19.33.4. The character appraisal describes this small area between Station Road and Mortimer Hill as having very low density housing, comprising large detached houses with large front and rear gardens. The objectors oppose its classification as an ‘Opportunity Area’ for redevelopment, plot amalgamation and infilling. They believe that this would lead to wholesale redevelopment and increased densities, contrary to the interests of the residents of Tring.
- 19.33.5. I can understand the concern of the objectors, for the low density and spacious nature of the area could be substantially changed through redevelopment and plot amalgamation. On the other hand, as the Council has correctly identified, the area does have the physical capacity to accommodate a significant increase in the number of houses. I therefore agree that the classification as an ‘Opportunity Area’ is appropriate, for it merely reflects the fact that capacity exists.
- 19.33.6. In terms of future development, the important part of the character study is the Policy Statement. The overall approach is to maintain the defined character of the area, and the Development Principles encourage detached properties with large gardens so as to retain the existing layout and density. If these objectives are followed, I believe that the character of the area should not be adversely affected. Indeed it might be argued that the guidance is not wholly consistent with the advice in PPG3, which seeks to maximise the potential of land in sustainable locations within existing urban areas. There is clearly a balance to be struck between making the best use of land and maintaining existing character, and I am satisfied that the guidance should enable an appropriate balance to be achieved.

(e) *Review of character study*

- 19.33.7. From my observations of different parts of the Borough, I see no reason to doubt the Council’s assertion that the character study is an objective appraisal that has been prepared on a consistent basis. It appears to provide a broadly accurate portrayal of

the character of the residential parts of the Borough, and proposes a strategy that generally seeks to maintain that character whatever the scale of opportunities for development. Many of the objections concern matters of detailed description, and in my view the fact that local people know more about their area than the Council does not detract from the overall validity of the study. In these circumstances I see no reason to call for a review the study or a re-assessment of the scope for development.

Recommendation

19.33.8. No modification be made in response to these objections.

19.34. TCA17: CHILTERN WAY

Objection

Rep No
4720

Name
Mrs B J Brown

Key Issues

- (a) Does the phrase “May be acceptable according to Development Principles” invite developer speculation that would lead to the virtual destruction of the existing environment. (4720)
- (b) Would the encouragement for developers to speculate lead to extra expense for the Council if applications were challenged. (4720)

Inspector’s Conclusions

(a) *Developer speculation and impact on existing environment*

19.34.1. Mrs Brown has made an identical objection to a number of residential Character Areas in Tring, and I have addressed this matter in detail under TCA12, New Mill East (see paragraphs 19.30.1 to 19.30.3 above). I conclude that, rather than destroying the existing environment, the guidance in these studies should help to ensure that the inevitable pressure for development is handled in a way that minimises its impact on the locality. I recommend no change in response to this objection.

(b) *Potential for challenges to the Council*

19.34.2. This is another identical objection to others made earlier, and is considered in paragraph 19.30.4 above. Whatever the effect of the guidelines, the implications for the workload of the Council are not matters that should have any bearing on the content of a development plan. I recommend no change in response to this objection.

Recommendation

19.34.3. No modification be made in response to these objections.

19.35. TCA18: GROVE PARK**Objection**

| <i>Rep No</i> | <i>Name</i> |
|---------------|---------------|
| 4721 | Mrs B J Brown |

Key Issues

- (a) Does the phrase “May be acceptable according to Development Principles” invite developer speculation that would lead to the virtual destruction of the existing environment. (4721)
- (b) Would the encouragement for developers to speculate lead to extra expense for the Council if applications were challenged. (4721)

Inspector’s Conclusions**(a) *Developer speculation and impact on existing environment***

19.35.1. This is another in the series of identical objections from Mrs Brown to residential Character Areas in Tring. I address this matter in detail under TCA12, New Mill East (see paragraphs 19.30.1 to 19.30.3 above). I conclude that, rather than destroying the existing environment, the guidance in these studies should help to ensure that the inevitable pressure for development is handled in a way that minimises its impact on the locality. I recommend no change in response to this objection.

(b) *Potential for challenges to the Council*

19.35.2. A further identical objection to others made earlier, which I consider in paragraph 19.30.4 above. Whatever the effect of the guidelines, the implications for the workload of the Council are not matters that should have any bearing on the content of a development plan. I recommend no change in response to this objection.

Recommendation

19.35.3. No modification be made in response to these objections.

19.36. TCA19: GROVE ROAD AND COW LANE**Objections**

| <i>Rep No</i> | <i>Name</i> | <i>Rep No</i> | <i>Name</i> |
|---------------|----------------------------|---------------|-------------------------|
| 1050 | Mr D J Metcalfe | 3835 | Old Road Securities plc |
| 1190 | Mr C H Gray | 3858 | Mr M Hicks |
| 1505 | HCC Environment Department | 4722 | Mrs B J Brown |
| 3124 | Tring Liberal Democrats | | |

Support for pre-inquiry changes

For pre-inquiry change 270
5561PC CPRE - The Hertfordshire Society

Key Issues

- (a) Whether Dunsley Bungalow and Cow Lane Farm should be omitted from TCA19. (1050, 3858)

- (b) Whether reference should be made to Dunsley Orchard wildlife site in the text to TCA19. (1505)
- (c) Whether reference should be made to properties along Marshcroft Lane. (1190, 3124)
- (d) Would development in TCA19 be detrimental to the orchard trees and wildlife in the back gardens of houses. (1050)
- (e) Whether development on the fringe of the urban area would lead to the development of surrounding fields. (1050)
- (f) Whether greater greenfield opportunities should be referred to in TCA19. (3835)
- (g) Does the phrase “May be acceptable according to Development Principles” invite developer speculation that would lead to the virtual destruction of the existing environment. (4722)
- (h) Would the encouragement for developers to speculate lead to extra expense for the Council if applications were challenged. (4722)
- (i) Did the character study undergo public consultation. (1190)
- (j) Is it appropriate to designate TCA19 as an ‘Opportunity Area’ which would lead to an increase in density. Alternatively, should it be re-designated as an ‘Area of Very Limited Opportunity’. (1050, 1190, 3124)
- (k) Whether the character study links into Sustainable Development and Agenda 21 objectives. (1050)
- (l) Should the character study be reviewed and development areas reassigned. (3124)

Inspector’s Conclusions

(a) *Inclusion of Dunsley Bungalow and Cow Lane Farm*

- 19.36.1. The objectors argue that the character of Dunsley bungalow and Cow Lane Farm distinguish them from the rest of TCA19. In their view the agricultural use links them more closely to the countryside to the south and west rather than to the adjoining housing. It is suggested therefore that these properties should be omitted from TCA19.
- 19.36.2. The Council acknowledges that the properties are in agricultural use and that Dunsley Orchard meets many of the sustainability objectives of both the Structure and Local Plans. It also accepts that Dunsley Bungalow is of local rarity but is not satisfied that it merits statutory listing. However, it points out that the Character Areas are intended to enable the impact of development proposals to be assessed and to give control of the extent of new development permitted. The inclusion of these properties within TCA19 does not mean that they would automatically be suitable for development.
- 19.36.3. Although the objectors raise a large number of issues relating to these objections many in my view are of limited relevance to the principal issue in this case which is whether or not it is appropriate for Dunsley Bungalow and Cow Lane Farm to be included in TCA19. While I appreciate that both properties are in agricultural use I am not sure that this would necessarily be immediately evident to anyone walking along Cow Lane. Visually the properties are contiguous with the housing to the north and thus form an extension of the built-up area of the town.

- 19.36.4. I fully understand the objectors’ desire to preserve the historical, wildlife and cultural interest of the smallholding at Dunsley Bungalow. However, while this is a feature of local interest there is no evidence that it is of sufficient historical value to merit being included on the statutory list of buildings of architectural or historical interest. I appreciate that the grounds of the bungalow including the orchard are managed on a sustainable basis but I do not consider that this warrants excluding the property from the Character Area. The Character Appraisal already lays significant stress on the importance of the area’s landscape-dominated appearance and the informally landscaped edge to the area where it meets the countryside. I consider this recognises the well landscaped extensive rear gardens and orchards of the properties on Cow Lane. I deal with the issue of the wildlife interest of Dunsley Orchard separately below. However, I am not persuaded that this designation justifies this part of the objection site from being excluded from TCA19 as it remains more closely related to the bungalow than to the open countryside.
- 19.36.5. While I appreciate that the character of the bungalow and the management of the smallholding make it rather different in character to the housing to the north I am not satisfied that this warrants deleting it from the Character Area. TCA19 already identifies the area as having a considerable variety in design with no overall consistency. The Character Areas are intended merely to describe the general character of an area. There will often be the occasional property that does not fit comfortably with the general description. It would not make sense to omit them merely because they differ from the general character. Moreover, in this case it would effectively leave two residential properties within the urban area but outside a Character Area. If the properties were also excluded from the urban area this would leave a small wedge of land outside the urban boundary which was not included in the Green Belt. In my view this would result in an unsatisfactory anomaly.
- 19.36.6. More importantly, I am not satisfied that excluding these properties would achieve a significantly higher degree of protection for Dunsley Bungalow, which is clearly what the objectors desire. The Wildlife Site would be protected under Policy 103 and intrusive or unsuitable development of Dunsley Bungalow would be prevented by Policy 9 and other policies which seek to safeguard the visual character of the countryside. I understand the objector’s concerns about the development of the land to the rear of properties on Station Road (H40) and the damage to the adjoining hedgerow. However, I do not consider that this merits excluding the objection properties from the Character Area. In the circumstances, I find insufficient justification for deleting Cow Lane Farm and Dunsley Bungalow from TCA19. I therefore recommend that no modification should be made to the boundary of TCA19 in response to objections 1050 and 3858.
- 19.36.7. In reaching this conclusion I have taken account of the fact that the objection properties and adjoining land to the north was considered for inclusion in the Green Belt in the early stages of the preparation of the adopted Local Plan. However, this was not progressed to the Deposit stage. I am not satisfied therefore that this warrants my reaching a different conclusion, particularly as there is no duly made objection to the land’s omission from the Green Belt.
- 19.36.8. I have also noted that the six properties at the southern end of Cow Lane, including Dunsley Bungalow, were excluded from the urban area on the Tring Open Land Strategy Diagram in Policy 110 of the Deposit Draft. However, this was clearly an

error as the Proposals Map clearly shows these properties as falling within the town boundary. The Council therefore proposes to amend the diagram under FC106. Since this would ensure consistency I endorse this change and recommend that the Plan be modified accordingly.

(b) *Dunsley Orchard wildlife site*

- 19.36.9. This is the last of the objections from the County Council that argues that the existence of a wildlife site within the residential Character Area should be acknowledged within the appraisal. Although not specifically stated, I assume that the objector would wish to see a reference to the wildlife site in the ‘open space’ part of the amenity section. As a general rule I have accepted that where an open space merits a mention in the appraisal, the fact that it is also a wildlife site should be recognised. In this particular case, however, I do not believe that the orchard is a recognisable open space within the Character Area, since it is not visible from any public vantage point being effectively screened from the surrounding area by the dwellings on Cow Lane. I indicated earlier in this chapter that one of the reasons for referring to a wildlife site is that it helps to establish the character of an open space. Because Dunsley Orchard does not warrant inclusion within the ‘open space’ section of the appraisal, I do not believe that it is necessary to separately introduce it as a wildlife site. I recommend no change in response to this objection.

(c) *Reference to Marshcroft Lane properties*

- 19.36.10. The Council accepts that the appraisal should be amended as suggested by the objectors, and proposes PIC270 to address this matter. I agree with the change.

(d) *Effect on trees and wildlife in back gardens*

- 19.36.11. The objector is concerned about the loss of trees and wildlife that are present in the gardens of the properties that have potential for development. In my experience, however, the typical domestic garden of lawns and borders is not a particularly important habitat for wildlife. The obvious exception in this Character Area is Dunsley Orchard, which is a designated wildlife site. As such it is unlikely to be available for development, being protected under the terms of Policy 103.

- 19.36.12. I acknowledge that there may be other garden areas on the fringe of the countryside that have some ecological value. The significance of this wildlife interest is a matter that would be considered under the general development control policies at the time that any housing proposal was being considered. It is not, in my view, sufficient reason for reaching a different conclusion about the potential of the area to accommodate some additional residential development.

(e) *Development on surrounding fields*

- 19.36.13. The outer boundary of the residential Character Area is both the defined edge of the settlement of Tring and the Green Belt boundary. National and local planning policies include a strict presumption against new residential development in the Green Belt, as Policy 3 indicates. I therefore believe that the objector’s fears about the development on the surrounding fields are unfounded. I recommend no change in response to this objection.

(f) Greater green-field opportunities

19.36.14. The objector opposes the lack of any green-field opportunities within TCA19, and argues that a triangular parcel of land fronting Station Road and Cow Lane is suitable for residential development. I agree with the Council, however, that there are no green-field opportunities within the residential Character Area. Instead, the land identified by the objector lies beyond the defined limits of Tring and within the Green Belt. It is the subject of a related objection in the Housing chapter, where I conclude that development would represent a clear extension the settlement into the surrounding countryside, and that there are no very special circumstances which warrant its release from the Green Belt. I recommend no change in response to this objection.

(g) Developer speculation and impact on existing environment

19.36.15. Mrs Brown has made an identical objection to a number of residential Character Areas in Tring, and I have addressed this matter in detail under TCA12, New Mill East (see paragraphs 19.30.1 to 19.30.3 above). I conclude that, rather than destroying the existing environment, the guidance in these studies should help to ensure that the inevitable pressure for development is handled in a way that minimises its impact on the locality. I recommend no change in response to this objection.

(h) Potential for challenges to the Council

19.36.16. This is another identical objection to others made earlier, and is considered in paragraph 19.30.4 above. Whatever the effect of the guidelines, the implications for the workload of the Council are not matters that should have any bearing on the content of a development plan. I recommend no change in response to this objection.

(i) Public consultation

19.36.17. The Council points out that consultation with the general public and representative organisations was carried out in 1996, as indicated in paragraph 1.3.2 of the introduction to the Character Study. No amendment is therefore necessary in response to this objection.

(j) Appropriate classification of development opportunities

19.36.18. The Grove Road/Cow Lane Character Area comprises mainly detached houses in well-landscaped plots set back from the frontages of the distributor roads that traverse the eastern edge of Tring. The objectors oppose the identification of the locality as an ‘Opportunity Area’ for redevelopment, plot amalgamation and infilling. They believe that the mixed character of the area is worthy of retention, with one objector arguing that it should be re-classified as an ‘Area of Very Limited Opportunity’.

19.36.19. The Council has not revealed the reason for the ‘Opportunity Area’ classification, though it does indicate that development opportunities within the area are not likely to be high. I imagine that the classification derives primarily from the very low density of the area, about 7 dwellings per hectare, and on that basis I acknowledge that there should be some potential for intensification. But I question whether the area should be included within the category of highest development potential, for two reasons. Firstly, the one part of the area which clearly has scope for new residential

development, comprising the very long back gardens to the south of the Station Road and Cow Lane frontage properties, is for the most part no longer available. The implementation of Housing Site H40 has removed most of the potential from a large part of this area, and whilst some land remains at the rear of the Cow Lane houses, part of this is a wildlife site that is protected from development.

19.36.20. Secondly, the policy approach is to maintain the defined character of the area, with the existing linear layout being retained and development required to respect and reinforce the landscaped edge of the town. These constraints would appear to rule out the most common forms of intensification, which generally involve making better use of the back gardens of existing properties. With large detached dwellings being sought, widely spaced as at present, the scope for additional housing would seem to be limited. Furthermore, I do not share the Council’s view that the area has the advantage of being a particularly sustainable location, for most of it is over 1km from the town centre and nearly 2km from Tring Station. These distances are well above the normal threshold for journeys on foot. Although the main roads are bus routes, and the conditions for cycling are reasonably good, I do not believe that the locality is one where the likelihood of reduced car usage is high.

19.36.21. Taking these factors into account, I find it difficult to accept that the area is one that has the highest potential for residential development. However, without knowledge of the assessment criteria, it is difficult for me to reach a firm conclusion on this matter. Consequently I shall request the Council to re-examine the classification, with a view to considering whether it might be more appropriate to categorise the area as one of ‘Limited Opportunity’.

(k) Sustainable development and Agenda 21

19.36.22. The objector questions whether the strategy for the Character Area is consistent with sustainable development principles and links-in with the objectives of the Agenda 21 action plan. I have considered this matter in the preceding sub-section, where I conclude that the area is sufficiently far from the town centre and the railway station not to be a particularly sustainable location. On the other hand, I agree with the Council that the intensification of residential development within built-up areas such as this is often a more sustainable way of meeting the housing needs of the Borough than releasing land from the Green Belt. The scale of development that existing residential areas can accommodate is largely a matter of balance, and as I indicate above, I am not certain that the identification of Grove Road/Cow Lane as an ‘Opportunity Area’ achieves the correct balance. Other than the re-assessment that I suggest in the preceding sub-section, I recommend no further change in response to this objection.

(l) Review of character study

19.36.23. This is an identical objection to that made to TCA16, and stems from the belief that the appraisal is deficient because it fails to properly describe the range of properties within the Character Area. The Council has acknowledged that the appraisal could be improved by referring to the older properties mentioned by the objector (see sub-section (c) above). Whilst it is clearly important that the appraisal portrays an accurate picture of the Character Area, I regard this omission as a matter that does not detract significantly from the overall validity of the study.

19.36.24. Nonetheless, for other reasons I have concluded in this instance that the potential for new residential development within the Grove Road/Cow Lane area may not be as high as the Council suggests. I believe that my recommendation that the Council re-assesses the classification of the locality as an ‘Opportunity Area’ should satisfy the concern of the objector.

Recommendation

19.36.25. **The Plan be modified in accordance with PIC270 and FC106.**

19.36.26. **The Council re-examines the classification of the Grove Road/Cow Lane Character Area, and considers whether it might be more appropriate to categorise it as an ‘Area of Limited Opportunity’.**

END OF CHAPTER 19