

**Schedule of Representations relating to  
The Council's Statement of Decisions on  
the Inspector's Report, and the Council's  
Response**

## **Explanatory Notes**

### **Representations on:**

- **The Council's Statement of Decisions on the Inspector's Report and the Council's Response to these Representations**

The names of the commenters referred to in the Schedule are listed first.

Representations relating to The Council's Statement of Decisions on the Inspector's Report are then set out in a standard format:

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<b>Plan Reference:</b>	i.e. that part of the Local Plan to which a representation relates. Representations are given in Plan order.
<b>Decision Number:</b>	i.e. that Decision in The Council's Statement of Decisions on the Inspector's Report to which a representation relates. Representations are given in ascending order of Decision number.
<b>Representation Number:</b>	i.e. a unique reference number for one representation covering a specific point. Each representation is from an individual or single organisation.
<b>Representation:</b>	i.e. a brief summary of the particular point.
<b>Response:</b>	i.e. a statement of the Council's intention to modify the Deposit Draft or a Decision, or not. Reasons for each intention are given. In cases where the Council proposed further changes to the Plan, wording of the change is given in the Schedule. However, note that all proposed changes are also brought together in a separate document entitled 'List of Proposed Further Modifications.'

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## List of Commenters on The Council's Statement of Decisions

<i>Rep No. Name Reference</i>		<i>Statement No.</i>	<i>Plan</i>
M 1 Mr P.S. Thring, CPRE Hertfordshire		106	Housing Policy 21
M 2 Aitchison Rafferty on behalf of G. B. Kent & Sons Ltd		407	PART 4 TWA5

## Representations on the Statement of Decisions

<b>Plan Ref:</b>		
<b>Housing</b>	<b>Policy 21</b>	<b>Affordable Housing</b>

**Decision Number:** 106

**Representation No:** M 1

**Commenter:** Mr. P.S Thring, CPRE Hertfordshire

**Obj/Sup:** Objection

### **Representation:**

Support for the general principle of seeking appropriate proportions of affordable housing in housing development schemes. However, object to that part of the proposed Policy 21 which states that the affordable housing needs of the rural areas "should be generally directed to the larger settlements." Smaller settlements should not be excluded from the affordable housing requirements.

### **Response:**

No change to the Schedule of Decisions.

The issue of appropriate affordable housing thresholds was discussed during a round table session at the Public Local Inquiry. The Council's original arguments that affordable housing should be sought outside of the main settlements and in general locations in the countryside were not supported by the Inspector. The Inspector's reasons for excluding the smaller settlements from Policy 21 are clearly set out in paragraph 7.8.146 of his Report. He felt that many of these smaller settlements had no services and relatively poor access to public transport. Those likely to occupy affordable housing would be on low incomes and may not have access to their own vehicles. The Inspector concluded that it would be contrary to the principles of sustainable development to seek to locate affordable housing in the countryside or in very small settlements that do not have a basic minimum level of services. The Council has accepted his conclusion.

Policy 26 of the Plan relates to affordable housing in the Green Belt and Rural Area. It allows for the provision of small-scale affordable housing schemes promoted by Parish Councils, village trusts and other similar organisations on sites not appropriate for general housing development and is specifically aimed at meeting local housing need in rural locations. It would help children of long established residents and other local people to find affordable homes, thus sustaining community life and avoiding the population imbalance envisaged by the objector. The policy applies to all villages, regardless of size and its implementation will be assessed by the next borough-wide housing needs survey, which will cover the rural area in more depth.

In addition, Policy 25 of the Plan allows for the provision of agricultural and forestry workers' dwellings in selected small villages and elsewhere provided a functional need is demonstrated.

**Plan Ref:****Part 4****TWA 5****General Employment Areas in Two Waters and Apsley - Schedule of Two Waters and Apsley Inset Proposal Sites****Decision Number: 407****Representation No: M 2**

Commenter: G.B Kent, G.B Kent and Sons Ltd

Obj/Sup: Objection

**Representation:**

The Council have in considering the Inspector's Report, interpreted the report in a rigid fashion and ignored the Inspector's comments set out in paragraph 17.17.5 of the report as follows:- "The objection site is the only premises of any significant size within the Gade Valley GEA that is in employment use. I conclude in the subsection above that the GEA designation is inappropriate because of the preponderance of retail uses, and recommend that it be deleted. The existence of the Kent factory does not change my view, and the 0.5ha site is too small to be designated a GEA on its own. If my recommendation is accepted, therefore, the objection site will not be subject to any designation in the Plan."

The Inspector recommends the deletion of the General Employment Area zoning as the site area of 0.5ha is too small to be designated a GEA on its own and he also recommended the GEA designation is inappropriate because of preponderance of retail usage.

At the time of making the original objection the future plans of G. B. Kent & Sons Ltd. had not at that stage been advanced.

They are now more actively pursuing a local relocation option and in this context it is likely that a proposal for the total redevelopment of the site may be advanced within 12 months culminating in the submission of a comprehensive planning application for redevelopment.

In the light of the circumstances addressed above, we consider that it would be inappropriate for the Kent site to be zoned specifically as a General Employment Area and require the Council to conform to the Inspector's recommendation that the site should be left without specific zoning.

**Response:**

Amend the Schedule of Decisions.

Since the Public Local Inquiry in 2000/2001 a number of changes have occurred on this and the adjoining site which suggest that they may come forward for development within the Plan period. To reflect these changes, Further Modifications are proposed to the Plan (see response to Modification 429).

**Change to The Council's Schedule of Decisions:**

Amend Decision 407 as follows and move from Part 2 to Part 1 of the Decision Schedule:-

**Response:**

Accept recommendation ~~in part~~. It is proposed to amend the Plan to include a new designation relating to major out of centre retailing locations in the Gade Valley, Tow waters and Corner Hall GEAs. This designation is covered by an amended Policy 41 (see recommendation 9.5.24). The designation will identify all individual or clusters of non-food retailing units which are considered

to be of significance (a net sales areas of 2,500 sqm or greater to be used as a yard stick). It also seeks to cover all out of centre convenience stores, including Sainsburys in the Gade Valley and Tesco's at London Road, Tring.

As a result of this redesignation, it is proposed to exclude these uses from the GEAs. If the Inspector's recommendation to delete a GEA is followed, this will leave a small area of land fronting London Road to which no specific Local Plan designation applies. ~~It is therefore proposed that this land remains within the Gade Valley GEA, with the necessary amendments made to the text of Policy 31. This approach will avoid any confusion arising as to the Council's position regarding this land, should it come forward for development.~~