

ANNEX ONE

Summary of duly-made objections to development at the Manor Estate and the Council's response.

Representations Supporting the Manor Estate development

MODIFICATION NO. 41

Modification	
1. Amend the Green Belt boundary relating to the Manor Estate	
Summary/Issues	Councils Response
<ul style="list-style-type: none"> The modification is in line with the Inspector's recommendation. The change to the Green Belt boundary is justified by the need to allocate the land for housing within the Plan period. 	The support for this modification is welcomed.

MODIFICATION NO. 441 TWA7

Modification	
1. Increase to 300 dwellings	
Summary/Issues	Councils Response
<ul style="list-style-type: none"> Increasing the net capacity of the site is supported and the stated figure is not opposed to for the policy purposes. However could the net capacity be expressed as being indicative? The precise dwelling capacity can only be determined through a detailed planning process. 	<p>The support for this modification is welcomed.</p> <p>Issues regarding the site capacity will be examined through the Development Brief process.</p>

MODIFICATION NO. 454 TWA16

Modification	
1. Amend reference to the timing of road improvement implementation	
Summary/Issue	Councils Response
<ul style="list-style-type: none"> The amendments accord with the Inspector’s recommendation for a more flexible approach to implement the improvements. The precise phasing and implementation arrangements are a matter to be determined through the detailed phasing process. 	The support for this modification is welcomed.

Representations Objecting to the Manor Estate development

Note In all cases the Council’s response is as follows:

Retain Proposed Modifications relating to the Manor Estate. The Council have accepted all of the Inspector’s recommendations on the Manor Estate. Detailed responses to the points raised during consultation on the modifications are set out below. Many of the details of the development will be addressed in a Development Brief that will be prepared for the site. Full public consultation will be carried out on the Brief.

The issues raised by the residents petition are also covered in the summary below.

MODIFICATION NO. 33

Modification	
1. Amend Map 6 to reflect the new boundary at the Manor Estate	
Summary/Issues	Council’s Comment
<ul style="list-style-type: none"> Recreational areas will be required. 	<p>Recreational land and open space was discussed at the Inquiry.</p> <p>The development of the site will retain the southern corner of the site and the land adjacent to Featherbed Lane as public open space within the development. Further public open land is required by the planning requirements for the site.</p> <p>The location of the recreational land and open space will be determined in the Development Brief.</p>
<ul style="list-style-type: none"> Extending the site boundary will have an adverse effect to the personal lives of existing residents. 	<p>The Development Brief will examine issues, including the impact the development will have on existing residents. Improvements to the infrastructure and the provision of public open space will benefit the existing and new residents on the estate.</p>

<ul style="list-style-type: none"> • Moving the Green Belt boundary will leave open the possibility of more development in the future. Will the new boundary protect from any further expansion? • Moving the boundary of the Green Belt unnecessarily increases the area of Green Belt having to be allocated for the development. Should, as much of the Green Belt as possible be salvaged to try to preserve the present character? • The designation as 'open land' will fail to protect the area as effectively from possible future development. • Moving the boundary is an open invitation for more development. Should this area remain protected under Green Belt status? 	<p>The extension to the site is proposed to remain as public open space, which will be protected from further development under Policy 110 in the Local Plan.</p> <p>The proposed Green Belt boundary will be defined in the Local Plan. Exceptional circumstances will be required for this boundary to be altered.</p>
<ul style="list-style-type: none"> • Brown field sites should be exhausted before further land is taken out of the Green Belt. 	<p>This issue was discussed at the Inquiry and, as outlined in section 7.4 of the Inspector's Report, it was considered that there is not sufficient previously developed land within the Borough to accommodate the housing requirement for the period up until 2011.</p>
<ul style="list-style-type: none"> • Implications of moving the Green Belt boundary. The effects of this move in relation to the sustainability matrix and visual impact on both local residents and the broader outlook for town and Borough. 	<p>This was discussed at the Inquiry (section 4.32 of the Inspector's Report). He concluded that there would be some loss of outlook from a number of properties along High Ridge Road. However, with due care being taken with the layout of new buildings it would not seriously detract from the general amenity of local residents.</p> <p>The development will be viewed against the backdrop of existing properties. New planting will also reduce the impact over time. The provision of additional open space does not impact on the sustainability matrix.</p>
<ul style="list-style-type: none"> • If the development does not proceed to completion, moving the Green Belt boundary will cause problems. Future development on the remainder of land for high rise flats would be easier and more difficult to object to. Could the open space remain designated as Green Belt? 	<p>A development brief is to be prepared for the site which will set out the detailed layout for the development. It is proposed that the site is designed and developed comprehensively and any further future development will have to comply with this.</p> <p>The proposed extension of the proposal site boundary will be designated as open land within the Local Plan and therefore will be protected from further development by Local Plan policy.</p>

MODIFICATION NO. 41

Modification	
1. Amend the Green Belt boundary relating to the Manor Estate	
Summary/Issues	Council's Comment
<ul style="list-style-type: none"> It is unnecessary to reduce the Green Belt area by moving the boundary. Modification does not safeguard the remaining open space from future development. Open space vital for well being to town dwellers. With little open space for children to play protection is required. The 'open space' within the extended boundary should remain part of the Green Belt. The Green Belt boundary should follow the Manor Estate boundary reducing the risk of future development. 	<p>This was discussed at the Public Local Inquiry and outlined in section 4.32 of the Inspector's report. He concluded that the realignment of the Green Belt boundary would constitute a more defensible boundary. In line with PPG2, it is important that Green Belt boundaries follow clear and recognisable features in order to safeguard their permanence.</p> <p>The built footprint of the development site has not been increased. The extended boundary is proposed to remain as public open space, which will be protected from further development under Policy 110 in the Local Plan.</p>
<ul style="list-style-type: none"> Realignment of the Green Belt boundary now will have a knock on effect in the future. 	<p>The proposed revised Green Belt boundary will be defined and safeguarded in the Local Plan. The alignment takes into account the need to ensure its permanence. Exceptional circumstances would be required for this boundary to be altered in the future.</p>
<ul style="list-style-type: none"> Little Green Belt land exists in Apsley so what is currently Green Belt should remain so. 	<p>The removal of this area of land from the Green Belt has been supported by the Inspector following a Public Local Inquiry. He concluded after dealing with objections to this, that exceptional circumstances existed to warrant its release. The Council has accepted his recommendation for the Green Belt boundary at the Manor Estate..</p>
<ul style="list-style-type: none"> Both parts of Home Wood should remain in the Green Belt. 	<p>There is no proposal to remove Home Wood from the Green Belt. The Inspector in his report concluded in paragraph 4.32.42 that the removal of either Home Wood or the southern fields would seriously detract from the character and openness of the Green Belt.</p>
<ul style="list-style-type: none"> The area of Green Belt land to be allocated for housing is increased unnecessarily. Should salvage it to preserve the present character of the estate. 	<p>The built footprint of the development site has not been increased. The extended boundary is proposed to remain as public open space, which will be protected, from further development under Policy 110 in the Local Plan.</p>

<ul style="list-style-type: none"> No use of Green Belt should be used until all brownfield sites are exhausted. 	<p>This issue was discussed at the Inquiry and, as outlined in section 7.4 of the Inspector's report, he considered that there was not sufficient previously developed land within the Borough to accommodate the housing requirement for the period up until 2011. He concluded in his report that there was a need for some strategic greenfield sites to be developed over the Plan period (para. 17.22.22).</p>
<ul style="list-style-type: none"> If proposed development does not reach completion and Green Belt boundary is moved, it may make it easier for unsuitable future development to take place on the remaining land, such as high rise flats. Extension to be taken out of Green Belt unnecessary. Appears to open the door to further development. Only verbally promised that this area of land will not be built on in the future. Needed in writing. 	<p>A development brief is to be prepared for the site which will set out the detailed layout for the development. It is proposed that the site is designed and developed comprehensively and any further future development will have to comply with this.</p> <p>The proposed extension of the proposal's site boundary will be designated as open land within the Local Plan and therefore will be protected from further development by Local Plan policy.</p>

MODIFICATION NO. 137 (56) TWA7

Modification	
1. Increase the net capacity of TWA7	
Summary/Issues	Council's Comment
<ul style="list-style-type: none">An increase in the net capacity will increase the danger posed by the access over the railway bridge. This would still be dangerous even if bridge improvements were made.	<p>The Inspector recognised that the existing access onto the Manor Estate was substandard and that the bridge did give rise to congestion at peak hours. However, he concluded in paragraph 17.22.31 of his report that it seemed to function with reasonable safety. Whilst accepting that there were problems with the existing access arrangement into the estate (para. 17.22.32), he felt that overall the proposed junction improvements and the replacement of the railway bridge would be sufficient to avoid serious problems arising (para. 17.22.33).</p> <p>The access arrangements, including the existing railway bridge, are to be considered in more detail through a Development Brief which is a planning requirement of the proposal.</p>

MODIFICATION NO. 419

Modification	
1. Increase the Dwelling provision to 300	
Summary/Issues	Councils Response
<ul style="list-style-type: none"> • Brownfield sites should accommodate this increase. The mayhem brought on by development will be catastrophic. • The increase in dwellings is unnecessary and unwarranted and should not be built on Green Belt land, especially when there are less difficult, more sustainable sites available within the town and borough. 	<p>This issue was discussed at the Inquiry and, as outlined in section 7.4 of the Inspector's report, he considered that there was not sufficient previously developed land within the Borough to accommodate the housing requirement for the period up until 2011. He concluded in his report that there was a need for some strategic greenfield sites to be developed over the Plan period (para. 17.22.22).</p> <p>Within section 4.32 of the Inspector's Report the land at the Manor Estate was compared to and favoured over possible alternative sites. He concluded that the Manor Estate sites are sustainable, available and would have a limited impact on the Green Belt and adjoining countryside.</p>
<ul style="list-style-type: none"> • Enhancing access for vehicles would cause major traffic problems and increase in dwellings would overload the already growing population of the Manor Estate. 	<p>In paragraph 17.31.6 of the Inspector's report he accepted that some delays would be inevitable during construction. However, he concluded that the long-term benefits of the bridge improvements outweighed the short-term inconvenience.</p> <p>The access arrangements, including the existing railway bridge, are to be considered in more detail through the preparation of a Development Brief, which is a planning requirement of the proposal.</p>
<ul style="list-style-type: none"> • Objection to any increase as this will result in the school standards slipping. • The school is too small to cope with the additional demand. It would require doubling otherwise traffic congestion would be increased. 	<p>A Development Brief is to be prepared for the site and will involve discussions with the County Council as Education Authority. This will outline the nature of the contribution required by the developers to meet the educational requirements resulting from the development.</p>

<ul style="list-style-type: none"> • The increase will create a density that is too high and will detract from the quality of life of existing residents and will be out of character. The development will be too cramped. • There is insufficient space to accommodate the increase. • The increase in number of dwellings will increase the number of affordable housing and this type of housing is inconsistent with the type of housing in the rest of the Manor Estate (primarily 3-4 bed properties). • The increase in dwellings will destroy the Manor Estate as a low crime, low problem area. • The quality of life of existing residents and the nature of the local community will be affected, and will lead to a rapid decline in the local environment and surrounding areas. The value of houses will lower as the area is made undesirable. • The increase in housing will have a substantial detrimental impact on the local environment. • 	<p>The Inspector in his report (sections 17.23.36 and 17.23.37) examined the effect the expansion of the estate would have on its character in terms of density and the impact of affordable housing. He felt that the a major expansion of the site could impact on the character in the shorter term, particularly in light of higher traffic levels. However, the Inspector found no reason to believe that the development would have a seriously damaging impact on the character of the estate.</p> <p>A Development Brief is to be prepared for the site which will examine in more detail the type, layout and density of new housing and its relationship with the existing character of the area. A higher density need not be incompatible subject to a high standard of design and layout being achieved.</p> <p>Government guidance (PPG3: Housing) encourages mixed and inclusive communities, which offer a choice of housing and lifestyles. The government does not accept that different types of housing and tenures necessarily make bad neighbours. The Inspector did not find any evidence that 33% affordable housing units would lead to a degeneration of the current residential environment of the estate.</p> <p>Draft Supplementary Planning Guidance on Safety and Security has been produced which aims to create safe environments for all development proposals.</p>
<ul style="list-style-type: none"> • The increased traffic will lead to increased noise and pollution 	<p>The Inspector was satisfied in dealing with objections to traffic and related issues in his report that development of TWA6 and TWA7 would not lead to significant problems of additional noise, disturbance or pollution for residents in and around the Manor Estate (paras. 17.22.36-17.22.37 and 17.23.44-17.23.46)</p> <p>The Inspector did identify that there would be an impact on the residents on King Edward Road (para. 17.23.45). However, he thought that any significant increase in traffic noise would be limited to peak hours on peak days, and he did not consider that it would erode the residential environment.</p>

<ul style="list-style-type: none"> • The increase will result in extra traffic flow on the already congested roads and no road widening or junction improvements can reduce this. • The new traffic survey should be undertaken before any increase in the number of dwellings. • Over development of an area, which is not capable of taking an increased population without major disruption to the existing road, network. Access already congested. 	<p>The Inspector specifically took into account concerns about traffic surveys in dealing with objections to related road improvements (TWA16) in his report (para. 17.31.12-17.31.13). He was satisfied that sufficient analysis had been carried out into the impact of the development (including traffic surveys in 1997 and 2000). The Inspector found no reason to question the findings that the proposed highway improvements were more than sufficient to cater for the housing development.</p> <p>The Development Brief will consider in more detail the impact of TWA6 and TWA7 on the highway network and the nature of road improvements required.</p>
<ul style="list-style-type: none"> • The increase will only profit the developer. 	<p>The proposed increase in the net capacity is in response to the Inspector's recommendation 17.23.71. The increase has been sought so as to bring the development in line with Government guidance which requires housing to be developed within the density range of 30 to 50 dwellings per hectare. This development will be at the lowest end of this range.</p>
<ul style="list-style-type: none"> • It would be a health and safety problem for the residents. 	<p>The Inquiry Inspector in his report considered a wide range of issues, including noise, pollution, disturbance and security, in assessing the suitability of the Manor Estate as a housing location. He did not identify any significant problems to warrant removing the site from the Plan.</p>
<ul style="list-style-type: none"> • The development will lose the only children's playground and open land for recreation. 	<p>The Inspector dealt with this specific issue at para. 17.23.34 of his report. He concluded that the provision of significant areas of permanent public open space would offset the loss of fields for recreational purposes. The Inspector noted that much of the access to the land for recreation was unofficial in any event. He accepted that the play area may have to be moved but there was scope to relocate replacement facilities close to its existing location.</p>
<ul style="list-style-type: none"> • The risk of flooding will be increased. 	<p>A Development Brief is to be prepared for the site. As part of this process the Council will consult with the relevant water authorities to ensure that there is adequate water supply, surface water, foul drainage and sewage treatment capacity to serve this development. This may require the developer to fund appropriate improvements.</p>

<ul style="list-style-type: none"> It would result in over development of the area as a result of recent development that has taken place. The plan and residents have been given very little thought. 	<p>In accepting housing at the Manor Estate, the Inspector was satisfied overall that a suitable development could be achieved, subject to a high standard of design and layout being achieved. The Inspector also recognised that the development of the site at the Manor Estate will bring many benefits to the existing residents (para. 17.23.59).</p> <p>The development will be subject to a Development Brief which will consider the proposal in more detail. The process will involve consultation with the public and other key stakeholders.</p>
<ul style="list-style-type: none"> The site and surrounding area does not have the facilities (i.e. doctors) and infrastructure in place to accommodate an increase in dwellings. 	<p>The provision of local facilities and infrastructure will be investigated through a Development Brief for the site.</p> <p>The Primary Care Trust has identified a need for a new Doctor's Surgery in Apsley which as been reinforced as a result of the decision to support new housing on the Manor Estate. The Council is currently working with the PCT to investigate options for a suitable site.</p> <p>An area of land between Featherbed Lane and Two Waters Way has been identified in the Plan for a community facility should evidence of a need be clearly demonstrated (Proposal TWA 22).</p>
<ul style="list-style-type: none"> The sudden increase of even more dwellings will be even more disconcerting for the elderly. 	<p>It is likely that housing will come forward in a number of phases because of the size of the development and to ensure it is properly co-ordinated with the relevant infrastructure. Therefore, it is expected that the proposal will be completed over time.</p> <p>The impact the development may have on existing residents will be considered in the Development Brief. This will seek to address concerns of residents and minimise any disruption and inconvenience the development may cause as far as is reasonable. The Council aims to involve residents in the process of the preparation of the Brief.</p>

2. Amend reference to educational facilities

Summary/Issues	Councils Response
<ul style="list-style-type: none">• The development brief will need to be specific regarding the contribution provided for educational facilities for both primary and secondary education.• Deleting the requirement for expansion of the school is wrong, and an unspecified contribution is open to limited cash being offered.• Diminishes the requirement to provide sufficient educational facilities. Full educational facilities should be provided in line with current Government Guidance to get school children to walk or cycle to school.• No committed assurance of increased educational facilities.• There will be an increased demand on school places without a specific contribution. Failing to increase the size will produce a negative effect on the sustainability of the site. Children will have to be driven to more distant schools.	<p>The Inspector concluded in paragraph 17.22.50 of his report, that deleting the specific requirement for the expansion of the school to an unspecified contribution provides the necessary degree of flexibility for the Education Authority in meeting the needs arising from this site. He noted that there might be a number of options the County Council will have to consider. Restricting the provision to the expansion of the primary school alone would not meet the increased educational needs at secondary school level.</p> <p>A Development Brief is to be prepared for this site which will set out the details for this development. Within this Brief the contribution towards additional educational facilities at all levels will be discussed following consultation with the County Council as Local Education Authority.</p>

3. Delete reference to TWA Diagram 3

Summary/Issues	Councils Response
<ul style="list-style-type: none">• Prevents having the opportunity of seeing the overall proposal and being able to make informed comments on the whole scheme.	<p>The Local Plan establishes the broad principles of a development and a high level of detail is not appropriate at this stage. The Inspector in his report (para. 17.22.48) agreed that the Plan should only set out general principles and was generally critical of the original amount of detail provided. However, a Development Brief will be produced, which will provide greater details of the scheme.</p>

MODIFICATION NO. 440 TWA6

Modification	
1. Increase to 300 dwellings	
Summary/Issues	Councils Response
<ul style="list-style-type: none"> Capacity of school is inadequate to accommodate extra population. The development will have an impact on the current catchment area. Increasing the size of the school to accommodate the extra children will increase traffic and lead to safety issues. 	<p>A Development Brief is to be prepared for the site and will involve discussions with the County Council as Local Education Authority. This will outline the nature of contribution required by the developers to meet the educational requirements resulting from the development of the site.</p>
<ul style="list-style-type: none"> The increase will lead to a number of environmental issues. Will environmental studies be produced to assess the impact? 	<p>The Inspector at the Inquiry considered the environmental impact of the proposed development, and he concluded that the area was a sustainable location. Environmental improvements are included as planning requirements as part of this proposal. These include, for example, provision of public open space and more active ecological management of Home Wood.</p>
<ul style="list-style-type: none"> Will any green areas for recreational use remain for the existing residents on the Manor Estate? The development will lead to the loss of the recreational ground. Safe play facilities are required for children, a replacement park should be provided before the loss of the existing one. 	<p>The planning requirements of the site require the provision of open space and children's play space.</p> <p>The proposal will not lead to the loss of children's play facilities. The Council accepts that the existing playground on site TWA7 may need to be relocated. The location of a replacement facility will be determined in the Development Brief.</p> <p>The development of the site will retain the southern corner of the site and the land adjacent to Featherbed Lane as public open space within the proposal. Further public open land is required by the planning requirements for the site.</p>
<ul style="list-style-type: none"> The increase in number of dwellings should not be accommodated on a Green Belt site, as this is not in line with PPG2. It will increase the degeneration of the area. The increase should be on brownfield sites (i.e. the Lucas site) 	<p>This issue was discussed at the Inquiry and the Inspector concluded that there was not sufficient previously developed land within the Borough to accommodate the housing requirement for the period up until 2011 (section 7.4 of his report).</p> <p>In paragraph 4.32.35 of the Inspector's report, he compared land at the Manor Estate to other possible alternative sites, including land adjacent to the Lucas site. He concluded that the location should be preferred to these other sites.</p> <p>The Inspector felt that the Manor Estate sites are sustainable, available and would have a limited impact on the Green Belt and adjoining countryside. The Council accepted the Inspector's</p>

	conclusions.
<ul style="list-style-type: none"> The increase in traffic will make it unsafe for children walking to school and will add to existing road damage. 	<p>The implications of traffic generated by the development on safety will be considered in the Development Brief. This will also address the quality of the existing roads to determine if improvements should be made.</p>
<ul style="list-style-type: none"> It will lead to additional noise and emission pollution. 	<p>The Inspector's report identified overall that the proposed development would not seriously erode the residential environment of the estate, though some increase in traffic noise is expected.</p> <p>In any event, the ambient noise levels are high given the estate's location close to Two Waters Way/A41 Bypass and the railway line.</p>
<ul style="list-style-type: none"> Increased pressures on the current infrastructure (including the bridge), resources and wider transport links (rail and road) will not support the increase in traffic. It will increase traffic congestion and cause gridlock and accidents. It will increase the illegal use of one-way system leading to more congestion. With road improvements there will still be only one exit, what about safe access for emergency vehicles? There has been no attention paid to the danger posed by the access over the railway line, which is very dangerous and would still be dangerous if bridge modifications are made. 	<p>The Inspector recognised that the existing access onto the Manor Estate was substandard and that the bridge did give rise to congestion at peak hours. However, he concluded in paragraph 17.22.31 of his report that it seemed to function with reasonable safety. Whilst accepting that there were problems with the existing access arrangement into the estate (para. 17.22.32), he felt that overall the proposed junction improvements and the replacement of the railway bridge would be sufficient to avoid serious problems arising (para. 17.22.33).</p> <p>The access arrangements, including the existing railway bridge, are to be considered in more detail through a Development Brief which is a planning requirement of the proposal.</p>
<ul style="list-style-type: none"> There is a need to consider whether there are adequate community facilities (i.e. Doctors, dentists) to accommodate the increase in dwellings. 	<p>The provision of local facilities and infrastructure will be investigated through a Development Brief for the site.</p> <p>The Primary Care Trust has identified a need for a new Doctor's Surgery in Apsley which has been reinforced as a result of the decision to support new housing on the Manor Estate. The Council is currently working with the PCT to investigate options for a suitable site.</p> <p>An area of land between Featherbed Lane and Two Waters Way has been identified in the Plan for a community facility should evidence of a need be clearly demonstrated (Proposal TWA 22).</p>

<ul style="list-style-type: none"> • There is an inadequate sewage system 	<p>Section 17.23.56 of the Inspector's report identified that all relevant utilities were consulted over the proposal and did not raise any fundamental objection to it.</p> <p>Three Valley's Water will be consulted as part of the Development Brief process as to the existing capacity of the system and whether any additional infrastructure will be necessary. The developer may be required to contribute towards improvements.</p>
<ul style="list-style-type: none"> • The increased density will lead to increased parking problems 	<p>The level of off street parking provision will accord with the car parking provision set out in the parking standards contained in Appendix 5 to the Local Plan. The Council will expect the development to generally meet its own need for off-street parking.</p>
<ul style="list-style-type: none"> • The development should be at the same density and be sympathetic to the existing area and properties to maintain the existing character and quality of life. The proposed density is too high and it is out of character. 	<p>The Inspector in his report (sections 17.23.36 and 17.23.37) examined the effect the expansion of the estate would have on its character in terms of density. He felt that a major expansion of the site could impact on the character in the shorter term, particularly in light of higher traffic levels. However, the Inspector found no reason to believe that the development would have a seriously damaging impact on the character of the estate in the longer-term.</p> <p>A Development Brief is to be prepared for the site, which will examine in more detail the type, layout and density of new housing and its relationship with the existing character of the area. A higher density need not be incompatible subject to a high standard of design and layout being achieved.</p>

<ul style="list-style-type: none"> The increase in the number of dwellings is not required given the recent amount of development that has taken place in Hemel Hempstead. Apsley has reached saturation point and the proposed development will more than double the size of the Manor Estate. 	<p>The Inquiry Inspector, in considering the suitability of Proposals TWA6 and 7, accepted that there was insufficient previously developed land within the urban area to accommodate the housing requirements to 2011. Furthermore, in dealing with other related objections to the Two Waters and Apsley Inset, he would have been aware of a number of existing and potential housing sites in concluding the need to identify new housing around the Manor Estate.</p>
<ul style="list-style-type: none"> The crime rate will increase on the estate. Will extra policing be provided? 	<p>The Inspector concluded that the development would not necessarily lead to an increase in crime. Draft Supplementary Planning Guidance on Safety and Security has gone through public consultation and all development proposals should make reference to this. This will be explored through the Development Brief in consultation with the public and other interested parties.</p>
<ul style="list-style-type: none"> The risk of flooding will increase 	<p>Drainage issues were raised at the Inquiry. The Inspector noted in his report that no objections were raised by the relevant utilities. The water utilities will be consulted as part of the Development Brief process as to whether any additional infrastructure will be necessary. The developer may be required to contribute towards improvements.</p>
<ul style="list-style-type: none"> The privacy of residents will suffer, the views will be spoilt and visual impact on the valley sides will be increased. 	<p>The development of this site will have an impact on the outlook from some properties on Manorville Road. However, the Inspector did not consider (section 4.32.18) that this would cause adjacent occupiers significant harm, particularly as the land slopes away from Manorville Road towards Featherbed Lane.</p> <p>The Development Brief will deal in more detail with the layout, design and landscaping of the new housing. An important consideration will be the relationship of new housing with existing properties.</p>
<ul style="list-style-type: none"> The development will be unsustainable 	<p>The Inspector assessed this site against a number of other sites put forward for housing development and concluded in section 4.32, 17.22 and 17.23 of his report that this site is a sustainable location.</p>
<ul style="list-style-type: none"> The development has little thought for existing residents; the value of housing will lower. 	<p>The design and layout of the development will be determined within the Development Brief, which will be subject to public consultation. The aim is to achieve a high standard of layout and design, and there is no reason to believe that the value of properties will be decreased.</p>

<ul style="list-style-type: none"> The increase in the amount of dwellings will increase the number of affordable housing and this type of housing is inconsistent with the type of housing in the rest of the Manor Estate (primarily 3-4 bed) 	<p>The Inspector in his report (para 17.23.37) noted that PPG3 encourages mixed and inclusive communities, which offer a choice of housing and lifestyles. It does not accept that different types of housing and tenures make bad neighbours. No evidence was found by the Inspector that 33% affordable housing units would lead to a degeneration of the current residential environment of the estate.</p>
<ul style="list-style-type: none"> There is no reference to a phased program of road improvements. 	<p>Modification No.454 to Proposal TWA16 makes specific reference to a phased program of road improvements in its Planning Requirements. This is a prerequisite of the development.</p>
<ul style="list-style-type: none"> Access should be via Featherbed Lane only. 	<p>The issue of access will be examined in detail through the preparation of a Development Brief in consultation with the public and other stakeholders.</p>

2. Refer to a contribution towards educational facilities

Summary/Issues	Councils Response
<ul style="list-style-type: none"> The quality of the school will be affected The unspecified contribution towards educational facilities is unsatisfactory. Need to know what the precise contributions will be otherwise it will put pressure on the already over subscribed school with increased intake and not enough money or facilities. The expansion should be in agreement with the education authority. A full contribution should be required to expand the school and there should be a minimum level of two form entry. One and half form entry is inadequate and disruptive. Two new classrooms should be required before development takes place. 	<p>The Inspector concluded in paragraph 17.22.50 of his report, that deleting the specific requirement for the expansion of the school to an unspecified contribution provides the necessary degree of flexibility for the Education Authority in meeting the needs arising from this site. He noted that there may be a number of options open to the County Council and that it was important to also consider the impact at secondary level.</p> <p>A Development Brief is to be prepared for this site which will set out the details for this development. Within the Brief the contribution towards additional educational facilities will be considered following consultation with the Local Education Authority.</p>

<ul style="list-style-type: none"> • A contribution should be agreed and made public at the outset. • The school is unable to support more children and they will have to travel to other schools increasing traffic problem further. The children's ability to socialise will be affected by having to travel out of the community to school. All children who live on the estate should be able to attend a local school. How will the existing catchment area be effected? • Is the expansion of the existing school no longer a requirement as a result of the modification? 	
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3. Refer to archaeological evaluation with appropriate mitigation measures.

Summary/Issues	Councils Response
<ul style="list-style-type: none"> • Modification does not provide sufficient safeguarding to preserve any archaeological finding in the proposed development area. 	<p>The Inspector in his report at paragraphs 17.22.52 and 17.22.53 considered this issue. He was satisfied with the suitability of the reference to the archaeology of the site in the planning requirements, subject to minor changes. The Council accepted the Inspector's recommended wording.</p> <p>The archaeological importance of the site will be considered in more detail through the preparation of a Development Brief. This will involve consultation with the County Archaeologist.</p>
<ul style="list-style-type: none"> • The archaeological survey has been downgraded to a simple evaluation. If finds arise correct procedures should be carried out. 	
<ul style="list-style-type: none"> • A full survey should be carried out to avoid destroying potential archaeological finds. 	

4. Delete Reference to TWA Diagram 3.

Summary/Issues	Councils Response
<ul style="list-style-type: none"> • Removal of diagram does not allow people to see what is happening in their roads or make informed comments on the whole scheme. 	<p>As outlined in the Inspector's report at paragraph 17.22.48, the Plan should only set out general principles. He considered that TWA Diagram 3 introduced too much detail into the Plan.</p> <p>A Development Brief will be produced in consultation with the public, which will set out the details of the scheme. This is a more appropriate stage to deal with this greater level of detail and to allow for opportunities to make comments.</p>

MODIFICATION NO. 441 TWA7

Modification	
3. Increase to 300 dwellings	
Summary/Issues	Councils Response
<ul style="list-style-type: none"> Capacity of school is inadequate to accommodate extra dwellings. The development will have an impact on the current catchment area. Increasing the size of the school to accommodate the extra children will increase the traffic and lead to safety issues. 	<p>A Development Brief is to be prepared for the site and will involve discussions with the County Council as Local Education Authority. This will outline the nature of contribution required by the developers to meet the educational requirements resulting from the development of the site.</p>
<ul style="list-style-type: none"> The increase will lead to a number of Environmental issues. Will environmental studies be produced to access the impact? 	<p>The Inspector at the Inquiry considered the environmental impact of the proposed development, and he concluded that the area was a sustainable location. Environmental improvements are included as planning requirements as part of this proposal. These include, for example, provision of public open space and more active ecological management of Home Wood.</p>
<ul style="list-style-type: none"> Will any green areas for recreational use remain for the existing residents on the Manor Estate? The development will lead to the loss of the recreational ground. Safe play facilities are required for children, a replacement park should be provided before the loss of the existing one. 	<p>The planning requirements of the site require the provision of open space and children's play space.</p> <p>The proposal will not lead to the loss of children's play facilities. The Council accepts that the existing playground on site TWA7 may need to be relocated. The location of a replacement facility will be determined in the Development Brief.</p> <p>The development of the site will retain the southern corner of the site and the land adjacent to Featherbed Lane as public open space within the proposal. Further public open land is required by the planning requirements for the site.</p>
<ul style="list-style-type: none"> The increase in number of dwellings should not be accommodated on a Green Belt site, as this is not in line with PPG2. It will increase the degeneration of the area. The increase should be on brownfield sites (i.e. the Lucas site) 	<p>This issue was discussed at the Inquiry and the Inspector concluded that there was not sufficient previously developed land within the Borough to accommodate the housing requirement for the period up until 2011 (section 7.4 of his report).</p> <p>In paragraph 4.32.35 of the Inspector's report, he compared land at the Manor Estate to other possible alternative sites, including land adjacent to the Lucas site. He concluded that the location should be preferred to these other sites.</p> <p>The Inspector felt that the Manor Estate sites are sustainable, available and would have a limited impact on the Green Belt and adjoining</p>

	<p>countryside. The Council accepted the Inspector's conclusions.</p>
<ul style="list-style-type: none"> • There is inadequate room for the increase in dwellings and it will lead to over development of the site and strain on road infrastructure. There is a need to consider whether there are adequate community facilities (i.e. Doctors, dentists) to accommodate the increase in dwellings. 	<p>The Inspector considered these issues in detail in his report but was satisfied that the development could be accommodated on the site and in highway terms subject to a number of road improvements.</p> <p>The provision of local facilities and infrastructure will be investigated through a Development Brief for the site.</p> <p>The Primary Care Trust has identified a need for a new doctor's surgery in Apsley which has been reinforced as a result of the decision to support new housing on the Manor Estate. The Council is currently working with the PCT to investigate options for a suitable site.</p> <p>An area of land between Featherbed Lane and Two Waters Way has been identified in the Plan for a community facility should evidence of a need be clearly demonstrated (Proposal TWA 22).</p>
<ul style="list-style-type: none"> • Increased pressures on the current infrastructure (including the bridge) and wider transport links (rail and road) will not support the increase in traffic. • It will increase the illegal use of one-way system leading to more congestion. • With road improvements there will still be only one exit, what about safe access for emergency vehicles? • It will increase traffic congestion and cause gridlock and accidents. • There has been no attention paid to the danger posed by the access over the railway line, which is very dangerous and would still be dangerous if bridge modifications are made. 	<p>The Inspector recognised that the existing access onto the Manor Estate was substandard and that the bridge did give rise to congestion at peak hours. However, he concluded in paragraph 17.22.31 of his report that it seemed to function with reasonable safety. Whilst accepting that there were problems with the existing access arrangement into the estate (para. 17.22.32), he felt that overall the proposed junction improvements and the replacement of the railway bridge would be sufficient to avoid serious problems arising (para. 17.22.33).</p> <p>The access arrangements, including the existing railway bridge, are to be considered in more detail through a Development Brief, which is a planning requirement of the proposal.</p>
<ul style="list-style-type: none"> • It will lead to additional noise and emission pollution. 	<p>The Inspector's report identified overall that the proposed development would not seriously erode the residential environment of the estate, though some increase in traffic noise is expected.</p> <p>In any event, the ambient noise levels are high given the estate's location close to Two Waters Way/A41 Bypass and the railway line..</p>

<ul style="list-style-type: none"> The increase in traffic will make it unsafe for children walking to school and will add to existing road damage. 	<p>The safety implications of the development will be addressed in the Development Brief. This will also address the quality of the existing roads to determine what improvements should be made.</p>
<ul style="list-style-type: none"> There is an inadequate sewage system. 	<p>Section 17.23.56 of the Inspector's report identified that all relevant utilities were consulted over the proposal and did not raise any fundamental objection to it.</p> <p>Three Valley's Water will be consulted as part of the Development Brief process as to the existing capacity of the system and whether any additional infrastructure will be necessary. The developer may be required to contribute towards improvements.</p>
<ul style="list-style-type: none"> The access along King Edward Road is too narrow for the increased number of dwellings. 	<p>Paragraph 17.23.40 of the Inspector's report concludes that King Edward Road has the physical capacity to accommodate the predicted increase in vehicles.</p> <p>Access arrangements will be determined in the Development Brief, which will consider this in more detail.</p>
<ul style="list-style-type: none"> The increased density will lead to increased parking problems 	<p>The level of off street parking provision will accord with the car parking provision set out in the parking standards contained in Appendix 5 to the Local Plan. The Council will expect the development to generally meet its own need for off-street parking.</p>
<ul style="list-style-type: none"> The development should be at the same density and be sympathetic to the existing area and properties to maintain the existing character and quality of life. The proposed density is too high and it is out of character. 	<p>The Inspector in his report (sections 17.23.36 and 17.23.37) examined the effect the expansion of the estate would have on its character in terms of density. He felt that a major expansion of the site could impact on the character in the shorter term, particularly in light of higher traffic levels. However, the Inspector found no reason to believe that the development would have a seriously damaging impact on the character of the estate in the longer-term.</p> <p>A Development Brief is to be prepared for the site, which will examine in more detail the type, layout and density of new housing and its relationship with the existing character of the area. A higher density need not be incompatible subject to a high standard of design and layout being achieved.</p>
<ul style="list-style-type: none"> The increase in the number of dwellings is not required given the recent amount of development that has taken place in Hemel Hempstead. Apsley has reached saturation point and the proposed development will more than double the size of the Manor Estate. 	<p>The Inquiry Inspector, in considering the suitability of Proposals TWA6 and 7, accepted that there was insufficient previously developed land within the urban area to accommodate the housing requirements to 2011. Furthermore, in dealing with other related objections to the Two Waters and Apsley Inset, he would have been aware of a number of existing and potential housing sites in concluding the need to identify new housing around the Manor Estate.</p>

<ul style="list-style-type: none"> The crime rate will increase on the estate. Will extra policing be provided? 	<p>The Inspector concluded that the development would not necessarily lead to an increase in crime. Draft Supplementary Planning Guidance on Safety and Security has gone through public consultation and all development proposals should make reference to this. This will be explored through the Development Brief in consultation with the public and other interested parties.</p>
<ul style="list-style-type: none"> The risk of flooding will increase 	<p>Drainage issues were raised at the Inquiry. The Inspector noted in his report that no objections were raised by the relevant utilities. The water utilities will be consulted as part of the Development Brief process as to whether any additional infrastructure will be necessary. The developer may be required to contribute towards improvements.</p>
<ul style="list-style-type: none"> The privacy of residents will suffer, the views will be spoilt and visual impact on the valley sides will be increased. 	<p>The development of this site will have an impact on the outlook from some properties on Manorville Road. However, the Inspector did not consider (section 4.32.18) that this would cause adjacent occupiers significant harm, particularly as the land slopes away from Manorville Road towards Featherbed Lane.</p> <p>The Development Brief will deal in more detail with the layout, design and landscaping of the new housing. An important consideration will be the relationship of new housing with existing properties.</p>
<ul style="list-style-type: none"> The development will be unsustainable 	<p>The Inspector assessed this site against a number of other sites put forward for housing development and concluded in section 4.32, 17.22 and 17.23 of his report that this site is a sustainable location.</p>
<ul style="list-style-type: none"> The development has little thought for existing residents; the value of housing will lower. 	<p>The design and layout of the development will be determined within the Development Brief, which will be subject to public consultation. The aim is to achieve a high standard of layout and design, and there is no reason to believe that the value of properties will be decreased.</p>
<ul style="list-style-type: none"> Will the cul-de-sacs be lost? 	<p>Only two vehicular access points have been identified within the planning requirements to TWA7 (off Featherbed Lane and King Edward Street). The development brief will determine in consultation with the public whether the existing cul-de-sacs will benefit from being opened up to allow pedestrian or cycle routes through.</p>
<ul style="list-style-type: none"> The increase in number of dwellings will increase the number of affordable housing and this type of housing is inconsistent with the type of housing in the rest of the Manor Estate (primarily 3-4 bed) 	<p>The Inspector in his report (para 17.23.37) noted that PPG3 encourages mixed and inclusive communities, which offer a choice of housing and lifestyles. It does not accept that different types of housing and tenures make bad neighbours. No evidence was found by the Inspector that 33% affordable housing units would lead to a degeneration of the current residential environment of the estate.</p>

<ul style="list-style-type: none"> • There is no reference to a phased program of road improvements. 	Modification No.454 to Proposal TWA16 makes specific reference to a phased program of road improvements in its Planning Requirements. This is a prerequisite of the development.
<ul style="list-style-type: none"> • Access should be via Featherbed Lane only. 	The issue of access will be examined in detail through the preparation of a Development Brief in consultation with the public and other stakeholders.

4. Refer to a contribution towards educational facilities

Summary/Issues	Councils Response
<ul style="list-style-type: none"> • The unspecified contribution towards educational facilities is unsatisfactory. Need to know what the precise contributions will be otherwise it will put pressure on the already over subscribed school with increased intake and not enough money or facilities. The expansion should be in agreement with the education authority. • A full contribution should be required to expand the school and there should be a minimum level of two form entry. One and half form entry is inadequate and disruptive. • The quality of the school will be affected • Two new classrooms should be required before development takes place. • Contribution should be agreed and made public at the outset. • The school is unable to support more children and they will have to travel to other schools increasing traffic problem further. The children's ability to socialise will be affected by having to travel out of the community to school. All children who live on the estate should be able to attend a local school. How will the existing catchment area be effected? • Is the expansion of the existing school no longer a requirement as a result of the modification? 	<p>The Inspector concluded in paragraph 17.22.50 of his report, that deleting the specific requirement for the expansion of the school to an unspecified contribution provides the necessary degree of flexibility for the Education Authority in meeting the needs arising from this site. He noted that there may be a number of options open to the County Council and that it was important to also consider the impact at secondary level.</p> <p>A Development Brief is to be prepared for this site which will set out the details for this development. Within the Brief the contribution towards additional educational facilities will be considered following consultation with the Local Education Authority.</p>

3. Refer to archaeological evaluation with appropriate mitigation measures.

Summary/Issues	Councils Response
<ul style="list-style-type: none"> Modification does not provide sufficient safeguarding to preserve any archaeological finding in the proposed development area. 	<p>The Inspector in his report at paragraphs 17.22.52 and 17.22.53 considered this issue. He was satisfied with the suitability of the reference to the archaeology of the site in the planning requirements, subject to minor changes. The Council accepted the Inspector's recommended wording.</p>
<ul style="list-style-type: none"> The archaeological survey has been downgraded to a simple evaluation. If finds arise correct procedures should be carried out. 	<p>The archaeological importance of the site will be considered in more detail through the preparation of a Development Brief. This will involve consultation with the County Archaeologist.</p>
<ul style="list-style-type: none"> A full survey should be carried out to avoid destroying potential archaeological finds. 	

4. Delete Reference to TWA Diagram 3.

Summary/Issues	Councils Response
<ul style="list-style-type: none"> Removal of diagram does not allow people to see what is happening in their roads or make informed comments on the whole scheme. 	<p>As outlined in the Inspector's report at paragraph 17.22.48, the Plan should only set out general principles. He considered that TWA Diagram 3 introduced too much detail into the Plan.</p> <p>A Development Brief will be produced in consultation with the public, which will set out the details of the scheme. This is a more appropriate stage to deal with this greater level of detail and to allow for opportunities to make comments.</p>

MODIFICATION NO. 454 TWA16 and 455 TWA17

Modification	
2. Amend reference to the timing of road improvement implementation	
Summary/Issue	Councils Response
<ul style="list-style-type: none"> • There should be no phased programme. Road and bridge improvements should be completed in full before any building starts or any additional large vehicles access the area. • The development of 50 houses before the infrastructure improvements should not be permitted. The Developer could ‘walk away’ without providing any infrastructure to cope • Phased development provides the developers and county council the opportunity to delay the design and implementation of the improvements. • Road and bridge improvements to be completed before allowing any development to take place. • The Bridge should be built first for safety reasons. The bridge and access are currently inadequate. A second bridge should also be provided to help filter traffic and give access to emergency vehicles. • Phased programme unacceptable because there is only one access road onto the Manor Estate, the railway bridge is virtually a single lane, tight turn onto bridge. Difficult to negotiate long vehicles. No Entry on lower end of Featherbed Lane and alternative exit routes very narrow. • King Edward Street is too narrow for lorries it will be dangerous with construction vehicles driving through resulting in it being a major safety hazard. • The construction traffic will need to go against the one way system increasing the likelihood of accidents and chaos. How will HGV’s be controlled from using the one-way system incorrectly? • Traffic access virtually impossible at peak times, adding construction traffic to this could cause gridlock • Because of the huge disruption construction traffic will cause the existing road infrastructure all improvements should be done prior to any house construction. The existing bridge not adequate for large vehicles. It would cause delays of other vehicles, such as emergency vehicles, getting through. 	<p>The phasing of the proposed development was discussed at the Inquiry and the Inspector’s conclusions are set out in paragraphs 17.31.10 and 17.31.11.</p> <p>In summary he concluded that the works to London Road should be carried out prior to the start of development. However, he considered that the roads were not so hazardous to warrant all the improvements being carried out before the commencement of development. He considered that the bridge improvements should be completed at a relatively early stage with 50 dwellings a reasonable limit that could be built before the bridge improvements became necessary.</p> <p>The Inspector’s report identifies that there will be some delays during construction, but that there will be long-term benefits.</p> <p>The provision of a second access point was considered at the Inquiry but was rejected by the Inspector in his report (17.31.14). He felt that the scale appeared to be disproportionate to the size of the expansion of the Manor Estate and would result in further harm to the Green Belt.</p> <p>The detail of the phasing and timing of the bridge and other road improvements and their timing will be considered in detail through the preparation of a Development Brief. The Brief will determine the routes and where construction traffic will be directed. A key concern is to try to minimise disruption to the existing residents during the construction phase. This will be subject to a full consultation process.</p>

<ul style="list-style-type: none"> Using the existing road infrastructure would dramatically effect the quality of lives of the existing residents. 	<p>The Inspector recognised that the existing access onto the Manor Estate was substandard and that the bridge did give rise to congestion at peak hours. However, he concluded in paragraph 17.22.31 of his report that it seemed to function with reasonable safety. Whilst accepting that there were problems with the existing access arrangement into the estate (para. 17.22.32), he felt that overall the proposed junction improvements and the replacement of the railway bridge would be sufficient to avoid serious problems arising (para. 17.22.33).</p> <p>The access arrangements, including the existing railway bridge, are to be considered in more detail through a Development Brief which is a planning requirement of the proposal.</p>
<ul style="list-style-type: none"> The road improvements must not be restrictive (e.g. parking restrictions) 	
<ul style="list-style-type: none"> Full plans of the access arrangements need to be drawn up and approved prior to the start of any works. 	
<ul style="list-style-type: none"> Fewer cars are required in Apsley not more. 	<p>The Inspector specifically took into account concerns about traffic surveys in dealing with objections to related road improvements (TWA16) in his report (para. 17.31.12-17.31.13). He was satisfied that sufficient analysis had been carried out into the impact of the development (including traffic surveys in 1997 and 2000). The Inspector found no reason to question the findings that the proposed highway improvements were more than sufficient to cater for the housing development.</p> <p>The Development Brief will consider in more detail the impact of TWA6 and TWA7 on the highway network and the nature of road improvements required.</p>
<ul style="list-style-type: none"> Advice should be sought from the local Police Traffic Management Unit. 	<p>Public consultation will be undertaken during the Development Brief process. The Highways Authority will also be consulted as part of this process.</p>
<ul style="list-style-type: none"> Need improved site lines 	<p>The options of the provision of a second bridge or the re-decking and widening of the existing structure to enable unimpeded two-way flows, and forward visibility will be examined in the Development Brief process</p>

- A Traffic survey undertaken by an independent body, not the developer, should be carried out.

The Inspector specifically took into account concerns about traffic surveys in dealing with objections to related road improvements (TWA16) in his report (para. 17.31.12-17.31.13). He was satisfied that sufficient analysis had been carried out into the impact of the development (including traffic surveys in 1997 and 2000). The Inspector found no reason to question the findings that the proposed highway improvements were more than sufficient to cater for the housing development.

The Development Brief will consider in more detail the impact of TWA6 and TWA7 on the highway network and the nature of road improvements required.