

**THREE RIVERS DISTRICT COUNCIL**  
Local Development Framework

**CORE STRATEGY SUBMISSION  
STATEMENT OF REPRESENTATIONS**

**FEBRUARY 2011**



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# 1 Introduction

## 1.1 The Core Strategy

The Core Strategy forms part of the Local Development Framework for Three Rivers and is a strategic Development Plan Document which sets the broad vision, objectives and policies for the District. It sets out, in broad terms the spatial strategy and apportionment of development for the District, but does not identify sites for this growth.

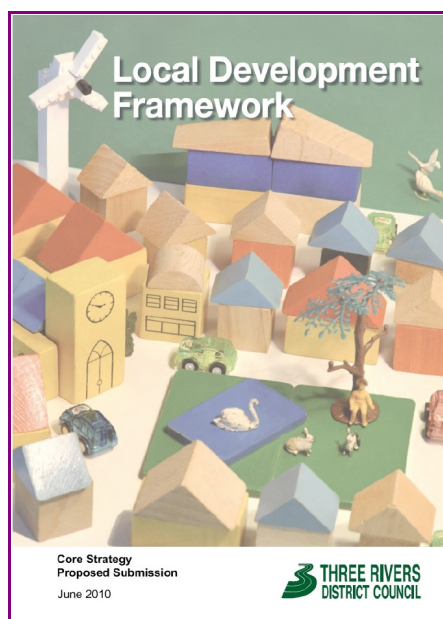
## 1.2 Purpose of this statement

This Statement of representations is in support of the Submission Three Rivers Core Strategy. It has been prepared in accordance with Regulation 30(e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

It sets out the number of representations made during the publication of the proposed submission Core Strategy, and summarises the main issues raised by representations. It also contains additional information about who was invited to make representations and how representations were invited.

A separate consultation statement in accordance with Regulation 30(d) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 setting out who the Council consulted at Issues and Options and Preferred Options stages, how people and organisations were invited to comment, summarising the main issues raised and explaining how these have been addressed has been prepared and is available on our website at <http://www.threerivers.gov.uk/>.

## 2 Publication Stage Consultation 'Core Strategy Proposed Submission June 2010'



Publication stage consultation, also known as Regulation 27 consultation is the final stage of public consultation required on Local Development Framework Development Plan Documents including the Core Strategy. Government regulations required the Council to consult on this stage of the Core Strategy for a period of at least six weeks. During this consultation period, any person or organisation could make representations on the document.

The consultation was approved by the Council's Executive Committee on 29 March 2010 and by full Council on 20 April 2010.

The consultation on the Core Strategy Proposed Submission document started on 11 June 2010. It ended on 23 July 2010. Details of the consultation are available on our website at [www.threerivers.gov.uk](http://www.threerivers.gov.uk).

## 2.1 Who was consulted?

We consulted the following specific consultation bodies:

- East of England Regional Assembly
- East of England Development Agency
- Government Office for the East of England
- The Coal Authority
- Environment Agency
- Natural England
- English Heritage
- Secretary of State for Transport
- Highways Agency
- Hertfordshire County Council
- Watford Borough Council
- Hertsmere Borough Council
- St Albans City and District Council
- Dacorum Borough Council
- London Borough of Harrow
- London Borough of Hillingdon
- Chiltern District Council
- South Bucks District Council
- Buckinghamshire County Council
- Greater London Authority
- London Development Agency
- South East England Development Agency
- Abbots Langley Parish Council
- Chorleywood Parish Council
- Croxley Green Parish Council
- Sarratt Parish Council
- Watford Rural Parish Council
- Bovingdon Parish Council
- Chalfont St Giles Parish Council
- Chalfont St Peter Parish Council

- Chenies parish Council
- Chipperfield Parish Council
- Denham Parish Council
- Flaunden Parish Council
- Gerrards Cross Parish Council
- Kings Langley Parish Council
- Nash Mills Parish Council
- Redbourn Parish Council
- St Michael Parish Council
- St Stephen Parish Council
- East of England Strategic Health Authority
- West Hertfordshire Primary Care Trust
- Hertfordshire Constabulary
- Hertfordshire Police Authority
- Thames Valley Police
- Metropolitan Police Service
- Homes and Communities Agency
- T-Mobile (UK) Ltd
- Vodafone Ltd
- Hutchinson 3G UK Ltd
- National Grid Wireless
- MMO2
- O2 (UK) Ltd
- Orange
- PHA Communication Ltd
- Mobile Operators Association
- British Telecommunications Plc
- Ofcom
- Virgin Mobile
- British Gas Transco
- EDS Energy
- Veolia Water
- Thames Water Utilities Ltd
- Three Valleys Water PLC
- Ofgem
- Strategic Rail Authority
- Network Rail
- BAA Heathrow
- BAA Gatwick
- BAA Stanstead
- London Luton Airport
- Hertfordshire Highways

We also consulted 2,465 people, businesses and organisations using details from our consultation database of respondents to previous stages of Local Development Framework

consultations and people, organisations and businesses who had requested to be kept informed on progress on the Local Development Framework.

## **2.2 How were consultees invited to be involved in the plan preparation?**

Consultation on the Core Strategy Proposed Submission was carried out through a range of measures:

- Providing specific consultation bodies with a copy of the proposed submission documents and inviting them to comment
- Contacting 2,465 general consultees to notify them that the document was available for consultation, where it could be viewed and asking them to comment
- Publishing all consultation material on the Council's website for the duration of the consultation
- Documents were made available for public inspection at the Council's main offices in Rickmansworth and at all libraries in the District
- A public notice in the Watford Observer on 11 June 2010
- Updates were provided at the Abbots Langley Local Area Forum which took place during the consultation period
- All Councillors were informed by email about the consultation and what it covered.

## **2.3 How many representations were received?**

The Council received duly made responses to the consultation by 29 individuals and organisations. These duly made responses have been analysed by Council officers to identify the different representations that have been made. A representation is each different comment made in a response. A response can contain more than one representation.

Each representation has been assigned to the most relevant policy of section of the Core Strategy. A total of 143 representations on the Core Strategy have been identified.

For each representation, we have recorded what each representation has said about whether the Core Strategy is considered to be legally compliant or sound, and where a representation is made in support of the Core Strategy or is commenting where there is no issue over legal compliance or soundness.

Legal compliance and soundness are the main requirements that the Inspector will test the Core Strategy against at Examination. To be legally compliant, the Core Strategy should:

- Be identified in the Local Development Scheme and follow the key stages for document preparation
- Have been informed by community involvement in general accordance with the Statement of Community Involvement
- Be accompanied by environmental assessments required by the law
- Take into account national planning policy and the community strategy and reflect the requirements of the East of England Plan.

The Core Strategy will be considered sound by the Inspector if it is justified, effective and consistent with national policy.

- Justified means that the plan is founded on a robust and credible evidence base showing that the plan is the most appropriate strategy.
- Effective means that the plan is deliverable and that it can be monitored to ensure that it is being delivered.

16 representations considered that the Core Strategy is not legally compliant.

63 representations considered that the Core Strategy is not sound. Of these, 36 representations considered that the Core Strategy is not justified, 34 representations considered that the Core Strategy is not effective and 35 representations considered that the Core Strategy is not consistent with national policy.

48 representations were supporting the Core Strategy.

32 representations were making comments on the Core Strategy that were not related to issues of legal compliance or soundness.

## **2.4 What were the main issues raised by the representations received?**

Table 1 summarises the representations received, and also identifies the main issues that were raised. The table is in plan order.

Representations are presented by policy or chapter. Where we refer to a policy, this includes all representations on that policy and its supporting text.

**Table 1:** Summary of Representations Received and Main Issues Raised: Core Strategy Proposed Submission

Policy/ Part of DPD	Total Representations Received <sup>1</sup>	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
Background and Context	1	0	0	0	0	1	0	No issues raised.
Spatial Vision	4	0	0	0	1	2	1	Ensure that 'environment' specifically includes the historic environment
Strategic Objective 1	4	0	2	1	1	2	0	Changes to the Green Belt would not enhance landscapes near where people live and would reduce property values.
Strategic Objective 2	3	0	0	0	0	2	1	No issues raised.
Strategic Objective 3	2	0	0	0	0	1	1	No issues raised.
Strategic Objective 4	1	0	0	0	0	0	1	No issues raised.
Strategic Objective 5	None	-	-	-	-	-	-	-
Strategic Objective 6	None	-	-	-	-	-	-	-
Strategic Objective 7	None	-	-	-	-	-	-	-
Strategic Objective 8	None	-	-	-	-	-	-	-
Strategic Objective 9	3	0	0	0	0	2	1	No issues raised.
Strategic Objective 10	2	0	0	0	2	0	0	Important buildings are a sub set of heritage assets.
Strategic Objective 11	None	-	-	-	-	-	-	-
Strategic Objective 12	None	-	-	-	-	-	-	-

<sup>1</sup> The representations may not always add up because one representation could consider that the policy or part of the DPD is not sound and not legally compliant, and representations could object on more than one element of soundness.



Policy/ Part of DPD	Total Representations Received	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
Spatial Strategy	17	2	6	6	3	7	1	<p>Plans for 5,000 dwellings and requirement for Green Belt development are not sound without review since scrapping of regional targets.</p> <p>Loudwater should not be included within Rickmansworth.</p> <p>Croxley Green should be classified as a village.</p> <p>The Strategy should state that whilst the emphasis is on previously developed land, it is expected that development on greenfield/ Green Belt land will need to be brought forward at the Principal Town, Key Centres and Secondary Centres.</p> <p>Kings Langley and Carpenders Park should be identified as Key Centres.</p> <p>The list of infrastructure should include waste facilities.</p> <p>Policies not flexible enough to ensure effective delivery of secondary provision during plan period.</p>
Place Shaping Policies	2	0	0	0	0	1	1	No major issues raised.
<b>PSP1</b> Development in the Principal Town	2	0	0	0	0	2	0	No issues raised.

Policy/ Part of DPD	Total Representations Received	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
<b>PSP2</b> Development in the Key Centres	10	2	2	3	3	3	3	<p>Leavesden and Garston and Mill End should not be included as Key Centres as this will lead to an unsustainable pattern of development.</p> <p>PSP2 does not offer any form of protection for the Green Belt around Croxley Green.</p> <p>Croxley Green can not sustain any more major developments.</p> <p>PSP2 should refer to the potential of Leavesden Aerodrome to meet the needs of waste management within the county.</p>
<b>PSP3</b> Development in the Secondary Centres	2	0	1	1	0	1	0	Inconsistent approach to strategic planning of Kings Langley, in particular about the effect of housing growth on school infrastructure.
<b>PSP4</b> Development in Villages	2	0	1	1	0	1	0	Sites at villages should not have to rely on a rural exceptions policy.
<b>CP1</b> Overarching Policy on Sustainable Development	8	0	1	2	1	4	2	<p>Policy should reflect upcoming changes to Part L of Building Regulations and emerging national policy.</p> <p>Policy should allow decentralised energy opportunities to come forward as CO<sub>2</sub> reduction mechanisms.</p>

Policy/ Part of DPD	Total Representations Received	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
CP2 Housing Supply	11	4	7	4	4	1	3	<p>East of England Plan housing targets revoked. Evidence of housing need should be provided to support targets.</p> <p>SHLAA will have included land once classified as previously developed by PPS3 but now classified as undeveloped.</p> <p>Reference to approximately 70% of total housing development to come from within the urban area should be expressed as a range.</p> <p>The housing trajectory should be updated to the latest position.</p>
CP3 Housing Mix and Density	3	0	3	1	0	0	0	<p>Reference to a density of at least 30dph not justified given changes to PPS3 and revocation of East of England Plan.</p> <p>Housing size and type requirements should be considered flexibly on a site by site basis.</p>
CP4 Affordable Housing	3	1	3	2	0	0	0	<p>Unrealistic to expect housing in Bedmond and Sarratt to be entirely affordable, and question that this would be sustainable or contribute to balanced communities.</p> <p>Lowering the threshold below PPS3 levels will impact on deliverability.</p> <p>Affordable housing requirements should take account of site specific circumstances.</p>

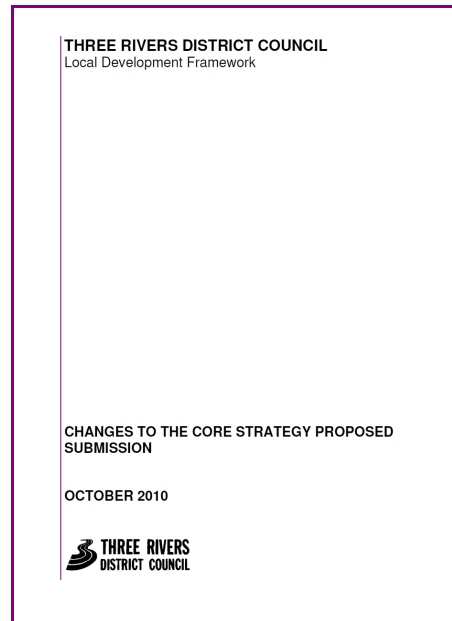
Policy/ Part of DPD	Total Representations Received	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
<b>CP5</b> Gypsy and Traveller Provision	3	0	0	0	1	2	0	Provision of sites should take account of impact on historic assets
<b>CP6</b> Employment and Economic Development	6	1	0	0	2	3	1	Releasing surplus office space from employment should mention consideration for use as affordable housing.  Core Strategy should refer to the economic benefit of leisure and tourism uses and the need to support existing businesses.
<b>CP7</b> Town Centres and Shopping	1	1	1	1	1	0	0	Croxley Green's frontages should be protected and treated in the same way as those in Abbots Langley, Chorleywood and South Oxhey.
<b>CP8</b> Infrastructure and Planning Obligations	8	1	2	3	2	2	2	Document fails to mention future services needed to maintain population or cater for growth of Croxley Green.  Concern that identifying infrastructure requirements on a case by case basis may not be adequate, particularly for cumulative effects of housing development.  Policy should reflect that in some circumstances, development should be conditional upon the repair or enhancements of heritage assets.  Policy should include delivery of infrastructure to contribute to a low carbon future.

Policy/ Part of DPD	Total Representations Received	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
CP9 Green Infrastructure	9	0	0	1	1	2	5	<p>Policy should refer to heritage landscapes.</p> <p>The Infrastructure Delivery Schedule does not identify Green Infrastructure required to support development or partners who will deliver the Green Infrastructure.</p>
CP10 Transport and Travel	3	0	0	0	0	0	3	No major issues raised.
CP11 Green Belt	15	3	7	5	6	5	2	<p>Revisions to Green Belt will depend on review of housing targets.</p> <p>Policy should recognise the importance of land around urban areas (Croxley Green) to those who live and work there.</p> <p>Policy should consider the needs of existing businesses in the Green Belt.</p> <p>Developing Green Belt at the edge of urban areas would not enhance landscapes and would reduce property values.</p> <p>Designation of Merchant Taylors and Royal Masonic Schools as Major Developed Sites in the Green Belt.</p>
CP12 Design of Development	6	0	0	1	1	3	1	<p>Policy should make reference to the design of roads alongside development proposals.</p> <p>Policy should go further in recognising the potential of historic assets to contribute to place shaping.</p>

Policy/ Part of DPD	Total Representations Received	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
CP13 Monitoring and Delivery	None	-	-	-	-	-	-	-
Appendix 1 Schedule of Saved Policies in the Three Rivers Local Plan Superseded by Core Strategy Policies	None	-	-	-	-	-	-	-
Appendix 2 Housing Site Selection Criteria	3	0	0	0	3	0	0	Amend 'archaeological site' criterion to include potential for as yet unknown archaeological potential.  Tool does not appropriately reflect significance of heritage assets and Appendix should be omitted.
Appendix 3 Retail Hierarchy	None	-	-	-	-	-	-	-
Appendix 4 Infrastructure Delivery Schedule	2	0	0	1	1	0	0	Include provision for contributions to conservation and enhancement of heritage assets and their settings.  Remove reference to support of R19 as service withdrawn.
Appendix 5 Green Infrastructure Map	None	-	-	-	-	-	-	-
Appendix 6 Transport Map	None	-	-	-	-	-	-	-
Appendix 7 Monitoring Framework	5	0	0	0	1	1	3	Herts and Middlesex Wildlife Trust should be included as a partner for CP9 indicators.
Appendix 8 Glossary and Abbreviations	None	-	-	-	-	-	-	-

Policy/ Part of DPD	Total Representations Received	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
Appendix 9 Planning Policy Statements and Guidance	None	-	-	-	-	-	-	-
Policy Omission	2	1	0	1	1	0	0	Core Strategy should cover land use requirements and infrastructure needs of farming sector.  Core Strategy should include a policy that specifically deals with the Chilterns AONB.

### 3 Publication Stage Addendum Consultation ‘Changes to the Core Strategy Proposed Submission October 2010’



As a result of the Government’s abolition of Regional Spatial Strategies in July 2010 and responses received to the publication stage consultation the Council consulted on changes to the Core Strategy Proposed Submission.

The consultation was approved by the Council’s Executive Committee on 6 September 2010 and by full Council on 19 October 2010.

The consultation started on 29 October 2010 and ended on 10 December 2010. Details are available on our website at [www.threerivers.gov.uk](http://www.threerivers.gov.uk).

#### 3.1 Who was consulted?

We consulted the following specific consultation bodies:

- East of England Regional Assembly
- East of England Development Agency
- Government Office for the East of England
- The Coal Authority
- Environment Agency
- Natural England
- English Heritage
- Secretary of State for Transport
- Highways Agency
- Hertfordshire County Council
- Watford Borough Council
- Hertsmere Borough Council
- St Albans City and District Council
- Dacorum Borough Council



- London Borough of Harrow
- London Borough of Hillingdon
- Chiltern District Council
- South Bucks District Council
- Buckinghamshire County Council
- Greater London Authority
- London Development Agency
- South East England Development Agency
- Abbots Langley Parish Council
- Chorleywood Parish Council
- Croxley Green Parish Council
- Sarratt Parish Council
- Watford Rural Parish Council
- Bovington Parish Council
- Chalfont St Giles Parish Council
- Chalfont St Peter Parish Council
- Chenies parish Council
- Chipperfield Parish Council
- Denham Parish Council
- Flaunden Parish Council
- Gerrards Cross Parish Council
- Kings Langley Parish Council
- Nash Mills Parish Council
- Redbourn Parish Council
- St Michael Parish Council
- St Stephen Parish Council
- East of England Strategic Health Authority
- West Hertfordshire Primary Care Trust
- Hertfordshire Constabulary
- Hertfordshire Police Authority
- Thames Valley Police
- Metropolitan Police Service
- Homes and Communities Agency
- T-Mobile (UK) Ltd
- Vodafone Ltd
- Hutchinson 3G UK Ltd
- National Grid Wireless
- MMO2
- O2 (UK) Ltd
- Orange
- PHA Communication Ltd
- Mobile Operators Association
- British Telecommunications Plc
- Ofcom
- Virgin Mobile
- British Gas Transco

- EDS Energy
- Veolia Water
- Thames Water Utilities Ltd
- Three Valleys Water PLC
- Ofgem
- Strategic Rail Authority
- Network Rail
- BAA Heathrow
- BAA Gatwick
- BAA Stanstead
- London Luton Airport
- Hertfordshire Highways

In addition we consulted all people and organisations who had responded to the proposed submission consultation, other Hertfordshire local authorities, all developers and landowners on the consultation database, Gypsy and Traveller groups and all Gypsies and Travellers in the District. A list of non-statutory consultees who were consulted on the Changes to the Core Strategy Proposed Submission is at Appendix 1.

### **3.2 How were consultees invited to be involved in the plan preparation?**

Consultation on the Core Strategy Proposed Submission was carried out through a range of measures:

- Providing specific consultation bodies with a copy of the proposed submission documents and inviting them to comment
- Contacting the non-statutory consultees in writing to notify them that the document was available for consultation, where it could be viewed and asking them to comment
- Publishing all consultation material on the Council's website for the duration of the consultation
- Documents were made available for public inspection at the Council's main offices in Rickmansworth and at all libraries in the District
- A public notice in the Watford Observer on 29 October 2010
- All Councillors were informed by email about the consultation and what it covered.

### **3.3 How many representations were received?**

The Council received duly made responses to the consultation by 20 individuals and organisations. These duly made responses have been analysed by Council officers to identify the different representations that have been made. A representation is each different comment made in a response. A response can contain more than one representation.

Each representation has been assigned to the relevant change proposed to the Core Strategy Proposed Submission. A total of 66 representations on the Core Strategy have been identified.

For each representation, we have recorded what each representation has said about whether the Core Strategy is considered to be legally compliant or sound, and where a representation is made in support of the Core Strategy or is commenting where there is no issue over legal compliance or soundness.

Legal compliance and soundness are the main requirements that the Inspector will test the Core Strategy against at Examination. To be legally compliant, the Core Strategy should:

- Be identified in the Local Development Scheme and follow the key stages for document preparation
- Have been informed by community involvement in general accordance with the Statement of Community Involvement
- Be accompanied by environmental assessments required by the law
- Take into account national planning policy and the community strategy and reflect the requirements of the East of England Plan.

The Core Strategy will be considered sound by the Inspector if it is justified, effective and consistent with national policy.

- Justified means that the plan is founded on a robust and credible evidence base showing that the plan is the most appropriate strategy.
- Effective means that the plan is deliverable and that it can be monitored to ensure that it is being delivered.

16 representations considered that the Core Strategy is not legally compliant.

43 representations considered that the Core Strategy is not sound. Of these, 10 representations considered that the Core Strategy is not justified and 33 representations considered that the Core Strategy is not consistent with national policy.

9 representations were supporting the changes to the Core Strategy.

14 representations were making comments on the Core Strategy that were not related to issues of legal compliance or soundness.

### **3.4 What were the main issues raised by the representations received?**

Table 2 summarises the representations received, and also identifies the main issues that were raised. The table is in change reference order. Where a change is not listed in the table, no representations were received against this change.

**Table 2:** Summary of Representations Received and Main Issues Raised: Changes to the Core Strategy Proposed Submission

Change Reference	Total Representations Received <sup>2</sup>	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
AMND1	2	1	1	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND3	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND5	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND6	3	2	0	0	3	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND7	2	0	0	0	0	2	0	No issues raised.
AMND8	4	2	1	0	3	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.  Reference should be made to Greater Watford Economic area.
AMND9	1	0	0	0	0	1	0	No issues raised.
AMND10	3	2	0	0	3	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND11	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND12	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND14	1	1	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.

<sup>2</sup> The representations may not always add up because one representation could consider that the policy or part of the DPD is not sound and not legally compliant, and representations could object on more than one element of soundness.

Change Reference	Total Representations Received <sup>3</sup>	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
AMND17	1	0	0	0	0	0	1	Amend Key Diagram to show Green Infrastructure corridor to north.
AMND20	1	1	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND21	7	3	4	0	3	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.  Evidence for proposed target required.  Reasonable alternatives have not been subject to SA/SEA.
AMND22	1	1	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND23	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND28	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND29	4	3	1	0	3	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.  Figure of 70% housing provision in the urban area should be retained.
AMND31	2	0	1	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.  Discrepancy between the need for housing and the proposed target.

<sup>3</sup> The representations may not always add up because one representation could consider that the policy or part of the DPD is not sound and not legally compliant, and representations could object on more than one element of soundness.

Change Reference	Total Representations Received <sup>4</sup>	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
AMND32	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND33	1	0	0	0	0	0	1	Reduction of Gypsy and Traveller provision should be robustly justified by evidence base.
AMND35	2	0	0	0	0	1	1	Include biodiversity protection when considering Gypsy and Traveller provision on brownfield sites.
AMND36	1	0	0	0	0	1	0	No issues raised.
AMND37	1	0	1	0	0	0	0	Reference to Three Rivers being within the London Arc should be re-instated.
AMND42	1	0	0	0	0	1	0	No issues raised.
AMND43	1	0	0	0	0	1	0	No issues raised.
AMND44	3	0	0	0	0	2	1	No issues raised.
AMND45	1	0	0	0	0	0	1	Include reference to Local Transport Plan 3 and DfT's Active Travel Strategy.
AMND46	2	0	1	0	0	0	1	Refer to HCC Local Transport Plan 3.  Lack of transport evidence base to support policy (objection withdrawn).
AMND48	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND54	1	0	0	0	0	0	1	Upgrade weight of archaeological sites from 'significant' to 'important'.
AMND56	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND57	1	0	0	0	1	0	0	Figure of 70% housing provision in the urban area should be retained.

<sup>4</sup> The representations may not always add up because one representation could consider that the policy or part of the DPD is not sound and not legally compliant, and representations could object on more than one element of soundness.

Change Reference	Total Representations Received <sup>5</sup>	Of which said...						Major Issues Raised
		Not Legally Compliant	Not Justified	Not Effective	Inconsistent with National Policy	Supporting	Commenting	
AMND61	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND62	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
AMND64	1	0	0	0	1	0	0	Document has not been updated to reflect that the RSS is part of the Development Plan.
Core Strategy	7	0	0	0	0	0	7	Council should monitor position in relation to Regional Strategies.  Job targets may need to be reviewed following Autumn 2010 EEFM run.

<sup>5</sup> The representations may not always add up because one representation could consider that the policy or part of the DPD is not sound and not legally compliant, and representations could object on more than one element of soundness.

**Appendix 1: Non-Statutory Consultees Invited to Comment on the Changes to the Core Strategy Proposed Submission**

<b>Respondents to Core Strategy Proposed Submission</b>	
00321	Merchant Taylors School
00327	Royal Masonic School
00334	MEPC
00430	Mr Simon Freethy
00649	Hertfordshire Biological Records Centre
01367	Taylor Wimpey
01762	Croxley Green Residents Association
01764	Hertfordshire County Council Historic Environment
02126	Banner Homes
02127	Warner Bros.
02128	Mr David Wilson
02130	Mrs Sally Chapman
NSI/0204	Mr Brian Thomson
NSO/0015	Thames Water Propoerty
NSO/0029	Theatres Trust
NSO/0039	Wellcome Trust
NSO/0054	British Waterways
NSO/0077	CPRE Hertfordshire
NSO/0078	Chilterns Conservation Board
NSO/0082	Hertfordshire and Middlesex Wildlife Trust
NSO/0084	Ralph Trustees
<b>Other Hertfordshire Local Authorities</b>	
02143	Stevenage Borough Council
02148	Broxbourne Borough Council
02149	East Herts District Council
02150	North Herts District Council
02151	Welwyn Hatfield Borough Council
<b>Gypsies and Travellers and Gypsy and Traveller Groups</b>	
00411	Gypsy Council
00722	Ms Mary Watson
02124	Ms Linda Petryszyn
02144	Mr John Wall-Cash
02145	Mr Jordan
02146	Mr Daly
NSO/0063	Showmens Guild of Great Britain
<b>Developers/Landowners</b>	
00324	DLA Town Planning
00326	WE Black Ltd
00329	Planning Potential
00339	Terence O'Rourke
00347	Mr Iain Taylor
00350	Bidwells



00353	Michael Shanly
00354	Bidwells
00364	Kebbell Country Homes
00365	HTA Planning
00370	Savills
00378	Planning Potential
00381	Mr Roy Beach
00387	Planning Potential
00388	Leukaemia Research Fund
00392	Planning Perspectives
00400	HTA Architects
00416	Complex Developments Ltd
00417	DPP
00419	Taylor Wimpey
00421	Taylor Wimpey
00425	Network Housing Group
00428	Mr Ken Conder
00603	Mr J Cornell
00610	Mr Lanigan
00637	Merchant Taylors Company
00643	Kebbell Homes
00658	Thrive Homes
00660	Yeoman Homes
00681	Land and Partners
00738	Architectural, Planning And Environment (APE)
00740	Nett Assetts
00741	Fairview New Homes
00747	RPS
00755	Consensus Planning
00817	Mr K Murray
00818	Mr C Thurlow
01100	Cornell Family
01370	Canon House Properties
01972	Ms Sheila O'Neill
02100	GL Hearn
02119	Peter Diffey and Associates
02120	Nathaniel Lichfield and Partners
02121	Graham Seabrook Partnership
02123	Watford Community Housing Trust
02126	Banner Homes Ltd
02132	Tempietto Ltd
02134	Hallam Land Management
02136	Pegasus Planning
NSI/0002	Mr Colin Howard
NSO/0004	Lord Young of Grafham
NSO/0010	DLP

NSO/0019	Bidwells
NSO/0036	QUattro
NSO/0038	HTA
NSO/0043	Elizabeth Lawrence Ltd
NSO/0049	TfL Group and Property Services
NSO/0062	Royal British Legion
NSO/0067	Brian Barber Associates
NSO/0080	Home Builders Federation
NSO/0085	National Grid Holdings Ltd
NSO/0091	Kennet Properties