Three Rivers District Council

Examination of Site Allocations Local Development Document

Hearing Sessions

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Introduction
1. The hearing sessions are part of the overall examination of the Three Rivers Site Allocations Local Development Document (SALDD). They will open at 10.00am on Tuesday 15th October 2013 at The Fairway Inn, Moor Lane, Rickmansworth, Hertfordshire, WD3 1QL. A schedule of Matters and Issues that the Inspector wishes to discuss is appended to this note, together with a draft programme for the hearing sessions.

The Inspector
2. Inspector Keith Manning BSc (Hons) BTP MRTP has been appointed by the Secretary of State for Communities and Local Government to examine the soundness of the SALDD prepared by Three Rivers District Council. This guidance note explains the procedural and administrative matters relating to the hearing sessions in the context of the examination process as a whole.

The Programme Officer
3. The Programme Officer (PO) for the Examination is Ian Kemp. He is entirely independent of the Council and works to the direction of the Inspector. Mr Kemp can be contacted on 01527 837920, mobile 07723 009166, by email at idkemp@icloud.com or by post at 49 All Saints Place, Bromsgrove, Worcestershire, B61 0AX.

4. The main tasks of the Programme Officer are to act as a channel of communication between the Inspector and all parties; to liaise with all parties to ensure the smooth running of the Examination; to ensure that all documents received are recorded and distributed; and to keep the Examination Library. Copies of the Examination documents are mainly on the Council’s web site (see below). Anyone interested in viewing any of the documents should contact Mr Kemp beforehand in order to ensure availability.

5. Mr Kemp will be able to tell you how closely the hearing sessions are following the circulated programme. Alternatively, you will be able to view a regularly updated programme on the Council’s Examination website. This will not only provide information about the progress of the Examination and hearing sessions but also provides links to relevant documents:

http://www.threerivers.gov.uk/Default.aspx/Web/SiteAllocationsExaminationPage

Any participant who has a disability that could affect their contribution to the Examination should contact the PO as soon as possible so that any necessary assistance can be provided. All other procedural questions or other matters that you wish to raise prior to the hearings should be made through the PO.

Purpose and scope of the examination
6. The Inspector’s role is to consider whether the SALDD meets the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and associated Regulations and whether it is sound in accordance with the guidance in the National Planning Policy Framework (‘the Framework.’). It is not the Inspector’s role to improve the SALDD. Changes will only be recommended to rectify issues of soundness.
7. To be sound the SALDD must be:

**Positively prepared:** based on an approach which seeks to meet objectively assessed requirements in the context of the Council's adopted Core Strategy and the Framework, consistent with the objective of achieving plan-led sustainable development;

**Justified:** the most appropriate strategy (in this case for site allocations) when considered against the reasonable alternatives and based on proportionate evidence;

**Effective:** deliverable over the plan period and based on effective joint working across administrative boundaries where it is appropriate to do so; and

**Consistent with national policy:** enabling the delivery of sustainable development in accordance with the policies in the Framework.

8. The examination must consider whether the SALDD satisfies the following legal and procedural requirements: whether it has been prepared in accordance with the Local Development Scheme and in compliance with the Statement of Community Involvement and the relevant Regulations; whether it has been subject to Sustainability Appraisal and Habitats Regulations Assessment; whether it complies with national policy; whether it has regard to the Sustainable Community Strategy for the area and whether the Duty to Cooperate has been met.¹

9. The starting point for the examination is the assumption that the Council have submitted what it considers to be a sound plan. The Council should rely on evidence collected while preparing the SALDD to demonstrate that it is sound. Those seeking changes to the plan have to demonstrate why it is not sound and how their suggested changes would make it sound. Representations concerning the SALLD will be considered insofar as they relate to soundness and legal requirements. However, they will not be individually reported on.

10. 271 representations were received on the published SALDD from 58 respondents. All representations made during the consultation will be taken into account by the Inspector in the examination of the SALDD but only insofar as they relate to his consideration of soundness.

11. **Representors should let the Programme Officer know by Friday 27th September 2013** whether or not they wish to be heard at a hearing session. Those who wish to rely on their written representations already submitted should be aware that these carry the same weight.

12. Only those parties seeking specific changes to the SALDD are entitled to participate in the hearing sessions of the examination, and there is no need for those supporting or merely making comments on the plan to attend.

13. At this stage substantial changes to the SALDD should be limited to those required to make it legally compliant and sound. Such changes may be initiated by the Council but may only come about through a ‘main modification’ requested by the Council and recommended by the Inspector.² However, the Council may also consider ‘minor modifications’ are necessary, but these should not affect the substance of the document. If ‘main modifications’ are proposed, these must

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¹ Section 33A of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011
² Section 20 of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011
meet relevant requirements for public consultation and, where appropriate, Sustainability Appraisal.

14. The Inspector will confirm the likely date for the submission of his report at the end of the hearing sessions. The report will set out the Inspector’s conclusions about the soundness of the plan and, where appropriate, will include recommendations on any actions or modifications needed to make the SALDD sound.

15. The possible outcomes of the examination are as follows, bearing in mind that the Council has already indicated\(^3\) (in response to initial concerns expressed by the Inspector) that it wishes to request the recommendation of ‘main modifications’ should the Inspector deem the SALDD (or elements of it) unsound. It could be that, subject to such ‘main modifications’, the SALDD may be found to be sound as currently conceived. If it is not, it may be decided that additional work needs to be undertaken before the examination can be completed. It may be the Inspector’s conclusion that the plan should be more extensively modified than currently anticipated to make it sound (having regard to any implications for consultation and sustainability appraisal). The most serious outcome would be a finding that the SALDD is not sound.

16. Relevant legislation and guidance is referenced in Appendix A

**Examination Programme**

17. The hearing sessions of the examination will commence on **Tuesday 15\(^{th}\) October 2013** and may last for up to **13** days. Sessions will normally start at 10am and 2pm each day, with a break for lunch at about 1pm, and a finish at about 5pm. A short break will be taken mid-morning and mid-afternoon.

18. The **Matters and Issues for the Examination** are included at Appendix B. **Appendix C** is a **Draft Programme**.

19. Every effort will be made to keep to the programme, but late changes may be unavoidable. Priority will be given to starting the debate on each matter at the appointed time, and it may be necessary to extend the discussion in the afternoon session. The Programme Officer will inform the participants of any late changes to the Programme, but it is the responsibility of the participants to keep themselves up to date with the arrangements and Programme.

20. Should changes be required to the Programme, it will be updated on the Council’s web site (see above).

**Procedure at the hearing sessions of the Examination**

21. The topics selected for discussion arise from the tests of soundness and the representations made about soundness. The hearing format will provide an informal setting for dealing with these issues, by way of a discussion led by the Inspector. The Inspector will begin by making a few brief comments on the matters to be covered, before inviting participants to make their contribution to the debate. The session will progress under the Inspector’s guidance, drawing participants into the discussion in such a way as to enable him to gain the information necessary to come to a firm conclusion on the relevant issues. At the end of each session, participants will have the opportunity to sum-up the main points of their arguments. Whilst not necessary, those attending may bring professional advisors with them and, although they may participate, there will be no formal presentation of evidence, cross-examination or formal submissions.

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\(^3\) Letter to Inspector dated 30 July 2013
22. The discussion will focus on the matters and issues set out. The emphasis will be on the tests of soundness and the hearings will be conducted on the basis that everyone taking part has read the relevant documents. The examination will be partly topic based and, because of the site-specific nature of the SALDD and the particular geography of the Three Rivers area, partly area based. Inevitably, therefore, it may be necessary for certain representors to attend both topic based and area based sessions.

**Submission of further written statements**

23. If representors participating in the hearing sessions so wish, they may submit further written statements. These should directly address, as relevant to their case, the matters and issues identified by the Inspector. (See Appendix B)

24. Those who wish to proceed solely by written representations (and are not participating in the hearing) can rely on what they have already submitted in writing. However, representors proceeding by this method may also submit a written statement if they feel it necessary to respond to the matters and issues.

25. Any statements from representors should be succinct and relate solely to the matters raised in their representations. **It would be very helpful for the Inspector to have a brief concluding section which:****

- explains which particular part or parts of the SALDD are considered unsound
- explains why this is so, having regard to the Framework criteria (referring to the key parts of your original representations)
- explains how the SALDD can be made sound
- explains the precise change/wording that is being sought

26. From the Council, a written statement in response to each issue and each particular germane matter is required. These should include full and precise references to the evidence base to justify the relevant policies and allocations and to demonstrate that the SALLD is sound. They should also include references to any main modifications the Council considers necessary to make it sound and set out the Council’s position on changes sought by other parties, where relevant. The Council’s response should take the form of a version of the appended Matters and Issues paper with answers following the questions posed in relation to the seven Issues identified. **For this reason the word limit does not apply to the Council’s statements as it is important that full answers are given.**

27. In the interests of succinctness, written statements should avoid unnecessary detail and repetition. There is no need for verbatim quotations from the Core Strategy, national planning policy or other core documents (references will suffice). Nonetheless, it is vital that the fundamental elements of cases are set out clearly, since the hearing is not the place for new points or evidence to be presented for the first time. All statements should clearly indicate the relevant policy/paragraph/page of any document being referred to. The Council has prepared an evidence base list which includes documents to which parties are likely to need to refer. Most of these will be available on the Council’s web site, which will be regularly updated. Accordingly, parties should not attach extracts of these documents to their Statements as they are already Examination documents. However, where reference is made to an Examination document the reference number should be given as should the section or paragraph where the point referred to can be found. This will allow other participants to see for themselves the context in which the point is made.

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4 i.e. respect the 3,000 word limit as explained below and in Appendix D
28. Appendix D of this document sets out the requirements for the presentation of all Statements. Its provisions should be thoroughly read and implemented. Statements that do not comply with these requirements will be returned. Please note, where applicable, the 3,000 word limit.

29. Participants should attempt to reach agreement on factual matters and statistics before the hearings start and, where practical, maintain a dialogue with the Council and other participants in advance of the hearings. Statements of Common Ground can be a useful way of narrowing the issues in dispute, and should be submitted within the timescales set out below. There is no need to prepare a further statement if all the points are already covered in the original representation, but it would be helpful for participants to notify the Programme Officer if they do not intend to submit further statements.

30. 3 paper copies of each written statement should be sent to the Programme Officer. Separate statements are required for each issue i.e. Hearing Session to aid circulation and web presentation. An electronic copy should also be provided. Statements should be no longer than 3,000 words in respect of each issue. Statements in excess of this or which contain irrelevant or repetitious material are likely to be returned by the Programme Officer for editing. Any technical evidence should be limited to appendices, and should be clearly related to the case.

31. All statements should be received by the Programme Officer by Tuesday 1st October 2013 at the latest. If material is not received by this deadline, the Programme Officer will assume that written statements are not being provided.

32. Participants should adhere to the timetable for submitting written statements. Late submissions and additional papers are unlikely to be accepted on the day of the relevant session, since this can cause disruption and result in unfairness, and may lead to the hearing being adjourned.

Site visit arrangements and close of the examination

33. The Inspector will carry out an unaccompanied tour of the District to familiarise himself with the area, the various sites proposed to be allocated, and suggested alternative or additional sites, as necessary. It may be necessary to arrange accompanied visits of certain sites, for example to gain access to privately owned land, but in general this will not be necessary and the Inspector will indicate those sites where he considers it is. Should participants independently consider an accompanied visit to be essential, they should present their reasons to the Programme Officer.

34. The examination will remain open until the report is submitted to the Council. However, no further representations or evidence will be accepted after the hearing sessions have finished unless specifically requested by the Inspector. Any late or unsolicited material is likely to be returned.

35. The Council may suggest further changes as the Examination progresses. The Schedule of Proposed Changes will be an evolving document and updated regularly. Respondents should monitor these in case they wish to comment upon them.

Action required now

36. Finally, a reminder as to key known dates for participants and representors:
   
   No later than
   
   • Friday 27th September 2013 Inform Programme Officer of desire to be heard
• **Tuesday 1\textsuperscript{st} October 2013** Submit Statements of Common Ground\textsuperscript{5}
• **Tuesday 1\textsuperscript{st} October 2013** Submit statements in accordance with Appendix D guidelines

37. If you have any further questions please contact the Programme Officer:

**Ian Kemp, Programme Officer**

49 All Saints Place
Bromsgrove
Worcestershire
B61 0AX

Tel: 01527 837 920; Mobile: 07723 009 166 E mail: idkemp@icloud.com

\textsuperscript{5} Except for the SoCG on Education Provision currently being prepared by Hertfordshire County Council and TRDC for release in September
Appendix A - Relevant legislation and guidance

A. Legislation

These documents can be searched for and found on: http://www.legislation.gov.uk/

- Planning and Compulsory Purchase Act 2004
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- The Localism Act 2011

B. Government Policy and Guidance

These can be found by using the search facility on: http://www.communities.gov.uk/

- National Planning Policy Framework ('the Framework')

C. Plan Making Manual

The Plan Making Manual has been produced by the Government and is delivered via the Planning Advisory Service web site. Please note that recent changes have been made to Government policy so that the guidance pre-dating 27 March 2012 will not be current.

http://www.pas.gov.uk/pas/core/page.do?pageId=51391

See also: The Principles of Plan-Making:

http://www.pas.gov.uk/pas/core/page.do?pageId=1786265

D. Guidance from the Planning Inspectorate

- Examining Development Plan Documents: Learning from Experience [The Planning Inspectorate, September 2009]

See: http://www.planningportal.gov.uk/planning/planningsystem/localplans

Again, please be aware that these guidance notes are in need of some updating.

E. Examination and Evidence Base Documents

The Examination web site can be found at:

http://www.threerivers.gov.uk/Default.aspx/Web/SiteAllocationsExaminationPage

Many of the above documents and most of the evidence base documents are available on-line on the Council’s web site at:

Appendix B  - Schedule of Matters and Issues

The Inspector has identified the following issues as central to the soundness or otherwise of the SALDD. Participants are invited to focus on these as appropriate to their particular interests, avoiding undue repetition of points already made but having due regard as necessary to the Council’s stated response to their representations as set out in SA CD5a (link below).


**Issue 1: Whether the SALDD has been positively prepared and whether, overall, it will deliver sustainable development in accordance with the broad thrust of the National Planning Policy Framework (‘the Framework’).**

The following matters in particular are germane:

**Q1.1** Whether, during the course of its preparation, there has been adequate cooperation with neighbouring local authorities and other relevant public bodies.

**Q1.2** Whether it is based on a strategy which aims to meet objectively assessed requirements.

**Q1.3** Whether the strategy for allocating sites is adequately justified as the most appropriate, when considered against reasonable alternatives in the context of the Core Strategy and the more recent publication of the Framework.

**Q1.4** Whether the SALDD can be confidently expected to effectively deliver the planned development on the allocated sites over the years to 2026.

**Q1.5** Whether the effectiveness of the SALDD can be adequately monitored over the plan period.

**Q1.6** Whether the SALDD is sufficiently responsive and flexible to achieve the required amount of sustainable development over the plan period.

**Q1.7** Whether the SALDD is complementary to and consistent with the Core Strategy and the Development Management Policies Local development Document (DMPLDD).

**Q1.8** Whether it is necessary or appropriate for the SALLD to depart from the principles contained within those documents and, if so, to what degree?

**Participants**

Three Rivers District Council  
Terence O‘Rourke for WBSL (30015)  
Bidwells for Mr. C. Edwards (30021)  
Bidwells for Wellcome Trust (30031)  
Phase 2 Planning for Mr. S. Lyne (30038)  
CBRE Ltd for TfL Property (30048)
**Issue 2: Whether the SALDD addresses necessary changes to the Green Belt boundary in an appropriate fashion.**

The following matters in particular are germane:

**Q2.1** Whether the Council’s signalled intentions\(^6\) to now remove most allocated edge of settlement sites from the Green Belt, having regard to the need to deliver housing and other forms of development, are sufficient to accord with the intentions of the Core Strategy in that respect.

**Q2.2** Whether the SALDD is too tentative in its approach to altering the Green Belt boundary, as has been suggested, or whether the circumstances of Three Rivers justify a cautious approach focused primarily on the plan period itself.

**Q2.3** Whether, bearing in mind the context of the Framework, it is necessary to provide for ‘safeguarded land’ by removing additional land from the Green Belt and, if so, where and how much?

**Q2.4** Whether the proposed phasing of housing land release to delay the development of allocated edge of settlement sites removed from the Green Belt, in deference to sites coming forward within the urban area, is an appropriate response to the intentions of the Core Strategy and the more recent Framework.

**Q2.5** Whether it would be necessary and appropriate to remove the indicative build area of the proposed school sites from the Green Belt, bearing in mind the matters referred to under Issue 4 and those recently referred to by the Council.\(^7\)

**Participants**

Three Rivers District Council  
Terence O’Rourke for WBSL (30015)  
Bidwells for Mr. C. Edwards (30021)  
Howard Sharp & Partners for GADE Investments (30026)  
Bidwells for Wellcome Trust (30031)  
Phase 2 Planning for Mr. S. Lyne (30038)  
Conrad Strategic Partners Ltd for Maplecross Properties (30040)  
CBRE Ltd for TfL Property (30048)  
Savills for Kennet Properties (30052)  
Hertfordshire County Council (30057)  
DLP for Taylor Wimpey (30058)

**Issue 3: Whether the SALDD provides satisfactorily for the amount and type of local employment, shopping and green infrastructure envisaged by the Core Strategy.**

The following matters in particular are germane:

**Q3.1** Whether the amount of additional employment land identified is adequate to achieve the intentions of the Core Strategy as set out in policy CP6 and those of the Framework to build a strong competitive economy nationally.

\(^6\) Letters to Inspector dated 30\(^{th}\) and 31\(^{st}\) July and 8\(^{th}\) August 2013  
\(^7\) Letter to Inspector dated 31st July
Q3.2 Whether the quality of the land identified is adequate to the task.

Q3.3 Whether the sites identified for mixed use further the cause of achieving sufficient sustainable development to meet both housing and employment needs.

Q3.4 Whether the greater scope for converting offices to housing implicit in recent changes to permitted development rights will exert a material influence on these factors.

Q3.5 Whether the SALDD adequately reflects the intentions of the Core Strategy to maintain and enhance accessible shopping in existing centres and re-balance provision in South Oxhey.

Q3.6 Whether the SALDD will be effective in delivering the Core Strategy objective of a net gain in the quality and quantity of Green Infrastructure in the Three Rivers District.

Participants

Three Rivers District Council
Conrad Strategic Partners Ltd for Maplecross Properties (30040)
Savills for Kennet Properties (30052)

Issue 4: Whether the SALDD provides satisfactorily for the provision of new schools over the plan period.

The following matters in particular are germane:

Q4.1 Whether the sites identified for secondary schools should be reserved exclusively for that purpose, even if they are not, in the event, required during the plan period.

Q4.2 Whether, in that context, and in the context of Issue 2 more generally, the site identified at Baldwins Lane should be supplanted by or combined with an allocation for housing, as has been suggested.

Q4.3 Whether, as has also been suggested, the need for the school in this area would be better served by an alternative site.

Q4.4 Whether one of the two sites identified in the west of the District has decisive advantages which should lead to a firmer stance on the question of which should be taken forward.

Q4.5 Whether it is necessary to allocate land for primary education in any particular area and, if so, whether this should be part of a larger residential development as has been suggested, for example, at Woodside Road, Abbotts Langley.
Participants

Three Rivers District Council
Bidwells for Mr. C. Edwards (30021)
WD3 School Action Group (30027)
Conrad Strategic Partners Ltd for Maplecross Properties (30040)
CBRE Ltd for TfL Property (30048)
Savills for Kennet Properties (30052)
Hertfordshire County Council (30057)
DLP for Taylor Wimpey (30058)

Issue 5: Whether the approach anticipated for Langleybury and the Grove (Policy SA7) is appropriate in the context of relevant policy

Bearing in mind the representations from English Heritage, the following matters in particular are germane:

Q5.1 Whether the adopted development brief and the SALDD are mutually consistent.

Q5.2 Whether the SALDD is consistent with national policy in respect of heritage assets.

Q5.3 Whether the anticipated housing and other development may be considered ‘enabling’ development.

Q5.4 Whether the proposed development as a whole may be considered sustainable.

Q5.5 Whether the anticipated housing and other development would be regarded as inappropriate within a Green Belt or whether it may be regarded as not inappropriate.

Participants

Three Rivers District Council
English Heritage (30044)

Issue 6: Whether the SALDD provides satisfactorily for the amount and type of housing proposed by the Core Strategy and in the broad locations in which the latter intends it should be developed.

The following matters in particular are germane:

Q6.1 Whether housing sites should be chosen by ‘sustainability score’ and ‘ranking’ or on the basis of their specific ‘merits’.

Q6.2 Whether the availability, suitability and viability of each of the allocated housing sites is based on firm knowledge or, alternatively, realistic assumptions informed by credible evidence.
Q6.3  Whether allocated sites currently in active use for other purposes are appropriately allocated for housing, having regard to employment and local services.

Q6.4  Whether the allocated sites are broadly in the right locations.

Q6.5  Whether the allocated sites are, in practical terms, accessible.

Q6.6  Whether the density assumed for each site is a realistic and appropriate reflection of its potential, having regard to social, environmental and economic considerations and the explicit intentions of Core Strategy policy CP3.

Q6.7  Whether, having regard to the above matters, the likely distribution of the planned housing will be sufficiently in accordance with the intentions of the Core Strategy to produce a spatial outcome that may be considered sustainable as the strategy intends.

Q6.8  Whether, having regard to the above matters, the temporal outcome will serve to sustain a housing trajectory that will provide for the minimum requirements of the Framework in respect of ongoing housing land availability.

Q6.9  Whether the intended phasing of the allocated sites over the plan period is sufficiently clear and robust to be effective and whether it will, in practical terms, serve Core Strategy and Framework intentions to promote sustainable development.

Q6.10  Whether there are key infrastructure constraints that will materially influence the above matters over the course of the plan period and, if there are, whether sufficient account has been taken of them.

Q6.11  Whether it is reasonable and realistic to rely on a windfall allowance of 38 dwellings per annum beyond 2021.

Q6.12  Whether there are key environmental constraints including flood risk, groundwater protection and biodiversity objectives that will materially influence the above matters over the course of the plan period and, if there are, whether sufficient account has been taken of them.

Q6.13  Whether, having regard to the above matters, alternative and/or additional housing sites should be allocated for release during the plan period, so as to meet the requirements and intentions of the Core Strategy and the Framework.

Q6.14  Whether, in this context, specific alternative and/or additional housing sites advanced by objectors to the SALDD have decisive merits.

Participants

Three Rivers District Council
Howard Sharp & Partners for GADE Investments (30026)  (Plus K / A Langley Session)
J & J Design for New Gospel Hall Trust (30030)  (Omission Site Session)
Bidwells for Wellcome Trust (30031)  (Plus Omission Site Session)
Phase 2 Planning for Mr. S. Lyne (30038)  (Plus K / A Langley & Omission Site Session)
Rickmansworth Neighbourhood Forum (30043)  (Plus Rickmansworth Area Session)
Issue 7: Whether the SALDD creates an adequate framework for the regeneration of South Oxhey.

The following matters in particular are germane:

**Q7.1** Whether the net gain in housing envisaged is deliverable and appropriate to needs.

**Q7.2** Whether the resources are available to realise the vision for the area within the plan period.

**Q7.3** Whether implementation mechanisms complementary to the land allocations for housing, shopping and mixed use development have been identified and, if so, whether there is sufficient confidence that they will be able to deploy the available resources effectively.

**Participants**

Three Rivers District Council
Hertfordshire County Council (30057)
### Appendix C – Draft Programme

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<td>Issue 1</td>
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<td>p.m. Schools and School sites</td>
<td>Issue 4</td>
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<td>p.m. Housing – Current supply and trajectory - Compatibility with NPPF criteria</td>
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<td>a.m. Accompanied site visits <strong>(Venue unavailable)</strong></td>
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<td>a.m. Housing sites - Kings Langley &amp; Abbots Langley</td>
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<td>p.m. Housing sites – Croxley Green</td>
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<td><strong>Day 10</strong> Wednesday 30 October</td>
<td>a.m. Alternative/additional sites – Woodside Road, Abbots Langley, Fairways Farm, land at East Lane, Bedmond Village, land opposite Kings Langley Station</td>
<td>Issue 6 (area based)</td>
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<tr>
<td>Time</td>
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<td>p.m.</td>
<td>Alternative/additional sites – Wellcome Trust site, Kings Langley, 59 – 99 Ebury Road, Rickmansworth</td>
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Appendix D - Format for statements

A. Please send, where possible, e-mailed electronic versions of all Statements and Appendices to the Programme Officer (in Word or PDF format) for the Examination web site as well as three paper copies as detailed below.

B. The need for succinct submissions with the avoidance of unnecessary detail and repetition of the original representation is emphasised.

C. **A separate statement should be submitted for each Issue you are addressing.** For administrative reasons, it is not appropriate to submit a single statement covering multiple issues or sessions.

D. It is the quality of the reasoning that carries weight not the bulk of the documents. There is no need for verbatim quotations from the LDD or other sources of policy guidance. It is vital that the fundamental elements are set out clearly and succinctly – the hearing session is not the place for surprise contributions!

E. None of the statements should be longer than **3,000 words**. For the avoidance of doubt, this limit applies to the statement for the Issue as a whole, not for the individual Questions within an Issue. Any submissions longer than this will be returned by the PO for editing. Statements should be prepared on A4 paper, printed on both sides, and **not bound** but just stapled and hole punched. Any photographs should be submitted in A4 format and should be annotated (back or front).

F. Supporting material in the form of appendices to statements should be limited to that which is essential and should not contain extracts from any publication that is already before the Examination, such as evidence base documents and nationally available Government guidance – a paragraph or page reference will suffice. Any appendices should have a contents page and be paginated throughout. Whilst the word limit does not include text in appendices, the aim of succinctness should be respected. Anyone submitting appendices should indicate in their statement which parts they are especially relying upon.

G. Those submitting statements (or further written representations) should submit **three hard copies** to the PO (for the Inspector, Council, and Programme Officer).

H. All participants should adhere to the timetable for submitting statements. Late submissions and additional material are unlikely to be accepted on the day of the relevant hearing session since this can cause disruption and result in unfairness and the adjournment of the hearing. If material is not received by the deadlines stated below, the Programme Officer will assume that you are relying on your original representation:

- Statements of Common Ground: in time to feed into Statements or (as a last resort) at least **2 weeks** before the relevant programmed hearing, if agreed.
- All Statements: by **midday on 1st October 2013**.
- **It is stressed that this last deadline refers to the receipt of both electronic and paper copies of statements. It is not sufficient to**
send an electronic copy by this deadline to be followed by paper copies at a later time.

- All paper copies of statements should be addressed to the Programme Officer at the following address:

  Mr Ian Kemp  
  49 All Saints Place  
  Bromsgrove  
  Worcestershire  
  B61 0AX