



CORE STRATEGY REPORT OF REPRESENTATIONS

PART 1

Contains:

- **Main Report**
- **Annex A: Notification**

MAIN MODIFICATIONS

April 2013

This publication is **Part 1 of the Report of Representations for the Main Modifications to the Pre-Submission Core Strategy**. It contains a summary of the Main Modifications consultation process and discusses the main issues raised.

Part 2 comprises Annex B of the Report of Representations: it contains the results of the consultation on the Main Modifications to the Pre-Submission Core Strategy, together with the responses to the question about the impact of the revocation of the Regional Strategy.

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ANNEX B: RESULTS

Table 1 – List of Groups / Individuals from whom Representations were received

Table 2 – Number of Representations considered

- (a) Main Modifications**
- (b) Revocation of Regional Strategy**

Table 3 - Main Issues raised and Council's Response

- (a) Main Modifications**
- (b) Revocation of Regional Strategy**

Table 4 – Suggested Changes to the Main Modifications

Table 5 – Responses not considered in the Report of Representations

- **List of those making No Comment**
- **List of those making comments on the Sustainability Appraisal and Strategic Environmental Assessment**

1. INTRODUCTION

Background:

- 1.1 Dacorum's Core Strategy was submitted for Examination on 22nd June 2012. Following a two week hearing in October, the Inspector published his initial advice to the Council on 19 November 2012 (see Appendix 1). The Council notified the Inspector of its intention to publish a series of Main Modifications, in accordance with this initial advice on 30 November 2012 (see Appendix 2).
- 1.2 The Inspector advised the Council which modifications were considered to fall into the category of 'Main Modifications.' The wording of the question about the implications of the Regional Strategy revocation was agreed with the Planning Inspector. All communication with the Inspector was via the Programme Officer, Mr Ian Kemp.
- 1.3 The Council also decided to take the opportunity to seek feedback on a series on Minor Modifications at the same time. These are less significant changes which do not affect the soundness of the policies, but, in the Council's opinion, benefit clarity and accuracy in presentation of the Core Strategy.
- 1.4 These three components, i.e.:
 - 1) the Main Modifications
 - 2) the question about the implications of the revocation of the Regional Strategy; and
 - 3) the Minor Modifications,are collectively referred to in this report as the 'Proposed Modifications.'
- 1.5 Representations concerning items (1) and (2) above are being referred to the Inspector for consideration and are the subject of this report. Representations regarding item (3) will be considered by the Council only and will be separately summarised and reported through the Council's internal processes.
- 1.6 The Proposed Modifications were considered by the Council's Cabinet on 11 December 2012 (Appendix 3). Following consideration of the wording of the Proposed Modifications by Cabinet, feedback was received from the Inspector regarding the proposed wording of the Main Modifications. This feedback resulted in a small change to the text of MM28 relating to the early partial review of the Core Strategy being proposed and minor changes to MM5 and MM10 to aid clarity. These wording changes were agreed through a Portfolio Holder Decision (Appendix 4), before being agreed alongside the other Proposed Modifications by Full Council on 16 January 2013 (Appendix 5).

- 1.7 A Sustainability Report Addendum, which assesses the potential social, economic and environmental implications of the Proposed Modifications, was also published for comment alongside the Proposed Modifications. This considered the implications for Habitats Regulations Assessment and concluded that the conclusions of the HRA Update Summary Report (September 2011) stand.

Consultation Procedures

- 1.8 The procedure followed for the Proposed Modifications mirrored that of the Pre-Submission Core Strategy, i.e. Regulation 27 (Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008), namely to:
- publicise the Proposed Modifications to the Pre-Submission Core Strategy; advertise the representations procedure and the availability of the proposed modifications;
 - make the Proposed Modifications available on the Council's website, at the main Council office and other places the Council considered appropriate; and
 - contact the consultation bodies notified under Regulation 25.
- 1.9 Consultation bodies comprised specific consultation bodies listed in the regulations and general consultation bodies. A statement of the representations procedure was set to all the consultation bodies (Appendix 6). The specific consultation bodies were also sent a copy of the Proposed Modifications document.
- 1.10 Any person could make representations on the Proposed Modifications, provided the representations were sent to the Council (at Hemel Hempstead) within the specified 6 week time period (Regulation 28). This time period began on 23 January and ended at 5.15pm on 6 March 2013.
- 1.11 A copy of all relevant documentation was also sent to the Planning Inspector, Mr David Hogger, via the Programme Officer.
- 1.12 This report – the Report of Representations – contains:
- a record of the publicity given to the Proposed Modifications consultation, including a list of organisations (or consultation bodies) notified;

- a statement of the number of representations received on the Main Modifications and the question about the impact of the revocation of the Regional Strategy;
- a summary of the main issues raised by these representations and the Council's response to these issues; and
- a summary of the suggested amendments to the Main Modifications as a result of the above.

1.13 It does not cover the representations received on the Minor Modifications to the Core Strategy. These representations will be considered separately.

2. NOTIFICATION AND PUBLICITY

- 2.1 The Main Modifications stage was a formal one, designed to allow for representations about the soundness of the changes proposed to the Core Strategy.
- 2.2 The approach satisfied the intention set out in the Statement of Community Involvement. Under 'Submission to the Secretary of State' (in that document), the Council said it would use the following techniques of consultation:
- advertising in the local press;
 - displaying documents on the Council's website;
 - making documents available at Council offices (the deposit points)
 - by letter; and
 - sending documents to appropriate consultation bodies.

Consultation

- 2.3 The consultation was announced by a local advertisement, by notification on the Council's Core Strategy Examination webpage (www.dacorum.gov.uk/corestrategyexamination) and by direct notification.
- 2.4 The advert, which comprised the Statement of Representations Procedure, (Annex A: Appendix 6) appeared in both The Gazette and St Albans Review on Wednesday 23 January.
- 2.5 Stakeholders and representative groups were directly notified (see AnnexA: Appendix 7 for a distribution list and a list of consultation bodies notified). Sample copies of the letters, memos and emails are contained as Annex A: Appendix 8. Individuals who had previously commented or who had requested to be notified were also contacted. This notification amounted to around 1,500 people or organisations. Each notification was accompanied by a notice with a Statement of Representations Procedure (see Annex A: Appendix 6).
- 2.6 Some organisations (including specific consultation bodies) were also sent a copy of the documents.
- 2.7 All information was available on the Council's website – including a link to the consultation portal on the homepage – and from Council offices and local libraries.

3. RESULTS

- 3.1 In total 141 representations were received, from 63 different groups / individuals.
- 3.2 133 of these representations relate to the Main Modifications. 35 were in support of the changes, whilst 98 were objections.
- 3.3 7 representations relate to the question about the revocation of the Regional Strategy. 1 representation has been treated as a general comment (see paragraphs 3.11-3.13 below).
- 3.4 A list of the organisations and individuals from whom representations were received is contained as Annex B: Table 1.
- 3.5 All valid representations were analysed. All were checked to ensure the correct boxes had been completed, in particular to see:
- whether the commenter was supporting or objecting;
 - which of the Proposed Modifications their representation(s) related to; and
 - whether the commenter said the Core Strategy, incorporating the Proposed Modifications, was legally compliant and/or was sound.
- 3.6 Annex B, Table 2 provides a full statistical breakdown of representations.
- 3.7 Where the commenter did **not** comment on legal compliance and soundness, the following assumptions were made:
- Supporting representations meant that the Core Strategy was both legally compliant and sound.
 - Objections meant that the Core Strategy was unsound (but normally legally compliant).
 - If an objector had complained about the process, he/she felt the Core Strategy was not legally compliant.
- 3.8 Reasons for lack of soundness are recorded in Table 2: i.e.
- not justified,
 - not effective,
 - not consistent with national policy, and/or
 - not positively prepared.
- 3.9 Sometimes more than one reason was given. However where a commenter did not give reasons, their objection was recorded as “commenting” in Table 2 (in Annex B).
- 3.10 All valid representations have been made available for inspection on the Council’s website (electronic copies) and at the Civic Centre in Hemel Hempstead (paper copies).

- 3.11 In addition to the representations covered in Annex B, Table 3, a general comment was received from Natural England providing additional information for consideration. None of the matters relate directly to the Main Modifications. Rather they relate to.
- the need to update the Habitats Regulation Assessment in the light of the Proposed Modifications;
 - the need to ensure the Plan adequately refers to the Chiltern Beechwoods Special Area of Conservation (SAC) and the protection this designation should be accorded.
- 3.12 Points raised in connection with the second bullet point will be considered as part of the minor changes process.
- 3.13 No substantive submission was received about the Sustainability Appraisal (incorporating Strategic Environmental Assessment) that accompanied the Proposed Modifications.

4. SUMMARY OF THE MAIN ISSUES

Main Modifications:

- 4.1 Many of the objections raised to the Main Modifications were of a general nature and did not relate directly to the amended text itself.
- 4.2 They include concerns relating to:
- The process being followed;
 - Key policy principles that underpin the Core Strategy; and/or
 - Text that forms part of a wider policy / paragraph, but is not directly affected by a Main Modification itself.
- 4.3 The majority of the responses received to the consultation also repeated issues that had already been considered through the Examination process – either through objections to earlier stages of the Core Strategy; within the Issues Papers prepared by the Council and other parties in advance of the hearings; or through the hearings themselves. These repeated issues included:
- The approach to the timing and delivery of the Local Allocations;
 - The adequacy of the housing target;
 - The robustness of key parts of the evidence base;
 - Whether the wording of policies is sufficiently clear and/or flexible.
- 4.4 Rather than repeat its previous response(s) to these issues, the Council has included cross-references to relevant Issues Papers and Examination Documents within the summary of objections (see Annex B: Table 3).
- 4.5 Relatively few of the representations received raised genuinely ‘new’ issues. Most of the new issues related to:
1. The compliance of policies and/or text with the National Planning Policy Framework;
 2. The legality of the Main Modifications process; and/or
 3. The wording of partial review text.
- 4.6 These new issues are considered in turn below.

Compliance with the NPPF

- 4.7 The National Planning Policy Framework (NPPF) was published in March 2012. This was after the Pre-Submission Core Strategy was published and consulted upon, but before it was submitted for Examination.
- 4.8 A NPPF compliance check was carried out on the Core Strategy prior to its submission (see Examination Document OT7: An Assessment by Dacorum Borough Council of its Pre-Submission Core Strategy (NPPF Compliance Checklist), June 2012). This checklist used the standard template provided by Planning Advisory Service (PAS).

- 4.9 As a result of this checking process, a number of changes were proposed through the Report of Representations (Examination Documents SUB5). The most significant changes related to Policy CS5: Green Belt, with consequential changes to Policy CS7: Rural Area. Some other changes were proposed prior to the Examination through the Schedule of Proposed Examination Changes. These changes have now been formalised and subject to consultation through the Proposed Modifications process.
- 4.10 The Core Strategy (with the Proposed Modifications) is considered to be consistent with the NPPF. Where policies elaborate on the principles set out within the NPPF, this is justified by local circumstances and is usually a roll forward of a longstanding and effective policy approach.

Legality of the Main Modifications Process

- 4.11 Several objections raised concerns about the legality of the Main Modifications process itself.
- 4.12 The most significant concern raised by objectors was whether Main Modifications could be used, in their words, *'to make an unsound plan sound.'*
- 4.13 On this particular point, the Council considers that the Inspector is under an obligation to reach his own conclusion on whether the Core Strategy is sound. Paragraph 182 in the NPPF identifies four tests of soundness. The Inspector can find the Core Strategy sound as submitted: i.e. on all four tests of soundness.
- 4.14 However if he finds an element that is unsound, he must either recommend non-adoption or, if satisfied that the duty to co-operate (with adjoining authorities and relevant others) has been complied with and if asked by the Council (as local planning authority), he must recommend modifications of the document in order to make it sound.
- 4.15 The Council considers that it has satisfied the duty to co-operate in the preparation of the Core Strategy and that with Main Modifications the Core Strategy should be declared sound.
- 4.16 A number of respondents to the Main Modifications have argued that the soundness issues identified by the Inspector cannot lawfully be addressed by means of the early partial review option. These representations make the same point in a variety of ways but, in essence, the contention is that it is not open to an Inspector to recommend adoption (or to a planning authority actually to adopt) a development plan document which has been identified as unsound where the only

recommended means to address this unsoundness is a commitment to an early review of the unsound elements.

- 4.17 The Council is following a course of action suggested by the Planning Inspector as set out in his Preliminary Findings (19 November 2012). Other options were put forward for consideration, but the route of the Main Modifications was clearly supported by the Inspector. This process is not unusual and has been used for a number of other Core Strategies, with Milton Keynes and Hertsmere being the most recent examples locally.
- 4.18 The role of the Preliminary Note was to explain the basis of the Inspector's concerns regarding matters relating to housing and Green Belt and to invite the Council's view on how these should be resolved. The inspector was careful to stress that this preliminary view "*.....should not be taken as my conclusion on the soundness of the Core Strategy*".
- 4.19 In its letter of 30 November, the Council confirmed that its preferred approach was to pursue the early partial review option. The Proposed Modifications to the Core Strategy were published to give effect to this commitment. MM28 proposes the insertion of new text specifically referring to the partial review process.
- 4.20 In order to satisfy itself, the Council has sought Counsel's opinion on whether, with modifications, the Dacorum Borough Council Core Strategy can properly be found to be "sound" for the purposes of section 20 of the Planning and Compulsory Purchase Act 2004.
- 4.21 It is noted that there is no statutory definition of the term "sound". Its meaning comes from being read in its full context. An important part of that context includes section 19 of the Act which deals with the stage of plan preparation, i.e. prior to submission for independent examination.
- 4.22 Within the NPPF itself, the requirement for soundness is explained under the heading *Examining Local Plans* as follows:
- "A local planning authority should submit a plan for examination which it considers is "sound" – namely it is*
- **Positively prepared** - *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
 - **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.¹

4.23 Whilst this is the Government’s policy guidance on the approach to soundness to which both local planning authorities and Inspectors should attach significant weight, it is not, nor does it purport to be, a statutory definition of soundness.

4.24 Counsel draws attention to the previous case of Barratt Developments PLC v The City of Wakefield MBC [2010] EWCA Civ 897, where the Court of Appeal considered the very similar guidance on soundness contained in PPS12 (June 2008). As to its status Carnwath LJ said:

*“I would emphasise that this guidance, useful though it may be, is advisory only. Generally it appears to indicate the Department’s view of what is required to make a strategy “sound”, as required by the statute. Authorities and inspectors must have regard to it, but it is not prescriptive. Ultimately it is they, not the Department who are the judges of “soundness”. Provided that they reach a conclusion which is not “irrational” (meaning “perverse”), their decision cannot be questioned in the courts. The mere fact that they may not have followed the policy guidance in every respect does not make the conclusion unlawful”.*²

4.25 It is not necessarily *irrational* to recommend adoption of a Local Plan which does not plan to meet objectively assessed needs in full. The NPPF soundness criteria are not expressed in terms which allow them to be treated as absolutes. Indeed, there may well be tensions between them. For example, when all of the relevant circumstances taken into account, the most appropriate strategy for the plan area may not be one which, at the time it is being examined, is consistent with national policy. In those circumstances, it is a matter for the inspector to decide what weight to give to each of the indicative factors and to form overall soundness judgment. Provided that judgment is not irrational, it is lawful.

4.26 In this context, it is important to have regard to the NPPF as a whole rather than to be selective. For example, the requirement that objectively assessed needs must be met in full, is not itself an unqualified

¹Para. 182

²Para.11

requirement. Paragraph 47 of the NPPF applies a proviso: “*as far as is consistent with the policies set out in this Framework*”. The NPPF is recognising that there may be particular local circumstances which prevent the full needs being met. These wider issues are addressed by the Council in Examination Document HG16: Background Paper: Selecting the Background Housing Target (June 2012) and summarised in its closing statement at the hearings.

- 4.27 There is therefore no proper basis upon which to claim that the option of an early partial review is in principle unlawful. To date, all that the Inspector has done is to set out his preliminary findings. It is for the Inspector to decide in his final report whether there are other planning advantages which, when assessed against the NPPF as a whole, support a conclusion that the partial review approach is the most appropriate strategy.
- 4.28 The Council has sought advice on the Counsel opinions submitted by two of those making representations on the Proposed Modifications (Barton Wilmore representing Cala Homes and Emery Planning representing Waterside Way Sustainable Planning Ltd). Neither of these Counsel opinions, or any of the representations received mention the Barratt case and the judgement of Carnwath LJ referred to above. All also overstate the significance of the NPPF tests in forming the soundness judgment required by section 20 of the 1990 Act.
- 4.29 It is therefore wrong to contend that the partial review option is foreclosed as a matter of principle on the basis of the Inspector’s findings and premature to contend that adopting it would be unlawful when the Inspector has yet to consider all of the circumstances which are relevant to the exercise of his duty in examining the Core Strategy. It is also wrong to characterise the partial review option as effectively allowing an unsound plan to be adopted. In essence, by requiring a Main Modification that refers to a partial review, the Inspector would be accepting that there are issues which potentially go to soundness in the plan which, although they could not be tolerated for the full plan period, they would be acceptable (and thus sound) provided that they are corrected at an early stage.
- 4.30 What Main Modification MM28 effectively does is to conclude that the issues which potentially go to soundness identified by the Inspector should not be left for the full plan period: they should be addressed further and, as appropriate, corrected.

Wording of the Partial Review Text

- 4.31 In addition to raising concerns about the early partial review option itself, many objections raised concerns about the detailed text referring to this process. This text is set out in MM28.

- 4.32 The Council made a change from the original wording of MM28 considered by Cabinet on 11 December 2012 to that agreed by Full Council on 16 January 2013 (see paragraph 1.6 above). This change was made as a result of feedback from the Inspector requesting the text to be more specific regarding when the partial review would commence.
- 4.33 It is considered more appropriate to include the main information relating to the timing and content of the partial review within a revised Local Development Scheme (LDS), rather than in the Core Strategy itself. The LDS will be reviewed following adoption of the Core Strategy and may be amended from time to time. The 3 year programme (timetable) is reviewed annually as part of the Annual Monitoring Report (AMR) process. While the challenge for the Council is to align its progress with neighbouring authorities, the Council understands the desire for an effective and expeditious approach. It therefore has no objection to the following text being added to the end of paragraph 29.9 in MM28: *“The Council will aim to adopt the review by 2017/18”* if this would help overcome some of the concerns raised and provide greater clarity regarding expected timing.

Revocation of the Regional Strategy:

- 4.34 Relatively few issues were raised with regard to the implications of the revocation of the Regional Strategy. Most comments were general in nature and stressed the increased importance of:
- cross-boundary working
 - meeting full objectively assessed housing needs
 - the role of the Green Belt; and
 - the role of the evidence base that underpinned the Regional Strategy.
- 4.35 The Council’s response to these (and other) issues is set out in Annex B: Table 3.

Conclusions:

- 4.36 As a result of the comments made and a further consideration of the text of the Main Modifications, the Council wishes to put forward three small amendments to the wording for consideration by the Inspector.
- 4.37 These amendments relate to the following Main Modifications:
- MM21 – Policy CS29
 - MM24 – Policy CS33
 - MM28 – partial review text
- The reasons for the changes are explained in Annex B: Table 3(a), with the suggested revised wording set out in Annex B: Table 4.

Preliminary Advice from Planning Inspector

Examination of the Dacorum Core Strategy

Inspector's Preliminary Findings on Matters Relating to Housing Provision and the Green Belt

19 November 2012

1. Following the close of the hearing sessions into the Dacorum Core Strategy (CS) and having considered all the evidence, including the answers to the questions I posed during the hearing sessions (and the subsequent consultation responses), I consider that there is a shortcoming in the document, relating to soundness, which the Council may wish to address. The purpose of this note is to explain the basis for my concern and to invite the Council's view on how it should be resolved. It should not be taken as my conclusion on the soundness of the CS.

2. The Council confirmed that in its view 11,320 dwellings over the plan period would meet objectively assessed needs (as referred to in paragraph 14 of the NPPF). However, in my view that figure does not represent full objectively assessed need, rather it represents a level of development that in the Council's opinion could be satisfactorily accommodated in the Borough without detriment to other policy constraints as set out in the NPPF.

3. I consider the starting point should be the identification of full 'objectively assessed needs' (paragraph 47 of NPPF). The most recent CLG household projections¹ indicate a need for 13,500 new households in the Borough (about 540 dwellings a year) over the plan period and there is also a significant need for affordable housing. The population projections also identify a significant growth². Whilst I understand the Council's concerns regarding the robustness of the figures, I am mindful of the advice in paragraph 159 of the NPPF regarding meeting household and population projections.

4. Having identified the full need, the Council should then have undertaken the appropriate analysis to ascertain whether or not that full need for market and affordable housing could be met, remembering that the objective is to 'boost significantly the supply of housing'. It may be that the Council would have reached similar conclusions as it has done in relation to the submitted Core Strategy but without a more thorough analysis I cannot be certain that this would have been the case.

5. I have two specific concerns: the lack of a robust and comprehensive green belt review and the limited emphasis that appears to have been given to the role that neighbouring local planning authorities could play in accommodating some of Dacorum's housing needs.

6. Whilst it is correct that great importance should be attached to green belts, paragraph 83 of the NPPF advises that green belt boundaries should

¹ CLG 2008 based

² ONS Interim 2011 based projections

be capable of enduring beyond the plan period and bullet point 3 of paragraph 85 suggests that 'safeguarded land' could be identified to meet longer term needs, stretching well beyond the plan period.

7. Documents HG10³ and HG15⁴ assess a number of sites against a range of criteria, including impact on the Green Belt and there is no reason to challenge, in themselves, the conclusions that are drawn. However, there appears to be little weight given to accommodating the full objectively assessed housing need, as identified for example in the CLG projections.

8. I acknowledge that the situation may change but there is no reason to conclude that the needs for housing in Dacorum Borough will not continue to grow beyond 2031. In these circumstances and bearing in mind the tight constraint which the green belt imposes (together with the AONB elsewhere in the Borough) I am not satisfied that longer term development needs could be satisfactorily accommodated.

9. With regard to neighbouring local planning authorities making a contribution to meeting the housing needs of Dacorum, this is clearly not a new concept, particularly in terms of St Albans City and District (which is immediately to the east of Hemel Hempstead). Hemel Hempstead is rightly identified in the CS as the main centre for sustainable development and change in the Borough and in my view every opportunity for re-enforcing the role of the town and making the best use of the facilities and services that it provides should have been robustly assessed (together with any consequential infrastructure improvements).

10. Whilst it is clear that Dacorum and St Albans have 'co-operated', particularly with regard to the joint Area Action Plan, it appears to me that the co-operation was directed more towards securing protection for the land in St Albans District between Hemel Hempstead and the M1, rather than investigating ways in which the area could contribute towards meeting the full housing needs of Dacorum. Bearing in mind the conclusion in HG10 that 'if significant expansion of Hemel Hempstead is required, this should be taken forward in the form of the eastern growth option' (i.e primarily within St Albans City and District), then I consider the Council should have attached greater weight to the role that this area could play in meeting the Borough's housing needs more fully.

11. In summary there is insufficient substantive evidence to enable me to confidently conclude firstly that the figure of 11,320 dwellings represents full objectively assessed need; secondly that the housing needs of Dacorum up to 2031 could not be met more fully than is currently proposed without causing significant harm to interests of acknowledged importance; and thirdly that future needs (i.e. post 2031) could be satisfactorily accommodated without a review of the green belt.

³ Assessment of Alternative Growth Scenarios for Hemel Hempstead (April 2009)

⁴ Assessment of Potential Local Allocations and Strategic Sites (June 2012)

12. The Council will wish to consider the options available to it but one of those options may be to commit to an early partial review of the CS (by way of an appropriate Main Modification), in order to investigate ways of assessing and meeting housing need more fully (taking into account up- dated household and population projections). Any such partial review would need to consider the identification of a housing target that closely reflects identified need; a thorough review of the green belt boundary (including the potential for safeguarded sites); and the role that effective co-operation with neighbouring local planning authorities could play in helping to meet the housing needs of Dacorum.

13. Other options available to the Council could include requesting a suspension of the Examination in order to undertake further work; the withdrawal of the CS; or a request that I complete the Examination on the basis of the submitted CS. However, the latter option carries the significant risk that I would not be in a position to find the CS sound.

14. In the light of the potential shortcoming I have identified, I am inviting the Council to provide an indication of how it wishes to proceed, remembering that in order for me to recommend modifications to the plan the Council will need to formally notify me if it wishes to request modifications under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

15. In order to make progress as quickly as possible it would be appreciated if the Council could respond to this note by Monday 3rd December at the latest.

David Hogger
Inspector

Dacorum Borough Council's Response to Preliminary Advice of Planning Inspector

Date: 30 November 2012
Your Ref.
Our Ref: File 7.17
Contact: Laura Wood
Email: Laura.Wood@dacorum.gov.uk
Directline: 01442 228661
Fax:



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Dear Mr Hogger,

Examination of the Dacorum Core Strategy – Inspector’s Preliminary Findings on Matters Relating to Housing Provision and the Green Belt

Thank you for the note of your preliminary findings relating to the Core Strategy examination, which the Council received on 19th November 2012.

You have advised the Council that you have a concern about the soundness of the plan with regard to the issue of housing numbers and the lack of a comprehensive Green Belt review.

We believe for the reasons set out below that the Council has provided a reasonable justification for the conclusions reached, but accept the need to work together to ensure the Core Strategy can proceed to adoption as quickly as possible.

With regard to housing numbers, the Council remains of the view that it has followed the requirements of the NPPF. Paragraph 47 requires that full objectively assessed needs are considered. It does not require them necessarily to be met. As stated in the Council’s evidence, we do not consider that objectively assessed needs and projections are one and the same thing. Furthermore, the NPPF does not state that this full objectively assessed need equates to the most recent CLG household projections: other projections are also available and should be taken into account.

With regard to assessing the role of the Green Belt, a comprehensive sieving exercise was carried out for land at Hemel Hempstead as part of the ‘Assessment of Alternative Growth Scenarios for Hemel Hempstead (April 2009) (Examination Document HG10). It is accepted that this did not explicitly consider each site against the Green Belt objectives set out in PPG2: Green Belts (Examination Document REG20) and more recently, paragraph 80 of the NPPF. This evaluation was carried out as part of the ‘Assessment of Potential Strategic Sites and Local Allocations – Final Assessment (June 2012) (Examination Document HG15).



We have considered the four options you have put forward to enable us to move forward:

- commit to an early partial review;
- request a suspension of the Examination in order to undertake further work;
- withdrawal of the Core Strategy; and
- request the completion of the Examination on the basis of the submitted Core Strategy.

Given the views expressed in your note of preliminary findings, the Council does not consider it prudent to continue the Examination process on the basis of its submitted strategy. I can therefore advise that our preference is to commit to an early partial review of the Core Strategy, by way of an appropriate main modification.

This recommendation will be considered by Cabinet on 11th December and I will confirm our formal decision after this meeting. I should be able to send you some draft wording next week, although this will obviously be on a without prejudice basis.

Provided the above approach is agreed, the Council expects to be in a position to consult on the main modifications in mid January, following a Sustainability Appraisal being carried out on the main modifications.

When preparing any early review, we will have particular regard to paragraphs 4 and 10 of your preliminary note which state that *'It may be that the Council would have reached similar conclusions [regarding whether or not full need for market and affordable housing could be met] ... but without a more thorough analysis I cannot be certain that this would have been the case';* and *'I consider the Council should have attached greater weight to the role that this area [i.e. land East of Hemel Hempstead in St Albans City and District] could play in meeting the Borough's housing needs more fully.'* You will be aware that this Council remains willing to co-operate on planning the east side of Hemel Hempstead.

I would like to take this opportunity to thank you for the inclusive manner in which you conducted the recent hearings and for the helpful responses you have provided to the Council's questions during this Examination process.

Yours sincerely,



Laura Wood
Team Leader (Strategic Planning)
Strategic Planning and Regeneration

**Cabinet Report relating to Proposed
Modifications**

AGENDA ITEM: 8

SUMMARY



Report for:	Cabinet
Date of meeting:	11th December 2012
PART:	I

Title of report:	The Annual Monitoring Report and Local Planning Framework Update
Contact:	Cllr Terry Douris, Portfolio Holder for Planning and Regeneration; Laura Wood, Team Leader, Strategic Planning and Regeneration (extn2661); Francis Whittaker, Strategic Planning Officer, Strategic Planning and Regeneration team (extn 2383)
Purpose of report:	To consider: The Annual Monitoring Report for 2011/12; progress on the Local Planning Framework; and the future Local Planning Framework timetable.
Recommendations:	Cabinet is recommended to: <ol style="list-style-type: none">1. note the headline results from the forthcoming Annual Monitoring Report 2011/12;2. update the Local Development Scheme in accordance with the principles set out in paragraphs 3.4 to 3.7 in this report, delegating authority to the Assistant Director of Planning, Development and Regeneration to agree the final wording of the document with the Portfolio Holder; and3. approve the interim timetable set out in Chart A and delegate authority to the Assistant Director of Planning, Development and Regeneration, to continue to keep this timetable under review and issue updates if required.4. agree to conduct an early partial review of the Core Strategy, once adopted, as recommended by the Planning Inspector in his note of 19 November (Annex 1).5. agree the list of main modifications to the Pre-Submission Core Strategy for submission to the Planning Inspector, delegating authority to the Planning and Regeneration Portfolio Holder to agree any changes to this wording

	Required by the Planning Inspector.
Corporate objectives:	<p>The Annual Monitoring Report looks at the effectiveness of current planning policies – for example the achievement of the overall housing target and protection of green space/wildlife sites—and progress towards planning policy review (i.e. targets set out in the Local Development Scheme). It therefore provides a good summary of how the Council’s planning policies are supporting delivery of corporate objectives– especially those relating to affordable housing; safe and clean environment and regeneration. As the policies within the Core Strategy and other planning documents are aimed at enabling growth, it also provides an indication of how the ‘Dacorum Delivers’ objective is being supported.</p> <p>The Local Planning Framework is important in supporting delivery of the long term goals of Destination Dacorum as expressed in the Sustainable Community Strategy and the projects in the Dacorum Development Programme (DDP).</p>
Implications:	<p><u>Financial:</u></p> <p>Whilst outside of the 2011/12 monitoring period, it is prudent to take account of the latest position on the Core Strategy, especially in rolling forward the interim timetable. The Core Strategy has recently been examined by a Planning Inspector to determine whether or not the plan is ‘sound’. At the time of finalizing this report, the Inspector’s preliminary letter had just been received and its implications were being assessed by Officers. Further updating will be given orally at Cabinet. The nature and scope of any further main changes to the plan will determine future financial implications—both in terms of further consultation on the Core Strategy and any delays to progressing work on subsequent Development Plan Documents.</p> <p><u>Value for Money:</u></p> <p>Every effort has been made to secure external funding, to reduce the impact on the Council’s budget. Where possible, Evidence base work is undertaken jointly with other authorities to ensure cost is optimized (through economies of scale). Collaborative working with landowner consultants will continue to help extend the resources available to the Council and avoid the duplication of site specific technical information.</p> <p><u>Legal</u></p> <p>No direct effects. The performance of planning policies does however have a direct bearing on the proportion of planning appeals allowed and dismissed. An out-of-date planning strategy also increases the risk of speculative planning applications and legal challenges.</p> <p><u>Human Resources:</u></p> <p>No direct implications. However, in order to ensure the Local</p>

	<p>Planning Framework continues to progress to timetable, the Strategic Planning team currently employs a temporary member of staff (via Comensura) and has a CIL/Infrastructure Officer on a 2 year secondment. Both posts are funded through the LDF reserve.</p> <p><u>Land</u> No direct implications. Land within the Council's control will however play an important role in ensuring housing and Employment targets set out within the Core Strategy are met.</p> <p><u>Environmental</u> No direct effects, but monitoring looks at the success of existing policies to ensure environmental protection.</p>
Risk Implications	<p>A risk assessment has been carried out as part of the PID process. The Local Development Scheme also contains its own risk assessment. The key concern is that the (new) development plan must be sound, and delivers what is needed expeditiously. Risk is reduced by ensuring processes and the evidence base are robust. Sufficient financial resources are essential to achieve that. Certain elements of the process have explicit statutory requirements such as consultation, publication, examination and presentation of the adopted Development Plan Document. The Annual Monitoring Report reviews the risks inherent in preparing the Local Planning Framework. Monitoring of development is a source of information which, properly used, can assist risk reduction – i.e. it checks whether progress and control of development has been successful and can indicate where change (in policy or process) may be beneficial.</p>
Equality Implications	<p>An Equality Impact Assessment has been carried out as part of the PID process.</p>
Health and Safety Implications	<p>None.</p>
Sustainability Implications	<p>The Core Strategy contains a number of policies aimed at improving the sustainability credentials of new development. The AMR reports on the performance on these policies and this information provides a proxy against which to assess the relative sustainability of development.</p>
Monitoring Officer/ S.151 Officer Comments	<p>Monitoring Officer – The Council has received the Inspector's preliminary findings on matters relating to housing provision and the Green Belt (Annex 1) following the close of the hearing sessions into the Core Strategy (CS). The Inspector has identified a shortcoming in the CS relating to soundness and has invited the Council to consider how it should be resolved.</p> <p>The Inspector has suggested a number of options which the Council could consider, and the advice of officers is that the best way forward would seem to be the option outlined in paragraph 12 of Annex 1. i.e. an early partial review of the CS</p>

	<p>by way of an appropriate Main Modification. Any such partial review would need to consider the identification of a housing target that closely reflects identified need; are view of the Green Belt boundary; and the role that effective co-operation with neighbouring local planning authorities could play in helping to meet Dacorum's housing needs.</p> <p>S.151 Officer – There are no budgetary implications directly associated with there commendations within this report.</p>
Consultees:	Assistant Director Planning, Development and Regeneration. Group Manager, Strategic Planning and Regeneration.
Backgroundpapers:	<p>Local Development Scheme (May 2009)</p> <p>Pre-Submission Core Strategy (together with schedule of proposed minor changes)</p> <p>Dacorum Borough Local Plan 1991 – 2011 and related supplementary planning advice national Planning Policy Framework (NPPF) Draft Annual Monitoring Report 2011/12</p> <p><i>Note: The finalized Annual Monitoring Report 2011/12 will be Published in late December 2012 and made available in the Group Rooms then.</i></p>

BACKGROUND REPORT

1. INTRODUCTION

1.1 This report covers two matters connected with:

- a) the Annual Monitoring Report (AMR) 2011/12; and
- b) the Local Development Scheme (May 2009).

2. ANNUAL MONITORING REPORT Statutory Requirements

2.1 In April 2012, the Town and Country Planning (Local Development) (England) (Amendments) Regulations 2008 were superseded by the Town and Country Planning (Local Planning) (England) Regulations 2012. These new regulations introduced greater flexibility regarding coverage and presentation. There is no longer a legal requirement for local authorities to publish monitoring reports by a prescribed date, or to formally submit them to the Secretary of State. The information must however be published 'as soon as possible' after it becomes available. Officers recommend that this information continues to be contained and analysed in an annual report.

2.2 The following information must be provided:

- a) The titles of the Local Plan and Supplementary Planning Documents specified in the Council's Local Development Scheme together with the timetable for their preparation, the stage reached and reasons for any slippage against the published timetable;

- b) Information on any Local Plan or Supplementary Planning Document that has been adopted or approved during the monitoring period, and the date of this adoption;
- c) Performance against monitoring indicators set out within its Local Plan;
- d) An explanation of why the local planning authority has chosen not to implement a policy specified in its local plan (if appropriate);
- e) Information regarding any Neighbourhood Development Orders or Neighbourhood Development Plans;
- f) Information related to progress on establishing a Community Infrastructure Levy (CIL);
- g) Details of actions under the 'Duty to Co-operate' introduced in the Localism Bill 2011.

Items (a) to (c) above have always been provided within the Council's AMRs. Items (d) to (g) are new requirements that need to be included in the AMR 2011/12.

As well as monitoring the performance of the planning policy documents, it is intended to use the AMR to report progress on the Dacorum Development Programme (DDP) and newly updated Economic Development (ED) Strategy.

2.3 The Annual Monitoring Report for 2011/12 is prepared by Officers. It is due to be completed by the end of 2012. A draft copy will be available in Group Rooms prior to the Cabinet meeting. Once finalised, copies will be placed in the Group Rooms and published on the Council's website.

Improving monitoring arrangements and reporting

2.4 The AMR summarises planning activities within the Borough over a twelve month monitoring period (1st April 2011 – 31st March 2012). The structure and content has been revised to reflect the structure of the Core Strategy and the monitoring indicators within it. Sections have been added to ensure the document complies with the 2012 Regulations and performance of the DDP and ED Strategies. The section on the Economic Development Strategy (October 2012) will be limited in scope at present, as this document was only adopted in October 2012. However, baseline information can be established against which future progress can be judged. New information about water quality has been added at the request of the Dacorum Environmental Forum's Water Group.

2.5 This broadening of content will allow the AMR to become the document through which the success of projects managed by the Strategic Planning and Regeneration team, and supported by other Council departments, can be measured.

2.6 The AMR 2011/12 will be accompanied by a technical appendix containing more detailed monitoring information for reference.

2.7 The County Council's monitoring system (SmartHerts) has been in operation for a year and supports the districts. Whilst further training and other work is needed to ensure the system is used to its full potential, SmartHerts has significantly improved the efficiency of monitoring processes within the SPAR team.

Key Findings - (1) Headline figures

2.8 The AMR 2011/12 reports progress against key targets. Headline figures for housing and employment are set out below:

Housing:

- 447 (net) dwellings were completed over the monitoring period. This is above the annual Core Strategy target (430 dwellings per year) but lower than the completion rate in the previous monitoring period of 603 (an exceptional year).
- 77% of dwellings built in the monitoring period were in Hemel Hempstead. This is broadly in line with the 78% target over the plan period (2006/2031) period 2006-2031.
- 93% of all dwellings were completed on previously developed land. 149 affordable housing units were delivered in 2011/12.
- 95% of new homes were provided at a density exceeding 30 dwellings per hectare. This is above the Council's target of 85%.
- The Council can demonstrate that it has a 5 year housing land supply as required by the National Planning Policy Framework: this assumes a housing target of 430 dwellings per year.

Employment

- During the monitoring period there was a net loss of over 36,200 sqm of B-class employment floorspace (i.e. offices, industry and warehousing). This is a significant change from the previous monitoring period, when there was a gain of over 1,200 sqm. The floorspace loss in 2011-2012 was caused by the loss of nearly 37,000 sqm at four sites, due to demolition of buildings damaged by the Buncefield explosion (replacement employment development is proposed), redevelopment at Breakspear House on Maylands Avenue (Travelodge Hotel site) and the change of use of Lord Alexander House in Hemel Hempstead town centre to affordable housing.
- There has been a net loss of nearly 36,800 sqm of office floorspace since 2006. This trend needs to be carefully monitored over future years, given the Core Strategy's target for a net gain of 130,000 sqm between 2006 and 2031. However, planning permission has been granted for large scale new office development at the People Building site in the Maylands Gateway area. There is also scope for further substantial office development in the Maylands Gateway, elsewhere on the Maylands Business Park and in Hemel Hempstead town centre.
- There has been a net gain of over 12,100 sqm of industrial/warehousing floorspace since 2006. Planning permission exists for further gains and there is also potential for some industrial/warehousing development at Maylands Gateway, in accordance with the revised Development Brief. The Council is therefore on track to meet (or exceed) the Core Strategy target of no net loss of industry, storage and distribution floorspace over the 2006-2031 period.

- All new employment development in the monitoring period used previously developed land and existing buildings.

2.9 Data relating to other key planning areas including social and community facilities, transport and accessibility, commercial development and the built and natural environment is still being assessed.

Key findings - (2) Progress with the Local Planning Framework

Progress during 2011/12 monitoring period

2.10 Good progress was made on the LPF during the 2011/12 monitoring period. Key achievements included:

- Adoption of the Developer Contributions Supplementary Planning Document - adopted 29th March and published April 2011;
- Pre-Submission Core Strategy approved by Full Council – 28th September 2011;
- Consultation on Pre-Submission Core Strategy - 26th October to 7th December 2011.
- Consultation on Pre-Submission Omissions – 15th February to 28th March 2012; and
- Publication of further technical studies to reinforce the evidence base, and inform development of Core Strategy policies and development of Hemel Hempstead Town Centre Masterplan. This includes an Access and Movement Study and Major Land Use Study for Hemel Hempstead town centre, and an update to the Council's Infrastructure Delivery Plan.

Progress post 2011/12 monitoring period

2.11 Consultation on the draft Affordable Housing Supplementary Planning Document (SPD) and Hemel Hempstead Town Centre Masterplan both took place in August / September 2012.

2.12 A schedule of proposed changes to the Pre-Submission Core Strategy was agreed by Full Council on 22nd May 2012. The schedule of changes comprised minor amendments to take account of objections received on the Pre-Submission Core Strategy and to improve and update the document. The Pre-Submission Core Strategy, together with this schedule of proposed changes and other required documents, was formally submitted to the Planning Inspectorate on 22nd June 2012. Submission of the Core Strategy marks the beginning of the formal Examination stage, when an independent planning Inspector assesses whether the document is 'sound' (with or without changes). The Examination hearing sessions took place between 9th and 18th October 2012.

2.13 A letter summarising the Inspector's initial findings following the hearings was received on 19th November. This is attached as Annex 1. The Inspector's concern relates to the overall number of new homes proposed for the plan period (2006-2031). He does not consider this represents the *'full objectively assessed needs'* as required by the NPPF

and highlights the Government's intention to *'boost significantly the supply of housing.'* In particular, he raises concerns regarding:

- a) The lack of a robust and comprehensive Green Belt review; and
- b) The limited emphasis that appears to have been given to the role that neighbouring local planning authorities could play in accommodating some of Dacorum's housing needs.

2.14 In order to address these concerns, The Inspector has invited the Council to consider a number of options to address them. Of these options, the most constructive way forward would appear to be to commit to an early partial review of the Plan to address these matters. This would allow the Council to progress the Core Strategy to be adopted within the timescale as planned (ie by Spring 2013) and then carry out the partial review subsequently. This is in addition to the main change relating to the inclusion of a 'model policy' relating to sustainable development that Government now requires all plans to contain. The final report of the Planning Inspector will follow the 'main changes' consultation in 2013. An update will be provided at the meeting.

Changes to Government policy

2.15 The Council has faced some important changes in circumstances, including those relating to the coalition Government's planning agenda. The National Planning Policy Framework (NPPF) was published in March 2012. The content of the Pre-Submission Core Strategy was reviewed in the context of this new national planning guidance and some changes made to ensure conformity. These primarily related to the treatment of buildings and previously developed land within the Green Belt and Rural Areas.

2.16 New Town and Country Planning (Local Planning) (England) Regulations followed in April 2012. These regulations supersede the Town and Country (Local Development) (England) (Amendments) Regulations 2008. Further amendments to the Community Infrastructure Levy (CIL) regulations are still awaited, as are the final regulations that will govern the operation of Neighbourhood Plans.

2.17 The Local Planning Framework was started on the basis that a clear strategic policy direction would be provided at the regional level through the review of the East of England Plan. As the Government has stated their intention to remove the regional tier of the development plan, this strategic policy direction will no longer be provided. The Council has made very good progress, but it is has proved much more complex, demanding and slower to prepare an evidence base using alternative (and locally derived) growth scenarios than to implement a regionally allocated target.

3. UPDATING THE LOCAL DEVELOPMENT SCHEME

3.1 The 2004 Planning and Compulsory Purchase Act requires all local planning authorities to prepare a Local Development Scheme. This requirement is reinforced by the 2012 Local Planning Regulations.

3.2 The Local Development Scheme sets out the Council's programme for preparing planning documents and a summary of the role and function of each. It contains a timetable that is updated annually in the light of Annual Monitoring Reports. A full review of the progress on each of the planned DPDs will be included within the Annual Monitoring Report 2011/12.

3.3 The focus continues to be on the replacement of the current Local Plan (the Dacorum Borough Local Plan 1991-2011) and incorporating the Council's regeneration priorities within that. The work programme is therefore centred on the Core Strategy, followed as soon as possible afterwards by the Site Allocations and East Hemel Hempstead Area Action Plan DPDs. The Development Management Policies DPD would be last. The proposals map will be updated as and when necessary. These priorities remain appropriate – although some of the detailed timings need to be reviewed.

Review of the LDS

3.4 A full review of the LDS had been put on hold because of uncertainties over the Coalition Government's intentions with regard to reform of the development plan system. These intentions have now been clarified through the Decentralisation and Localism Act, and publication of NPPF and associated Regulations.

3.5 The LDS should therefore be reviewed during 2013. The existing document will be used as a template, with sections covering:

- Transitional arrangements (i.e. the role and weight of policies within the existing and emerging Local Plan);
- The structure of the Council's replacement Local Plan (i.e. the Local Planning Framework);
- The role of Strategic Environmental Assessment, Sustainability
- Appraisal and Appropriate Assessment; Mechanisms for monitoring and evaluation;
- Resources (in terms of people, skills, money and external support); and
- Risk Assessment.

3.6 Existing profiles for each Development Plan Document (the documents that will make up the Local Plan) will be amended, and the schedule of programmed and unprogrammed supplementary planning documents (SPDs) updated.

3.7 While the new LDS will contain the most up-to-date timetable, clear links will be made to the role of the AMR in terms of reviewing and updating this timetable.

Interim Timetable

3.8 Prior to adoption of a revised LDS, a new, interim timetable to guide future work programming is recommended (see Chart A). This moves the current three year programme forward to 2015.

3.9 While the regulations no longer require SPDs to be programmed, Officers advise that this is helpful in terms of work programming and public understanding of planning. SPDs which are in progress, or required in the short term, are therefore shown for illustrative purposes only.

3.10 Background work on the evidence base will also continue during this period.

3.11 It should be noted that the timetable does not take account of the need for Officers to support production of any Neighbourhood Plans that may be progressed by Town or Parish Councils (or Neighbourhood Forums in non-parished areas). The take-up of Neighbourhood Plans will have a time and resource impact on the LDS programme and may need to be reflected in the next timetable review.

3.12 The original LDS was drawn up to ensure alignment of key milestones for the Core Strategy and Area Action Plan with those in St Albans Council's Local Development Scheme in order to facilitate joint working. Due to significant slippage in St Albans' Core Strategy programme, keeping these documents aligned has not been possible, without putting our own work on hold. However, it is important that key issues relating to the regeneration of Maylands and future housing development continue to be addressed on a cross-boundary basis. Officers and Members have been liaising with their counterparts in St Albans to ensure key issues continue to be discussed. This liaison will continue and is increasingly important given the Inspector's view that greater weight should have been accorded to the role of land to the east of Hemel Hempstead in meeting the Borough's housing needs. St Albans Council is due to publish their Pre-Submission Core Strategy before Christmas. The Council will need to decide how best to respond.

3.13 The new timetable will be published on the Council's website and used to inform the public and other interested parties as to the Council's intentions. It is then recommended that the Assistant Director for Planning, Development and Regeneration keeps this timetable under review and issue interim updates as necessary. The next formal review of the LDS timetable will occur as part of the AMR for 2012/13, which will be put before Cabinet in December 2013.

Key



Time Period of Preparation



Period of Submission Stage

- I** Key Stage of consultation on issues and options
- D** Consultation on
 - draft plan with alternatives for Development Plan Documents; or
 - draft Supplementary Planning Document
- E** Examination Period
- A** Adoption of Document

Examination of the Dacorum Core Strategy

Inspector's Preliminary Findings on Matters Relating to Housing Provision and the Green Belt

19 November 2012

1. Following the close of the hearing sessions into the Dacorum Core Strategy (CS) and having considered all the evidence, including the answers to the questions I posed during the hearing sessions (and the subsequent consultation responses), I consider that there is a shortcoming in the document, relating to soundness, which the Council may wish to address. The purpose of this note is to explain the basis for my concern and to invite the Council's view on how it should be resolved. It should not be taken as my conclusion on the soundness of the CS.
2. The Council confirmed that in its view 11,320 dwellings over the plan period would meet objectively assessed needs (as referred to in paragraph 14 of the NPPF). However, in my view that figure does not represent full objectively assessed need, rather it represents a level of development that in the Council's opinion could be satisfactorily accommodated in the Borough without detriment to other policy constraints as set out in the NPPF.
3. I consider the starting point should be the identification of full 'objectively assessed needs' (paragraph 47 of NPPF). The most recent CLG household projections¹ indicate a need for 13,500 new households in the Borough (about 540 dwellings a year) over the plan period and there is also a significant need for affordable housing. The population projections also identify a significant growth². Whilst I understand the Council's concerns regarding the robustness of the figures, I am mindful of the advice in paragraph 159 of the NPPF regarding meeting household and population projections.
4. Having identified the full need, the Council should then have undertaken the appropriate analysis to ascertain whether or not that full need for market and affordable housing could be met, remembering that the objective is to 'boost significantly the supply of housing'. It may be that the Council would have reached similar conclusions as it has done in relation to the submitted Core Strategy but without a more thorough analysis I cannot be certain that this would have been the case.
5. I have two specific concerns: the lack of a robust and comprehensive green belt review and the limited emphasis that appears to have been given to the role that neighbouring local planning authorities could play in accommodating some of Dacorum's housing needs.

¹ CLG 2008 based

² ONS Interim 2011 based projections

6. Whilst it is correct that great importance should be attached to green belts, paragraph 83 of the NPPF advises that green belt boundaries should be capable of enduring beyond the plan period and bullet point 3 of paragraph 85 suggests that 'safeguarded land' could be identified to meet longer term needs, stretching well beyond the plan period.

7. Documents HG10³ and HG15⁴ assess a number of sites against a range of criteria, including impact on the Green Belt and there is no reason to challenge, in themselves, the conclusions that are drawn. However, there appears to be little weight given to accommodating the full objectively assessed housing need, as identified for example in the CLG projections.

8. I acknowledge that the situation may change but there is no reason to conclude that the needs for housing in Dacorum Borough will not continue to grow beyond 2031. In these circumstances and bearing in mind the tight constraint which the green belt imposes (together with the AONB elsewhere in the Borough) I am not satisfied that longer term development needs could be satisfactorily accommodated.

9. With regard to neighbouring local planning authorities making a contribution to meeting the housing needs of Dacorum, this is clearly not a new concept, particularly in terms of St Albans City and District (which is immediately to the east of Hemel Hempstead). Hemel Hempstead is rightly identified in the CS as the main centre for sustainable development and change in the Borough and in my view every opportunity for re-enforcing the role of the town and making the best use of the facilities and services that it provides should have been robustly assessed (together with any consequential infrastructure improvements).

10. Whilst it is clear that Dacorum and St Albans have 'co-operated', particularly with regard to the joint Area Action Plan, it appears to me that the co-operation was directed more towards securing protection for the land in St Albans District between Hemel Hempstead and the M1, rather than investigating ways in which the area could contribute towards meeting the full housing needs of Dacorum. Bearing in mind the conclusion in HG10 that 'if significant expansion of Hemel Hempstead is required, this should be taken forward in the form of the eastern growth option' (i.e primarily within St Albans City and District), then I consider the Council should have attached greater weight to the role that this area could play in meeting the Borough's housing needs more fully.

11. In summary there is insufficient substantive evidence to enable me to confidently conclude firstly that the figure of 11,320 dwellings represents full objectively assessed need; secondly that the housing needs of Dacorum up to 2031 could not be met more fully than is currently proposed without causing significant harm to interests of acknowledged importance; and thirdly that future needs (i.e. post 2031) could be satisfactorily accommodated without a review of the green belt.

³ Assessment of Alternative Growth Scenarios for Hemel Hempstead (April 2009)

⁴ Assessment of Potential Local Allocations and Strategic Sites (June 2012)

12. The Council will wish to consider the options available to it but one of those options may be to commit to an early partial review of the CS (by way of an appropriate Main Modification), in order to investigate ways of assessing and meeting housing need more fully (taking into account up- dated household and population projections). Any such partial review would need to consider the identification of a housing target that closely reflects identified need; a thorough review of the green belt boundary (including the potential for safeguarded sites); and the role that effective co-operation with neighbouring local planning authorities could play in helping to meet the housing needs of Dacorum.

13. Other options available to the Council could include requesting a suspension of the Examination in order to undertake further work; the withdrawal of the CS; or a request that I complete the Examination on the basis of the submitted CS. However, the latter option carries the significant risk that I would not be in a position to find the CS sound.

14. In the light of the potential shortcoming I have identified, I am inviting the Council to provide an indication of how it wishes to proceed, remembering that in order for me to recommend modifications to the plan the Council will need to formally notify me if it wishes to request modifications under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

15. In order to make progress as quickly as possible it would be appreciated if the Council could respond to this note by Monday 3rd December at the latest.

David Hogger
Inspector

Portfolio Holder Decision relating to Main Modifications

PORTFOLIO HOLDER DECISION RECORD SHEET

Name of decision maker:	Cllr Terry Douris
Portfolio:	Planning & Regeneration
Date of Portfolio Holder Decision:	09/01/2013

Title of Decision:	Minor wording amendments to the 'main changes' to the Pre-Submission Core Strategy.
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Decision made and reasons:

Decision:
 To agree some small wording changes to the schedule of 'main changes' agreed by Cabinet on 11th December, in order to:
 a) reflect feedback from the Planning Inspector on the proposed wording;
 b) ensure the final wording is put before Full Council on 16th January for consideration; and
 c) enable progression of the Core Strategy to adoption as quickly as possible.

Reasons:
 The agreement of the Portfolio Holder is required in order to comply with the following recommendation from Cabinet:
"That Council be recommended to approve the list of main modifications to the Pre-Submission Core Strategy for submission to the Planning Inspector, and that authority be delegated to the Planning and Regeneration Portfolio Holder to agree any changes to this wording required by the Planning Inspector."

Since 11th December Cabinet, the Council has received feedback from the Planning Inspector regarding the detailed wording of the main modifications. This has required a number of minor textual changes to the following main modifications.

In accordance with the Cabinet recommendation above, Full Council will be asked to agree these main modifications on 16th January 2013, before they are published for a 6 week period of public consultation. In order for Full Council to have the most up-to-date version of the main modifications before them, Portfolio Holder agreement is required to make these wording changes. This revised wording is attached as Appendix 1. The wording changes are minor in nature and do not affect the thrust of any Core Strategy policies. The changes (from Cabinet version to current version) are summarized as follows:

Main Modification Number	Policy/Para	Change made and reason
MM5	PolicyCS7	Insertion of the words 'through the Site Allocations DPD', to clarify that there will be no general review of the Green Belt carried out as part of this Development Plan Document, which is due to reach Pre-Submission stage in summer 2013. This means that the Site Allocations DPD

		will focus on delivering the number and distribution of new homes set out in the Core Strategy, rather than proposing any further significant Green Belt releases for housing at this stage. The comprehensive Green Belt Review will be commissioned separately in 2013 and will inform the early partial review of the Core Strategy.
MM10	Policy CS15	Inclusion of the first paragraph of the policy in order to provide the necessary context for the text that follows.
MM28	New sub-section in Section 29 relating to early partial review	Include additional sentence to state that 'Evidence gathering will begin in 2013,' in order to respond to the Inspector's request for clarity regarding when the early partial review will begin.

Reports considered: (here reference can be made to specific documents)

11th December Cabinet Report entitled 'The Annual Monitoring Report and Local Planning Framework Update.'

Officers/Councillors/Ward Councillors/Stakeholders Consulted:

- Assistant Director – Planning, Development and Regeneration
- Group Manager – Strategic Planning and Regeneration
- Rob Jameson – Partner, Attwaters James on and Hill Solicitors (independent legal adviser to the Council for Core Strategy Examination)

Monitoring Officer comments:

This decision does not constitute a "key decision" within the meaning of regulation 8 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 and, therefore, the requirement to give 28 days prior notice does not apply.

Chief Financial Officer comments:

Implications: If the decision to agree these changes is not made, then the Council Risks delaying the adoption of the Core Strategy and would be forced to accept main modification wording imposed by the Inspector.

Risk: A risk assessment has been carried out as part of the PID process. The Local Development Scheme (the 'project plan' for the whole of the Local Planning Framework) also contains its own risk assessment. The key concern is that the (new) development plan must be sound, and

delivers what is needed expeditiously. Risk is reduced by ensuring processes and the evidence base are robust and that the plan is adopted as soon as possible. Certain elements of the process have explicit statutory requirements. This includes the need to consult on any 'main modifications' prior to receiving the final Inspector's Report and progressing towards adoption.

Financial: There are no direct financial implications related to this Portfolio Holder Decision request: the main modifications consultation is a statutory process that must be undertaken. The issue is the precise wording of these main modifications and the timing of the resulting consultation. Funding for the Core Strategy is provided from the LDF reserve. A three year rolling budget requirement has provisionally been agreed with the Director of Finance and Governance for 2012/13, with projections for 2013/14 and 2014/15. The 2012/13 budget is currently being reviewed as part of the annual budget cycle. Progressing the final stages towards adoption of the Core Strategy as swiftly as possible will ensure additional costs are minimized and reduce potential delays in progressing work on subsequent Development Plan Documents.

Value for Money: Every effort has been made to secure external funding for the wider Local Planning Framework programme of work i.e. through the New Homes Bonus. This will help reduce the impact on the Council's budget. Where possible, evidence base work is undertaken jointly with other authorities to ensure cost is optimized (through economies of scale). Collaborative working with landowner consultants will continue to help extend the resources available to the Council and avoid the duplication of site specific technical information.

Options Considered and reasons for rejection:

Continue with existing main modification wording – rejected: MM5 and MM28 lack the clarity needed to explain the early partial review and could weaken the protection afforded to the Green Belt now. MM10 needs the additional clarification.

Portfolio Holders Signature:

Date:

Details of any interests declared and any dispensations given by the Standards Committee:

For Member Support Officer use only

Date Decision Record Sheet received from portfolio holder: 08/01/2013

Date Decision Published: 09/01/2013 Decision No: PH/002/13

Date of Expiry of Call-In Period: 16/01/2013

Date any Call-In received or decision implemented:

Appendix 5

Minutes of Full Council relating to consideration of Proposed Modifications

**Extract from Full Council Minutes
– November 2012**

DACORUM BOROUGH COUNCIL

MEETING OF THE COUNCIL

21 NOVEMBER 2012

Present -

MEMBERS:

Councillor H Chapman (Mayor); Councillors, Adeleke, Adshead, Anderson, Ayling, Mrs Bassadone, G Chapman, Clark, Collins, Conway, Doole, Douris, Elliot, Fantham, Mrs Green, Griffiths, Mrs Guest, Harden, Harris, Hearn, N Hollinghurst, R Hollinghurst, Laws, Lawson, Link, Mahmood, Organ, Peter, Mrs Rance, Ryan, G Sutton, R Sutton, Taylor, Tiley, Townsend, Whitman, Williams, Wood, C Wyatt-Lowe and W Wyatt-Lowe (40).

OFFICERS:

The Chief Executive, The Corporate Director (Finance & Governance), The Corporate Director (Housing & Regeneration), The Corporate Director (Performance, Improvement and Transformation), The Assistant Director (Legal Democratic & Regulatory), The Group Manager (Democratic Services), S Hamilton, P Duff and L Stone.

The meeting began at 7.30pm.

29. MINUTES

Last month, the public examination into our Local Planning Framework Core Strategy took place over a two week period. The feedback I have had indicates that the process went well, with the Inspector being satisfied with the level and amount of information he received from the Borough Council to help in his deliberations. We expect to receive an initial letter of findings from the Inspector in early December, which will indicate how well our strategy for growth and development in the Borough to 2021 has fared. From this we hope to be able to address any issues of concern the Inspector may have before preparing formal modifications to the Plan, for which there will be a further round of public consultation.

ANNEX A

NOTIFICATION

Notice of Consultation and Statement of Representations Procedure (Placed in Gazette and St Albans Review)



Dacorum's Local Planning Framework

Modifications to the Pre-Submission Core Strategy

Notice of Consultation and Statement of Representations Procedure

This notice is provided in accordance with Town and Country Planning (Local Planning) (England) Regulations 2012.

The Core Strategy sets the planning framework for Dacorum for the next 20 years. It contains a vision of what the Borough should be like in 2031 and a set of policies to help achieve this. It also contains individual strategies for the Borough's towns, large villages and the wider countryside. These set out specific planning issues affecting these individual areas and how any problems will be addressed.

The Council has published the following for a 6 week consultation:

- (1) Main Modifications to the Pre-Submission Core Strategy
- (2) Minor Modifications to the Pre-Submission Core Strategy

It is also seeking views on the impact of the recent revocation of the Regional Strategy (the East of England Plan) on the above.

A Sustainability Report Addendum, which assesses the potential social, economic and environmental implications of the Modifications has also been published for comment.

Representations must be received by the Council between Wednesday 23rd January and 5.15pm Wednesday 6th March 2013.

Representations can be made in writing, on the prescribed form, to the Strategic Planning and Regeneration Team, Dacorum Borough Council, Civic Centre, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1HH or via electronic communication using the Council's online planning portal or by emailing the prescribed form to strategic.planning@dacorum.gov.uk

Representations may be accompanied by a request to be notified of both/either of the following: (a) that the person appointed to carry out the independent examination has published their recommendations and/or (b) that the Core Strategy has been formally adopted by the Council.

A schedule of the Modifications (both main and minor) to the Pre-Submission Core Strategy, the representation form and the Sustainability Report Addendum are available:

- on the Council’s website www.dacorum.gov.uk/planning
- via the Council’s consultation portal;
- at public libraries within the borough during normal opening hours; and
- at Borough Council’s offices during the following opening hours.

Civic Centres	Berkhamsted	Hemel Hempstead	Tring
<i>Monday</i>	9am-12.30pm and 1.30pm-5pm	8.45 am - 5.15 pm	9am-12.30pm and 1.30pm-5pm
<i>Tuesday</i>	9.30am- 2pm	8.45 am - 5.15 pm	CLOSED
<i>Wednesday</i>	CLOSED	8.45 am - 5.15 pm	9.30pm-2pm
<i>Thursday</i>	9.30am-2pm	8.45 am - 5.15 pm	CLOSED
<i>Friday</i>	9.30am-2pm	8.45 am - 4.45 pm	9.30pm-2pm

Please contact the Strategic Planning and Regeneration team at strategic.planning@dacorum.gov.uk or phone 01442 228660 if you have any questions.

Distribution List and List of Consultation Bodies

Distribution List – Modifications to the Pre-Submission Core Strategy January 2013

	Recipient	Document	Method of Notification	
	Councillors	-	Councillors Email	
	Group Rooms	3	Doc	
	Chief Executive	-	General Officers Memo	
	Director of Finance & Governance – Sally Marshall	-	General Officers Memo	
	Asst Director Legal Governance (etc) – Steve Baker	-	Officers & Doc Memo	
	Group Manager Legal Governance – Noele Pope	-	Officers & Doc Memo	
	Group Manager Regulatory Services – Rita McGinley	-	General Officers Memo	
	Planning Solicitor – Mark Brookes	-	Officers & Doc Memo	
	Group Manager Commercial Assets (etc) – Mike Evans	-	Officers & Doc Memo	
	Valuation & Estates – Adriana Livingstone	-	Officers & Doc Memo	
	Director of Performance (etc) – Louise Miller	-	General Officers Memo	
	Asst Director Neighbourhood Delivery – David Austin	-	General Officers Memo	
	Group Manager Resident Services – Julie Still	-	General Officers Memo	
	Group Manager Environmental Services – Craig Thorpe	-	General Officers Memo	
	Trees and Woodlands - Colin Chambers	-	General Officers Memo	
	Asst Director Strategy & Transformation (etc) – Janice Milsom	-	General Officers Memo	
	Partnerships & Citizen Insight - Dave Gill	-	General Officers Memo	
DBC	Environmental Resource - Lizzy Staincliffe	-	General Officers Memo	
	Communications - Sara Hamilton	-	General Officers Memo	
	Director of Housing & Regeneration – Mark Gaynor	1	Officers & Doc Memo & Doc	
	Assistant Director of Planning, Development & Regen – James Doe	1	Officers & Doc Memo & Doc	
	Group Manager Strategic Housing – Julia Hedger	1	Officers & Doc Memo & Doc	
	Housing Enabling - Jack Burnham	1	Officers & Doc Memo & Doc	
	Group Manager Strategic Planning & Regeneration – Chris Taylor	1	Officers & Doc Memo & Doc	
	Team Leader S P & R - Becky Oblein	-	General Officers Memo	
	Strategic Plans Team	5	Officers & Doc Memo & Doc	
	STRATEGIC PLANNING LIBRARY	1	Officers & Doc Memo & Doc	
	Group Manager of Development Management – Alex Chrusiack	1	Officers & Doc Memo & Doc	
	Development Management Team Leaders – Fiona Bogle, Paul Newton	2	Officers & Doc Memo & Doc	
	Development Management Case Officers (x 12)	-	Officers & Doc Memo & Doc	
	Conservation & Design - Fiona Webb	1	Officers & Doc Memo & Doc	
	Enforcement - Mark Staincliffe	1	Officers & Doc Memo & Doc	
	Planning Registry & Land Charges	-	Officers & Doc Memo	

	Recipient	Document	Method of Notification
	HEMEL deposit point	2	Library Letter & Doc
	BERK deposit point	2	Library Letter & Doc
	TRING deposit point	2	Library Letter & Doc
	SECTION TOTAL	25	
HCC	Forward Planning	-	Letter no doc
	HBRC	-	Letter no doc
	Head of Landscape	-	Letter no doc
	Policy Authority Member	-	Letter no doc
	SECTION TOTAL	0	
LIB	County	2	Library Letter & Doc
	Hemel Hempstead	2	Library Letter & Doc
	Adeyfield	2	Library Letter & Doc
	Berkhamsted	2	Library Letter & Doc
	Bovingdon	2	Library Letter & Doc
	Kings Langley	2	Library Letter & Doc
	Tring	2	Library Letter & Doc
	Leverstock Green	2	Library Letter & Doc
	Herts Local Studies	2	Library Letter & Doc
	SECTION TOTAL	18	
TPC	Nash Mills	2	TPC Letter & Doc
	Flamstead	2	TPC Letter & Doc
	Great Gaddesden	2	TPC Letter & Doc
	Nettleden with Potten End	2	TPC Letter & Doc
	Kings Langley	2	TPC Letter & Doc
	Northchurch	2	TPC Letter & Doc
	Berkhamsted	2	TPC Letter & Doc
	Aldbury	2	TPC Letter & Doc
	Bovingdon	2	TPC Letter & Doc
	Chipperfield	2	TPC Letter & Doc
	Flaunden	2	TPC Letter & Doc
	Little Gaddesden	2	TPC Letter & Doc

	Recipient	Document	Method of Notification
	Tring Rural	2	TPC Letter & Doc
	Tring Town	2	TPC Letter & Doc
	Wigginton	2	TPC Letter & Doc
	Markyate	2	TPC Letter & Doc
	Leverstock Gr Village Assoc	2	TPC Letter & Doc
	SECTION TOTAL	34	
OTHER STATUTORY CONSULTEES	Secretary of State for Communities & Local Government	-	-
	Adjoining Local Authorities (x14) <i>(see full list below)</i>	-	Letter no doc
	Adjoining Parish Councils (x12) <i>(see full list below)</i>	-	Letter no doc
	Local Enterprise Partnership (x3)	-	Letter no doc
	Adjoining Police Authorities (2 - Bucks/Beds)	-	Letter no doc
	Herts Constabulary (x2)	-	Letter no doc
	Civil Aviation Authority	-	Letter no doc
	Ministry of Defence	-	Letter no doc
	Natural England (x4)	-	Letter no doc
	Environment Agency (x4)	-	Letter no doc
	Highways Agency	-	Letter no doc
	English Heritage (x2)	-	Letter no doc
	Canal & River Trust	-	Letter no doc
	Network Rail	-	Letter no doc
	British Telecom	-	Letter no doc
	Transco	-	Letter no doc
	British Gas	-	Letter no doc
	Three Valleys Water (x2)	-	Letter no doc
	Thames Water	-	Letter no doc
	Primary Care Trust (x3)	-	Letter no doc
Strategic Health Authority	-	Letter no doc	
	SECTION TOTAL	0	

	Recipient	Document	Method of Notification
OTHER / NON STAT	County Councillors (5) <i>(see full list below)</i>	-	Email
	LSP (Local Strategic Partnership) (13) <i>(see full list below)</i>	-	Email
	Agents Forum (43) <i>(see full list below)</i>	-	Email or Letter no doc
	Clubs & Societies (49) <i>(see full list below)</i>	-	Letter no doc
	Chambers of Commerce (2)	-	Letter no doc
	Health & Safety Executive	-	Letter no doc
	Economic Development (12)	-	Letter no doc
	Education (76) <i>(see full list below)</i>	-	Letter no doc
	Employers (18) <i>(see full list below)</i>	-	Letter no doc
	British Pipeline Agency	-	Letter no doc
	National Air Traffic Service	-	Letter no doc
	Sport England	-	Letter no doc
	Dacorum Environmental Forum	-	Letter no doc
	Ethnic Minority Groups (13) <i>(see full list below)</i>	-	Letter no doc
	Media (11) <i>(see full list below)</i>	-	Letter no doc
	Infrastructure Providers (41) <i>(see full list below)</i>	-	Letter no doc
	Disability Groups (12) <i>(see full list below)</i>	-	Letter no doc
	Residents Associations (57) <i>(see full list below)</i>	-	Letter no doc
	Key Land Owners/Developers (105) <i>(see full list below)</i>	-	Letter no doc
	Estate Agents (42) <i>(see full list below)</i>	-	Letter no doc
	Local Pressure Groups (48) <i>(see full list below)</i>	-	Letter no doc
	National Pressure Groups (24) <i>(see full list below)</i>	-	Letter no doc
	Local Residents (No. not known-aprox600)	-	Letter no doc
	Planning Development Consultants (87) <i>(see full list below)</i>	-	Letter no doc
	Public Bodies (32) <i>(see full list below)</i>	-	Letter no doc
	Surveyors and Architects (8) <i>(see full list below)</i>	-	Letter no doc
	Voluntary Organisations (19) <i>(see full list below)</i>	-	Letter no doc
	SECTION TOTAL	0	
	Copies required for list	77	
	TOTAL COPIES	100	

Consultation Groups

Adjoining Local Authorities (x14)

Aylesbury Vale District Council
Bucks County Council
Central Bedfordshire Council
Chiltern District Council
East Herts Council
Hertfordshire County Council
Hertsmere Borough Council
Luton Borough Council
North Hertfordshire District Council
St Albans City & District Council
Stevenage Borough Council
Three Rivers District Council
Watford Borough Council
Welwyn Hatfield District Council

Adjoining Parish Councils (x12)

Abotts Langley Parish Council
Aldbury Parish Council
Aston Clinton Parish Council
Buckland Parish Council
Cheddington Parish Council
Chenies Parish Council
Cholesbury-Cum-St Leonard Parish Council
Drayton Beaucamp Parish Council
EdlesboroughNorthallandDagnall Parish Council
Ivinghoe Parish Council
Mentmore Parish Council
Wingrave-With-Rowsham Parish Council

County Councillors (5)

CouncillorTerenceDouris
CouncillorNickHollinghurst
CouncillorDavid Lloyd
CouncillorAndrewWilliams
CouncillorColetteWyatt-Lowe

LSP (Local Strategic Partnership) (13)

Hertfordshire Constabulary
LAA Children and Young People's Block
Herts County Council
Churches Together
Countryside Management Service

Job Centre Plus
Berkhamsted Town & Parish Council
Community Action Dacorum
WENTA Business Services
Age Concern Dacorum
West Herts College
Herts County Council
West Hertfordshire Primary Care Trust

Agents Forum (43)

Aukett Associates
Brian Branwite Surveyors
Brown & Merry
Cannon Morgan & Rheinberg
Capener Cross Partnership
Clarke & Whalen Construction
Derek Kent Associates
Derek Rogers Associates
Edward Hunt & Co.
Hunt Associates
Ian Pankhurst Architects
Leslie Gear & Associates
M H Seabrook Design Services
Maurice Phillips Partnership
P W Abbiss
Paul Burdess Architect
Payne Cullen Partnership
PEP Architects
Project Design Co.
Rickaby Thompson Associate
Robert Tucker Associates
S A York Design Facilities
Savage & Partners
Shankland Cox Ltd
Terence Fidler Partnership
Wren Designs
York Place Company Services
Mr. MAshfaq
Mr. GBushby, CGB Partnership
Mr. DClarke
Mr. Chris Davy, Davy Associates
Mr. R N, Elderton
Mr. Douglas Foster
BJohnson
Mr. Edward Lloyd Johnston
Mr. APLaight
Mr. David Lane, DLA Town Planning Ltd
Mr. Richard Onslow
Mr. John Proctor

Mr.GordonScott
MrRexStubbings
DWilson
Mr.RYork

Clubs & Societies (49)

Boxmoor Arts Centre For Young People
Phasels Wood Scout Camp
The Georgian Group
The Society For The Protection Of Ancient Building
The Twentieth Century Society
The Victorian Society
Local History & Museum Society
Leverstock Green Village Association
Tring Hockey Club
Hemel Hempstead Child Contact Centre
Iain Rennie Hospice at Home
Kings Langley Society Ltd
Tring TLC
Iain Rennie Hospice at Home
St Pauls Church Langleybury Wives Fellowship
Tring Sports Forum & Dacorum Sports Network
Tring Lawn Tennis Club
1St Bovingdon Scout Group
The Woodland Trust
West Division Guides
Bucks Herts & Middx Camping & Caravanning Club
Tring Athletic Football Club
The Lawn Tennis Association
Berkhamsted Bowls Club
Tring Anglers
Tring Bowling Club
The Chiltern Society
Dacorum Heritage Trust
Saddlers Walk Social Group
Tring Rambling Club
Berkhamsted Citizens Association
British Film Institute
The Chiltern Society
National Travellers Action Group (NTAG)
Workers' Educational Association
Tring Swimming Club
Bovingdon Horticultural Society
Berkhamsted Local History & Museum Society
Hemel Hempstead Cyclists Touring Club
Berkhamsted Civic Association
Dacorum Architecture Forum
Hemel Hempstead Cycling Club

Markyate Society
British Horse Society
Gade Dog Training Society
Hemel Hempstead Local History Society
Rural Heritage Society
Pendley Sports Centre
Tring Squash Club

Education (76)

Herts Youth Enterprise Service
Abbot's Hill School
Adeyfield Secondary School
Aldbury JMI School
Astley Cooper School
Aycliffe Drive Primary School
Beechwood Park School
Bellgate JMI School
Belswains Primary School
Berkhamsted School
Bishop Wood Junior Mixed School
Bovingdon Infants School
Bovingdon Primary School
Boxmoor House School
Boxmoor Primary School
Bridgewater Middle School
Broadfield JMI School
Brockswold JMI School
Chambersbury JMI School
Chaulden Infants School
Chaulden Junior Mixed School
Collett School
Dundale Infants School
Gaddesden Row JMI School
Gade Valley J M I School
George Street JMI School
Goldfield Infants School
Great Gaddesden Primary School
Greenway Primary School
Grove Road Primary School
Hammond JMI School
Hemel Hempstead School
Hobbs Hill Wood Primary School
Hobletts Manor JMI School
Holtsmere End Infant School
John F.Kennedy RC Secondary School
Jupiter Drive JMI School
Kings Langley Secondary School
Leverstock Green JMI School
Lime Walk JMI School

Little Gaddesden JMI School
Lockers Park School
Long Marston JMI School
Longdean Secondary School
Marlin Montessori School
Micklem JMI School
Nash Mills JMI School
Pixies Hill JMI School
Potten End Primary School
Reddings JMI School
Rossgate JMI School
South Hill JMI School
St Albert The Great RC JMI School
St Cuthbert Mayne Catholic Junior School
St Paul's JMI School
St Rose's RC Infant School
St Thomas More's RC JMI School
The Arts Educational School
The Cavendish School
Thomas Coram School
Tring School
Tudor JMI School
Two Waters JMI School
Victoria First School
Westbrook Hay School
Westfield First School
Wigginton JMI School
Woodfield Special School
Hertfordshire Education Services
The Reddings School
Renewables East
Zicer Building
Brockwoods Primary School
Kings Langley Primary School
Ashlyns School
West Herts College

Employers (18)

Ashridge Management College
Blue Arrow Personnel Services
BP Oil (UK) Ltd
British Gas Plc Eastern
Champneys
British Standards Institute
Trw Aeronautical Systems
Dexion Ltd
Bull Information Systems
Northgate Information Solutions
Atlas Copco Compressors

Balfour Beatty Plc
24 Seven Utility Services
BFI
Multicore Solders Ltd
Jones Day
Marlowes Shopping Centre
Andrew Grout

Ethnic Minority Groups (13)

Gujarati Language School / DIS
Africans Together In Dacorum
Dacorum Chinese Community Association
Asian Masti
Hemel Anti Racism Council
Caribbean Women's Equality & Diversity Forum
Club Italia
Muskann - Pakistani Women's Association
Muslim Welfare Association
Jewish Interests
Dacorum Indian Society
Dacorum Chinese School Association
Dacorum Multicultural Association / MWA

Media (11)

BBC Elstree Centre
BBC Three Counties Radio
Herald Express
HHOT Marketing And Promotion
The Bucks Herald
The Watford Observer
Herts Film Link
Chiltern FM
Gazette & Herald Express
Hemel Hempstead Gazette & Express
Mix 96

Infrastructure Providers (41)

Peacock & Smith
Passenger Transport Unit, Hertfordshire County Council
Neighbourhood Delivery, Assistant Director, Dacorum Borough Council
Practice Based Commissioning Support, West Herts Hospital Trust
Planning Officer - Minerals & Waste, Hertfordshire County Council (x2)
District Commander, Hertfordshire Fire and Rescue Service
National Grid
Network Rail
East of England Ambulance (x3)

Operations Manager - Clean, Safe & Green, Dacorum Borough Council
Managing Director, SportSpace, Dacorum Borough Council
SPAR Officer (Green Spaces), Dacorum Borough Council
EDF Energy
CSF, Herts County Council (x2)
Thames Water (x2)
Outdoor Recreation Officer (Allotments), Dacorum Borough Council
Assoc. Director Of Infrastructure & Dev, West Herts Hospitals Trust
Veolia Water
Hertfordshire County Council - Transport
Job Centre Plus
Valuation & Estates Group Manager, Dacorum Borough Council
Assistant Director Estate Planning, Herts Partnership NHS Foundation Trust
Southern Gas Network
Bereavement Services Team Leader, Dacorum Borough Council
Strategy Manager - Early Years, Hertfordshire County Council
Principal Strategy Development, Herts Highways
Royal Mail Legal Services (Property Law)
Chief Insp, Dacorum CDRP
Space & Property Manager, West Herts Hospital NHBS Trust
Highways Agency
S106 Officer, Hertfordshire County Council
Strategic Housing (Group Manager), Dacorum Borough Council
The Land Office
Environmental Services (Group Manager), Dacorum Borough Council
Conservation & Design, Dacorum Borough Council
Children Services Manager, Dacorum Borough Council

Disability Groups (12)

Hertfordshire Action on Disability
Age Concern
Tring Access Committee
DISH
The Puffins
Heart to Herts
Hemel Hempstead Access Group
Dacorum Talking Newspaper
POHWER
Dacorum Dolphin Swimming Club
Mind in Dacorum
Alzheimer's Society (Dacorum Branch)

Residents Associations (57)

Gadebridge Community Association
Leverstock Green Village Association
Tenant Participation Team
Tring Community Assn

Grovehill West Residents Association
Highfield Community Centre
Apsley Community Association
The Tudors Residents Association
The Quads Residents Association
Hyde Meadows Residents Association
Kings Langley Good Neighbours Association
Hales Park Residents Association
The Mount Residents Association
Berkhamsted Citizens' Association
Douglas Gardens Street/Block Voice
Street Block Voice (Farm Place)
Briery Underwood Residents Association
The Briars & Curtis Road Street/Block Voice
Hunters Oak Residents Association
Thumpers Residents Association
Kings Langley Community Association
Henry Wells Residents Association
Herons Elm Street/Block Voice
Adeyfield Neighbourhood Association
Bellgate Area Residents Association
Bourne End Village Association
Street Block Voice (Hilltop Corner, Berkhamsted)
Village Voice (Little Gaddesden)
Conservation Area Resident's Association (CARAB)
Picotts End Residents Association
Westfield Road Street/Block Voice
Redgate Tenants Association
Shepherds Green Residents Association
Piccotts End Residents Association
Bennetts End Neighbourhood Assn
Warners End Neighbourhood Association
Bourne End Village Association
The Planets Residents Association
Residential Boat Owners Association
Gaddesden Row Village Voice
Save Your Berkhamsted Residents Association
Pelham Court Residents Association
Long Marston Tenants Association
Shepherds Green Residents Association
R.B.R. Residents Association
Grovehill Community Centre
Street Block Voice (Typleden Close)
Longdean Park Residents Association
Longfield Road Playing Out Committee
Manor Estate Residents' Association
Street Block Voice (Winchdells)
Chaulden Neighbourhood Association
Northend Residents Association
Heather Hill Residents Association

Dacorum Borough Council Leaseholder Group
Nash Residents Association
Rice Close Street/Block Voice

Key Land Owners/Developers (105)

Akeman Property Company Ltd
AMEC (x3)
APLC
Ashley House Plc
Barton Willmore (x5)
Beechwood Homes Ltd
Bellway Homes - North London
Bidwells (x2)
Box Moor Trust
Brian Barber Associates (x3)
Brixton Properties Limited
CALA Homes
Calderwood Property Investment Ltd
City & Provincial Properties Plc
Colliers CRE
Courtley Consultants Ltd
Crest Nicholson (Chiltern) Ltd
D W Kent & Associates
David Russell Associates
David Wilson Estates
DLP Planning Ltd
Dpds Consultant Group
Drivers Jonas Deloitte
Entec UK Ltd.
Estates And Property Services
Felden Park Farms Ltd
George Crutcher Planning
George Wimpey (x2)
George Wimpey Strategic Land
Gerald Eve LLP
Gleeson Strategic Land (x3)
Griffiths Environmental Planning
Hives Planning
Homes & Communities Agency (HCA) (x2)
Horstonbridge Development Management
Housebuilders Federation
Iceni Projects Limited
Indigo Planning Limited (x2)
JB Planning Associates (x2)
Jehovah's Witnesses
Jeremy Peter Associates
John Beyer & Associates
Level
Lone Start Land Ltd

Main Allen
Maze Planning Ltd
Nathaniel Lichfield & Partners Ltd (x2)
Nelson Bakewell
Parrott & Coales
PDMS Vesty Limited
Peacock & Smith
Permisson Homes Midlands
Picton Smeathmans
PJSA Property & Planning Consultants
Planning Perspectives
Plato Estate Ltd
Procter Farm Partnership
Rapleys LLP (x2)
Renaissance Lifecare Plc
Rolfe Judd Ltd
Savills (x3)
Sellwood Planning
Sibley Germain LLP
Steve Morton Brickworks Ltd
Stimpsons
Strutt And Parker
Taylor Wimpey Developments
Tetlow King Planning
The Crown Estate
Tribal MJP
Twigden Homes Ltd.
Vincent & Goring (x4)
Zog Brownfield Ventures Ltd
Mr. D. Brightman
Mr. Steve Cook
Mr. Mark Glenister
Mr. Patricia Kelly
Mr. John Normanton
Mr. David Prothero
Mr. Peter Vallis
Mr. Paul Webb
Mr. & Mrs. West
Mr. G Dean & Mrs C. M. Walter
Owner of Rectory Farm

Estate Agents (42)

Aitchison Raffety (x4)
Ashridge Estates
Bidwells
Brasier Harris
Carter Jonas
Castles (x2)

Cesare Nash & Partners (x2)
Chesterton
Cole Flatt & Partners
Connells
Cornerstone
Cushman & Wakefield
DTZ
Fisher Wilson
FreethMelhuish (x2)
Hemel Property
Kirkby & Diamond
Lambert Smith Hampton (x4)
Malcolm Judd & Partners
Michael Anthony
Nathaniel Lichfield & Partners
Pendley Commercial
Pendley Estates
Poulter & Francis
Savills (L & P) Limited (x3)
Stimpsons
Strutt & Parker (x4)
Stupples & Co

Local Pressure Groups (48)

Action Against Injustice Caused by Dacorum Borough Council
Berkhamsted & District Gypsy Support Group
Berkhamsted Residents Action Group (BRAG)
Built Environment Advisory & Management Service
Campaign For Real Ale
Chiltern Hundreds Housing Association
CPRE - The Hertfordshire Society
Dacorum Architecture Forum
Dacorum CVS
Dacorum Environmental Forum Waste Group
Dacorum Green Party
Drayton Beauchamp Parish Meeting
Guinness Trust
Gypsy Council
Hemel Hempstead High Street Assn.
Hertfordshire Agricultural Society
Hertfordshire Gardens Trust
Herts & Middlesex Badger Group
Herts and Middlesex Wildlife Trust
Herts Fed. of Women's Institutes
Hightown Praetorian & Churches HA
London Luton Airport Operations Ltd
Markyate Village Hall Committee
Mr Richard Mabey
S & W Herts WWF Group And Green Party

St Albans Enterprise Agency
St Albans Museums
The Conservation Society (Herts)
Transition Town Berkhamsted
Tring Sports Forum
Trustees of Drayton Beauchamp Parochial Charities
Wendover Arm Trust
Tring Environmental Forum
Woodland Trust
Save Your Berkhamsted Residents Association
Kings Langley Local History & Museum Society
The Chiltern Society
Ramblers Association
CPRE - The Hertfordshire Society
The Inland Waterways Association
Herts Natural History Society
The Box Moor Trust
Groundwork Hertfordshire
Friends of Tring Reservoirs
Ramblers Association
Campaign to Protect Rural England
Ramblers Association
Chilterns Conservation Board

National Pressure Groups (24)

Ancient Monuments Society
Civic Trust
Confederation of British Industries
Country Land & Business Association
Derbyshire Gypsy Liaison Group
English Rural Housing Association
Friends of the Earth
Garden History Society
Gypsy Council
N S C A
National Federation of Gypsy Liaison Groups (x2)
NFU East Anglia Region
Outdoor Advertising Council
RSPB (Eastern England Region)
Rural Housing Trust
The Architectural Heritage Fund
The Bell Cornwell Partnership
The British Wind Energy Association
The Housing Corporation
The Ramblers Association
The Victorian Society
Timber & Forestry Association
Town & Country Planning Association

Planning Development Consultants (87)

Alan Hedley Partnership
Argyll Developments
Bell Cornwell
Bidwells (x3)
Blue Sky Planning
BNP Paribas Real Estate
Boyer Planning
Capital & Regional PLC
Carter Jonas, Property Consultants
Catalist Capital
CB Richard Ellis Limited
CBRE (x2)
CBRE Global Investors
Chartered Town Planner
Consensus Planning
Countryside Homes
CPRE - The Hertfordshire Society
Cramond-Ivey Management Limited
Cushman & Wakefield
Dalton Warner Davis LLP (x2)
David Ames Associates
David Lock Associates
Delta Financial Services
Dennis Jean Properties
Design Council CABE
DLP Planning Consultants
DPP
EllamOxtoby and Peck LLP
Emery Planning
Francis Weal & Partners
Fusion Online Limited
Genesis Town Planning
Gregory Gray Associates
Halcrow Group
Harrison Webb
Horstonbridge Property Development
Indigo Planning (x2)
Insight Town Planning
J & J Design
JB Planning Associates (x2)
JS Bloor Homes (Northampton) Ltd
Knight Frank LLP
Labyrinth Properties Ltd
Linden Homes (Chiltern) Ltd
Living Heritage Developments Limited
Lucas Land & Planning (x2)
Malcolm Judd & Partners
Mayfair Investments
Metropolis Planning And Design LLP

Montagu Evans
Murdoch Associates
Nick Shute Associates
NMB Planning Ltd
Peter Brett Associates and Roger Tym & Partners
Phillips Planning Services Ltd (x2)
Planning Perspectives (x2)
Planning Potential
PPML Consulting
Principle Purpose
Quilichan Consultancy
Rapeleys (x2)
RGB
RO Developments Ltd
Robert Turley Associates
Shire Consultancy
Smith Stuart Reynolds
Stanhope Plc and Aviva
Stewart Ross Associates
Tanner & Tilley
Terence O'Rourke (x2)
TFM Readers
The W. R. Davidge Planning Practice
Tribal Consulting
Vincent AndGorbing
Woolf Bond Planning (x2)

Public Bodies (32)

Aldwyck Housing Assn
Community Development Agency
Council For British Archaeology
Dacorum Citizens Advice Bureau
Dacorum Heritage Trust
East England Conservancy
East Of England Tourist Board
English Heritage East Of England
Environment Agency (x2)
Environment Agency Emergency Workforce
Estates & Facilities Department
Forest Enterprise England
Forestry Commission
FWAG East
Hemel Hempstead Police Station
Hertfordshire Prosperity Ltd/LIC
Herts Biological Records Centre
Herts Building Preservation Trust
Housing Corporation
Local Government Association
National Air Traffic Services

Ordnance Survey
PITSTONE CEMENT WKS. LIAS
Rural Development Commission
The Commission for Local Administration In England
The Crown Estate
The National Trust (x2)
The National Trust Regional Office
The Royal Town Planning Institute
The Theatres Trust

Surveyors and Architects (8)

AKT Planning+Architecture
David Kann Associates
Januarys Consultant Surveyors
Prudential
Wakelin Associates
Mr.HugoHardy
Mr.DavidHoworth
Mr.DavidRaeside

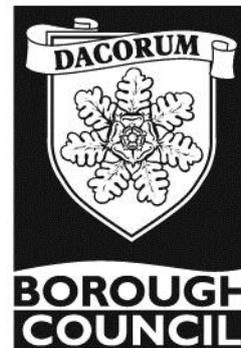
Voluntary Organisations (19)

Chiltern Woodlands Project
Citizens' Advice Bureau
GADEBRIDGE YOUTH CLUB
Grove Hill Youth Centre
Hemel Hempstead Community Church
Herts Committee For V.S.O.
Hertfordshire Federation Of WI
Hertfordshire Gardens Trust Conservation Team
Herts Groundwork Trust
HGT Conservation Team
Housing Link
Museum Of London Archaeology Service
New Gospel Halls Trust
Shaftsbury Housing Assn
St. George's United Reformed Church
The New Gospel Hall Trust
Volunteer Centre Dacorum
William Sutton Trust
William Sutton Trust

Examples of Notification Letters, Memos and Emails

Notification Letter - General

Date: 21 January 2013
Your Ref: 17.7
Our Ref:
Contact: Strategic Planning
Email: strategic.planning@dacorum.gov.uk
Directline: 01442 228661 (Laura Wood)



Civic Centre
Marlowes
Hemel Hempstead
Hertfordshire
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«otOfficialTitle»«tiTitle»«Forename»«Surname»
«Position»
«Organisation»
«Address_1»
«HouseNumber»«Street»
«District»
«Town»
«County»«Post_Code»

Dear «tiTitle»«Forename»«Surname»,

DACORUM'S CORE STRATEGY: MODIFICATIONS CONSULTATION

The Core Strategy was submitted for examination in June 2012. This was conducted by a Planning Inspector and included a hearing in October 2012. Following that examination, the Council is proposing some changes to the Core Strategy.

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- Main Modifications to the Pre-Submission Core Strategy
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- Minor Modifications to the Pre-Submission Core Strategy.

There is also an explanatory introduction.

Representations must be received on the 'Modifications document' by the Council between Wednesday 23rd January and **5.15pm Wednesday 6th March 2013**. All representations on the first two items will be passed to the Planning Inspector: representations on the minor modifications will be considered by the Council only.

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I hope this letter and supporting information explains the position sufficiently. However if you have any queries, please contact the Strategic Planning and Regeneration team at strategic.planning@dacorum.gov.uk or phone 01442 228660.

Yours sincerely

Laura Wood
Team Leader (Strategic Planning)
Strategic Planning and Regeneration

Footnote: The Core Strategy sets the planning framework for Dacorum for the next 20 years. It contains a vision of what the Borough should be like in 2031 and a set of policies to help achieve this. It also contains individual strategies for the Borough’s towns, large villages and the wider countryside. These set out specific planning issues affecting these individual areas and how any problems will be addressed.

Notification Email - General

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Yours sincerely

Laura Wood
Team Leader (Strategic Planning)
Strategic Planning and Regeneration

MEMORANDUM

**STRATEGIC PLANNING &
REGENERATION**

To: Assistant Director Legal Governance
Group Manager Legal Governance
Group Manager commercial Assets
Director Housing & Regeneration
Assistant Director Housing & Regeneration
Group Manager Strategic Housing
Team Leader Housing Enabling
Group Manager Strategic Planning & Regeneration
Group Manager Development Management
Team Leader Development Management
Team Leader Development Management
Team Leader Conservation
Team Leader Enforcement

From: Laura Wood
Ext: 2661
Ref: 7.17
Date: 21 January 2013

Dear Colleague

DACORUM'S CORE STRATEGY: MODIFICATIONS CONSULTATION

The Core Strategy was submitted for examination in June 2012. This was conducted by a Planning Inspector and included a hearing in October 2012. Following that examination, the Council is proposing some changes to the Core Strategy.

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There is also an explanatory introduction.

The consultation runs from 23 January until 5.15pm 6 March 2013.

The modifications, both main and minor, are part of the Core Strategy. They are material planning considerations, which should be used in considering and deciding planning proposals. A copy of the 'Modifications document' is attached for your attention.

You may like to note that the main modifications have been considered informally by the Planning Inspector, approved by full Council and enable the Core Strategy to be

considered sound. The question relating to the Regional Strategy has been requested by the Inspector.

If you have any queries, please contact the Strategic Planning and Regeneration team at strategic.planning@dacorum.gov.uk or phone 01442 228660.

Further information about the public consultation

Representations must be received on the 'Modifications document' by the Council between Wednesday 23rd January and **5.15pm Wednesday 6th March 2013**. All representations on the first two items will be passed to the Planning Inspector: representations on the minor modifications will be considered by the Council only.

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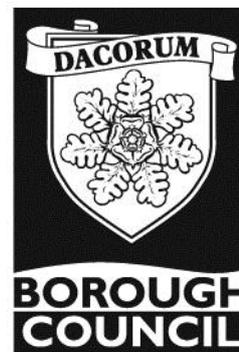
Yours sincerely

Laura Wood

Team Leader (Strategic Planning)
Strategic Planning and Regeneration

*Enclosures

Letter to Town & Parish Councils



Civic Centre
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1HH

Telephone: 01442 228000
www.dacorum.gov.uk
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D/deaf callers, Text Relay:
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Date: 21 January 2013
Your Ref: 17.7
Our Ref:
Contact: Strategic Planning
Email: strategic.planning@dacorum.gov.uk
Directline: 01442 228661 (Laura Wood)

«tiTitle» «Forename» «Surname»
«Position»
«Organisation»
«Address_1»
«HouseNumber» «Street»
«District»
«Town»
«County» «Post_Code»

Dear «tiTitle» «Forename» «Surname»,

DACORUM'S CORE STRATEGY: MODIFICATIONS CONSULTATION

I enclose a copy of two new documents connected to the Core Strategy for your attention:

- 'Modifications document'
- Sustainability Report Addendum.

The purpose of the documents and related consultation, which starts on 23 January and runs for six weeks, is explained below.

The Core Strategy was submitted for examination in June 2012. This was conducted by a Planning Inspector and included a hearing in October 2012. Following that examination, the Council is proposing some changes to the Core Strategy.

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- (3) Main Modifications to the Pre-Submission Core Strategy
- (4) An invitation to submit views on the implications, if any, of the recent revocation of the Regional Strategy (the East of England Plan) on the Core Strategy.
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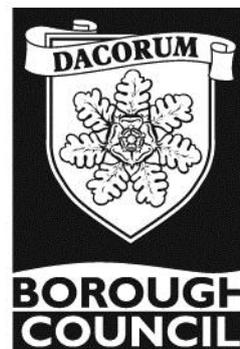
Yours sincerely

Laura Wood
Team Leader (Strategic Planning)
Strategic Planning and Regeneration

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Letter to Statutory Consultees

Date: 21 January 2013
Your Ref: 17.7
Our Ref:
Contact: Strategic Planning
Email: strategic.planning@dacorum.gov.uk
Directline: 01442 228661 (Laura Wood)



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«tiTitle» «Forename» «Surname»
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Yours sincerely

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Team Leader (Strategic Planning)
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Letter to Deposit Points

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Contact: Strategic Planning
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Dear Sir/Madam,

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I enclose a copy of two new documents connected to the Core Strategy which I would be grateful if you could make available to the general public:

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Yours faithfully

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