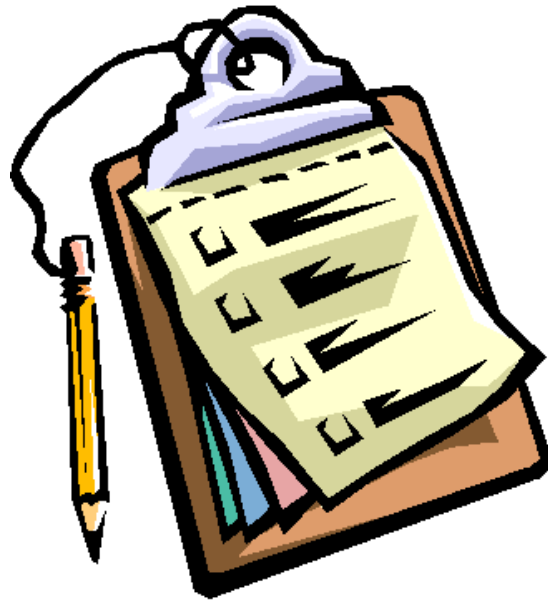




**Broxbourne Local Development Framework  
Core Strategy Submission  
December 2010**



**Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008**

**Regulation 27 Statement of Consultation**

**Regulation 30 Statement of Representations**

## Introduction

1. Regulation 27 of the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008 states that proposed submission documents should include “(iv) a statement setting out (aa) which bodies and persons are invited to make representations under regulation 25, (bb) how those bodies and persons were invited to make such representations, (cc) a summary of the main issues raised by those representations and (dd) how those main issues have been addressed in the DPD.”
2. Regulation 30 of the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008 states that submission documents should include “(e) a statement setting out (i) if representations were made in accordance with Regulation 28(2), the number of representations made and a summary of the main issues raised in those representations or (ii) that no such representations were made.”
3. This Statement therefore combines the requirements of Regulation 27 and Regulation 30 into a single document.

## **Regulation 27 – Statement of Consultation**

4. This section accords with Regulation 27 by identifying who the Council consulted at Key Issues and Preferred Options stages, by describing how those bodies and persons were invited to comment, by summarising the main issues that were raised and by explaining how these issues have been addressed in the Core Strategy Pre-Submission document.

### **(aa) Which bodies and persons were invited to make representations**

5. The Council's [Statement of Community Involvement](#) was adopted in December 2006. It sets out how all sections of the community will be engaged in the LDF process and identifies the bodies that will be formally consulted at each stage of document preparation.
  - The listed statutory bodies are the East of England Regional Assembly (EERA), East of England Development Agency (EEDA), Hertfordshire County Council, adjoining Local Planning Authorities, adjoining Parish Councils, Highways Agency, Strategic Rail Authority, Environment Agency, Countryside Agency, English Nature, Lee Valley Regional Park Authority, English Heritage and relevant gas, electricity, water, sewerage and telecommunications companies.
  - The listed non-statutory national bodies are Age Concern, Help the Aged, British Geological Society, British Waterways, Centre for Ecology and Hydrology, Chamber of Commerce, Civil Aviation Authority, British Airports Authority, Commission for Architecture and the Built Environment (CABE), English Partnerships, Home Builders Federation (HBF), equal opportunities and disabilities advisory groups, Disabled Persons Transport Advisory Committee, National Grid, Campaign to Protect Rural England (CPRE), Royal Society for the Protection of Birds (RSPB), Herts and Middlesex Wildlife Trust, Forestry Commission, Freight Transport Association, Rail Freight Group, Health and Safety Executive Regional Housing Board, Sport England and those Government departments with land holdings in the borough.
  - The listed non-statutory local bodies are community and resident groups, business groups, major employers, landowners, housebuilders, developers, estate agents, planning agents/consultants, housing associations, environmental groups, healthcare providers, education and training providers, transport providers and the emergency services.

6. Throughout the Core Strategy process the Council has maintained a LDF consultation database which is updated as existing consultees change their details or request their removal and new consultees are added. At both Key Issues and Preferred Options stage the Council contacted all statutory, non-statutory and other consultees on the database to invite them to make representations. The database now contains over 600 bodies and individuals.

**(bb) How those bodies and persons were invited to make representations**

7. At both Key Issues and Preferred Options stage statutory and non-statutory bodies and individuals were invited to make representations in accordance with Town & Country Planning Regulations and the [Statement of Community Involvement](#). Letters and emails sent to all consultees invited them to submit comments online, by post or by fax. An online planning portal was also used at Preferred Options stage. Consultees were invited to contact the planning policy team by phone or email if they had any queries.
8. The Council has not restricted itself to these forms of promotional communication however. Other methods used during consultation stages included newspaper adverts, newspaper wraparounds, executive summaries, press releases, glossy brochures, posters, leaflets, articles in Borough News and Hoddesdon and Waltham Cross e-biz magazines, presentations to the Borough Consultative Panel, presentations to neighbourhood forums and displays in One Stop Shops and libraries. This has all been supplemented by on-going correspondence and meetings with key bodies, developers/landowners and their consultants, community groups and individuals.
9. The evolution of the Core Strategy has also benefitted from contextual information in the form of updated national and regional guidance, new evidence studies, the findings of sustainability appraisals and habitat assessments, the results of Ipsos MORI surveys, Place Surveys and the Council's internal prioritisation process and a number of developer workshops as part of the SHLAA process.

**(cc) Summary of the main issues raised by representations**

10. The Council received 65 responses from bodies and individuals to the Key Issues consultation. They are summarised in a report to the Council's Planning & Licensing Committee on 2 October 2007 which can be viewed at:  
[http://www.broxbourne.gov.uk/council\\_and\\_democracy/council\\_meetings/planning\\_and\\_licensing/archive\\_may\\_07\\_-\\_april\\_08.aspx](http://www.broxbourne.gov.uk/council_and_democracy/council_meetings/planning_and_licensing/archive_may_07_-_april_08.aspx)

- Responses from statutory bodies focused on their respective policy agendas with reference to the policy ambitions of the East of England Plan to deliver sustainable development and national guidance in respect of producing a robust plan. There were recommendations that the Core Strategy should make specific reference to development in the green belt, the historic and natural environment, green infrastructure and planning obligations.
  - Statutory bodies with a particular remit and other services providers focused on the approach to development in light of capacity and infrastructure constraints.
  - Landowners and developers sought to promote specific urban and green belt sites and emphasised the requirement for the Council to demonstrate a 15 year housing land supply. They also sought a flexible approach in respect of sustainability targets and planning obligations.
  - Community groups and individual members of the public identified affordable housing, the green belt, open space, the impact of development and density as important local issues.
  - Responses to proposals for a Brookfield Area Action Plan focused on its remit in terms of technical evidence, green belt release, highway works, sustainable transport options and the need for complementary town centre strategies.
11. The Council received 565 representations from 158 bodies and individuals to the Preferred Options consultation. They are summarised in a report to the Council's Planning & Licensing Committee on 21 July 2009 which can be viewed at:  
[http://www.broxbourne.gov.uk/council\\_and\\_democracy/council\\_meetings/planning\\_and\\_licensing/archive\\_may\\_09\\_-\\_april\\_10.aspx](http://www.broxbourne.gov.uk/council_and_democracy/council_meetings/planning_and_licensing/archive_may_09_-_april_10.aspx).
- The main issues raised in respect of the ***borough profile and key planning issues*** focused on the omission of particular issues such as environmental characteristics, flood risk, housing types, green infrastructure and local heritage.
  - The main issues raised in respect of the ***spatial vision and strategic objectives*** focused on inconsistencies and the omission of particular issues. Proposed changes included more commitment to sustainable development and climate change, a clear objective to reduce carbon emissions, promotion of water efficiency, new flood risk objectives, stronger reference to the 2012 Olympic Games, reference to both social

rented and intermediate affordable housing, greater emphasis on existing town centres, reference to local heritage and stronger green belt protection. There are also accusations that some development proposals will not improve quality of life.

- The main issues raised in respect of **sustainability** focused on the general lack of consideration of both the impacts and mitigation measures of climate change.
- The main issues raised in respect of **housing** focused on assumptions made about the delivery of urban sites and the preference for major growth locations over individual sites. Urban sites should only be relied upon where they have been actively promoted by a developer or landowner and all open spaces, allotments and back garden land should be discounted. Policies should avoid green belt releases in advance of urban sites. Further thought should be given to the balance of market and affordable properties and the mix of houses and apartments. The approach to affordable housing should take account of social problems in recent mixed use developments. Options for gypsies should include private ownership or management by housing associations.
- The main issues raised in respect of a **review of the green belt** focused less on the general approach to define a strategic boundary and more on the possible release of specific areas and the potential effects of sites promoted for development. Emphasis should be placed on urban sites before green belt land but where releases are necessary they should take account of landscape, wildlife, flood risk, climate change, accessibility and the ability to define a defensible new green belt boundary. There was particular opposition to the release of land at Wormley given its open space and wildlife value and concern about the Southern A10 Corridor becoming an extension of Enfield.
- The main issues raised in respect of **employment** were whether job targets should be revised in light of the economic downturn, to consider strategic sites for uses other than warehousing to help achieve wider regeneration objectives and to exploit the amenity value of waterways. A number of new employment sites to the north-east of Essex Road employment area, to the north of Dinant Link Road and along the A10 were proposed.
- The main issues raised in respect of **retail** focused on the over-emphasis of Brookfield compared to existing town centres and the lack of justification evidence. Existing town centres have been allowed to degenerate and need rescuing. Emphasis should be placed on tackling vacant units, attracting reputable shops, providing more car parking, providing free car parking and creating a thriving night-time economy. There are

concerns that Brookfield will prejudice town centres and other sub-regional centres and increase traffic movements. Supportive comments recommend a high quality development with good retailers and leisure activities to create a mixed use centre.

- The main issues raised in respect of the ***environment*** focused on the need for stronger policies for energy, water, waste, pollution, flood risk, wildlife and green infrastructure. There should be reference to the Code for Sustainable Homes and BREEAM, greater protection for important areas and defined targets for energy, water and waste.
- The main issues raised in respect of ***transport*** focused on traffic congestion and the role of public transport. All strategic development sites, particularly those distant from public transport hubs, should be underpinned by robust transport evidence and supported by green travel plans. Neighbourhoods should be conducive to walking and cycling with safe areas for children to play. Efforts should be made to make east-west travel less problematic.
- The main issues raised in respect of ***infrastructure*** focused on concerns about the lack of infrastructure and the need to ensure sufficient provision to accommodate development.

**(dd) How main issues have been addressed in the Pre-Submission Core Strategy**

12. Representations received at both Key Issues and Preferred Options stages were analysed by planning policy officers and presented to the Council's Planning & Licensing Committee. The report to Planning & Licensing Committee on 21 July 2009 which summarised representations to the Preferred Options consultation also contained officer recommendations on how each representation would be dealt with. These were [1] noted, [2] clarification or amendment will be considered, [3] significant issue likely to involve revisions to the Core Strategy, [4] significant issue requiring revisions or additional work on the evidence base, [5] comment considered to be outside the scope of the LDF or [6] comment not agreed although clarification may be considered.
13. It should be noted that the Pre-Submission Core Strategy was prepared in early 2010 and therefore covered the period when a new coalition Government was elected and the East of England Plan was revoked. This action deleted the housing target, affordable housing target, approach to job creation, requirement for a green belt review, retail strategy and other policies that had informed both Key Issues and Preferred Options consultation. It required

the Council to revise some policies to better reflect national guidance and local evidence and to consider the views of the community as part of the localism agenda.

14. In respect of the ***spatial portrait, main challenges and drivers of change***, the Council has sought to acknowledge all of the issues raised in representations.
15. In respect of the ***spatial vision and strategic objectives*** the Council has revised the vision and objectives to be more spatial and to have clear links back to the Broxbourne Sustainable Community Strategy. A draft version of the vision and objectives were sent to a mock inspector prior to his visit in December 2009 and he subsequently commended the length of the vision but advised that some objectives were vague and not locally distinctive or specific. In response, the spatial vision now repeats the overall vision of the Sustainable Community Strategy and explains how sense of place and sense of community will be achieved through development decisions and the strategic objectives seek to deliver all nine themes of the Sustainable Community Strategy and particularly the four themes that deal with development issues. There is more emphasis on creating sustainable neighbourhoods by promoting high quality development and attractive open spaces, a greater recognition of the presence and legacy of the 2012 Olympic Games to help raise prosperity and a desire to protect the safe, leafy and suburban character of the borough.
16. In respect of ***sustainability*** the Council has introduced Policy CS1 Sustainable Neighbourhoods which establishes a broad spatial strategy for growth and regeneration and places a clear emphasis on the relationship between homes, jobs and services, accessibility by all forms of transport and the sustainability of homes and other buildings. It contains clear policy links back to national guidance and establishes suitable mechanism for addressing sustainability issues in more detail in subsequent DPDs and SPDs.
17. In respect of ***housing*** the revocation of the East of England Plan has deleted the policy requirement to deliver 280 dwellings per annum. The Council has used evidence from the Strategic Housing Market Assessment, the Affordable Housing Viability Study, the Strategic Housing Land Availability Assessment, previous completions and commitments history and housing waiting list information to set a target of 240 dwellings a year. The SHLAA has also been amended in light of discussion at a developer workshop that commercial sites are unlikely to be viable for housing in current economic circumstances and a number of open space, allotment and back garden sites have been removed following the new coalition Government's amendment to national guidance.



18. In respect of **affordable housing** the revocation of the East of England Plan has deleted the policy requirement to contribute to a regional target of 35% affordable housing but has not changed that fact that Broxbourne has a serious lack of affordable housing. The Council has therefore used evidence from the Affordable Housing Viability Study and the housing waiting list to set a flexible 40% target. Provision can be on-site or off-site where preferable and developers can prepare viability appraisals to demonstrate the limits of their scheme.
  
19. In respect of a **review of the green belt** there have been some notable changes since the Preferred Options stage. Firstly, in early December 2009 the Council sought to progress the Core Strategy by agreeing the extent of Areas of Search and by precisely defining new strategic green belt boundaries in accordance with its interpretation of Policy SS7 of the East of England Plan but was asked to reconsider this approach by the LDF Steering Group. Secondly, the Council benefitted from a visit by a mock inspector in late December 2009 who recommended that an alternative, less contentious, approach could be taken whereby the rough location of an Area of Search could be identified on the Key Diagram and supported by as much information as possible including a description on how the new green belt boundary would be defined but that the formal release and allocation of such land could be in a Site Allocation DPD. Thirdly, in July 2010 the requirement for a review of the green belt was deleted by virtue of the revocation of the East of England. In light of these events, as well as in response to housing need evidence, SHLAA evidence on the capacity and deliverability of urban sites and the desire to build attractive neighbourhoods with a mix of larger family properties, the Pre-Submission Core Strategy retains policy support for small edge-of-urban sites and/or large green belt sites to be allocated for development but only releases land from the green belt as part of the Greater Brookfield strategic allocation. Policy CS2 Housing identifies four Areas of Search (West of Hoddesdon, Goff's Oak Area, Bury Green Area and Southern A10 Corridor) where there is scope for such sites to come forward and Policy CS8 Environment establishes a clear mechanism to review and release land from the green belt in a Site Allocation DPD. In light of significant opposition from local residents and its inherent landscape value it was decided that Wormley playing fields to the east of the A10 should remain in the green belt and not be identified as an Area of Search. The Council continues to support its decision to discount land to the west of Goff's Oak and land to the south of Goff's Lane as Areas of Search.
  
20. In respect of **employment**, the Council's objective to attract more high-value jobs is supported by the Hertfordshire Economic Development Strategy which recognises that people need high-value jobs to afford to live in the county and that low-value jobs are likely to attract cheap labour from London and rural areas. Policy CS5 identifies two sites in the Southern A10 Corridor Area of Search which have scope for long-term employment

development. Maxwells Farm West is favoured for industrial uses and Park Plaza West is favoured for high quality business park activities.

21. In respect of **retail and town centres**, the Council has reviewed its health check evidence for Hoddesdon and Waltham Cross town centres and Cheshunt Old Pond district centre and has established a retail strategy to ensure that all centres in the borough grow and develop relative to their size and status. A Hoddesdon Town Centre Strategy was published in May 2010 which addresses many of the concerns raised during previous rounds of consultation. A similar programme of evidence collection and debate with landowners, developers and relevant statutory bodies has been initiated to explore redevelopment options as part of a Waltham Cross Town Centre Strategy. This will be complemented by on-going actions as part of the Waltham Cross Renaissance Programme.
  
22. In respect of **Greater Brookfield**, the Council has amended its stance in response to the change to PPS12 which allowed core strategies to make strategic allocations and in light of the revocation of the East of England Plan which deleted the regional retail structure. The planning context for retail is now provided by PPS4 which seeks to enhance vitality and economic performance by planning for new provision to meet local needs, promote regeneration, tackle deprivation, reduce travel and ensure a sustainable pattern of development. The Council has reviewed its retail evidence in light of the economic downturn to identify the need for new retail floorspace in the borough and the impact of development at Brookfield. It continues to conclude that Greater Brookfield is a sequentially preferable location for new high-value shops and leisure activities, that a critical mass of development will help to reclaim a significant amount of non-food spending that currently leaks to competing centres at Enfield, Harlow and Welwyn Garden City and other more distant centres and that development will create new jobs and social opportunities. Policy CS7 quantifies the amount of retail and leisure floorspace that will be acceptable and establishes criteria for a masterplan approach.
  
23. In respect of the **environment** there is a clear focus on seeking to protect and enhance the natural, historic and built environment. This includes reference to the Lee Valley Regional Park Authority's Park Development Framework, a clear mechanism to review and release land from the green belt in a Site Allocation DPD and clear links back to national guidance in respect of flood risk and conserving and enhancing protected sites and areas. There is also greater emphasis on high quality design as a way of responding to concerns about the impact of development in urban areas and to create attractive developments in other locations.

24. In respect of **infrastructure** the Pre-Submission Core Strategy clearly explains how infrastructure and services will be brought forward to support housing, employment, retail, leisure and other development. This includes transport, utilities and social infrastructure such as schools and healthcare centres.
  
25. In respect of **transport** the Council benefitted from a visit by a mock inspector in December 2009 who recommended that further highway evidence be obtained to support the Core Strategy. Strategic transport modelling work was therefore commissioned in early 2010 and the Council worked with consultants and the local highway authority to assess the traffic implications of various development options. It concludes that short and medium term proposals will add additional stress to a number of highway links and junctions but that they will continue to operate within capacity and that longer-term options will add even more stress depending on the scale and location of development. In response to these issues the Core Strategy makes provision for an A10 Route Management Strategy to ensure that the A10 and other roads and junctions can accommodate future traffic levels.
  
26. In respect of **delivery** the Council has introduced a “What If...?” chapter which explains how the Council will respond if key elements of the spatial vision do not come forward within the timescale anticipated and a series of Implementation and Monitoring tables which identify the mechanisms that are or will be put in place to deliver the vision and objectives.

## Regulation 30 – Statement of Representations

27. This section accords with Regulation 30 by stating the number of representations that were made in response to the Pre-Submission Core Strategy and by summarising the main issues raised in those representations.

### (i) Number of Representations

28. The Council received 97 responses from bodies and individuals to the Pre-Submission Core Strategy. They comprise 21 from statutory and public sector bodies, 13 from local community and environmental bodies, 24 from landowners and developers and 39 from local residents. They were submitted in a variety of formats primarily proformas that comment on individual policies/paragraphs and state whether they are “legally compliant” and/or “sound” and more general letters which cover a variety of matters and do not explicitly state whether the Strategy is “legally compliant” and/or “sound”. Where appropriate, officers have separated proformas and letters into over 350 individual representations.

29. A copy of each response is available on the Council’s website:

[www.broxbourne.gov.uk/corestrategy](http://www.broxbourne.gov.uk/corestrategy)

30. Representations are also summarised in a report to the Council’s Planning & Licensing Committee on 7 December 2010 which can be viewed at:

[http://www.broxbourne.gov.uk/council\\_and\\_democracy/council\\_meetings/planning\\_and\\_licensing/7\\_december\\_2010.aspx](http://www.broxbourne.gov.uk/council_and_democracy/council_meetings/planning_and_licensing/7_december_2010.aspx)

### (i) Main Issues Raised

31. The main representations to the **Spatial Vision** and **Strategic Objectives** focus on minor wording changes that could be made to better reflect the responsibilities of statutory bodies such as the Environment Agency and Natural England. A number of representations criticise the size/prominence of stars on the Key Diagram given the level of development they potentially represent. It is difficult to see which areas will definitely continue to be protected as green belt. Herts and Middlesex Wildlife Trust state that key biodiversity assets should be identified and Lee Valley Regional Park Authority recommend that the Park be annotated.
32. The main representations to the **Sustainable Neighbourhoods** chapter encourage more rigorous sustainability targets. The Environment Agency assert that a water consumption rate of 105 litres per person per day can be achieved for less than £125 per dwelling.

Thames Water also encourage more water efficiency. Natural England note that climate change policies included at Preferred Options stage have now been removed and seek reassurance that such issues will be addressed in the Development Control Policies DPD. Hertfordshire County Council Environment Department encourage support for other energy sources alongside district heating.

33. The main representations to the ***Housing Development*** chapter focus more on the approach to urban sites and green belt releases as well as the dwelling target itself. Confusion is expressed about the strategic green belt review work that has been undertaken to inform the Core Strategy and the more detailed green belt review work that will be carried out to inform site allocations. A number of representations note that Areas of Search are much larger than the amount of land needed to accommodate new housing. They are too vague, should be reduced, ranked in terms of preference and defined in much more detail. Hertfordshire CPRE question whether there is an overriding need to release green belt land and believe that such issues warrant a separate chapter in any case. Land Improvements / Leach Homes and Crest Strategic Ltd respectively argue that large developments to the west of Hoddesdon and to the west of Cheshunt should be brought forward early. A number of developers/landowners support a higher dwelling target. They also consider that the SHLAA is overly-optimistic about the number of urban sites that will come forward. Broxbourne Housing Association state that the target falls well below the projected need for social housing and advise that green belt land may need to be released immediately to meet the shortfall. Hertfordshire County Council Environment Department and Stevenage Council query whether there is an audit trail and sustainability appraisal of alternative targets.
34. The main representations to the ***Housing Mix*** chapter are generally supportive of a mix of housing types and sizes. The Highways Agency is content with efforts to achieve a mix of housing. A number of developers/landowners recommend a different affordable housing target and many responses emphasise the importance of viability appraisals. Broxbourne Housing Association advise that careful targeting of shared ownership and intermediate rent products is required given the borough's unusually large intermediate housing market.
35. The main representation to the ***Travelling Community*** chapter focuses on the lack of a specific gypsy pitch target. Epping Forest describe the policy as short-sighted and reactive. The Environment Agency request that specific reference be made to caravan sites not being appropriate in certain flood zones. Lee Valley Regional Park Authority assert that gypsy pitches are inappropriate in the Park and incompatible with its remit for leisure and recreation.

36. The main representations to the **Employment** chapter focus on the complexities associated with bringing forward Areas of Search. The East of England Development Agency welcome the employment strategy but recommend a more comprehensive and aspirational approach to attract high-value jobs. Policies should be more specific about job numbers and sectors. The Highways Agency assert that development in the Southern A10 Corridor Area of Search requires a comprehensive transport approach. Plans should be flexible in case schemes do not come forward. Enfield Council query whether other strategic employment sites in Hertfordshire might undermine the justification for Park Plaza West. The Co-op Group suggest that the Park Plaza North policy should be relaxed to allow a wider mix of uses. A J Maxwell suggests that Maxwell Farm West should not be contingent on other employment sites coming forward.
37. The main representations to the **Retail and Town Centres** chapter question the merits of Greater Brookfield in light of its potential consequences on existing town centres. Many respondents support the emphasis of town centre strategies to enhance vitality and viability. Hertfordshire County Council Environment Department support aspirations coming out of town centre strategies and encourage performance to be monitored. Centros state that their redevelopment proposals for the Tower Centre will help to revitalise Hoddesdon.
38. The main representations to the **Greater Brookfield** chapter question the merits of the scheme in light of national policy and its potential consequences on traffic, on existing town centres and on the relocation of existing land uses. Bayfordbury Estates support the scheme in light of its shopping, leisure, housing, transport, and job benefits. Standard Life and others argue that their sites should be incorporated within the strategic allocation area. The Highways Agency are content with the main thrust of retail activity at Brookfield but would expect to be involved in masterplanning. Harlow, Epping Forest and Essex County Council oppose Brookfield in light of its potential impact on Harlow town centre regeneration ambitions. Local societies in Hoddesdon and Waltham Cross and other bodies oppose it in light of its potential impacts on other nearby centres. There is a suggestion that it only be supported for bulky goods retail. Hertfordshire CPRE consider the link road is an artificial green belt boundary. The Environment Agency note that part of the area is in the floodplain and should be subject to sequential testing. Hertfordshire County Council Commercial Services highlight the growing pressure for a new primary school in the Turnford area.
39. The main representations to the **Environment** chapter focus on changes that could be made to better reflect the responsibilities of statutory bodies and the interests of local bodies. English Heritage encourage policies to cover all heritage assets, not just buildings. Lee Valley Regional Park request more specific wording about the park and its remit for leisure

and recreation activities. They also highlight actions in biodiversity action plans. Sport England support references to green infrastructure and open space standards but recommend more rigorous efforts to protect particular open spaces types. The Ramblers Association encourage better links to the countryside and greater efforts to enhance landscape character.

40. The main representations to the **Infrastructure** chapter focus on existing congestion and the potential impacts of development on transport and other facilities/services. The Highways Agency is content with the transport modelling work undertaken but stress that the M25 cannot cater for unconstrained traffic growth and expect development to be subject to demand management. Hertfordshire County Council Environment Department note that they oppose direct access onto the A10 and expect special circumstances to be proven. They are satisfied that access solutions should be available for Areas of Search. An A10 Route Management Strategy will be particularly important in this regard. Land Improvements / Leach Homes question the validity of transport modelling work. National Grid does not consider that development in Broxbourne will create any capacity issues for the electricity or gas transmission network. Thames Water encourage developers to work with utility bodies to provide infrastructure by preparing utility statements and note that Deephams sewage treatment works is currently being upgraded. Hertfordshire County Council Commercial Services highlight the growing pressure for primary schools throughout the borough and encourage greater reference to youth and childcare facilities.
41. The main representations to the **Planning Contributions** chapter focus on omissions from the list of infrastructure and service items. The Highways Agency query whether sufficient funds can be obtained through Section 106 for road improvements. Hertfordshire County Council Commercial Services request reference to education, childcare and youth facilities. Hertfordshire Constabulary request the inclusion of funding for police infrastructure.
42. The main representations to the **What If...?** chapter and **Implementation and Monitoring** tables focus on the validity of delivery policies. Hertfordshire County Council Environment Department recommend that the Strategy should recognise any uncertainties and identify remedial measures. One landowner/developer considers that references to the Council working with other bodies are too generalised. Actions are not costed and there are no contingency arrangements. They recommend more specific actions and a more definitive approach to infrastructure planning are needed. A number of representations recommend the inclusion of additional strategies and documents which will aid delivery.

43. There are no representations to the ***Sustainability Appraisal***. Natural England consider that the ***Habitats Assessment*** appears to be complete and accurate in its coverage and conclusions. Lee Valley Regional Park Authority express surprise that the Strategy has not taken on-board advice to refer to recreation management in the Lee Valley Park Special Protection Area.



## Appendix 1 – LDF Consultation Database

1st and 2nd Waltham Cross Scout Group  
1st Cheshunt Scouts  
1st Hammondstreet Scout Group  
1st Turnford Scouts  
1st Turnford Scouts  
1st Wormley Scouts  
2nd Cheshunt Scouts (St Mary The Virgin)  
2nd Goff's Oak Scouts (Methodist) Scout Group  
3rd Waltham Cross Scout Group  
Abbey Road Surgery  
Abbeyvale Foods (Geest)  
Adams Holmes Associates  
Adventures River Cruises  
Age Concern - Italian Link  
Age Concern Hertfordshire  
Age Concern Hertfordshire - Care Support  
Aldwyck Housing Association  
Amwel Society  
Amwell Street Dental Practice  
Amwell Street Surgery  
Ancient Monument Society  
Andrew Martin Associates  
Andrews Lane Primary School  
Angling - Lee Anglers' Consortium  
Arlesdene Nursery  
Association of St. Paolino  
Athletics - Enfield & Haringey Athletic Club  
Attfield & Jones Architects  
Baigel Shah & Associates  
Bairstow Eves Ltd  
Baptist Church - Hoddesdon  
Barton Willmore Planning  
Bayfordbury Estates Ltd  
BCT Travel Group Ltd  
Beaumont Centre for the Over Sixties  
Bellway Homes  
Bidwells  
Biffa Waste Services  
Blue Arrow  
Bonneygrove County Primary School  
Bowyer Bryce  
Boyer Planning Limited  
Boys Brigade - 1st Hoddesdon Company  
Brethren Assembly  
Brickendon Liberty Parish Council  
British Aggregates Association  
British Airports Authority - Stansted  
British Chemical Distributors and Traders Assoc  
British Geological Survey  
British Horse Society - Rights of Way Dept  
British Naturalists' Association - Herts. Branch  
British Pipeline Agency  
British Waterways Board  
British Waterways London  
British Waterways London  
Brookland Infant and Nursery School  
Brooklands Women's Club  
Broxbourne & Sutura Town Twinning Association  
Broxbourne Arts Forum  
Broxbourne Asian Group  
Broxbourne Borough V & E  
Broxbourne C of E Primary  
Broxbourne Constituency Labour Party  
Broxbourne Constituency Liberal Democrats  
Broxbourne Dental Care  
Broxbourne Dental Practice  
Broxbourne Hockey Club  
Broxbourne Lawn Tennis Sports Club  
Broxbourne Neighbourhood Watch Forum  
Broxbourne Organisation for the Disabled  
Broxbourne Parish Church - Junior Church  
Broxbourne Parish Church - Women's Fellowship  
Broxbourne Parliamentary Conservative Association  
Broxbourne Rangers Youth Football Club  
Broxbourne Trustees Open Spaces & Recreation  
Broxbourne URC - Prayer Circle and Ministry  
Broxbourne Voluntary Sector Development Agency  
Broxbourne Volunteer Bureau  
Broxbourne Woods Area Conservation Society  
BT c/o agents Telereal Property Management  
Burleigh Primary School  
Business Link Hertfordshire  
Byways & Bridleways  
C P J Taylor  
Cadmore Lane Residents Association  
Campaign for Real Ale (CAMRA)  
Cannon Travel  
Carers in Hertfordshire - Young Carers Project  
Carnaby Road Residents' Association  
Cavendish Equipment Ltd  
CB Richard Ellis  
Centre for Ecology and Hydrology  
Cert Distribution Ltd  
CGMS  
CGMS agents for J Sainsbury  
Chamber of Commerce - Waltham Cross Cheshunt  
Chancellors School  
Changing Minds in Hertfordshire  
Chemical & Hazardous Installations Department - HSE (English Waters)  
Cherrytree Dental Care  
Cheshunt and Waltham Cross Branch Labour Party  
Cheshunt Art Club  
Cheshunt Bowls Club  
Cheshunt Carers Group  
Cheshunt Club  
Cheshunt Common Land Owners  
Cheshunt Congregation of Jehovah's Witnesses  
Cheshunt Deanery Synod  
Cheshunt Dental Centre  
Cheshunt Dental Practice  
Cheshunt Evening Women's Club  
Cheshunt Football Club  
Cheshunt Ladies' Afternoon Club  
Cheshunt Marriott  
Cheshunt Methodist Church  
Cheshunt Natural History Society  
Cheshunt Police Station  
Cheshunt Rifle & Pistol Club  
Cheshunt Rugby Football Club

Cheshunt School  
 Cheshunt Sea Cadets  
 Cheshunt Walkers  
 Children's Nest Nurseries  
 Chiltern Hundreds Housing Association  
 Christ Church  
 Chrysalis Drug Project Limited  
 Churches Together In Cheshunt and Waltham Cross  
 Churches Together in Hoddesdon  
 Citizens' Advice Bureau - Broxbourne  
 Civil Aviation Authority  
 Claude Lyons Ltd  
 Clifford W. & R. C. Shrimplin  
 Coco's Day Nursery  
 Coleman Brothers  
 Colin Buchanan and Partners  
 Colin Clapp  
 College Road, Hoddesdon, Residents' Association  
 Colliers Conrad  
 Commission for Architecture and Built Environment  
 Community Care - Borough of Broxbourne  
 Community Development Agency for Herts.  
 Connexions Partnership  
 Conservative Women's Branch - North Area  
 Co-op Homes Services  
 Co-op Women's Guild - Cheshunt  
 Co-operative Solutions Limited  
 Cornerstones Pre-School  
 Council for British Archaeology  
 Countryside Agency, Landscape Access Recreation  
 Countryside Agency - Landscape Access Recreation  
 Countryside Agency (E. England Region)  
 Countryside Management Service North East Area  
 CPRE - The Hertfordshire Society  
 Cranbourne Primary School  
 CTS Recruitment  
 Cuffley Football Club  
 Cuffley Outdoor Centre  
 Cuffley Playgroup  
 Cuffley School  
 Cursons of Broxbourne Ltd  
 Curwens Solicitors  
 Cygnets Pre-school  
 D W Lester Dental Practice  
 D W Windsor  
 Dacorum Borough Council  
 Dame Alice Owen School  
 Datum Contracts Intl  
 David Lane Associates Ltd  
 Dental Surgery  
 Dev Plan UK  
 Development Land & Planning Consultants Ltd  
 Development Planning Partnership  
 Dewhurst ST Marys C of E Primary School  
 Disability Employer Outreach Service  
 Disability Information Service for Herts  
 Disability Rights Commission  
 Disabled Persons Transport Advisory Committee  
 DLP Consultants Ltd  
 Downfield JMI School  
 DPDS Consulting Group  
 DPP  
 Drop-In Ino & Counselling for Young People  
 DTZ Piedad Consulting  
 Durkan Group  
 East Hertfordshire Archaeological Society  
 East Hertfordshire District Council  
 East Herts Black & Ethnic Minority Link Project  
 East Herts District Scout Council  
 East Herts Footpath Society  
 East Herts Youth Football Club  
 East of England Development Agency  
 East of England Regional Assembly  
 East of England Tourist Board  
 Eaton Strevens Associates  
 EDF Energy  
 Enfield Enterprise Agency  
 English Heritage, East of England Region  
 English Nature  
 Enterprise Cleaning & Support Services Ltd  
 Environment Agency  
 Epping Forest District Council  
 ESAB Group (UK) Ltd  
 Essex County Council  
 Fairacre Properties Limited  
 Fairfields Primary and Nursery School  
 Farming and Wildlife Advisory Group  
 Faulkners  
 Fields In Trust  
 Fishpools Ltd  
 Fitzpatrick PLC  
 Flamstead End Conservative Association - Ladies  
 Flamstead End Primary and Nursery School  
 Flamstead End Ward Conservative Association  
 Forestry Commission  
 Forres Primary School  
 Forte Solutions  
 Four Corners Pre-School  
 Four Swannes Primary School  
 Freight Transport Association  
 Friends of Cheshunt Park  
 Friends of Cheshunt Park  
 Friends of Lowewood Museum  
 Friends of the Earth Mid & North  
 Friends of the Hertfordshire Way  
 Garden History Society  
 Geoffrey Lane Town Planning  
 George Wimpey  
 Girlguiding - Hoddesdon District  
 Girls Brigade - 1st Wormley Company  
 Goff's Oak Community Association  
 Goff's Oak Junior Mixed Infants and Nursery School  
 Goff's Oak Methodist Church  
 Goff's Oak Village Playgroup  
 Goff's Oak Ward Conservative Association  
 Goff's School  
 Government Office for the East of England  
 Great Amwell Parish Council  
 Greater London Authority  
 Greek/Greek Cypriot Group for over 55s  
 Greenfield Pre-school  
 Groom Road Surgery  
 Groundwork Hertfordshire  
 Guide Association - Broxbourne District Commission  
 Guide Association - Cheshunt District Commission  
 Guide Association - SE Herts Division

GVA Grimley  
 Gypsy Council  
 Haart  
 Halcrow Group Ltd  
 Hanover Housing Association  
 HAPAS (Hertfordshire Alcohol Problem Advisory  
 Harlow Jewish Community  
 HART  
 Haslewood Private Nursery  
 Hatfield Parish Council  
 Haydens of Goff's Oak  
 Health & Safety Executive  
 Heatheringtons Countywide  
 Help the Aged  
 Hertford & District University of the Third Age  
 Hertford & Ware Police Station  
 Hertford Heath Parish Council  
 Hertford Planning Service  
 Hertford Regional College  
 Hertfordshire Action on Disability  
 Hertfordshire Biological Records Centre  
 Hertfordshire Building Preservation Trust  
 Hertfordshire Chamber of Commerce & Industry  
 Hertfordshire Constabulary - ALO  
 Hertfordshire Constabulary - Strategic  
 Hertfordshire County Council  
 Hertfordshire County Council - CSF  
 Hertfordshire County Council Development Unit  
 Hertfordshire County Council - Environment  
 Hertfordshire County Council - Minerals/Waste  
 Hertfordshire County Council - Property  
 Hertfordshire County Council - Property and Estates  
 Hertfordshire Fire Service  
 Hertfordshire Health Authority  
 Hertfordshire Hearing Advisory Service  
 Hertfordshire Natural History Society  
 Hertfordshire Orchard Initiative, Highfield Park Trust  
 Hertfordshire Police  
 Hertfordshire Society for the Blind  
 Hertfordshire Wheelers  
 Herts & Essex Mosque and Islamic Cultural Centre  
 Herts & Middlesex Badger Group  
 Herts & Middlesex Bat Group  
 Herts & Middlesex Wildlife Trust  
 Herts Aid  
 Herts Gay Community  
 Herts Health Action with the Homeless  
 Herts Learning and Skills Centre Councils  
 Herts Moth Group  
 Herts Personal Assistance & Advisory Service  
 Herts Rights of Way Association  
 Herts Young Mariners Base  
 Hertsmere Borough Council  
 High Speed Piercing Ltd  
 High Street Surgery  
 Hightown Praetorian Housing Association Ltd  
 Highways Agency, Network Strategy Division  
 Hoddesdon and Rye Park Bowls Club  
 Hoddesdon Bowls Club (Rosehill)  
 Hoddesdon Branch Labour Party  
 Hoddesdon Cricket Club  
 Hoddesdon Cricket Club  
 Hoddesdon Lawn Tennis Club  
 Hoddesdon Methodist Church  
 Hoddesdon Organisation for Local Disabled  
 Hoddesdon Parish Church - St Catherine & St Pau  
 Hoddesdon Retail Association  
 Hoddesdon Society  
 Hoddesdon Town Football Club  
 Hoddesdon Youth & Community Centre  
 Holdbrook Christian Fellowship  
 Holdbrook United Football Club  
 Holdbroook Pre-school & Primary School  
 Holy Trinity Church of England Primary School  
 Housing Corporation  
 HRT Services Ltd  
 Hurst Drive Primary School  
 Indigo Planning  
 Initial Style Conferences (Theobalds Park)  
 Inland Waterways Association  
 Integrated Dental Holdings  
 Italia Club 2000  
 ITT Industries Jabsco  
 J R Property Services  
 James Barr Consultants Ltd  
 James Keir & Associates  
 Jean Henningan Properties  
 Jones Day  
 Keith Ian Partnership  
 Kemlows Diecasting  
 Key Associates  
 Killultagh Properties Ltd  
 King Estate Agents  
 Kings & Partners  
 Lanes Property Agents Ltd  
 Last Bros (Printers) Ltd  
 LDH UK Ltd  
 Lea Valley Art Society  
 Lea Valley Enterprise Agency  
 Lea Valley Growers Association  
 Lea Valley Talking Newspaper  
 Learning and Skills Council - local  
 Lee Valley Regional Park Authority  
 Leisure - Community Arts  
 Leisure (Community Development)  
 Leonard Cheshire Foundation Care at Home Service  
 Ley Park Pre-school group  
 Ley Park Primary School  
 Liberal Democrats - Broxbourne Constituency  
 Limes Surgery  
 Linde Trifik  
 Little Angels Nursery Ltd  
 Little Fields Pre School  
 Little Oaks Pre-School  
 London Borough of Enfield  
 Longlands Primary School and Nursery  
 Malcolm Judd & Partners  
 Maloney Partnership  
 Marks & Spencer PLC c/o agents Nathaniel Lichfield  
 Marriott Hotel  
 Mayfields Infant School  
 MENCAP - Hertford & District  
 Merck Sharp & Dohme  
 Metropolitan Housing Trust  
 Mill Lane Pre-school Association  
 Millbrook School

Ministry of Agriculture  
Mono Consultants Limited  
Moss Barrett Construction Ltd  
Moult Walker  
Mount Grace School  
Nathaniel Lichfield & Partners  
National Air Traffic Services Ltd (NATS)  
National Grid plc  
Nazeing Parish Council  
Netball - Turnford Netball Club  
Network Rail  
New River Action Group (NRAG)  
New River Women's Club  
Next Step  
Nightleys Playgroup  
Norman J Shepherd & Co  
North Hertfordshire District Council  
North House Dental Practice  
Northaw and Cuffley Parish Council  
One - West Anglia  
Open Spaces Society  
Park Lane Surgery  
Park Plaza Action Group  
Partially sighted Centre  
Patrick Michael Estates Ltd  
Paul & Company  
Paul Wallace  
PCS  
Peacock & Smith  
Pegasus Planning Group  
Peter Carter Associates  
Petrie Tucker & Partners  
Planware  
Police Head Quarters  
Polish Community Group  
Pondental Practice  
Ponsbourne St Mary's C of E VC Primary  
Portland Planning  
Post Office Property Holdings  
Potters Bar Fire Station  
PPML Consulting Ltd  
Public Monuments and Sculptures Association  
Rail Freight Group Office  
Railtrack  
Rainbow Pre-School  
Ramblers Association - East Herts Group  
Ramblers Association - Herts & North Middlesex  
Regional Sports Board  
Religious Society of Friends (Quakers)  
Residents Association Focus Team  
Riverside Church  
Road Haulage Association  
Robert Gibbs  
Robson Planning Consultancy  
Roger Bullworthy Associates  
Rosedale Free Church - Baptist  
Rosedale Old Cestrians Sports Club  
Rosedale Private Nursery  
Roselands Primary School  
Roselands Scout & Guide Group  
Roselands Scout and Guide Group  
Roselands Scouts and Guides  
Rotary Club - Hoddesdon

Royal British Legion - Cheshunt & District  
Royal British Legion - Hoddesdon and District  
Royal British Legion Women's Section - Cheshunt  
Royal British Legion Women's Section - Hoddesdon  
Royal Naval Association - Cheshunt Branch  
Royal Society for the Protection of Birds - S.E  
RPS - London  
RPS - St Ives  
RPS Chapman Warren  
RSPB Central England Division  
Rye Construction Services Ltd  
Rye House Speedway  
Rye Park Nursery  
Rye Park Residents Association  
Rye Park Ward Conservative Association  
Ryelands Primary School  
Sanctuary Housing Association  
Savills (L&P) Ltd  
SBH  
Scope Hertfordshire  
Secretary for the Hertfordshire Rural Forum  
Shelter  
Sheredes Playgroup  
Sheredes Primary School  
Sheredes School  
Simon Milliken Surveyors  
Smith Stuart Reynolds  
Society For The Protection Of Ancient Buildings  
South East Hertfordshire Primary Care Trust  
Speakerbus  
Spirals Dental Surgery  
Spiritualist Church - Cheshunt  
Spiritualist Church - Hoddesdon  
Spitalbrook Village Green Conservation Group  
Sport England  
Springboard Housing Association  
Squash - Broxbourne Sports Club  
Squirrels Day Nursery  
SSR  
St Albans City and District Council  
St Augustine's RC Primary School  
St Augustine's Under 5's School  
St Augustine's Church of England  
St Catherine's CofE Private Nursery  
St Catherine's Hoddesdon VC CE Primary School  
St Cross RC Primary School  
St John Ambulance Cadets - Hoddesdon  
St Josephs RC Primary School  
St Lawrence, Church of England  
St Mary's Church of England School  
St Mary's Pre-School Playgroup  
St Paul's RC Primary School  
St. Augustine's, Roman Catholic Church  
St. Clement's Church of England  
St. Cuthbert, Church of England  
St. James, Church of England  
St. John Ambulance - Hoddesdon Cadet Division  
St. Joseph's Roman Catholic Church  
St. Martin de Porres Roman Catholic Church  
St. Mary's Youth Club  
St. Mary's, Church of England  
St. Paul's Roman Catholic Church  
Stanhope Surgery

Stansted Airport Ltd  
Stansted St Margarets Parish Council  
Stevenage Borough Council  
Stockwell Lodge Medical Centre  
Strategic Rail Consultants  
Strutt and Parker  
Stubbins Marketing  
Swan Housing Association  
Sworders Agricultural  
T J Edens  
Table Tennis - Cheshunt Table Tennis Club  
TDB (Hoddesdon) Ltd  
Tesco Stores Ltd  
Thames Water Property Services Ltd  
Thames Water Utilities  
The British Aggregate Association  
The British Wind Energy Association  
The Broxbourne School  
The Chrysalis Drug Project  
The Dental Practice  
The Durkan Group  
The George Fuller Club for the Blind  
The Georgian Group  
The Goff's Oak and Waltham Cross Trusts  
The Gypsy and Traveller Law Reform Coalition  
The Hertfordshire Community Foundation  
The House Builders Federation  
The John Warner School  
The NRSWA Department  
The Peachdent Practice  
The Planning Bureau Limited  
The Planning Bureau Ltd  
The Planning Inspectorate  
The Reid Partnership  
Three Rivers District Council  
Three Valleys Water  
Tiny Toons Pre-School  
TJB Planning Consultancy  
Toc H - Lea Valley Branch  
Tolmers Foebel Nursery (Christian Foundation)  
Training Ship Vindicatrix, Herts Merchant Navy  
Transco - East Anglia District  
Transport for London  
Traveller Law Reform Coalition  
Turnford Residents Association  
Turnford School  
Turnford Youth Wing  
Ukrainian Association of Great Britain

Ultraclean  
United Reformed Church - Broxbourne  
University of Hertfordshire  
University of the Third Age - U3A (Broxbourne)  
University of the Third Age - U3A (Lea Valley)  
V & E Youth Club  
Victim Support Hertfordshire  
Victoria Society  
Vincent and Gorbings  
Waltham Abbey Parish Council/Town Council  
Waltham Cross & Cheshunt Chamber of Commerce  
Waltham Cross Baptist Church  
Waltham Cross Dental Practice  
Waltham Cross Gospel Trust  
Waltham Cross Youth Centre  
Warden Housing Association  
Warden Lodge Surgery  
Watford Borough Council  
Wayleave Dept  
Welwyn Hatfield Council  
Westfield Community Primary  
Westfield Pre-school  
Whirledge & Nott  
Whit Hern Cheshunt Bowls Club  
White & Co Plc  
William H Brown  
Windmill Estate Residents Association  
Windmill Lane Residents Association  
Windsor Close Residents Association  
Wolsey Hall Playgroup  
Women's National Commission  
Women's Institute - Flamstead End  
Women's Institute - Goff's Oak  
Women's Institute - Wormley  
Woodhouse Property Consultants Ltd  
Woodland Trust Policy Office  
Woods Hardwick Planning Ltd  
Woodside Primary School  
Woodside Primary School  
Woodside Primary School PTA  
Workers' Educational Ass - Goff's Oak & Cuffley  
Wormley Free Church  
Wormley Medical Centre  
Wormley Primary School  
Wormley Society  
Young Enterprise Hertfordshire  
Youth Hostel Association - Lee Valley Village  
Youth Service - Herts County Council

## Appendix 2 – Pre-Submission Core Strategy respondees

1. Government Office for the East of England
2. Environment Agency
3. Natural England
4. English Heritage
5. Highways Agency
6. National Grid
7. Thames Water
8. Coal Authority
9. East of England Development Agency
10. Herts CC Environment Dept
11. Herts CC Commercial Services
12. Herts CC County Planning Archaeologist
13. Montagu Evans for Harlow Council
14. Enfield Council
15. Epping Forest Council
16. Welwyn Hatfield Council
17. Essex County Council
18. Stevenage Council
19. Lee Valley Regional Park Authority
20. Broxbourne Housing Association
21. RPS Planning for Hertfordshire Constabulary
22. Sport England
23. CPRE Herts
24. Herts & Middlesex Wildlife Trust
25. Herts & North Middlesex Ramblers Ass
26. J Lucas for Brox Woods Area Cons Society
27. Hertfordshire Gardens Trust
28. Hoddesdon Society
29. Doreen Parsonage (Wormley Society)
30. C Mills (Wormley Society)
31. P Mills (Wormley Society)
32. B Oliver (Wormley Society)
33. S Butcher (Wormley Society)
34. B Lowe for Broxbourne Open Spaces
35. CB Richard Ellis for Bayfordbury
36. Gerald Eve LLP for Standard Life
37. CGMS for Crest Strategic
38. SSR Planning for Land Imps Leach Homes
39. Barker Parry for Leach Homes / Jest & Ruskin
40. Bullworthy Shallish for Wal X Ches Chamber
41. Firstplan for Centros
42. DPP for Spen Hill Developments / Tesco
43. Indigo for Sainsburys
44. Drivas Jonas Deloitte for Co-op Group
45. Rolfe Judd Planning for Zog Ventures
46. Barker Parry for Swanfield (Hamels) Ltd
47. Duncan Murdoch for TCM V-H Will Trust
48. Derrick Wade Waters for G Barnes & M Sherring
49. Bidwells for A J Maxwell Ltd
50. Bidwells for Mr Francis
51. Bidwells for Mr Cannatella
52. Bidwells for Mr Michael O'Connor
53. Molyneux Planning
54. New River Company Ltd
55. Stephen Hayhurst for Baynham Devs
56. J Griffiths for Mr H Pritchard
57. M Ciuffa, P Duffy, J Palmer, D Smith
58. Cheshunt Bowls Club
59. F Aldwinckle
60. D E Bastin
61. Mr & Mrs Briggs
62. A Blackman
63. S Georgeson
64. J Kelly
65. L Prior
66. S Wilson
67. Mr & Mrs Carter
68. T Charsley
69. RA & PE Clarke
70. P Elmes
71. H Davis
72. I G De'Ath
73. Dr & Mrs Garside
74. A Heine
75. R E Henbest
76. R E Hurley
77. B A Johnston
78. P Langlely
79. G Morgan
80. L Morgan
81. Mr & Mrs Noto
82. J E Petts
83. C M Procter
84. M J Seabrook
85. A Sims
86. J Simpson
87. L Thomas
88. J A Toogood
89. D Turl
90. J Turner
91. Mr & Mrs Wade
92. T White
93. M Wiley
94. Mr & Mrs Willoughby
95. A Wilson
96. J S Wright
97. Unknown