



Centre for Sustainability

**Dacorum Local Development  
Framework  
Core Strategy – Consultation Draft**

Sustainability Appraisal Report

Appendix D – Scoping Report Consultation

November 2010

## **Appendix D –Scoping Report Consultation**

In February 2006 the SA Scoping Report was consulted upon. The following table summarises the consultation comments received and the action taken in response.

## Stakeholders comments on SA/SEA Scoping Report for Dacorum

| Summary of Comments  | How comments taken on board |
|--|-----------------------------|
| <b>Statutory Consultees</b>  |                             |
| <b>Countryside Agency/Landscape, Access and Recreation Division</b>  |                             |
| We have read the draft Scoping Report with interest and in general, we are satisfied that the Sustainability Appraisal of the LDF is proceeding in a proper, logical and comprehensive manner.   | No action required.         |
| <p><b>PPP review</b></p> <p>The review of relevant plans, policies and programmes is comprehensive and well-focused. We can suggest no obvious omissions.</p>  | No action required.         |
| <p><b>Baseline section on landscape</b></p> <p>Could be improved by reference to information from Countryside Quality Counts (CQC) on landscape change, currently the project is under going a second phase covering the period from 1998-2003.</p> <p>The CQC study found that in the Chilterns Joint Character Area (JCA) there had been 'some changes inconsistent with character'; in the Bedfordshire and Cambridgeshire Claylands JCA there had been 'marked changes inconsistent with character' – Of course the JCAs extend beyond the Borough, but the position may be worth further investigation.</p> <p>Information regarding the presence of and access to open space and on the length and condition of Public Rights of Way is missing – the current and future green spaces strategies should provide a suitable up to date database.</p> <p>The Countryside Agency has published maps of Open Access Land under the CroW Act – a map for Hertfordshire can be access at <a href="http://www.countrysideaccess.gov.uk/where_you_can_go.php">www.countrysideaccess.gov.uk/where_you_can_go.php</a>; information on the Rights of Way network should also be available from the County Council's work on the Rights of Way Improvement Plan.</p> | Baseline amended.           |

| Summary of Comments  | How comments taken on board   |
|--|---|
| <p><b>Problems/opportunities/issues</b></p> <p>The Countryside Agency welcomes the analysis in Table 30 [issues and opportunities table] as it relates to human health, landscape and recreation, sport and leisure.</p>   | No action required.   |
| <p><b>Main/priority issues</b></p> <p>The Countryside Agency agrees with the course of action proposed in paragraph 3.2.</p>   | No action required.   |
| <p><b>SA/SEA Framework</b></p> <p>The Countryside Agency is content that the proposed sustainability framework should enable a thorough appraisal of the LDF.</p> <p>The Countryside Agency would like to see the first criterion for Objective 11: Landscape improved - It should be changed to "To conserve and enhance the landscape character of the district".</p>  | Changes have been incorporated in revised appraisal framework.                      |
| <p><b>Assessment and monitoring indicators</b></p> <p>The indicator of changes in landscape features will need to be related to the descriptions of the various local landscape character areas.</p> <p>The Countryside Agency is aware of the difficulty of setting targets and indicators of landscape change and is working to develop practice in this area through our Countryside Quality Counts (CQC) initiative – the CA hopes to be in a position to issue guidance later this year.</p> <p>Under Objective 12: To encourage healthy lifestyles it would be helpful to monitor "Length and <u>condition</u> of cycle ways and footpaths".</p> | Changes have been incorporated in revised appraisal framework.<br>Baseline amended. |
| <p><b>Consultation</b></p> <p>As one of the statutory consultation bodies the Countryside Agency is happy to respond to all future consultations and assist in the appraisal process in anyway it can.</p>   | Noted.  |
| <p><b>Methodology</b></p> <p>You might like to consider the use of Quality of Life Assessment as a tool to assist in the</p>   | Noted.  |

| Summary of Comments  | How comments taken on board |
|--|-----------------------------|
| identification of impacts for the appraisal.   |                             |
| <b>English Heritage</b>  |                             |
| <p><b>Plans, policies and Programmes</b></p> <p>In relation to PPS1 (pg8) reference should also be made to the emphasis placed on protecting and enhancing the historic and natural environment.</p>   | PPP review amended.         |
| <p><b>Current and future state of the environment</b></p> <p>Cultural heritage (pg22) – it would be more accurate to refer to the major contribution of the historic environment to the economy in general (not just in rural areas).</p>  | Amended.                    |
| <p><b>Baseline</b></p> <p>Heritage Counts for the East of England 2005 is available and can be found on the HELM website.</p> <p>Should National Trust properties be mentioned here? There are other sites open to the public, but the issue is the state of historic assets rather than their visitor potential.</p> <p>The reference to English Nature should be English Heritage.</p> <p>Reference to the of character areas is interesting and should help to capture aspects which are not covered by designations. Might be better to consider the extent to which proposals within these areas respect local distinctiveness and context, rather than aiming for consistency.</p> <p>The number of listed buildings of all grades should be given.</p> <p>Further data should be included to establish the condition of the historic environment. Recommend that the % of Conservation Areas covered by Appraisals should be included as a measure of positive management (BVPI 219).</p> <p>Historic Environment Record reference is welcomed. It would be appropriate to refer to the historic landscape characterisation data that is now available (referred to in figure 7).</p> | Baseline amended.           |
| <b>Landscape</b>   | Baseline amended.           |

| Summary of Comments  | How comments taken on board                   |
|--|---|
| <p>Recommended that reference be made to the Historic Landscape Characterisation (HLC) data now held in GIS format in the County Historic Environmental Records Centre.</p>  |   |
| <p><b>Issues, Opportunities and Priorities</b></p> <p>Would be helpful to identify key trends and challenges.</p> <p>Text in the opportunities column in table 30 is excellent.</p> <p>The need for the distinctive qualities of Tring, Berkhamstead and Hemel Hempstead to be preserved while accommodating growth should be a key priority. High quality design, sensitive to its context, is crucial.</p> <p>High density should not sacrificing townscape quality.</p>   | <p>Noted.</p>                                 |
| <p><b>SA/SEA Objectives and Framework</b></p> <p>Generally support the framework.</p> <p>Include some qualitative evaluation is built into the assessment framework.</p> <p>May want to broaden objective 10 to 'maintain and enhance the historic environment and cultural assets'.</p> <p>Criteria:</p> <p>Recreating historic features: suggest this is changes to: '..and restore historic character where appropriate, based on sound historical evidence'.</p> <p>3<sup>rd</sup> criterion – suggest changed to: 'to encourage thoughtful, high quality design in housing and mixed use developments – to a density which respects the local context and townscape character, and includes enhancement of the public realm'.</p> <p>Possible assessment indicators:</p> <p>Buildings at Risk data should be extended to cover grade II listed buildings since these are more representative of the historic building stock;</p> <p>Numbers of historic assets taken from the 'at risk' category should be measured'.</p> | <p>The SA/SEA Framework has been updated.</p> |

| Summary of Comments   | How comments taken on board  |
|---|--|
| <p>Include % of conservation areas covered by appraisals;</p> <p>Quality in the built environment as measured by public perception surveys might be included;</p> <p>A measure of increased public access or interpretation of sites could be included.</p>   |  |
| <b>English Nature</b>   |  |
| <p><b>PPP review</b></p> <p>Should include:</p> <p>Natural Environment and Rural Communities Act (2006)</p> <p>Regional Woodland Strategy for the East of England (<a href="http://www.woodlandforlife.net">www.woodlandforlife.net</a>)</p> <p>Catchment Flood Risk Management Plans</p>   | <p>PPP review amended.</p>   |
| <p><b>Main issues and opportunities</b></p> <p>These are likely to include: fragmentation of habitats, loss of infrastructure to support agriculture [comment: might not be relevant to Watford] and the rural economy (e.g. closure of livestock markets and abattoirs) , low flows in rivers during summer months, invasive non-native species, air and water pollution (surface and ground water), effects of climate change.</p> <p>SEA should consider implications of appropriate assessment if required.</p> <p>Adverse air quality is likely to be detrimental to Beech woodland and lowland heathland.</p> | <p>Issues taken into account when undertaking the assessment.</p> <p>HRA process has been completed.</p> |
| <p><b>Baseline information</b></p> <p>In order to establish the baseline the following should be addressed:</p> <ul style="list-style-type: none"> <li>- Status of habitats and species</li> <li>- Abundance and/or extent of habitats and species</li> <li>- Distribution of habitats and species</li> <li>- Condition of habitats and species</li> </ul>  | <p>Baseline amended.</p>   |





| Summary of Comments  | How comments taken on board                             |
|--|---|
| <p>Other useful sources of information include:</p> <ul style="list-style-type: none"> <li>- Biodiversity Action Reporting System-web based information system that supports the planning, monitoring and reporting requirements of national and local BAPS. The public can learn about BAP activities.</li> </ul>   | data.   |
| <p><b>Identification of significant effects through the suggested approach</b></p> <p>English Nature believes that the significant effects of the development of the DPDs can be identified using the approach outlined.</p>   | No action required.                                     |
| <b>Environment Agency</b>  |   |
| <p><b>Natura 2000 sites</b></p> <p>The Environment Agency confirms that Dacorum has one Natura 2000 site</p>   | No action required.                                     |
| <p><b>The following policies. Plans and programmes should be included:</b></p> <p>Draft PPS 3 Housing</p> <p>Draft PPS 25 Development and Flood Risk</p> <p>Draft Catchment Flood Management Plan (CFMP) for the Colne Catchment due to the implications for flood risk in the Dacorum area</p> <p>The summary of PPS 1 Sustainable Development should be amended to reflect the need to promote all three aspects of sustainable development not just focus on environmental enhancements and promoting a greener more environmentally focussed community</p> | <p>PPP updated.</p> <p>To be amended in PPP review.</p> |
| <p><b>Baseline section on biodiversity</b></p> <p>The EA is supportive of securing, strengthening and enhancing the biodiversity and natural features which characterise Dacorum's part of the natural area.</p> <p>The overall tone of the section does not support biodiversity in a more general manner and needs to look more broadly at the biodiversity of Dacorum and encourage enhancements throughout - This is particularly significant along river corridors such as the River Colne, the</p>   | Baseline amended.                                       |

| Summary of Comments  | How comments taken on board  |
|--|--|
| River Ver and River Lee.   |  |
| <p><b>Baseline section on climatic factors</b></p> <p>This section needs to be cross referenced with the sections on water resources (including flood risk) in the relation to adaptation to climate change.</p>   | Baseline amended.  |
| <p><b>Baseline section on material assets</b></p> <p>Inclusion of indicators BV 216a and BV 216b is welcomed.</p>  | No action required.  |
| <p><b>Baseline section on water resources</b></p> <p>Draft PPS 25 also requires the achievement of 'good ecological status of inland waters and should be noted in this section.</p> <p>The Environment Agency questions the statement that some areas of Hertfordshire suffer from over abstraction of water resources.</p> <p>A map regarding chemical and biological river quality has been provided which should be included in the Environmental Report.</p> <p>It is suggested to include a map illustrating the flood risk in the area.</p> <p>The Environment Agency recommends conducting a Strategic Flood Risk Assessment (SFRA) as required by PPG 25 ('sequential test') and draft PPS 25.</p> <p>The Environment Agency suggests including trend data for flood risk and water resources (water quantity and quality). More attention should be paid to the links between the provision of housing and water resources and flood risk issues.</p> <p>The Environment Agency recommends paying more attention to the interrelationship between Contaminated Land in Dacorum and the issue of water quality.</p> | <p>Baseline amended.</p> <p>The assessment considered the links between water consumption and housing development.</p> |
| <p><b>Environmental and sustainability issues, opportunities and priorities</b></p> <p>Opportunities for the enhancement of biodiversity in general should be encouraged.</p>  | Noted.   |

| Summary of Comments   | How comments taken on board   |
|---|---|
| This section should also outline how the LDF could prevent the pollution of water courses.  |   |
| <p><b>Main issues in Dacorum</b></p> <ul style="list-style-type: none"> <li>- Development should not be sited in close proximity to rivers and encroachment on river corridors should be avoided at all costs.</li> <li>- Ensure no adverse effects on ecology.</li> <li>- The River grade presents itself for potential ecological enhancements.</li> <li>- The Dacorum area is within an area of likely overabstraction.</li> <li>- Water efficiency should be promoted on all new developments.</li> </ul>                   | Issues amended.   |
| <p><b>SA/SEA Objectives</b></p> <p>The Environment Agency recommends to re-assess the proposed assessment framework.</p> <p>The Environment Agency recommends to reword the criteria regarding flood risk to reflect that developments should note take place in high risk areas.</p> <p>Remove reference to Coastal flooding.</p> <p>In respect of climate change the criteria The Environment Agency recommends to make reference to climate change adaptation in the water resources &amp; flood objectives and criteria</p> | The SA/SEA Framework has been updated.  |
| <p><b>Consultation and Next Steps</b></p> <p>Stage B: Assessment of the effects of the LDF alternatives.</p> <p>With regards to point 8 'no net loss', it should be highlighted that the LDF should seek to enhance and improve biodiversity as stated in PPS 1 and PPS 9.</p>  | The assessment considered the need for the Core Strategy to enhance and improve biodiversity. |
| <b>Historic Environment Unit, Hertford</b>  |   |
| Enter under historic assets, the total number of sites in Dacorum entered on the Hertfordshire Historic Environment Record. Current total is 819 (April 2006). A number of these are national   | Information has been included on heritage assets as outlined in                               |

| Summary of Comments  | How comments taken on board                       |
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| importance, but which are not Scheduled Monuments.   | Heritage Counts (2009).                           |
| Core Strategy to include measures to improve management of historic assets and improved access, to foster greater understanding of this resource.  | Noted. Not for the SA.                            |
| The County Council's Historic Environment Unit can offer advice throughout the SEA/SA process.   | Noted.  |
| Use Archaeological and historic environment characterisation methodologies to assess significant impacts of the DPDs.  | Noted.  |
| <b>Thames Water</b>  |   |
| <p><b>PPP review</b></p> <p>Reference is made in Table 1 to PPS12 as a reviewed document, but not to paragraphs B3-B8 on the provision of utility infrastructure.</p> <p>It is recommended to consider these paragraphs within the description of the current and future state of the environment.</p>   | PPS12 no longer refers to utility infrastructure. |
| <p><b>Baseline description for water resources and flooding</b></p> <p>It needs to be stated that as well as fluvial, sewer flooding needs to be taken into account when considering the management and reduction of flood risk.</p> <p>PPG 25 does not clearly identify the risk of sewer flooding, this issues is addressed in the revised PPS 25.</p> | Baseline amended.                                 |
| <p><b>SA/SEA Framework</b></p> <p>Thames Water supports the use of Sustainable Urban Drainage Schemes (SUDS) where they are well maintained; poorly maintained SUDS can potentially increase the amount of runoff that is received by surface water sewers and loose the benefits that are stated in that paragraph [sic].</p>                           | Noted.  |
| <b>Hertfordshire Gardens Trust</b>   |   |

| Summary of Comments   | How comments taken on board                                       |
|---|---|
| The Trust is concerned that there are over 200 sites in the County that are not registered as of national or international significance but they still play an important part in defining Dacorum's landscape. They should be acknowledged in future DPD's. | Noted. Not an issue for the SA.                                   |
| Scoping Report concentrates on development in urban areas, But development is occurring close to historic landscapes. Scoping Report should reflect awareness of these landscapes, so steps can be taken to safeguard their historic integrity.             | Assessment considered impacts on both urban and rural landscapes. |
| <b>Chilterns Conservation Board</b>   |   |
| The CCB supports Objectives 11, 1, 2, 8 and 13.   | No Action Required.   |
| Applauds the inclusion of the Chilterns AONB Management Plan.   | No Action Required.   |
| LDF should recognise the Chilterns AONB in all LDD's.   | Noted. Not an issue for the SA.                                   |
| Refer to AONB Management Plan not ANOB Management.  | Text amended.   |
| Para 2.3.5- Landscape- The Chilterns AONB Management Plan sets the framework for conserving and enhancing the Chilterns.  | Noted.  |
| Para 2.3.8- Make reference to the Chilterns Chalk Streams. The chalk streams are suffering from abstraction and this issue should be recognised. Council needs to address this issue through the planning process wherever possible.                        | Baseline and issues amended.                                      |
| Major concern about the impact of noise on the tranquillity of the Chilterns AONB. One significant contributing factor is air traffic. This issue should be addressed in the emerging LDD's through production of strategic noise maps and action plans.    | Noise was considered as part of the assessment process.           |
| Potential Indicator- % increase in use of local building materials (bricks and flint in the Chilterns).   | To be considered when monitoring measures are finalised.          |
| Objective 11 deals with the conservation and enhancement of the landscape. The same terminology should be used in the criteria and not protect and enhance.   | Noted.  |

| Summary of Comments  | How comments taken on board                       |
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| Para 4.3.2: 'Enhance and protect the countryside' should be amended to 'conserve and enhance the countryside'.   | Noted. Not an issue for the SA.                   |
| <b>Dacorum Environmental Forum</b>   |   |
| The Forum would like to remain part of the consultation process.   | Noted.  |
| Loosing the Chilterns Beechwoods should be prevented, if not mitigated.  | Considered as part of the HRA.                    |
| Refer to DBC Corporate Environmental Policy.   | PPP amended.                                      |
| 2.3.8- Refer to water efficiency and pressure on water supply due to increased demand and infrastructure.  | Baseline updated.                                 |
| Renewable energy to be included in Issues table.   | Noted.  |
| <b>Hertfordshire Biological Records Centre</b>   |   |
| The LDF has the potential to impact the SAC (Chiltern Beechwoods). Considers that there is sufficient policy protection.   | No Action Required.                               |
| The LDF process will not directly influence management unless the type of development is directly management related.  | No Action Required.                               |
| <p>The SAC consists of two SSSIs (Tring Woods and Ashbridge). Potential impacts depend on proposals, but could include:</p> <ul style="list-style-type: none"> <li>- Outright destruction from built development.</li> <li>- Destruction and fragmentation from new roads or other transport links.</li> <li>- Damage from water abstraction (spring sources), air pollution, chemical pollution from road run off.</li> <li>- Destruction from provision of visitor facilities such as car parks, cycle paths, bridleways, sports facilities such as floodlighting etc.</li> <li>- Impacts from leisure/business facilities such as horse liveries with increase in use of</li> </ul> | Impacts on the SAC considered as part of the HRA. |

| Summary of Comments  | How comments taken on board                  |
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| bridleways.<br>- Increased pressure from human disturbance.<br>- Potential difficulties in managing deer/squirrel populations.   |  |
| PPPs not mentioned:<br>National: Local Sites Guidance on their identification, Selection and Management (2006).<br>Regional: Regional Cultural Strategy, Regional Biodiversity Opportunity Mapping, Green Arc.<br>County: Hertfordshire Biodiversity Action Plan (updated 2006).<br>Local: Habitat Survey for Dacorum Borough (1997, updated annually), Dacorum Urban Nature Conservation Study (2006).  | PPP amended as appropriate.                  |
| Agriculture and land management should be mentioned, as it influences the nature and character of the majority of open land in the borough.  | Agriculture considered under soils.          |
| Issues of primary importance are those related to global issues, such as climate change and water resources.   | Noted.                                       |
| SEA topics are likely to represent a reasonable framework for DPD assessment. However will depend on how assessment takes place.   | No Action Required.                          |
| Assessment Indicators need further work to make them 'SMART'.<br>Populations of wild birds are too vague.<br>Semi-natural habitat lost to development needs defining.<br>Semi-natural habitat created- limited gains are expected through the planning process. Progress could be measured by achievements through agri-environment schemes.<br>Wildlife sites affected by water abstraction- no definition exists and no monitoring is being undertaken.<br>Loss/damage to SSSIs- how is this to be determined. | All assessment indicators have been revised. |

| Summary of Comments   | How comments taken on board   |
|---|---|
| <p>Numbers of species at risk needs refining.</p> <ul style="list-style-type: none"> <li>- Area of semi-natural has been measured once, is unlikely to be measured again.</li> </ul>  |   |
| <p>The water criteria needs to be refined (e.g. quality, flow and nitrate levels should have separate criteria). The indicators ought to be directly related to measuring the criteria.</p>   | <p>All three issues have been considered as part of the assessment.</p>                                       |
| <p>Safeguarding high quality agricultural land is not the issue, soil management is.</p>  | <p>Noted.</p>   |
| <p><b>Hertfordshire County Council</b></p>  |   |
| <p>Issues to include in Table 30: Landscape.</p> <ul style="list-style-type: none"> <li>- How to sustain the Chilterns AONB.</li> <li>- How to derive an urban landscape character assessment as a basis for townscape management.</li> <li>- How best to manage change in local landscape character.</li> <li>- How to increase contribution of trees and conserve critical assets: historic parks and gardens.</li> </ul> | <p>Noted.</p>   |
| <p>Reference should be made to:<br/>Hertfordshire County Council's Structure Plan Alterations 2001-2016.<br/>Dacorum Landscape Character Assessment, Strategy and Guidelines document.</p>  | <p>PPP amended as appropriate.</p>  |
| <p>Page 21 and 22: Reference should be made to Historic Parks and Gardens being considered by English Nature for inclusion on the Register.<br/>LDF to include policies to conserve Historic Parks and Gardens.</p>   | <p>The number of historic parks and gardens is provided.</p>  |
| <p>It is not clear why the National Trust has been singled out.</p>   | <p>National Trust properties have been referenced as they are considered buildings with local importance.</p> |



| Summary of Comments  | How comments taken on board                                     |
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| <p>Page 24-26: Both urban and peri-urban landscapes need consideration.</p> <p>Reference should be made to how local landscape character is handled. Lack of reference to urban landscape data gaps and an over-emphasis on national character assessment.</p> <p>Area numbering and source/copyright data should be added to figure 10.</p>                         | <p>Baseline amended.</p>  |
| <p>Page 9: SEA/SA to recognise the Chilterns AONB and Historic parks and gardens.</p>  | <p>Both are considered within the baseline of the SA.</p>       |
| <p>Page 18 and Table 30: Little reference to tree cover and (Table 30) woodland cover.</p> <p>The relationship between tree and woodland cover and carbon sequestration needs highlighting.</p> <p>Trends in tree and woodland cover and how best the development process can conserve tree and woodland cover.</p>  | <p>Baseline and issues table amended.</p>                       |
| <p>Page 35 and Table 30/Landscape: Important to recognise the broader links between green infrastructure and health and well-being through offering visual relief, privacy, carbon sequestration, shelter, screening, green networks.</p> <p>Planning process can influence this through support for tree and woodlands, biodiversity and landscape enhancement.</p> | <p>Issues table amended.</p>                                    |
| <p>Table 4.2: Management of landscape change is important.</p>   | <p>Noted.</p>   |
| <p>Further indicator: Proportion of local landscape character areas with characteristics intact or enhanced in relation to 2002/2004 baseline data.</p>  | <p>Additional landscape indicators have been added.</p>         |
| <p>Table 4.2: Add indicator regarding tree planning: Change in urban tree canopy cover.</p>  | <p>To be considered when monitoring measures are finalised.</p> |
| <p><b>Local Councillor</b></p>   |   |
| <p>Page 57: The character of Dacorum's conservation areas needs protecting and enhancing.</p>  | <p>Noted.</p>   |

| Summary of Comments  | How comments taken on board   |
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| Economic pressure on farming is detrimental to the landscape in that it encourages activities such as fenced paddocks for 'horsiculture'   | Noted.  |
| The interrelationship between water availability and other sustainability objectives is not made. E.g diminishing water table could affect biodiversity, river flow and the amount of new housing that could be permitted.   | Table updated.  |
| Term townscape to be added to Landscape SEA objective title.<br>Reference should be made for the need to maintain and enhance the appearance of the villages of the borough.   | Amended.  |
| Indicator for light pollution should be incorporated.  | Reference to CPRE's light and tranquilly mapping has been added.  |
| Major concern regarding the assessment indicators, work would be impractical as so much data would be required.  | Noted and indicators have been refined. Key indicators only would be used for future monitoring purposes. |
| <b>Hertfordshire County Council</b>  |   |
| A full screening of the Appropriate Assessment must be undertaken and the associated consultation needs to be carried out.   | An HRA screening exercise has been undertaken.  |
| Should refer to: <ul style="list-style-type: none"> <li>- Regional Environmental Strategy</li> <li>- Integrated Regional Strategy</li> <li>- Regional Sustainable Development Framework</li> <li>- SEA's of RSS14, LTP2, Minerals and Waste Management Strategy, Minerals Local Plan.</li> </ul> | PPP amended as appropriate.   |

| <b>Summary of Comments</b>  | <b>How comments taken on board</b>            |
|---|---|
| 2.3.1: The air quality figures are derived from towns which are smaller than Dacorum. Towns with similar characteristics similar to Dacorum should be used. | The choice of town was not controlled by C4S. |