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Dear Mr Cole

INSPECTORS' POST HEARINGS ADVICE

1. As indicated in our closing comments at the final hearing session on 13 June (ID/08) this letter sets out advice about the steps that should be taken to make the Ashford Local Plan (ALP) sound.
2. We have given full consideration to the representations made about the ALP including the verbal contributions at the hearings. Our final conclusions regarding soundness and legal compliance will be given in the report in due course. Nevertheless, having regard to the criteria for soundness and to assist for now, we shall give brief explanations for our preliminary advice.
3. Further evidence may emerge and we will need to take account of any representations received following consultation on any proposed main modifications. Our views are therefore given here without prejudice to the conclusions that will appear in the report. This will also cover other main soundness issues that are not dealt with in this letter.
4. Other detailed matters regarding the wording of many of the policies were covered during the hearings and the Council has been asked to give further consideration to them. These were referred to at paragraph 6 of our closing comments and are not set out here.

Housing requirement

5. The housing target for the entire plan period of the ALP is 16,120. Table 1 has been updated by the Housing Topic Paper produced in June 2018 (SD08) which shows the position as of April 2018. The residual requirement from 2018 to 2030 is 12,366.
6. The methodology undertaken to arrive at these figures follows that prescribed in the Planning Practice Guidance (PPG) on *Housing and Economic Development Needs Assessments*. However, we consider that the adjustments made to reflect market signals and specific local circumstances (migration from London) have resulted in an under-estimate of the objectively assessed need for Ashford.
7. The housing target includes an allowance of 442 dwellings for future proofing to allow for additional in-migration from London. It has been

clarified by the Council that this figure should be 546 (ED/17). Including it within the housing requirement for the purposes of positive planning reflects the high quality of the Borough's transport links to the capital. As a matter of principle this is a factor that will result in a change to the demographic projections because of local circumstances as referred to in paragraph 017 of the PPG.

8. The work undertaken to reach the figure of 546 was based on the 2013 London Strategic Housing Market Assessment (SHMA). An updated SHMA was produced in 2017 but whether its projection for household growth in Ashford can be relied upon is uncertain. Between 2001 and 2014 the average net flow from London to Ashford averaged about 600. Whilst a fluctuating trend in terms of numbers it was nonetheless a constant one. There is no reason to assume that this outward flow has become any less attractive and so a modest adjustment should be made in this respect.
9. The indicators listed in the PPG to determine how to respond to market signals show some variation with lower than average land values and flat rental trends. However, the lower quartile affordability ratio has increased from 8.5 in 2013 to 9.6 in 2017. In response and having regard to the affordable housing evidence, the Council includes a 5% upward adjustment.
10. Part of the rationale for doing this is the effect that a higher figure would have on the percentage growth in overall housing stock which is already very high compared to other authorities across the country. Furthermore, that a higher level of housing would not be deliverable in a sustainable way. However, neither of those matters should affect the initial task of assessing housing need. Any upward adjustment should be at a reasonable level in relation to the relevant signals rather than wider planning considerations.
11. Representors have suggested uplifts ranging between 10% and 25% as appropriate. The PPG observes that any allowance for market signals should increase planned supply by an amount that could be expected to improve affordability. However, there is no requirement for this to ensure that affordable housing needs are fully met. That said, any adjustment should make a meaningful difference although an estimate of the precise impact of an increase in housing supply on affordability should not be attempted.
12. The evidence indicates that an allowance for London migration should be made from 2017 onwards. However, for simplicity we consider that this should be absorbed into the market signals adjustment and calculated over the entire plan period. Both elements should assist in improving affordability. Bearing this in mind, the mixed picture portrayed by the relevant signals and the benchmark provided by annual housing growth elsewhere, we consider that the uplift should be increased to 13%. To achieve soundness the housing requirement should therefore be adjusted to reflect these findings. There is no overriding reason why the objectively assessed need for housing should not be met in full and therefore this comprises the housing requirement.

13. To assist we consider that the effect of this is as follows:

Demographic starting point plus vacancy rate = 786 dpa over plan period
or 14,934 in total

Market signals uplift of 13% = 888 dpa or 16,872 in total

Objectively assessed need and housing requirement = **16,872**

Delivered since 2011 = 3,754

Residual requirement from 2018 = 13,118

Housing supply

14. Arising from the above there has been a shortfall in delivery from the start of the plan period of 2,462 dwellings ($888 \times 7 = 6,216 - 3,754 = 2,462$). According to the PPG the aim should be to deal with any undersupply within the first 5 years where possible. However, at Ashford the need to complete Junction 10A before major developments around the town can be occupied has had a dampening effect. There is no evidence that adjoining authorities are in a position to absorb further housing in the short-term. Therefore we consider that it is reasonable and realistic to expect the shortfall to be made up over the next 7 years at a rate of 352 dwellings per annum.
15. As such, with an agreed 20% buffer for persistent past under-delivery, the five year supply of deliverable housing sites from 2018 and 2023 should be **7,440** ($888 \times 5 = 4,440 + 352 \times 5 (1,760) = 6,200 \times 1.2 = 7,440$).
16. To be deliverable according to the National Planning Policy Framework (NPPF) there should be a "realistic prospect" that this will occur within 5 years. The Council's latest calculation in the updated Housing Topic Paper is that deliverable supply equates to 8,594 dwellings. However, we will advise in due course that some sites should be deleted from the plan for reasons of soundness and also that the capacity of others should be reduced. Furthermore, on some of the larger allocations the Council has over-stated the number of dwellings that are realistically likely to be completed. When all this is factored in, the 5 year supply amounts to approximately 7,730 dwellings.
17. Over the plan period as a whole, taking into account the changes we are advising, the total numbers of dwellings provided for by the ALP between 2018 and 2030 is about 13,510. This allows for a contingency buffer over the residual requirement of some 400 dwellings.

Council's response to housing requirement and housing supply

18. As a first step we request that the Council come back to us with any queries it may have about the calculations we have undertaken. This is solely to ensure clarity rather than to question our findings.

19. The contingency buffer identified by the Council stands at 1,587. This would be considerably reduced taking into account the revised housing requirement and would constitute around 3% of the residual requirement from 2018 to 2030. The NPPF refers to meeting the full objectively assessed need for housing but does not specifically require a contingency buffer although this can provide for flexibility to accommodate unexpected delays or permissions not being taken up.
20. At Ashford almost half of the total supply comprises existing commitments and there is no evidence of a risk that rapid change may affect the need for housing. The revised housing trajectory shows that a higher proportion of housing will be completed in the first part of the remaining plan period with some of the larger sites delivering in the latter stages. Any slippage in the period to 2024 would increase the pool of sites thereafter and so it is not essential in our view for the contingency figure to be increased.
21. Otherwise the figures in the ALP should be changed by means of proposed main modifications to reflect our findings above and those which reduce anticipated site capacities. This will involve revisions to Table 1 and Policy SP2 and also the supporting text to suit.
22. Within Policy SP2 or a new separate policy it is important that not only is the total housing requirement set out for the residual period of the ALP but also the annual number to reflect the need to make up the shortfall over the next 7 years. This needs to be explicit in policy so that future decision-makers are clear about the housing requirement over any given 5 year period. This will then provide a firm basis for assessing whether a 5 year supply of deliverable sites exists at that time. Based on the figures above this will be to the effect that annual delivery between 2018 and 2025 should be 1,240 dwellings and between 2025 and 2030 should be 888. To that figure the 5% or 20% buffer referred to in paragraph 47 of the NPPF (or as detailed in the revised NPPF) should be applied depending on the relevant circumstances at the time of any such assessment.

Policies HOU3a and HOU5

23. Policies HOU3a and HOU5 deal with residential windfall development within, adjoining or close to listed settlements in the Borough. Twenty-two settlements have been added to those in the existing development plan but the basis for this is not clear. However, our main concern is that in some cases it is not apparent that the expectations of either policy could be met for all of the settlements listed. In particular, some places are small and dispersed. It is therefore difficult to see how residential development or infilling might occur within their built-up confines as required by Policy HOU3a because such opportunities may not exist. Furthermore, some of these settlements and some others are without any significant services or transport facilities. Consequently the criteria for development adjoining or close to them in Policy HOU5 are unlikely to be able to be complied with.
24. We do not wish to 'single out' any particular settlement since this is for the Council to review. But the evidence we heard causes us to consider that some of them should be excluded following an assessment against the

provisions in Policies HOU3a and HOU5. How this is done is a matter for the Council but some sort of systematic approach should be considered.

25. It follows that these policies as currently written are not justified and will not be effective. This is because they are permissive but in some cases the relevant criteria and provisions would be impossible or highly unlikely to be achieved.
26. Indeed, the policy approach is to treat all settlements alike ranging from Ashford to Crundale. We see nothing in national policy to indicate that this is necessary. Whilst paragraph 55 of the NPPF establishes that isolated development in the countryside should be avoided it does not state that this is the only circumstance in which it should be restricted. Although this is for the Council the evidence we heard suggests that a 'tiered' or 'graded' approach to settlement identification and the development that would be supported within or adjoining it should be explored. So it may be, for example, that there are some settlements where development within the built-up confines can be justified but where expansion outside them is not warranted.
27. Paragraph 5.44 of the ALP refers to the cumulative effects of allocated sites and other developments and this should be translated into any revised policies. Policy HOU5 refers to "proportionate" and "commensurate" development. If no capacity targets are to be set then some indication of how these judgements will be made on a case-by-case basis should be given. This might relate to the size of the settlement compared to the proposal, the type of services available, their ability to "absorb" the new development and how this will be measured.
28. The discussion at the hearing also raised a number of detailed points about the individual criteria which the Council should bear in mind when considering revisions to these policies. Once these have been formulated the Council should also consider the proposed rural allocations against them to satisfy itself that these are still justified.

Traveller sites and Policies HOU16 and HOU17

29. The Council's intention to produce a separate development plan document and the intended timescales should be referred to more clearly and expressly within the ALP in order that it is effective and reflective of the Local Development Scheme of March 2018. Indeed, the entire introductory section to Policy HOU16 from paragraph 5.108 onwards should be re-written to highlight the approach to be taken which currently is only referred to in paragraph 5.124.1.
30. Site S44 (Watery Lane, Westwell) is within the Area of Outstanding Natural Beauty. Although located between the M20 and a railway line a previous Inspector found that the proximity of these negative landscape elements places a greater emphasis on the need to protect remaining open areas (Ref: APP/E2205/A/13/2190874). It might be possible to limit the visual effects of the 4 pitches proposed at the rear of the site but these measures themselves would be likely to appear artificial. More fundamentally there is

no justification for allocating pitches in an area which has the highest status of protection in relation to landscape and scenic beauty when other options might come forward through the emerging development plan. This allocation should therefore be deleted but the Council may wish to consider retaining the frontage pitch which is the subject of a temporary permission.

31. Criteria a) and c) of Policy HOU17 dilute and weaken the intention and effect of the policy and should be deleted given the importance attached to maintaining an appropriate level of supply of traveller pitches.

Affordable housing

32. Emerging national policy does not justify departing from the Written Ministerial Statement of November 2014 regarding the site thresholds for affordable housing. Furthermore, no specific local circumstances have been put forward. There is insufficient evidence to require the application of a lower threshold within Areas of Outstanding Natural Beauty in the Borough. To achieve soundness Policy HOU1 should therefore be amended to refer to schemes of 11 dwellings or more and this approach should be applied to all site allocations.

Allocated Sites – General Issues

33. A number of site policies refer to their capacity being 'up to' a certain level. This has the effect of unnecessarily restricting the supply of housing. Unless there are justifiable site specific circumstances which warrant such an approach, the Council should replace all instances of 'up to' with 'indicative capacity' to achieve soundness. From discussions at the hearings, site S40 would appear to warrant an exception being made as a result of various appeal decisions. The nature of development suggested at sites S41 and S42 would also justify a restriction on the amount of suitable development.
34. There are a number of site policies which refer to 'protecting *and* enhancing' (or similar) the character and/or setting of heritage assets. This might not always be achievable and does not reflect the statutory duty in conservation areas. The Council should therefore modify these policies to ensure that heritage assets are 'preserved or enhanced'.
35. The Council has suggested that it is minded to delete sites from the plan that are currently under construction. An example of this is site S36. However, main modifications should only be made where they are required for soundness. Even if it is unlikely the policies would be called upon in the future, they are not unsound and thus they should not be deleted.

Allocated Sites – Site Specifics

36. Sites S47, S48, S49 and S58 are poorly related to existing settlements of any size and have relatively poor access to services and facilities capable of meeting everyday needs. These sites would therefore be inconsistent with criterion a) of Policy SP1 in terms of focussing development in accessible and sustainable locations and with the provisions about development in the

rural area in the fourth paragraph of Policy SP2. Tutt Hill and the communities of Westwell Lane and Sandyhurst Lane are also not listed in Policy HOU3a. Site S58 is located between High Halden and Bethersden and is not close to either. These locations would not normally be considered suitable for residential development when judged against Policy HOU5. In principle, these sites are not consistent with the Council's underlying strategy or approach toward the sustainable distribution of housing.

37. The sites are well related to the main road network and thus can ensure easy access to Ashford and other larger villages, particularly by car. While this might provide some economic benefits to these settlements, there is nothing to suggest their vitality is under threat to the extent that relatively large scale development in the open countryside is justified or necessary.
38. The limited benefits associated with these sites for a local employer and due to the use of a small area of previously developed land do not outweigh the negatives and none are exceptional or unusual in nature. It was clear from the hearings that the main benefit of these sites is their ability to be delivered in a reasonable timescale. Delivery is clearly an important factor, but we are satisfied that these sites will not be needed to meet the revised housing requirement. As such, development in these locations would be unsustainable and unsuitable and the allocations should be deleted.
39. Site S34 is visually separated from the strongly defined edge of Hothfield by a bank of protected trees. In addition to some concerns over the safety of the access shown in the plan, its formation would also result in the inevitable loss of important trees. The need to create adequate sightlines is likely to exacerbate the harm. Any development here would also appear visually isolated and disconnected from the main part of the village. In these circumstances, it is difficult to see how development would address the social cohesion issues identified by the Council. Improved cycle and pedestrian links into the site are unlikely to achieve this and would lead to the potential for further harm to trees.
40. An alternative location for the access was suggested which would avoid the trees and be further from the junctions. However, this would be even more remote from the edge of the village and increase the sense of disconnection and isolation. Taking all matters together, we have significant doubts as to whether a satisfactory form of development could be achieved on this site and the scale of development does not justify the likely harm. The allocation should therefore be deleted.
41. While site S61 is screened to an extent by existing dwellings, there are exposed areas where built development would be overt and potentially damaging to the character of the AONB. Furthermore, the site currently allows an element of the countryside to penetrate the built form, which is important to both the character of the village and its relationship with the AONB. This significant characteristic would be severely affected. Even if the allocation is not treated as 'major' it represents an incursion into the countryside that would materially detract from the landscape qualities of the AONB. The allocation as it stands is not sound.

42. However, the Council may wish to consider whether a smaller scale of development could be achieved without harm to the character of the area. This might be achieved by limiting the northward spread of development. We also have some concerns over the potential impact of the proposed access points on biodiversity assets and local character. In responding to this point, the Council should also provide us with any updates it has on the feasibility of vehicular access arrangements and further information on any affected ponds.
43. The evidence supporting the safeguarding of part of site S11a for rail uses is not strong. There is also some uncertainty over how much of the site might be required and when it would be needed. Such uncertainty may limit the ability of the site to come forward for redevelopment or ensure a comprehensive approach. As drafted, part of the site could be safeguard for rail use indefinitely. This would not be justified. However, we recognise that sites with railheads are rare and would not wish to see the potential for rail use lost entirely, particularly where Network Rail is in the process of developing their proposals.
44. To be sound, the policy should therefore include a mechanism by which consideration can be given to the release of the site from safeguarding in certain circumstances. This could include being able to demonstrate there is no need or demand for rail uses and/or a time limit by which if rail uses are not secured, the restriction is removed. This would provide some comfort that the long term development of the site is not stymied unnecessarily.
45. The sustainability benefits of providing employment floorspace in association with site S15 are recognised. However, the evidence does not present a strong justification for the specific figure given even if this is an indicative one. Amending the policy to reflect a smaller minimum area of land rather than indicative floorspace would provide some scope for flexibility in terms of the overall quantity of floorspace provided, how it is incorporated into the overall scheme and to enable prevailing economic conditions to be taken into account.
46. Any such area should be realistic and have regard to the wider employment aspirations of the plan. This should provide comfort that the policy requirements would not prejudice the delivery of the site. While B2 and B8 uses are not a requirement of the policy, the policy and supporting text should still highlight the need to ensure the relationship between residential and any such employment uses is carefully planned. However, there is little evidence of either demand or delivery to justify the requirement of 10 live/work units within this particular allocation. To be sound, this element of the policy should be deleted or amended to indicate that such units would be an acceptable part of any mix of development.
47. Site S31 sits in a prominent and sensitive location on the edge of Hamstreet. Guidance is provided in the policy relating to design and layout of housing, but little is said about what would be expected in terms of other uses, including the football pitch, parking and outdoor classroom. To be effective, the policy should include specific references as to how these are expected to be laid out and incorporated into any development to minimise

their impact. Measures relating to the integration with the housing, effects on the topography of the site, landscaping and minimising the paraphernalia associated with these uses should be considered for inclusion in the policy. As with other policies, the size of the landscaped buffer with the woodland should be specified, either by giving a distance and/or by identifying the 'developable area' on the policies map. This would provide necessary clarity on what is expected.

48. It is understood that the extant permission for 50 units granted on appeal on site S37 does not correspond to the allocation in the plan. Nonetheless, the principle of development on the larger site has been established and there is no clear justification as to why the ALP should not reflect the most up-to-date and accurate situation. To be sound, the allocation area and policy should therefore be amended to reflect what has been permitted.
49. Sites S41 and S42 propose a small number of high quality 'exclusive' homes. Both policies contain wording taken from paragraph 55 of the NPPF relating to a requirement for exceptional quality or innovative design for isolated development in the countryside. The Council acknowledged at the hearings that neither site would be considered 'isolated'. The policies therefore set a higher bar in terms of design than might be expected from the NPPF. This is not a justifiable approach and is inconsistent with national policy. Repeating paragraph 55 also fails to fully take account of the specific characteristics of the sites, particularly S41 which sits in a prominent location in the AONB.
50. There is no reason why in seeking to promote a particular type of housing the Council should not expect to see a particularly high standard of design. However, to be sound the policies should be modified to include a bespoke set of design criteria. With regard to site S41, this should pay particular regard to the AONB.
51. The views over the open fields across sites S51 and S52 are clearly an important and positive part of the setting of the Grade I Listed Aldington Church. The policies refer to retaining gaps in the built form, but if these are simply between dwellings or through gardens, as at Church View, then it may not be possible to ensure views of the church are maintained. To address this, the policies should be amended to be clear that views of the church will be required to form part of the layout of any development and that they should be maintained as wide and distinct areas of open space. The Council should revise site capacities as a result of this.
52. Brook is a village with a distinct linear form. Site S53 would allow development significantly at odds with this local character and its existing relationship with the AONB. The Council's suggested modification for a 'farmstead' to the rear of the frontage would not alter the likely incongruous and harmful impact of any such development. We do not consider therefore that a satisfactory form of in-depth development can be achieved on this site. To be sound, the Council should therefore limit development to the frontage only. This would also require a revision of the site's capacity.

53. There appears to be some doubt as to whether a pedestrian and cycle access through site S55 into Poppy Fields would be achievable. Nevertheless it is not an essential pre-requisite for the development of the site. As such, and to be effective, the policy should be amended to remove this as a requirement and instead retain it as an aspiration.
54. Site S59 has a number of significant constraints which mean that whether the scale of development envisaged could be achieved is doubtful. This is particularly because of the policy's requirements in terms of adequately protecting mature trees, woodland and ponds. Overall it has not been shown that resulting impact on the significance of the Mersham Conservation Area would be acceptable, especially due to the high amenity value of the trees. The policy should be modified to reduce the anticipated scale of development proposed in order to ensure that important features will not be unduly harmed by excessive development.

Other Topic Policies

55. Policy HOU9 requires a need to be demonstrated to justify a standalone annex. However, where a proposal meets the main criteria in the policy, or is in a location not precluded by Policies HOU3a and HOU5, the need for the annex would not be a relevant issue. Even if not intended to be onerous, the policy would add an unnecessary evidential burden which is not justified. If there is conflict with the criteria, the Council would still be able to consider other material considerations such as personal circumstances in the normal way. Concerns over the future use of an annex can be adequately controlled by a suitably worded planning condition. To be sound, any reference to need being a pre-requisite should therefore be removed.
56. Policy HOU14 requires 100% of housing to meet the optional Building Regulations Part M4(2) accessibility standard. The likely increase in the elderly population and people with long term health problems or disabilities over the plan period is noted. However, the demographic evidence does not justify this requirement. Moreover, a generalised assertion that the policy would 'future proof' the housing stock is not sufficient to demonstrate a need as required by the PPG. The policy is not therefore justified by the evidence. However we consider that a reduced requirement of a minimum of 20% for Part M4(2) would be more reflective of the demographic and viability evidence provided.
57. As currently drafted Policy HOU15 is too prescriptive, inflexible and would not be effective in achieving the Council's stated objectives of ensuring a good standard of design, layout and living environment. While the supporting text alludes to the 10 metre minimum distance being a 'starting point' or 'rule of thumb' this is not reflected in the policy. To be effective, the policy should be redrafted to clearly set out all of the factors that will be taken into account in assessing whether sufficient private external space is being provided and the status of any 'standards' that are included. It should also be made clear that the policy would apply to any proposals which result in the loss of private garden space.

58. Policy EMP2 requires applicants to demonstrate that it would not be viable to redevelop the site for any type of alternative employment use within the Plan period. This is an overly onerous requirement which would be difficult to demonstrate in many cases. This requirement should therefore be removed from the policy or amended to reduce the unjustifiably high bar that it currently sets.
59. Policies EMP7 and EMP8 deal with primary and secondary frontages. There are no controls or parameters within either policy to consider the individual or cumulative effects of different uses within these frontages. Such an approach could lead to unintended consequences for the vitality and viability of both centres, contrary to paragraph 23 of the NPPF. We understand the Council's reticence to rely on a threshold approach. However, the overall proportion of A1 frontage is only one factor that might be considered. A more nuanced approach might include having regard to a range of factors including, but not limited to, the accumulation of non-A1 uses in parts of the frontage, the size and location of the unit, whether there are unbroken rows of non-A1 uses, vacancy rates and the environmental quality of the centre. To be sound, the Council should therefore modify the policies to include a suitable mechanism that allows for potential impacts on the vitality and viability of each centre to be assessed.
60. Policy TRA7 could be read to imply that a small development that relates to a road with capacity or congestion problems could be refused on traffic grounds, even if it would have little impact in itself. Whether or not this is the intention, to be sound the policy should be amended to make it clear that it is the effect of the development on capacity and traffic delays that will be considered. Restricting the operation of the second sentence to only the primary and secondary road network would implicitly accept risks elsewhere. In the interests of effectiveness this reference should therefore be removed so all parts of the network are covered.
61. The second to sixth paragraphs of Policy COM2 appear to relate to the Council's expectations of new residential development. However, this is not made clear as the nature of any 'proposals' in paragraph two are not made explicit. It should be made clear that developers will be required to either deliver the open space in accordance with the policy, having regard to the relevant SPDs or provide a commuted sum to ensure delivery elsewhere.
62. Policy IMP3 is inconsistent with paragraph 154 of the NPPF in that it does not provide a clear indication of how a decision maker should react to a development proposal. The Council may see some benefit in terms of setting out its approach to enforcement in this way, but this does not justify a policy of this type. There are also other mechanisms through which this approach can be articulated and removing the policy will not prevent the Council from taking enforcement action when it is expedient to do so. To be sound, it should be deleted.

Finally

63. We are not inviting comments from the Council or from anyone else on the preliminary advice given in this letter except where specified. It is primarily directed to the Council for the purpose of identifying matters where consideration should be given to main modifications in order to achieve soundness. These are in addition to the matters raised during the hearings themselves. However, could the Council let us know as soon as possible if there is anything in this letter that is unclear and requires further explanation.
64. Subject to addressing this advice we now invite the Council to progress the main modifications in the manner set out our closing comments. If there are any outstanding procedural questions then the Council should contact us via the Programme Officer. The Council should also keep us informed of progress and, as previously advised, give us the opportunity to see the final schedule, including changes made in response to this letter, before it is published.
65. Any representations about any proposed main modifications that follow from this letter can be made as part of the consultation process and will be taken into account at that stage.

David Smith

Steven Lee

INSPECTORS

29 June 2018