



Report to Spelthorne Borough Council

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
SPELTHORNE DEVELOPMENT PLAN ALLOCATIONS
DEVELOPMENT PLAN DOCUMENT**

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List of Abbreviations used in this report

¶	Paragraph
2004 Act	Planning and Compulsory Purchase Act 2004
2004 Regulations	The Town and Country Planning (Local Development) (England) Regulations 2004
AA	Appropriate Assessment under the EU Habitats Directive
CSPDPD	Spelthorne Core Strategy and Policies Development Plan Document adopted in February 2009
DPD	Development Plan Document
FRA	Flood Risk Assessment
HLAA	Housing Land Availability Assessment Update Report July 2008
LDF	Local Development Framework
LDS	Local Development Scheme
LP	Spelthorne Borough Local Plan 2001
PPS	Planning Policy Statement
RPG9	Regional Planning Guidance for the South East
RSS	Regional Spatial Strategy
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document

Note: in this report Examination Core Documents, which are contained in the Examination Library, are referred to thus - CD/XXX/123

Introduction and Overall Conclusion

- 1.1 Under the terms of section 20(5) of the 2004 Act, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document;
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Spelthorne Development Plan Allocations DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act. In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan.
- 1.3 The Allocations DPD was originally submitted to the Secretary of State for examination in June 2007, together with the Spelthorne Core Strategy and Policies DPD (CSPDPD). The examination into the CSPDPD was delayed to allow that document to be readvertised with changes, as explained in my covering letter to the Council's Chief Executive dated 19 December 2008 and in ¶3.5 of my report on the CSPDPD, and was completed in December 2008. The long delay in the examination of the Allocations DPD is as a result of this process.
- 1.4 My role is to consider the soundness of the submitted DPD against the tests of soundness set out in Planning Policy Statement PPS12. When the DPD was submitted, PPS12 (2004): *Local Development Frameworks* was in force, but in June 2008, it was replaced by PPS12 (2008): *Local Spatial Planning* (CD/NAT/410a). Although the tests of soundness are now presented in a different and simpler way, they cover the same matters as before. The revised PPS12 requires that to be sound, a DPD should be justified, effective and consistent with national policy, along with a continuing requirement for the DPD to satisfy the legal/procedural requirements and be in conformity with regional planning policy. Justified means that a DPD should be founded on a robust and credible evidence base, and the most appropriate strategy when considered against the reasonable alternatives. Effective means that the submitted DPD should be deliverable, flexible and able to be monitored.
- 1.5 The Government intends that spatial planning objectives for local areas, as set out in the LDF, should be aligned not only with national and regional plans, but also with shared local priorities set out in Sustainable Community Strategies where these are consistent with national and regional policy. National policy emphasises the importance of spatial planning, requires local planning authorities to produce a Statement of Community Involvement and follow its approach, and to undertake proportionate sustainability appraisal. PPS12 (2008) also confirms that the rigour of the examination process remains unchanged and inspectors will be looking for the

same quality of evidence and content as before. Consequently, the publication of the new PPS12 does not materially affect the procedure or matters to be examined in terms of this DPD.

- 1.6 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination in terms of testing justification, effectiveness and consistency with national policy. My overall conclusion is that the Allocations DPD is sound, provided it is changed in the ways I specify in this report, and that it meets the requirements of the Act and Regulations. The amendments I consider are necessary in order to make the Allocations DPD sound are set out in shaded bold type thus - **In order for the Allocations DPD to be sound...**. Annex A to my report contains the detailed wording of these changes.
- 1.7 In reaching my conclusions on soundness I have considered all the matters raised in the representations made during the course of the Examination, although they may not be specifically referred to in my report, including the representations made following the readvertising of the Allocations DPD in March 2008 and the representations made following advertisement of site allocation representations under Regulation 32 of the 2004 Regulations (now revoked but in force in respect of this DPD).
- 1.8 The changes I have specified in this binding report and in Annex A are made only where there is a clear need to amend the document in the light of the legal requirements and/or the tests of soundness in PPS12. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.9 The principal changes which are required are, in summary:
 - a) Insert a reference to "saved" proposals of the adopted Local Plan (LP) which will cease to have effect on adoption of the Allocations DPD;
 - b) insert a paragraph explaining that the numbers of dwellings set out in respect of each site are approximate;
 - c) delete Tables 1 and 2 and Figures 1 and 2;
 - d) amend the indicators in Table 3;
 - e) alter the timescales for development in respect of Allocations A1-A5, A7, A8, A10 and A11;
 - f) delete Allocation A6;
 - g) include a paragraph in respect of Allocation A8 requiring a Method of Demolition and Construction Statement;
 - h) include a paragraph in respect of Allocation A10 relating to Airtrack.

The report sets out all the detailed changes required, including those suggested by the Council (CD/SBC/106), to ensure that the plan meets the legal requirements and the three tests of soundness.

2 Legal/Procedural Requirements

- 2.1 The Allocations DPD is contained in the Council's Local Development Scheme (LDS - CD/SBC/043), the updated version being approved in April 2007. There, it is shown as having a submission date of May 2007. The Allocations DPD was not submitted to the Secretary of State until 14 June, but the delay is insignificant. In all other respects the document accords with the LDS.
- 2.2 The Council's Statement of Community Involvement (SCI - CD/SBC/044) has been found sound by the Secretary of State and was formally adopted by the Council before the examination hearings took place. It is evident from the documents submitted by the Council, including the Regulation 28 and 31 Statements and its Self Assessment Paper, that the Council has followed the consultation arrangements set out in the SCI, and in respect of the period before the SCI was adopted, the emerging SCI and the minimum requirements of Regulations 25 and 26. The comments in my report on the CSPDPD (CD/SBC/105 - ¶¶2.2 and 2.3) about local dissatisfaction with the consultation process apply equally to the Allocations DPD. I also comment below on the consultation process in discussing Allocation Site A8 (¶¶3.13 et seq). However, I am satisfied that the Council has met the consultation requirements as set out in the Regulations. The Council has also complied with the requirements of Regulation 32 to advertise site allocation representations.
- 2.3 It is evident from the documents submitted by the Council that, alongside the preparation of the DPD the Council has carried out a parallel process of sustainability appraisal (CD/SBC/004). I am also satisfied that an Appropriate Assessment (AA - CD/SBC/007) has been undertaken in accordance with the Habitats Directive, and that the AA has adequately considered not only the effect of the Allocations DPD but also its effect "in combination" with other development proposed in adjoining local authority areas. Natural England considers the AA to be sound and concurs with its conclusions. In the light of this, I am satisfied that there would be no significant harm to the conservation of any Natura 2000 site in or within 15 km of the Borough boundary as a result of the proposals within this DPD.
- 2.4 I am satisfied that the DPD has regard to national policy. The South-East England Regional Assembly indicated that the DPD was in general conformity with the approved Regional Spatial Strategy (RPG9 as amended) and the emerging Regional Spatial Strategy (SEERA letter - CD/REG/305). Since then, the final Regional Spatial Strategy (RSS) has been published, and I conclude in 3.52 below that the Allocations DPD is consistent with it.
- 2.5 The community strategy in force at the time the Allocations DPD was submitted (the Spelthorne Community Plan 2005 -

CD/SBC/046) identified a number of broad themes. I am satisfied that the allocations in the DPD of sites for housing and retail development and additional public open space have regard to this strategy and seek to address some of its key priorities.

- 2.6 I am also satisfied that the DPD complies with the specific requirements of the 2004 Regulations including the requirements in relation to publication of the prescribed documents; availability of them for inspection and local advertisement; and notification of DPD bodies.
- 2.7 The LDS indicates that Proposals P7, P8, P11, P12 and P17 contained in the Spelthorne Borough Local Plan (LP) are to be saved until the Allocations DPD is adopted. In order to comply with Regulation 13(5) of the 2004 Regulations, the Allocations DPD should be changed to contain a specific reference to these.
- 2.8 Subject to that change, I am satisfied that the legal requirements have all been met.
- 2.9 In order for the Allocations DPD to be sound, a new paragraph 1.5 should be added identifying the "saved" proposals of the Spelthorne Borough Local Plan 2001 which are superseded by the Allocations DPD (Change 1).**

3 Justified, Effective and Consistent with National Policy

- 3.1 The main issues are: whether the allocations in the DPD are consistent with the strategy and provisions of the adopted CSPDPD (CD/SBC/001b); whether Allocation A8 Riverside Works Sunbury is appropriately included in the DPD; whether the allocations are supported by a robust and credible evidence base, are the most appropriate in all the circumstances and are consistent with national and regional policy; whether the DPD is deliverable, flexible and able to be monitored; and whether there is any need or justification for other sites to be allocated for development within the DPD.
- 3.2 **Issue 1 – Consistency with the CSPDPD**
- 3.3 Policy HO1 of the CSPDPD provides that one of the means by which the Council will ensure provision is made for housing is by promoting the development of specific sites for housing through Allocations DPDs. The explanatory text indicates in ¶6.12 that the Allocations DPD will make a significant contribution to ensuring that, with outstanding planning permissions and other large sites identified in the housing trajectory, the Council has at least 10 years worth of developable sites.
- 3.4 The sites allocated for housing in the DPD are estimated to provide around 15% of the housing required to be provided by March 2018. Further work on the capacity of these sites in the Housing Land

Availability Assessment Update of July 2008 (HLAA - CD/SBC/072) indicates that the sites could provide around 29% of the housing requirement up to March 2018. Whether the allocated sites would produce 15% or 29% of the housing requirement up to March 2018, I regard the contribution to be made by those sites as a significant proportion of the whole.

- 3.5 The Allocations DPD does not purport to identify sufficient land to meet the whole of the housing requirement for the first 10 years of the CSPDPD, but that is not something required by the CSPDPD. I am satisfied that sites with outstanding planning permissions and other large sites identified in the housing trajectory (including sites in the Allocations DPD and other identified sites) provide at least 10 years worth of developable sites. As I indicated in my report on the CSPDPD (¶3.68) the housing provision assumed in the CSPDPD for the first 10 years' supply of identified sites satisfies the requirements of PPS3, and there is no reliance on windfalls during the first 10 years.
- 3.6 Allocation A10 comprises a redevelopment and extension of the Elmsleigh Centre, Staines. The retail allocation and the extension to the bus station reflect the aims of policies SP4 and TC1 of the CSPDPD. Allocation A11, an allocation of additional open space, reflects the aims of policy SP5 and policy CO1(a).
- 3.7 All of the allocations apart from site A11 lie within the existing urban area, as required by Strategic Policy SP1 of the CSPDPD, and are on previously-developed land, thus according with Objective 10 of the CSPDPD, which requires effective use of urban land. The DPD makes it clear in section 3 that all development proposals on allocated sites will need to comply with the relevant detailed policies of the CSPDPD.
- 3.8 Policy SP1 also requires new residential development to be confined to Flood Zones 1 and 2 unless it can be demonstrated that flood risks can be overcome. Two of the Allocations sites, A9 and A10, are partly in Flood Zone 3, and Flood Risk Assessments (FRAs) approved by the Environment Agency (EA) in respect of residential development on these sites have demonstrated that the developments would be safe, and would increase the existing flood plain storage capacity. Their allocation would not, therefore, conflict with policy SP1.
- 3.9 In my report on the CSPDPD (¶¶3.22 et seq) I considered the application of the sequential test in PPS25 to the CSPDPD, and concluded that it would be necessary to consider sites for housing in Flood Zones 2 and 3. I also concluded that Allocation Sites A9 and A10, which both have significant proportions in Flood Zone 3, passed the Exceptions Test set out in PPS25. No convincing evidence has come forward during this Examination to lead me to alter my view. I am satisfied that the sequential test has been correctly applied in respect of those sites allocated in the DPD parts

of which lie in Flood Zones 2 and 3, and that the allocation of those sites does not conflict with national policy in PPS25 or regional policy in the RSS.

3.10 I conclude on the first issue that the Allocations DPD satisfies the requirements of the CSPDPD in making a significant contribution to the 10 year supply of sites, and that the allocations in the DPD are consistent with the strategy and provisions of the adopted CSPDPD.

3.11 Issue 2 - Allocation A8: Riverside Works Sunbury

3.12 The Council proposes that the timescale for this development should be changed from 2008-13 to 2009-14.

3.13 The Council's consultations included sending letters to occupiers of properties adjoining allocation sites on four separate occasions, in addition to the other forms of consultation set out in the SCI. In the case of the Riverside Works, only a small number of responses from local residents was received. In my opinion, the consultation process adopted by the Council allowed for the effective engagement of interested parties, even though individual letters were not sent to every resident in the immediate vicinity.

3.14 A petition was collected in the summer of 2008 opposing the site's allocation, but it seems likely that signatories were prompted by the knowledge of details of a specific development proposal being consulted on at that time. Whilst I give some weight to the existence of the petition, it does not undermine or devalue the consultation work carried out by the Council at earlier stages in the process, and I am not satisfied that it is evidence of a lack of effective engagement by the Council with interested parties at the consultation stage.

3.15 The vast majority of this site is located within Flood Zone 2, with a very small percentage in Flood Zone 3 on which it would be unnecessary to build. It comprises artificially raised ground, its levels having been raised in the 1930s. There is no evidence that the owners, the EA, have any intention of restoring it to its original levels (indeed, all the evidence points in the opposite direction) and in my opinion it is only realistic to regard the site in its current raised state as a permanent feature.

3.16 Policy LO1 of the CSPDPD would require any proposal for housing here to be supported by an appropriate FRA and incorporate an appropriate sustainable drainage scheme. I deal with the principle of allocating sites in Flood Zone 2 in ¶3.9 above. But I note here that, according to the Council, the EA has carried out an FRA which has indicated the acceptability of a residential development on this site. The site is already extensively developed with hard surfacing or buildings, and a redevelopment of the site would have the potential to reduce surface water run-off, and so even to a small

extent reduce the risk of flooding from that source. CSPDPD policies SP5 and CO2 would also require any development on the site to provide adequate sewerage infrastructure, and the text of the DPD identifies the need to assess whether any improvements to sewerage infrastructure would be needed and to implement them before occupation of the site. I conclude, taking all these matters into account, that the site could be redeveloped for housing without leading to increased flood risk for nearby dwellings.

- 3.17 The site is on the edge of Sunbury but given that it is bounded by residential development on two sides as well as on the other side of Fordbridge Road I consider it is properly regarded as being within the urban area. Housing would be an appropriate use given the predominance of housing in the area. The highway authority has not objected to the allocation on the grounds of traffic generation, the evidence suggesting that peak traffic movements from the site if redeveloped for housing could be significantly lower than traffic generation if the site were fully used for commercial purposes. I am satisfied that a safe access with adequate visibility could be provided, even though visibility is limited at the existing site access.
- 3.18 The Council's Transport Statement (CD/SBC/022) shows that the site is within 30 minutes public transport time of a range of key facilities (although not a hospital). I have no reason to doubt the accuracy of this assessment, which takes into account walking distances at the destination. This measure reflects a Government Core Output Indicator current at the time the DPD was submitted and is consistent with the approach to accessibility set out in the Surrey Local Transport Plan (CD/SCC/201). In my view it is a useful and appropriate indicator of accessibility. The site is also within 400m of a half-hourly bus route. Although the west-bound bus stop is over 400m from the site I regard it as within reasonable walking distance. On balance, I consider that although accessibility to facilities by foot is not particularly good, the site is reasonably well located for access to key facilities and services by public transport, and could not be described as an unsustainable location for housing.
- 3.19 The site is at a higher level than neighbouring dwellings in The Creek and Willow Way. These contain "Plotland" dwellings which tend to be constructed on brick piers or concrete supports and are of timber or similar materials. The evidence indicates that some structural damage has occurred to some of the properties adjoining the site, which the residents say was caused by piling works within the site. There is also evidence of slippage of the retaining bank of the site towards one of the properties in The Creek.
- 3.20 On the other hand, the site has been developed in the past with buildings, including an office building and a large workshop or storage building, and it is not clear that the construction of those buildings caused any damage to neighbours. Nor is there any convincing evidence that development on the site would inevitably

cause damage, or that other types of construction methods not involving piling would cause damage.

- 3.21 The evidence before me therefore indicates that, while some types of construction activity in some parts of the site might have the potential to cause damage to neighbouring properties, that does not mean that the site could not be redeveloped for housing at all. I note that prospective developers of the site are alleged to have told local residents that demolition of existing buildings would inevitably cause damage to adjoining properties, although there is no independent corroboration of that. But bearing in mind the need to make efficient use of land and given the site's suitability in other respects for residential development, I conclude that the risk of damage to adjoining properties is not so great or extensive as to make this site unsuitable for housing in principle.
- 3.22 It is primarily the developer's responsibility to ensure the site is suitable for the development proposed. But the effect of any development on its neighbours, including on their stability, is a material consideration. The text of the DPD should therefore identify the need for a method of demolition and construction statement to be provided in connection with any development proposal, and the Council will need to bear in mind the effect on neighbouring properties when considering any planning application. With that change, I conclude that the site is appropriately included in the DPD, and its allocation would not conflict with policies CC1 and CC2 of the RSS.
- 3.23 It would not be reasonable to require, as part of the development of this site, the provision of a cycle link to Wheatley's Eyot, even as part of a more extensive additional crossing point over the Thames, as there appear to be no committed plans by the relevant authorities to provide such a crossing point.

3.24 In order for the Allocations DPD to be sound, a paragraph should be added to the text supporting Allocation A8 requiring a Method of Demolition and Construction Statement (Change 15).

3.25 Issue 3 – Evidence base, appropriateness and consistency with national policy

Evidence base - general

- 3.26 The evidence base for the allocations is the same as that supporting the CSPDPD, and in my report on the CSPDPD I found it to be robust and credible. The HLAA is the principal source of evidence for the housing allocations. The Council has proposed some changes to the DPD relating to the timescale of development on each site. Those changes reflect evidence brought forward during

the Examination into the CSPDPD, and I consider that they are necessary in order to make the DPD sound.

- 3.27 Sites A1 - A8 are all in or formerly in employment use. In my report on the CSPDPD (¶¶3.56, 3.112) I concluded that the resulting loss of employment floorspace would be compensated by new employment floorspace coming forward and that there would be environmental or amenity benefits in their being developed for housing. No convincing evidence has come forward as part of this examination to lead me to a different view.
- 3.28 Other policies of the CSPDPD and in particular policy EN1 would require development on the sites to have a satisfactory relationship with neighbouring properties. I am satisfied that all of the sites could in principle be developed for residential uses without harming the living conditions of adjoining residents.
- 3.29 I now go on to consider particular points arising in respect of each of the other allocation sites.

Allocation A1: 28-44 Feltham Road Ashford

- 3.30 The Council proposes that the timescale for this development should be changed from 2011-16 to post-2024. I concluded in my report on the CSPDPD (¶3.62) that because of doubts over the site's availability it was not "developable" as envisaged in PPS3. On the other hand, no representations have been received from any of the owners of the site opposing the allocation, which is carried forward from the LP, and the age of buildings on the site suggest a reasonable prospect of change to the site occurring during the plan period. Development of the site is now proposed much later on in the plan period and it is not being relied on to produce housing within the first 15 years. In view of this, I consider that the evidence supports the allocation within the timescale envisaged, and I support the inclusion of this site with the change of timescale to post-2024. There do not appear to be any physical constraints to development on the site that could not be overcome. I am satisfied that Thames Water's requirements relating to discharge of surface water could be met without requiring the use of land outside the site.

Allocation A2: 158-166 Feltham Rd Ashford

- 3.31 The Council proposes that the timescale for this development should be changed from 2008-13 to 2014-2019, with consequential changes to the supporting text. Redevelopment of the site is supported by the landowners and there appear to be no significant physical constraints which could not be overcome which would prevent the site coming forward when now anticipated. I am satisfied that this site is deliverable within the timescale 2014-2019. Residential development of the site would result in a significantly reduced number of traffic movements during the peak

hour by comparison with the existing use. Here, too, I am satisfied that Thames Water's requirements relating to discharge of surface water could be met without requiring the use of land outside the site.

Allocation A3: Land adjoining Feltham Hill Road and Poplar Road Ashford

3.32 The Council proposes that the timescale for this development should be changed from 2018-23 to 2009-2019. It has resolved to grant planning permission for a Phase 1 development subject to the completion of a planning obligation, and no further evidence has come forward during this Examination to lead me to change the view I gave in my report on the CSPDPD (¶3.60) that the site is deliverable within the timescale now envisaged.

Allocation A4: Works adjoining Harrow Road Ashford

3.33 The timescale for this development is proposed to be changed from 2011-16 to 2019-2024. My finding in my report on the CSPDPD (¶3.61) was that this site was developable in the timescale now envisaged, and none of the evidence available in respect of this Examination leads me to a different conclusion.

3.34 The site is close to a bus route along the A30 providing a frequent bus service to key facilities. Despite the distance to the east-bound bus stop if the nearby footbridge is used, I am satisfied that that the site is well within 30 minutes public transport travel time of key facilities. As indicated above (¶3.18), in my view that is an appropriate measure of accessibility.

3.35 I am satisfied from the available evidence that any issues arising from traffic noise on the A30 could be addressed through the incorporation in the development of appropriate noise attenuation.

Allocation A5: Steel Works and Builders Merchants Gresham Road Staines

3.36 The timescale of this development is proposed to be changed from 2011-16 to post-2024. As with Allocation A1, I concluded in my report on the CSPDPD that because of doubts over the site's availability it was not "developable" as envisaged in PPS 3. However, the owners of the site do not oppose its allocation, and as the site would be suitable for residential development and is in a highly sustainable location, I consider that the evidence is sufficient to support the allocation within the longer timescale now envisaged.

3.37 The access to the redeveloped site is envisaged to be the same as the current access to the site, and this was assessed in the Transport Statement. I am satisfied that a comprehensive redevelopment scheme of the whole site could be implemented without any access being required via Albert Drive.

Allocation A6: Rodd Estate and The Lodge, Govett Avenue Shepperton

- 3.38 Planning permission has been granted for development of this site and construction is well under way. It is now inappropriate for the allocation to remain in the DPD, and it should be deleted.

Allocation A7: Builders Merchant Moor Lane Staines

- 3.39 The Council proposes that the timescale for this development should be changed from 2011-16 to post 2024. The allocation of the site is supported by the landowner, but opposed by the leaseholder, whose lease expires in January 2025.
- 3.40 The site is, in principle, highly suitable for residential development, being in a largely residential area and in a highly sustainable location. In view of this, and as development of the site is now proposed much later on in the plan period, when the landowner would be in a position to obtain possession regardless of the views of the leaseholder, the evidence is sufficient to support the allocation within the timescale now envisaged.
- 3.41 The Council has indicated that the use of compulsory purchase powers, referred to in Policy HO2 of the CSPDPD, would be a measure of last resort and would not be used until the Council was satisfied that other measures, including a review of all available sites, had demonstrated that there was no reasonable alternative. This and the change in timescale would provide adequate protection for the leaseholder.
- 3.42 I am satisfied that the requirement for a public footway for Moor Lane on the western boundary of the site is reasonable, having regard to existing road conditions and the absence of a footway in this location at present.

Allocation A9: Bridge Street Car Park Staines

- 3.43 The Council has resolved to grant planning permission for 143 dwellings on this site, which is a greater number of dwellings than the approximately 75 referred to in ¶6.75 of the DPD. The changes I recommend to ¶4.3 of the DPD (see ¶3.60 below) make it unnecessary to alter ¶6.75 to reflect the scheme the subject of the Council's resolution.
- 3.44 The site currently comprises a public car park, and the DPD in ¶6.75 proposes the retention of some public parking on the site. Questions of car park management, including the reasons for the Council deciding to dispose of the site and the future use and management of the spaces to be retained, are matters for the Council, and do not need to be referred to in the DPD.
- 3.45 The text of the DPD refers to an Initial Draft Planning Brief (CD/SBC/027) and the preparation of a Supplementary Planning

Document (SPD). Any other development proposal for this site would need to be considered in the context of the policies of the CSPDPD, as the DPD makes clear, and those policies would not be overridden by SPD. ¶6.80 with minor changes suggested by the Council is purely factual and it is not necessary in the interests of soundness to make any further changes to it.

- 3.46 CD/SBC/027 referred to the need for any development to maintain and where possible improve the towpath along the river. The Council acknowledges the importance of this issue, but I consider that this level of detail does not need to be included in the DPD.

Allocation A10: The Elmsleigh Centre and adjoining land, Staines

- 3.47 The Council proposes that the timescale for this development should be altered from 2008-11 (Phase 3) and 2011-14 (Phase 4) to 2009-2014 (Phase 3) and 2019-2024 (Phase 4). It has resolved to grant planning permission for a scheme for the Phase 3 redevelopment. It follows from the conclusions in my report on the CSPDPD that on the evidence then provided the revised timescales for these two phases appeared achievable. No further evidence has come forward to contradict that view although I recognise that implementation of such large schemes will be dependent on economic circumstances and market conditions.
- 3.48 The likely route of the Airtrack rail line as shown on the Proposals Map passes through the site and is required to be safeguarded by policy CC4 of the CSPDPD. In order to be sound, the text of the allocation should make specific reference to this requirement.

Allocation A11: Land to the west of Edward Way Ashford

- 3.49 The Council's report *Assessment of Open Space, Sport and Recreation Provision in Spelthorne* (CD/SBC/021) identifies a deficiency of amenity open space in north Ashford, and forms a sound evidence base for this allocation, subject to the timescale for development being updated to reflect the Council's current intentions. There is no evidence that a greater area of land is required, or indeed that a larger area could be delivered, and no justification, therefore, for increasing the allocation site to include land to the west. The allocation is intended to serve residents in the immediate vicinity, who would be able to walk to the site. As the site adjoins the A30 trunk road, highway safety considerations would preclude the provision of a vehicular access and public car parking.

Appropriateness

- 3.50 I considered the appropriateness of the Council's approach that all new development requirements would be met within the defined urban area in my report on the CSPDPD, and concluded that it was the most appropriate strategy. All of the allocated sites are

consistent with the provisions of the CSPDPD, and on the basis of the evidence before me I consider that they are appropriate for the uses proposed. The DPD does not seek to identify all the sites that will be required for housing during the period of the CSPDPD, and the evidence to the Examination into the CSPDPD identified other sites in the urban area that, in principle, would also be appropriate for housing. That does not, however, undermine the allocation of these sites. Non-allocation of any site would not preclude it from coming forward for housing in the future, provided its development would not be in conflict with other policies in the CSPDPD.

Consistency with national and regional policy

- 3.51 I found in my report on the CSPDPD that the overall strategy of the CSPDPD was consistent with national policy. No convincing evidence has come forward during this Examination to undermine this finding. The allocations in the DPD are founded on policies in the CSPDPD, and are therefore also consistent with national policy. I have indicated above in ¶3.9 that the allocations do not conflict with national policy in PPS25.
- 3.52 I also found, in my report on the CSPDPD, that the overall strategy of that document was consistent with emerging regional policy, and again no convincing evidence has come forward since which would point to a different conclusion. There are no significant differences between final RSS published by the Secretary of State just before the start of the Hearings Sessions, and the Proposed Changes document published in July 2008, which I took into account in my report on the CSPDPD, of relevance to this DPD. I am therefore satisfied that the Allocations DPD is consistent with the published RSS.

Overall conclusions

- 3.53 I conclude that subject to the changes I recommend the allocations contained in the DPD are founded on a robust and credible evidence base, are the most appropriate in all the circumstances and are consistent with national and regional policy.

3.54 In order for the Allocations DPD to be sound, the timescales for development in respect of Allocation sites A1 - A5 and A7, A8, A10 and A11 should be amended as set out above (Changes 6 - 11, 13, 14, 16 and 18); Allocation A6 should be deleted (Change 12); and a paragraph added to the text supporting Allocation A10 dealing with Airtrack (Change 17).

3.55 Issue 4 – Deliverability, flexibility and monitoring

- 3.56 On the basis of the available evidence, as discussed above, I am satisfied that there is a reasonable prospect of the allocations in the DPD being deliverable in the timescales envisaged in the DPD.

- 3.57 The scope for flexibility is limited by the nature of this document. If the need arose for further allocations of sites, that would be achieved through a new Allocations DPD, as provided for in policy HO2 of the CSPDPD. The DPD does not prescribe any more detail than is necessary in terms of the precise nature of any development on each site. The approach of the DPD to the sites it allocates is flexible in terms of type and quantum of development, but the numbers of dwellings proposed for each site do not fully reflect the assumptions made in the HLAA. To address this, the Council has suggested a change to the text of the DPD. With this change, I consider that the DPD is sufficiently flexible.
- 3.58 The approach of Chapter 5 of the DPD to monitoring reflects and is consistent with that in the CSPDPD. All allocations have targets and indicators which are measurable, clear and relevant to the allocation. But in order that the DPD reflects the government's latest Core Output Indicators some change to the wording of the Chapter is needed. In addition, the housing trajectory and tables included in pages 4-7 of the submission DPD are now out of date, and even if updated would rapidly become out of date again. Updates of the trajectory will continue to be produced in the Annual Monitoring Report, and it is unnecessary for this information to be included in the DPD.
- 3.59 I conclude that, subject to the changes I recommend, the DPD is deliverable, flexible and able to be monitored.

3.60 In order for the Allocations DPD to be sound, a new sentence should be added at the end of paragraph 4.3 noting that the number of dwellings set out for each site is approximate (Change 2); the housing trajectory and tables in pages 4-7 should be deleted, and consequential changes made to the supporting text (Changes 3 and 4); and Table 3 should be amended to reflect the latest government guidance on indicators (Change 5).

3.61 Issue 5 – Other sites

- 3.62 Of the other sites proposed for allocation for development by representors, a number are in the MGB and outside the defined urban area. Allocating those sites for development would conflict with Strategic Policy SP1, with saved policy GB1 of the LP, and with the advice in PPG2. It would therefore be inappropriate for any of the sites in the MGB to be included as allocations in the DPD.
- 3.63 All of the other “alternative sites” proposed by representors are located within the urban area as defined. Relevant policies of the CSPDPD provide a framework within which any proposals for their development could be assessed. Absence of allocation would not, by itself, preclude their development if that accorded with the

CSPDPD, and some may well be suitable in principle for some form of development, as the Council acknowledges.

- 3.64 However, there is little or no supporting evidence for these sites. None of them apart from ASA 18 (land at Majestic House High Street Staines) has been subject to appropriate sustainability appraisal; in the case of the majority of sites there is no detail of the quantum of development proposed, the timescale for development or any criteria development might need to address; and where a specific quantum of development is specified, there is no supporting evidence to justify that quantum. The sustainability appraisal in the case of ASA 18 does not provide any supporting evidence for the scale of development proposed or assess it in terms of flood risk, transport or other impact. In view of this lack of evidence, I cannot be satisfied that the allocation of any of these other alternative sites would be sound. Nor can I be satisfied that the allocation of any of these sites would not prejudice the sustainability appraisal already carried out.
- 3.65 In my report on the CSPDPD (¶3.241) I concluded that 2-8 Clarendon Road was correctly included within the Ashford town centre employment area. I am not satisfied that I am able to recommend any change to the employment area boundary as part of my examination of the Allocations DPD, even if I consider that would be desirable. There is evidence that 8 Clarendon Road, which is vacant, has been marketed for some time without success, although precise details of that marketing have not been provided. 4-6 Clarendon Road is still in employment use. Any proposal for the residential redevelopment of these properties would be assessed against the provisions of the CSPDPD, and particularly policy EM1 which makes provision for circumstances where maintenance of existing levels of employment floorspace are unsustainable and unviable in the long term. My comments above apply to the question whether 2-8 (together with 10-12 Clarendon Road) should be allocated for residential development in the DPD, but I also consider that such an allocation would be in conflict with policy EM1 and so would not be sound.
- 3.66 I conclude that there is no justification for any other sites to be allocated for development within the DPD.

Other matters

- 3.67 In my earlier report I also considered the impact on Spelthorne of Heathrow Airport, which adjoins the Borough. The Government has now confirmed policy support for adding a third runway at Heathrow. The adopted CSPDPD in ¶7.9 acknowledges the need to re-examine employment land requirements should further expansion of the airport be agreed. There is no need to repeat that in the Allocations DPD, and it would be inappropriate for this DPD, which is a subordinate document to the CSPDPD, to say anything

about the precise circumstances which might trigger a review of the spatial and employment strategy of the CSPDPD.

4 Minor Changes

- 4.1 The Council has proposed some minor changes, which I am satisfied are necessary to correct inaccuracies or inconsistencies, to bring the DPD up-to-date and to ensure consistency with the adopted CSPDPD. Although these changes do not address key aspects of soundness and do not require detailed examination, I endorse them on a general basis in the interests of clarity and accuracy. These are in Annex B. I am not satisfied that any other changes to the text of the DPD are necessary in order to achieve a sound document.
- 4.2 I am also content for the Council to implement any minor consequential changes to policy or paragraph numbering or cross-references which may be needed as a result of the changes I set out in this report, and to correct any spelling or grammatical errors, as long as the underlying meaning of the DPD is not altered.

5 Overall Conclusions

- 5.1 I conclude that, with the amendments I recommend, the Spelthorne Development Plan Allocations DPD satisfies the requirements of s20(5) of the 2004 Act and meets the tests of soundness in PPS12.

Sara Morgan

INSPECTOR

Inspector's Report Annex A

Schedule of Changes Necessary to make the DPD sound

Change No	Part of DPD	Change
1.	After Para. 1.4	Add new paragraph 1.5: <i>'By virtue of the Planning and Compulsory Purchase Act 2004 all the policies and proposals contained in the adopted Borough Local Plan 2001 expired on 27 September 2007, with the exception of those which were 'saved' by a Direction of the Secretary of State dated 21 September 2007. All of the five 'saved' proposals P7, P8, P11, P12 and P17 have been saved until the adoption of this DPD.'</i>
2.	Para 4.3	Line 5: insert new sentence at end of paragraph: <i>'However, only an approximate number of dwellings is set out for each allocation site on the basis that the precise form of development, and therefore the detailed number of units, is best determined at the detailed planning stage, taking into account all relevant factors'.</i>
3.	Para 4.4	Line 1: delete <i>'following pages present'</i> and insert <i>'sites are included in'</i> ; after <i>'housing trajectory'</i> insert <i>'which is prepared in accordance with the requirements of PPS3 and updated annually. The housing trajectory is reproduced in the Annual Monitoring Report (AMR) and shows how'</i> ; after <i>'Spelthorne's housing supply'</i> delete <i>'to the end of'</i> and insert <i>'will be delivered over the plan period to 2026'</i> . Delete last two sentences.
4.	Tables 1 & 2 Figures 1 & 2	Delete Tables 1 & 2 Delete Figures 1 & 2
5.	Table 3	A1 to A9 and A10: in Indicator column: delete <i>'2a - Housing Trajectory'</i> ; and insert <i>'H1: Plan period and housing targets. H2(a): Net additional dwellings - in previous years. H2(b): Net additional dwellings - for the reporting year. H2(c) Net additional dwellings - in future years. H2(d): Managed delivery target'</i> ; A10: in Indicator column: after <i>'COI 4a'</i> delete <i>'4a - Amount of completed retail development'</i> and insert <i>'BD4: Total amount of floorspace for 'town centre uses''</i>
6.	Allocation A1	After <i>'Timescale of development'</i> delete <i>'2011-16'</i> and insert <i>'post 2024'</i>
7.	Allocation A2	After <i>'Timescale of development'</i> delete <i>'2008-13'</i> and insert <i>'2014-2019'</i>
8.	Para 6.13	After <i>'allocation'</i> delete <i>'and has stated that the site will be available early in the plan period'</i>
9.	Allocation A3	After <i>'Timescale of development'</i> delete <i>'2018-23'</i> and insert <i>'2009-2019'</i>
10.	Allocation A4	After <i>'Timescale of development'</i> delete <i>'2011-16'</i> and insert <i>'2019-2024'</i>
11.	Allocation A5	After <i>'Timescale of development'</i> delete <i>'2011-16'</i> and insert <i>'post 2024'</i>
12.	Allocation A6	Delete Allocation
13.	Allocation A7	After <i>'Timescale of development'</i> delete <i>'2011-16'</i> and insert <i>'post 2024'</i>
14.	Allocation	After <i>'Timescale of development'</i> delete <i>'2008-13'</i>

Change No	Part of DPD	Change
	A8	and insert '2009-14'
15.	Para 6.68	At end of paragraph insert ' <i>Any proposal for demolition and construction work associated with the implementation of this allocation must be accompanied by an appropriate Method of Demolition and Construction Statement detailing how the works will be implemented to minimise any damage or nuisance to neighbouring properties</i> '.
16.	Allocation A10 Para 6.86	Delete '2008-11' and insert '2009-2014' before 'Phase 3'; delete '2011-14' and insert '2019-2024' before 'Phase 4'
17.	After Para 6.96	Add new paragraph: ' <i>Any scheme will need to have regard to Policy CC4 of the Core Strategy and Policies DPD which requires the route of Airtrack to be safeguarded</i> '
18.	Allocation A11	After ' <i>Timescale of development</i> ' delete '2008-13' and insert '2009-14'

Inspector's Report Annex B

Schedule of Minor Changes Proposed by the Council

Change No	Part of DPD	Change
19.	Para 1.2 a)	Line 1: delete ' <i>implementing</i> ' and insert ' <i>delivering</i> '; Line 3: delete ' <i>South East Plan</i> ' and insert ' <i>Regional Spatial Strategy for the South East</i> '; Line 4: delete ' <i>an</i> ' before Allocations and add ' <i>s</i> ' to DPD.
20.	Para 1.2 b)	Line 2: delete ' <i>implementing</i> ' and insert ' <i>delivering</i> '
21.	Para 1.2 c)	Line 2: delete ' <i>implementing</i> ' and insert ' <i>delivering</i> '
22.	Para 1.4	Line 1: delete first sentence; second sentence: delete ' <i>The document may be reviewed before that date</i> ' and insert ' <i>Additional Allocations DPDs may be brought forward</i> '; Line 3: delete ' <i>second half of the timescale of its</i> ' and insert ' <i>plan period for the</i> '; insert full stop after ' <i>Core Strategy and Policies DPD</i> ' and delete remainder of sentence.
23.	Para 2.1	Line 1: add ' <i>the</i> ' before and ' <i>Sites</i> ' after the word Allocations.
24.	Para 2.2	Line 4: delete ' <i>permission</i> ' after the word ' <i>refused</i> '
25.	Para 2.3	Line 1: delete ' <i>necessarily</i> ' after ' <i>does not</i> '
26.	Para 3.2	Bullet 3: delete second sentence.
27.	Para 3.2	Bullet 6: Line 2: delete ' <i>in that document</i> ' after ' <i>specific policies</i> '; Line 3: delete ' <i>implementing</i> ' and insert ' <i>delivering</i> '. Delete last sentence.
28.	Para 3.3	Line 2: second sentence: add ' <i>The following will be particularly relevant</i> ' at the beginning of the sentence, and insert full stop after ' <i>housing allocations</i> '. Delete remainder of paragraph.
29.	Para 3.3	Bulleted list of Policies: Delete "LO2" insert "LO1". Insert Policy titles. Delete policy text.
30.	Para 3.4	Delete whole paragraph.
31.	Para 3.4	Add new paragraph: ' <i>Where information on flood risk is included in the development criteria for particular Allocations it is based on the flood maps referred to in paragraph 5.11 of the Core Strategy and Policies DPD and as set out on the Proposals Map. However, when considering development</i>

Change No	Part of DPD	Change
		<i>proposals on any of the Allocation sites the Council will always have regard to the latest flood maps published by the Environment Agency.</i>
32.	Para 4.1	<p>Line 1: delete 'have been' and insert 'were';</p> <p>Line 2: delete 'also in'; add 'January 2007 (base date April 2006).' after 'Housing Land Availability Assessment';</p> <p>Line 5: delete 'by already approved' after 'compensated' and at the end of the sentence add 'much of which has already been approved' after 'employment development';</p> <p>Line 7: after 'intensification of' add 'the identified Employment Areas'; delete 'identified to be' after 'Areas'; add 'use' after 'employment'</p>
33.	Para 4.2	<p>Line 1: delete 'included as allocations in' and insert 'were consulted in the preparation of'; add full stop after DPD and delete remainder of sentence;</p> <p>Line 5: delete 'are based on' and insert 'have regard to';</p> <p>Line 6: insert full stop after 'the owners' stated intentions' and delete remainder of paragraph.</p>
34.	Para 4.3	<p>Line 1: delete 'South East Plan' and insert 'Regional Spatial Strategy for the South East'; delete '3020' and insert '3320';</p> <p>Line 2: delete '151' and insert '166';</p> <p>Line 3: insert 'housing' before 'allocations';</p> <p>Line 4: delete 'over' and insert 'of' before, and 'or larger' after '0.4ha'; delete 'considered important to identify' and insert 'identified' before 'to give certainty to'.</p>
35.	Para 5.1	<p>Line 1: insert 'the' before 'allocations';</p> <p>Line 3: delete 'as required by the Planning and Compulsory Purchase Act 2004';</p> <p>Line 5: delete 'it will negotiate to' and insert 'the Council will, if necessary,';</p> <p>Line 6: insert 'In accordance with Policy HO2 in the Core Strategy and Policies DPD' at beginning of sentence. Delete last sentence.</p>
36.	Para 5.2	<p>Line 1: delete 'set out below' after 'framework', and insert 'identifies' after 'indicators and';</p> <p>Line 3: after 'housing trajectory' insert full stop and delete remainder of sentence;</p> <p>Line 4: insert 'more' after 'A' at beginning of sentence;</p> <p>Line 6: delete '13' and insert '12'.</p>
37.	Para 6.24	Line 2: insert 'public' before 'open space'
38.	Para 6.25	<p>Line 1: insert 'sustainable drainage systems' before SUDS; insert 'the' before 'local sewer';</p> <p>Line 2: delete 'and' and insert 'to' after 'Thames Water';</p> <p>Line 5: after 'the site' delete 'which' and insert 'and any building within 3 metres of them would'; delete 'by' and insert 'from' before 'Thames Water'; insert full stop after 'Thames Water' and delete remainder of sentence.</p>
39.	After Para 6.25	Add new paragraph: 'There is scope to develop this site in phases provided each element contributes to an appropriate comprehensive approach including the provision of adequate open space'.
40.	Para 6.35	Insert 'implementation of' before 'Allocation A11';

Change No	Part of DPD	Change
		delete ' <i>adjoining</i> ' and insert ' <i>to the west of</i> ' before ' <i>Edward Way</i> '
41.	Para 6.36	Insert ' <i>as to</i> ' after ' <i>Thames Water</i> '
42.	Para 6.41	Line 1: insert ' <i>two</i> ' before ' <i>landowners</i> ' and ' <i>and Jewson Ltd, have</i> ' after ' <i>Network Rail</i> '; Line 2: delete ' <i>the second half</i> ' and insert ' <i>towards the end</i> ' before ' <i>of the plan period</i> '
43.	Para 6.42	Line 1: insert ' <i>the current use</i> ' after ' <i>residential roads and</i> '
44.	Para 6.43	Line 1: insert ' <i>Flood</i> ' before ' <i>Zone 2</i> ' and delete ' <i>(1 in 1000 flood plain)</i> '
45.	Allocation 7 Para 6.56	Line 2: delete ' <i>for</i> ' and insert ' <i>with</i> ' after ' <i>developed</i> '; insert full stop after ' <i>housing and flats</i> ' and delete remainder of sentence
46.	Para 6.60	Line 1: delete ' <i>site is within Zone 2 (1 in 1000 flood plain) with the</i> ' and insert ' <i>of the site is in Flood</i> ' before ' <i>Zone</i> '; delete ' <i>3a (1 in 100 flood plain)</i> ' and insert ' <i>2</i> '. Line 4: insert full stop after issues and delete remainder of sentence.
47.	Para 6.61	At beginning of sentence insert ' <i>For reasons of pedestrian safety</i> '
48.	Allocation A8 Para 6.64	Line 1: delete ' <i>was previously occupied</i> ' and insert ' <i>is owned</i> '
49.	Para 6.65	Line 3: insert ' <i>set out</i> ' after ' <i>hectare</i> ' and change Policy HO7 to ' <i>HO5</i> '
50.	Para 6.70	Line 1: insert ' <i>Flood</i> ' before ' <i>Zone 2</i> ' and delete ' <i>(1 in 1000 flood plain)</i> '; Line 3: after ' <i>development proposal will</i> ' delete ' <i>have to carry out</i> ' and insert ' <i>require</i> '
51.	Para 6.71	Line 1: insert ' <i>also</i> ' before ' <i>require an assessment</i> '; Line 2: after ' <i>Thames Water</i> ' delete ' <i>whether</i> ' and insert ' <i>to determine the need for</i> '; delete ' <i>are required</i> ' at the end of the sentence.
52.	Allocation A9 Para 6.74	Line 2: insert ' <i>has an</i> ' after ' <i>The site</i> '; delete ' <i>it</i> ' and insert ' <i>and</i> ' after ' <i>0.71ha</i> '
53.	Para 6.76	Line 1: after ' <i>The site</i> ' delete ' <i>was</i> ' and insert ' <i>is</i> '; after ' <i>the Council</i> ' delete ' <i>and has been sold to a housing developer</i> ' and insert ' <i>and is available for redevelopment</i> '
54.	Para 6.79	Line 2: insert ' <i>within the Staines Conservation Area</i> ' after ' <i>gateway location</i> ' and delete ' <i>and within the Staines Conservation Area</i> ' at the end of the sentence.
55.	Para 6.80	Line 2: delete ' <i>consulted on</i> ' and insert ' <i>subject to consultation</i> '; delete ' <i>developing</i> ' and insert ' <i>the preparation of</i> ' before ' <i>a Supplementary Planning Document</i> '.
56.	Para 6.81	Line 1: insert ' <i>Flood</i> ' before ' <i>Zone 2</i> ' and delete ' <i>(1 in 1000 flood plain)</i> '; Line 2: insert ' <i>(Flood Zone 3b)</i> ' at the end of first sentence; Line 4: delete ' <i>have to carry out</i> ' and insert ' <i>require</i> ' before ' <i>a detailed Flood Risk Assessment</i> '; Line 5: delete ' <i>of a specific scheme</i> ' at the end of the sentence.
57.	Para 6.82	Line 1: insert ' <i>also</i> ' before ' <i>require</i> '; Line 2: after ' <i>Thames Water</i> ' delete ' <i>whether</i> ' and

Change No	Part of DPD	Change
		insert ' <i>to determine the need for</i> '; delete ' <i>are required</i> ' at the end of first sentence
58.	Para 6.87	Delete ' <i>stages</i> ' and insert ' <i>phases</i> ' at end of sentence.
59.	Para 6.89	Line 4: insert ' <i>will</i> ' after ' <i>This phase</i> '; insert full stop after ' <i>catchment area</i> ' and start new sentence with ' <i>It will</i> '; Line 6: delete ' <i>creating</i> ' and insert ' <i>provide</i> ' before ' <i>the opportunity</i> '
60.	Para 6.90	Line 8: delete ' <i>shopping</i> ' and insert ' <i>town</i> ' before ' <i>centre</i> '; Line 9: delete ' <i>the Core Strategy</i> ' and insert ' <i>Strategic Policy SP4</i> ' at end of sentence.
61.	Para 6.92	Delete ' <i>in transport terms</i> ' and ' <i>larger</i> ' after ' <i>acceptability</i> '
62.	Para 6.94	Line 1: insert ' <i>Flood</i> ' before ' <i>Zone 3a</i> ' and delete ' <i>(1 in 100 flood plain)</i> '; insert ' <i>has been carried out</i> ' after ' <i>assessment</i> '; Line 2: after ' <i>Black and Veatch</i> ' delete ' <i>has been carried out to assess whether</i> ' and insert ' <i>which demonstrates that</i> '; Line 3: delete third sentence; Line 4: delete ' <i>have to carry out</i> ' and insert ' <i>require</i> ' before ' <i>a detailed Flood Risk Assessment</i> '
63.	Para 6.95	Line 1: delete ' <i>have</i> ' and insert ' <i>has</i> ' after ' <i>Thames Water</i> '
64.	Para 6.97	Line 2: delete ' <i>supports</i> ' before ' <i>Policy TC1</i> '
65.	Para 6.102	Line 1: after ' <i>The Council's</i> ' insert ' <i>Assessment of</i> '; insert ' <i>Sport and Recreation Provision in Spelthorne</i> ' after ' <i>Open Space</i> '; delete ' <i>Study</i> ' before ' <i>identifies</i> '; Line 2: insert full stop after ' <i>space provision</i> '; delete ' <i>and where</i> ' and start new sentence with ' <i>There</i> '; insert ' <i>in this area</i> ' after ' <i>open land</i> '; Line 3: insert ' <i>and this</i> ' before ' <i>Allocation</i> '
66.	Para 6.103	Line 2: insert ' <i>that</i> ' after ' <i>given</i> '
67.	Para 6.106	Line 2: delete ' <i>and</i> ' before ' <i>Policy CO1(a)</i> ' and insert ' <i>and Policy EN4 in the provision of open space</i> '