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# **Report on the Abbots Bromley Parish Neighbourhood Plan 2022 – 2031**

**An Examination undertaken for East Staffordshire Borough Council with the support of Abbots Bromley Parish Council on the October 2022 submission version of the Plan.**

Independent Examiner: Andrew S Freeman BSc (Hons) DipTP DipEM FRTPI

Date of Report: 8 February 2023

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## **Main Findings - Executive Summary**

From my examination of the Abbots Bromley Parish Neighbourhood Plan (the Plan) and its supporting documentation, including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – Abbots Bromley Parish Council;
- the Plan has been prepared for an area properly designated – Abbots Bromley Parish – Figure 1 on Page 4 of the Plan;
- the Plan specifies the period to which it is to take effect – 2022 to 2031; and
- the policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## **1. Introduction and Background**

### **Abbots Bromley Parish Neighbourhood Plan 2022 - 2031**

- 1.1 Abbots Bromley is a linear village and civil parish in Staffordshire within the administrative area of East Staffordshire Borough Council. The village is situated mid-way between Stafford to the west and Burton upon Trent to the east, both at a distance of some 16km. There are a number of other very small settlements within this rural parish along with working farms and converted agricultural buildings.
- 1.2 The Parish was designated as a neighbourhood area in October 2015. A Neighbourhood Plan Group was set up and community engagement gained in a variety of ways including through questionnaires, surveys, public meetings, newsletters, social media and direct communication with stakeholders. The resultant Plan has a vision and seven key aims. These set the context for 12 detailed policies in four topic areas.

### **The Independent Examiner**

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Abbots Bromley Parish Neighbourhood Plan by East Staffordshire Borough Council with the agreement of Abbots Bromley Parish Council.

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- 1.4 I am a chartered town planner and former government Planning Inspector with over forty years' experience. I have worked in both the public and the private sectors. I am an independent examiner and do not have an interest in any of the land that may be affected by the draft Plan.

### **The Scope of the Examination**

- 1.5 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ("the 1990 Act"). The examiner must consider:
- Whether the plan meets the Basic Conditions;
  - Whether the plan complies with provisions under Section 38A and Section 38B of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). These are:
    - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
    - it sets out policies in relation to the development and use of land;
    - it specifies the period during which it has effect;
    - it does not include provisions and policies for 'excluded development'; and
    - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
  - Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
  - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ("the 2012 Regulations").
- 1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

## The Basic Conditions

- 1.8 The “Basic Conditions” are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan for the area;
  - be compatible with and not breach European Union (EU) obligations (under retained EU law);<sup>1</sup> and
  - meet prescribed conditions and comply with prescribed matters.
- 1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>2</sup>

## 2. Approach to the Examination

### Planning Policy Context

- 2.1 The Development Plan for this part of East Staffordshire Borough, not including documents relating to excluded minerals and waste development, comprises the East Staffordshire Borough Council Local Plan 2012 – 2031.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented.

### Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:

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<sup>1</sup> The existing body of environmental regulation is retained in UK law.

<sup>2</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

- the draft Abbots Bromley Parish Neighbourhood Plan 2022 - 2031, October 2022;
- a map which identifies the area to which the proposed Neighbourhood Development Plan relates (Abbots Bromley Parish – Figure 1 on Page 4 of the Plan);
- the Consultation Statement, October 2022;
- the Basic Conditions Statement, June 2022;
- the Abbots Bromley Neighbourhood Development Plan Screening Opinion on Strategic Environmental Assessment and Habitats Regulations Assessment, prepared by East Staffordshire Borough Council, November 2022;
- a Regulation 14 “Health Check” Review Report dated 23 October 2022 prepared by Martin S. Lee;
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the request for additional clarification sought in my letter dated 9 January 2023 and the responses from East Staffordshire Borough Council and Abbots Bromley Parish Council dated 11 January 2023 and 21 January 2023 respectively. The answers of the Parish Council were further clarified in an exchange of emails dated 23 and 24 January 2023.<sup>3</sup>

## Site Visit

2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 25 January 2023 to familiarise myself with it and visit relevant sites and areas referenced in the Plan and evidential documents.

## Written Representations with or without Public Hearing

2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan’s suitability to proceed to a referendum.

## Modifications

2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal

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<sup>3</sup> View at: <https://www.eaststaffsbc.gov.uk/planning/planning-policy/neighbourhood-plans/abbots-bromley>

requirements. For ease of reference, I have listed these modifications separately in the Appendix.

### **3. Procedural Compliance and Human Rights**

#### **Qualifying Body and Neighbourhood Plan Area**

- 3.1 The Abbots Bromley Parish Neighbourhood Plan has been prepared and submitted for examination by Abbots Bromley Parish Council, which is a qualifying body for an area that was designated by East Staffordshire Borough Council on 8 October 2015.
- 3.2 It is the only neighbourhood plan for Abbots Bromley Parish and does not relate to land outside the designated Neighbourhood Plan Area.

#### **Plan Period**

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2022 to 2031.

#### **Neighbourhood Plan Preparation and Consultation**

- 3.4 Plan preparation and consultation on the Abbots Bromley Parish Neighbourhood Plan were carried out as detailed in the Parish Council's Consultation Statement, October 2022. Designation by East Staffordshire Borough Council took place on 8 October 2015. There followed the establishment of a Neighbourhood Plan Group which has overseen all stages of the Plan's development.
- 3.5 The Neighbourhood Plan Group involved the community and stakeholders in a variety of different ways (see Section 5 of the Consultation Statement and the table on Pages 5 and 6). Initial public opinion was gained through a questionnaire sent to the 750 households within the Parish. This helped identify the thoughts of the community and businesses on improvements and changes that would be of benefit. A number of key areas emerged that guided the Vision and Aims of the Plan; also, informed Plan content and detailed policies.
- 3.6 Formal consultation under Regulation 14 took place between 7 February 2022 and 21 March 2022. The Consultation Statements records comments from 46 different respondents including local residents, agents and statutory consultees. The representations made and the responses of the Parish Council are set out in Section 4 of the Consultation Statement.
- 3.7 Consultation under Regulation 16 ran from 3 November 2022 to 16 December 2022. The Borough Council has registered representations from 19 different bodies, again including residents, agents and statutory consultees as well as the Borough Council itself.

- 3.8 I am satisfied that, at both the Regulation 14 and the Regulation 16 stages, the consultation process met the legal requirements and there has been procedural compliance. Regard has been paid to the advice on plan preparation and engagement in the PPG.

### **Development and Use of Land**

- 3.9 The Plan sets out policies in relation to the development and use of land in accordance with Section 38A of the 2004 Act.

### **Excluded Development**

- 3.10 The Plan does not include provisions and policies for “excluded development”.

### **Human Rights**

- 3.11 The Basic Conditions Statement, prepared for Abbots Bromley Parish Council by Urban Vision Enterprise CIC, states that the draft Plan proposal meets human rights requirements. From my independent assessment, I am satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998).

## **4. Compliance with the Basic Conditions**

### **EU Obligations**

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by East Staffordshire Borough Council which found that it was unnecessary to undertake SEA. Having read the Strategic Environmental Assessment Screening Opinion, I support this conclusion.
- 4.2 The Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA) which also was not triggered. The site is not in close proximity to a European designated nature site. Natural England, in its 15 December 2022 response to the Regulation 16 consultation, had no related comments to make. From my independent assessment of this matter, I have no reason to disagree with the conclusion that HRA was not triggered.

### **Main Issues**

- 4.3 Having regard for the Abbots Bromley Parish Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are four main issues relating to the Basic Conditions for this examination. These concern the policy group headings in the Plan:
- Design and Heritage;
  - Dwellings, Employment and Community;

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- Natural and Green Environment; and
- Transport and Infrastructure.

- 4.4 Before I deal with the main issues, I have a few observations to make with regard to the representations. First, the Abbots Bromley Parish Neighbourhood Plan should be seen in the context of the wider planning system. This includes the Local Plan 2012 - 2031 as well as the NPPF and PPG. It is not necessary to repeat in the Neighbourhood Plan matters that are quite adequately dealt with elsewhere.<sup>4</sup> Having said that, there may be scope to give emphasis to matters particularly relevant in the context of Abbots Bromley.
- 4.5 Secondly, the Neighbourhood Plan does not have to deal with each and every topic raised through the consultation. In this regard, the content of the Neighbourhood Plan and the scope of the policies is largely at the discretion of the qualifying body, albeit informed by the consultation process and the requirements set by the Basic Conditions.
- 4.6 Thirdly, my central task is to judge whether the Neighbourhood Plan satisfies the Basic Conditions. Many of the representations do not demonstrate or indicate a failure to meet those conditions or other legal requirements. Similarly, many of the suggested additions and improvements are not necessary when judged against the Basic Conditions.
- 4.7 The following section of my report sets out modifications that are necessary in order to meet the Basic Conditions. Some of the proposed modifications are factual corrections.<sup>5</sup> Others are necessary in order to have closer regard to national policies and advice. In particular, plans should be succinct and contain policies that are clearly written and unambiguous.<sup>6</sup> In addition, the policies should be supported by appropriate evidence.<sup>7</sup>

### Issue 1 – Design and Heritage

- 4.8 Policy DAH1 deals with sustainable design and character. The final paragraph of the policy states that “Creative and innovative design solutions will be considered, especially where they incorporate high environmental protection performance”. However, there is no clarity over the meaning of “high environmental protection performance”.
- 4.9 In the Parish Council’s response to my request for clarification,<sup>8</sup> it is indicated that measures might include Passivhaus standards of thermal insulation and airtight fabric with a mechanical ventilation system

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<sup>4</sup> See NPPF, Paragraph 16 f).

<sup>5</sup> Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

<sup>6</sup> NPPF, Paragraphs 15 and 16 d).

<sup>7</sup> PPG on Neighbourhood Planning, Reference ID: 41-041-20140306.

<sup>8</sup> Abbots Bromley Parish Council, 21 January 2023.

incorporating heat recovery; rainwater harvesting for toilet flushing; and ensuring that all runoff from paved areas is directed to soakaways.

- 4.10 Whilst these are suitable examples of the sort of measures envisaged, they should be mentioned in the "Interpretation and Guidance" following the policy so as to give direction to applicants and decision-takers. In addition, they would be better described in the policy as measures making use of highly sustainable techniques for construction and performance. Clarity would be added through proposed modification **PM1**.
- 4.11 Policy DAH3: Abbots Bromley Conservation Area opens by saying that development *should* preserve or enhance the character and appearance of the Conservation Area. There is an implication that preservation or enhancement *ought* to happen but there may be circumstances where a different course of action could be appropriate.
- 4.12 Use of the conditional tense is out of step with Section 69(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 whereby special attention *shall* be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. To accord with this evidence, amendment of the policy is appropriate.
- 4.13 The policy continues by calling for development to complement the predominant townscape characteristics *in the main street*. However, the main street is not defined.
- 4.14 In the answers to my questions,<sup>9</sup> it is stated that "the main street" means the B5014 through the village incorporating Bagot Street from its junction with Uttoxeter Road and High Street through to its junction with Lichfield Road. For clarity, this information needs to be included in the policy. This can be succinctly expressed as "in that part of the Conservation Area adjacent to the B5014". The policy should be amended accordingly.
- 4.15 A final point is the reference to avoiding harm or loss to buildings and structures that contribute to the special architectural or historic interest of the area. This could be taken as just referring to listed buildings and buildings of townscape merit. However, it is meant to refer to all buildings since collectively they contribute to the special architectural or historic interest of the area.<sup>10</sup> This is covered by the phrasing of the policy and no amendment is necessary.
- 4.16 To accord with other aspects of the evidence and provide appropriate clarity, necessary amendments are set out in proposed modification **PM2**.

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<sup>9</sup> Abbots Bromley Parish Council, 21 January 2023.

<sup>10</sup> Abbots Bromley Parish Council, 21 January 2023.

## Issue 2 – Dwellings, Employment and Community

4.17 With regard to Policy DEC1: Residential Development, there are a number of matters to address including:

- what is meant by “the identified local need”;
- the minimum number of dwellings to which housing mix and types of sizes of accommodation should apply;
- the need to take account of the Secretary of State’s First Homes requirements;<sup>11</sup> and
- how historically important garden spaces are to be identified.

These matters are all clarified in the Parish Council’s answers to my questions:<sup>12</sup>

- Housing need is as identified in AECOM’s Housing Needs Assessment for Abbots Bromley (including any successor documents updating that assessment).
- With regard to housing mix and related matters, the Parish Council has said that this should apply to all developments of more than one unit. However, a mix of three or more types of housing (as identified in the policy) would not be possible in a small development. Rather, the policy should identify the preferred types and sizes of housing to be included in housing developments in Abbots Bromley.
- Additional wording has been suggested to address First Homes requirements.
- Historically important garden spaces can be identified from the Conservation Area Character Appraisal.

4.18 One further matter is the provision that states that housing internal layouts should be flexible to meet changing needs including home working. In this regard, works that affect only the interior of a house are normally outside planning control.<sup>13</sup> The provision would be better expressed as encouraging flexible layouts.

4.19 Having regard to the evidence, the need for clarity and the Secretary of State’s guidance, proposed modification **PM3** is recommended.

4.20 Policy DEC3 relates to the site of the former Abbots Bromley School. There have been representations regarding the prescriptive nature of the

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<sup>11</sup> PPG on First Homes, Reference ID: 70-018-20210524.

<sup>12</sup> Abbots Bromley Parish Council, 21 January 2023.

<sup>13</sup> See the 1990 Act, Section 55(2)(a)(i).

policy through use of the word “must” in relation to policy requirement. A degree of flexibility is sought.

- 4.21 For my part, although I normally use the word “shall” (or “should” to convey an expected course of action), I do not feel that there would be a failure to meet the Basic Conditions in this regard. The related requirements are all matters that ought to be adhered to in any development on the site. Where material circumstances point in a different direction, the planning legislation provides for a degree of flexibility.<sup>14</sup> No modification is necessary.
- 4.22 There are, however, two matters within the policy that require clarification. The first is the necessity to clarify what are the “community use facilities” that must be retained or replaced. The second is to confirm what are the “buildings of townscape merit” to be retained and refurbished.
- 4.23 It transpires<sup>15</sup> that “community use facilities”, whilst originally intended to include the school swimming pool and gym, now relates solely to the playing fields. Since this is covered by the provisions relating to open space/recreational space in Paragraph 1d) of the policy, the reference can be deleted.
- 4.24 As to buildings of townscape merit, the Parish Council has confirmed that these are limited to the ones identified in Appendix 1 of the Plan.<sup>16</sup> For clarity purposes, an appropriate cross-reference should be added to the policy.
- 4.25 On a final point, the policy requires the creation of new employment opportunities which could include new small “independent” retail uses. Whilst a laudable objective that could be expressed in the supporting text, it is not possible under planning legislation to specify the nature of the enterprise in this way. Reference to independent uses should be deleted.
- 4.26 Proposed modification **PM4** incorporates amendments that are necessary for clarity purposes.

### [Issue 3 – Natural and Green Environment](#)

- 4.27 Amongst other things, Policy NGE1: Natural Environment states that development *should* provide biodiversity net gain. Under the Environment Act 2021, biodiversity net gain is now a requirement. As such, “shall” should be substituted for “should”. Proposed modification **PM5** refers.
- 4.28 Policy NGE2 addresses drainage and flooding with specific reference to driveways and hard standing surfaces. Not all driveways and hard

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<sup>14</sup> Section 38(6) of the 2004 Act and Section 70(2) of the 1990 Act.

<sup>15</sup> Email from the Parish Council, dated 24 January 2023.

<sup>16</sup> Abbots Bromley Parish Council, 21 January 2023.

standings will require planning permission. This should be recognised in the policy. Additionally, the evidence of the Lead Local Flood Authority<sup>17</sup> indicates that alternative wording should be used in the policy and in the explanatory text. Proposed modification **PM6** reflects the evidence in respect of drainage and flooding matters.

#### Issue 4 – Transport and Infrastructure

- 4.29 Paragraph 1 of Policy TIN1: Sustainable Transport Provision calls for transport and parking options “proportionate to the scale and nature of the development”. The need for proportionate provision should also apply to the second paragraph of the policy (ease of movement of pedestrians and cyclists). A suitable amendment is included in proposed modification **PM7**.
- 4.30 Finally, Policy TIN4 states that new development must include high speed broadband provision. The actual provision of broadband will be dependent upon actions of related service providers. So far as the Neighbourhood Plan is concerned, it will be important to ensure that development facilitates provision. Appropriate wording is set out in proposed modification **PM8**.

#### **Other Policies**

- 4.31 There remain a number of policies that have not been the subject of commentary in the above report. These are Policy DAH2: Extensions; Policy DEC2: Employment, Tourism and Community Facilities; Policy TIN2: Transport Impacts; and Policy TIN3: Local Energy Schemes.
- 4.32 To a greater or lesser extent, these topics are covered in NPPF Sections 6 (Building a strong and competitive economy), 8 (Promoting safe and healthy communities), 9 (Promoting sustainable transport), 12 (Promoting well-designed places) and 14 (Meeting the challenge of climate change, flooding and coastal change). I find that there has been regard for national policy and that the Basic Conditions have been met.

#### **Other Matters**

- 4.33 All policy areas have been considered in the foregoing discussion. With the modifications that I have recommended, the Plan would meet the Basic Conditions. Other minor changes (that do not affect the Basic Conditions), as well as consequential amendments, corrections and updates, could be made prior to the referendum at the Councils’ discretion.<sup>18</sup>

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<sup>17</sup> Regulation 16 representation ABB7.

<sup>18</sup> PPG on Neighbourhood Planning, Reference ID: 41-106-20190509.

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## 5. Conclusions

### Summary

- 5.1 The Abbots Bromley Parish Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Abbots Bromley Parish Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

### Overview

- 5.4 It is evident that a considerable amount of time and effort has been devoted to the development and production of this Plan and I congratulate those who have been involved. The Plan should prove to be a useful tool for future planning and change in the Parish of Abbots Bromley over the coming years.

*Andrew S Freeman*

Examiner

## Appendix: Modifications

Proposed modification number (PM)	Page no/ other reference	Modification
PM1	Page 20	<p>In the final paragraph of Policy DAH1, for “high environmental protection performance”, substitute “measures making use of highly sustainable techniques for construction and performance”.</p> <p>In the Interpretation and Guidance following Policy DAH1, add a paragraph stating that:</p> <p>“Highly sustainable techniques for construction and performance could include Passivhaus standards of thermal insulation and airtight fabric with a mechanical ventilation system incorporating heat recovery; rainwater harvesting for toilet flushing; and ensuring that all runoff from paved areas is directed to soakaways.”</p>
PM2	Page 23	<p>In the opening paragraph of Policy DAH3, substitute “shall” for “should”.</p> <p>For “in the main street”, substitute “in that part of the Conservation Area adjacent to the B5014”.</p>
PM3	Page 28	<p>In the Interpretation and Guidance following Policy DEC1, add a paragraph saying:</p> <p>“Local need is as identified in AECOM’s Housing Needs Assessment for Abbots Bromley including any successor document that updates that assessment.”</p> <p>Provide a link to the AECOM assessment.</p> <p>For the second sentence of Paragraph 1a) of the policy, substitute the following:</p> <p>“Priority shall be given to the following and include a suitable mix in residential developments of 10 units or more:”.</p>

		<p>In Paragraph 1b), substitute the following for “these types of housing”: “the types of housing identified above with a minimum of 25% of the units comprising First Homes.”</p> <p>In the Interpretation and Guidance following the policy, add a paragraph saying:</p> <p>“Historically important garden spaces can be identified from the “Character Appraisal Abbots Bromley Conservation Area, ESBC, March 2009.”</p> <p>Add a link to the Conservation Area Appraisal.</p> <p>Substitute the following for Paragraph 1g) of the policy:</p> <p>“Layouts that are flexible enough to meet changing needs, including home-working, are encouraged.”</p>
PM4	Page 31	<p>In Paragraph 1b) of Policy DEC3, delete “the retention or replacement of community use facilities within the site, as well as”; also, the word “independent”.</p> <p>In Paragraph 1c), after “other buildings of townscape merit” insert “(Appendix 1)”.</p>
PM5	Page 35	<p>In Policy NGE1, substitute “shall provide biodiversity net gain” for “should provide biodiversity net gain”.</p>
PM6	Page 36	<p>At the beginning of the first paragraph of policy NGE2, insert “Where planning permission is required,”. Change “water permeable” to “constructed using permeable materials”.</p> <p>In the first paragraph of the Interpretation and Guidance, substitute “as required by Part H of the Building Regulations” for all the words after “drainage hierarchy”.</p>
PM7	Page 40	<p>Open the second paragraph of Policy TIN1 with the following:</p>



		"Proportionate to the scale and nature of the scheme,".
PM8	Page 43	<p>Replace Paragraph 1 of Policy TIN4 with the following wording:</p> <p>"As appropriate, new premises, including residential units, shall be designed and constructed so as to facilitate the provision of high-speed broadband."</p>