

BATH AND NORTH EAST SOMERSET CORE STRATEGY EXAMINATION

INSPECTOR'S PRELIMINARY COMMENTS AND QUESTIONS (1)

1. I am still undertaking the preparatory stage of the Examination, but there are a number of matters that I want to draw to the Council's attention and matters on which I seek clarification. The first matter below is of considerable significance. If the Examination continues in the usual way, I may need to raise further preliminary matters on other topics in due course. At this stage, I am seeking only the Council's response to this note, but if the Examinations continues there will be the opportunity to comment on the various questions I pose here in the context of the main issues and questions that I eventually identify for further consideration.

Relevance of the proposed abolition of Regional Strategies

2. The Government is proposing the abolition of Regional Strategies (RS) and the necessary legislative provision is included in the Localism Bill. The Government's intention in this respect underpins the Council's decision to put forward a locally derived figure for housing provision rather than drawing on the figure in the Secretary of State's Proposed Changes (2008) to the emerging draft RS for the South West.

3. The Council needs to consider carefully the implications of the Court of Appeal judgement in *R Cala Homes (South) Limited and the Secretary of State and Local Government and Another* 2011 EWCA Civ 639 (particularly paragraphs 24 and 29). Paragraph 24 includes the statement:

"It would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to the proposal to abolish regional strategies. For so long as the regional strategies continue to exist, any development plan documents must be in general conformity with the relevant regional strategy".

4. The Council should consider whether this ruling would so curtail my consideration of its case as to undermine at the outset the Council's justification for the strategy. The Council may wish to seek the withdrawal of the plan or the suspension of the Examination until there is certainty about the legislative framework. If the Council seeks a suspension of the Examination, it should set out the anticipated period of the suspension and how this relates to the anticipated progress of the Localism Bill and related procedural matters. Normally, Examinations are not suspended for more than about 6 months as longer periods may result in other significant changes in circumstances making resumption of the Examination more complicated. This matter is clearly crucial to the further progress of the Examination, but I have set out below comments and questions on other matters which would need to be addressed at some stage.

Sustainability Appraisal (SA)

5. In the light of the High Court's judgement in relation to the Forest Heath Core Strategy (*Save Historic Newmarket Ltd v. Forest Heath District Council* 2011 EWHC 606) the Council needs to consider whether it has fully complied with the requirements of the Strategic Environmental Assessment Directive and associated regulations. In particular, is the Council satisfied that the report accompanying the published plan adequately summarises or repeats the reasons for rejecting alternatives and that those reasons are still valid?

6. The Council has selected 11,000 dwellings as the appropriate level of housing development. This is a significant change from that set out in the *Spatial Options Consultation* which was based on the submitted Draft RS figure of 15,500 new homes over the plan period. The Options document stated (2.29) that if this level of housing is not provided then it will have *serious implications* (and goes on to refer to various matters). I am not clear how/where the Sustainability Appraisal Report (CD4/A13) explains the reasons for the choice of this lower figure of 11,000 rather than 15,500, or whether the *serious implications* previously suggested for not providing 15,500 have been highlighted or found not to exist.

7. The SA report (CD4/A13) tries to address the change in relation to the spatial approach although it indicates (3.6, p11) that it has been difficult to do so. Appendix E of the report compares the submitted spatial strategy with the strategy incorporating urban extensions, but I am not clear how this analysis fully explores the different effects of the reduced overall scale of housing proposed in the district. Please clarify.

Evidence studies

8. The Core Documents (CD) list contains numerous local evidence studies. The Core Strategy makes limited references to the specific evidence relied on to support its policies and proposals. The post submission Topic Papers prepared by the Council make greater reference to background evidence, but often in general terms. This has made my initial preparation more time consuming. I have looked at the studies which appear most relevant. I will not be reading all the material listed. The Council and other parties should presume that I will look at documents only when particular reference is made to them such as in the plan, the topic papers or other submissions. When referring to evidence studies it is important for the Council to make clear the conclusions it has drawn from the study, the future role of any such study and whether further work is being undertaken on the topic.

9. In my preliminary examination of the proposals for Bath (particularly the proposals in the central area and the riverside) I have found it difficult to understand what evidence has specifically informed the Council's assessment of capacity and deliverability of these important sites. The wide range of material of potential relevance has made it impossible for me to be clear as to the assumptions which the Council has made about these sites and the consistency of its approach. For example: Is the residential capacity of the key sites in the SHLAA (CD4/H6 and 7) the same as that expressed in the Bath Economic Regeneration Delivery Plan (CD4/E4) (as capacity is not expressed in consistent terms)? (The same question may arise in relation to the other Regeneration plans.) Does the SHLAA take into account the Bath Buildings Heights Strategy (CD4/UDL2-5) and any other studies which may inform or constrain their development? If so, how? Does the capacity of sites in the SHLAA reflect a preliminary application of the PPS25 sequential test where the site occupies land in more than one flood zone? I also want to be clear as to the latest position regarding the deliverability of these sites and have set out specific questions in Annex 1.

10 It would be helpful if the Council would prepare a Topic Paper on the capacity and deliverability of the sites in Bath central and riverside which brings together and clearly identifies the relevant material. I am not seeking new evidence (unless the position has changed since the published documents) nor does the paper need to duplicate material already available, but it should clarify how evidence has been used. Where references are made to evidence studies they should be as specific as possible. Where there are differences in evidence or

potential conflicts, the paper should make clear how these have been resolved, or whether they remain to be resolved.

11. I recognise that the Core Strategy is not making site specific allocations and it will be the role of the forthcoming Placemaking DPD to resolve the detail of the type and scale of development on particular sites. However, the delivery of the sites in Bath central/riverside is clearly crucial to the strategy, with no obvious alternatives available. Accordingly, the robustness of the expectations of these sites needs to be considered carefully. I have not yet looked at the capacity/deliverability issues concerning sites in Keynsham and the Somer Valley. It would be helpful for the Council to bring together the relevant evidence for these areas in similar way as I have requested for Bath.

12. There are several potentially important evidence documents that the Council refer to which have not been published and which I have not seen. The Council's Topic Paper 2 (CD6/S3) refers (3.10 and 3.11) to the *Smart Economic growth Report* (CD4/E15 - also erroneously referenced CD4/E15) particular. I understand that this will be available after 17 June. I will need to take this into account in forming my questions for further discussion and it will need to be published in good time for all parties to take it into account before having to respond to any pre-hearing questions. The *Bath Compensatory Storage Study Phase 1* (CD4/FR415) would also appear of potential relevance but with no date for publications. Council to confirm likely timescale for publication. The Council is also to updating the SHLAA and accordingly I have not yet looked in detail at the submitted document.

Justification for housing and employment provision

13. Putting aside the possible implications for the Examination of the Court of Appeal judgment referred to above, I have had considerable difficulty understanding the evidence underpinning the Council's justification for 11,000 houses over the plan period. The Council appears to be relying primarily on the *Future Housing Growth Requirement to 20206 Stage 2 Report* (CD4/H1) to justify the chosen level of housing, but it is not clear whether the Council endorses all the assumptions in this report and its caveats. I have not seen the Stage 1 report which was the precursor to Stage 2 and this is not a Core Document. I do not know whether the Stage 1 report would help me to understand the reasons for the adoption of the chosen approach. I have found the Stage 2 report difficult to follow.

14. I highlight the following overarching concerns and issues for the Council's consideration. More specific questions are set out in Annex 1.

15. Section 3 of CD4/H1 discusses the complexities of assessing an appropriate level of housing provision and the diverse drivers affecting any such consideration. That discussion is difficult to reconcile with the report's subsequent identification of a specific figure (8,700 jobs) and the apparent subsequent reliance on the report for the Council's planned provision of 11,000 dwellings.

16. Given the statement in the Stage 2 report that: *Economic forecasts and projections are inevitably an educated "shot in the dark"* (CD4/H1, paragraph 6.1) and the *inherent uncertainty* referred to in Topic Paper 2 (CD6/S3/3.13) I do not understand the Council's confidence in relying solely on a single figure for job growth to identify a specific housing target for the plan. The inevitable uncertainties would suggest that flexibility is important (see below).

17. Even if the economic projection relied on by the Council is a reasonable estimate for the present of what is likely to happen, I will need to test whether it sufficiently reflects the importance now placed by the Government (eg Ministerial Statement *Planning for Growth* March 2011) on facilitating and promoting economic development and jobs (or indeed the Council's own aspirations, expressed in other documents, of the *potential* for greater economic growth.)

18. The crux of the translation of assumed job growth to housing provision is the multiplier of 1.33. I will need to better understand the justification for this multiplier and explore what assumptions it embeds. In particular, why (if I have understood the approach correctly) is the ratio of jobs to housing calculated from the Draft RS a suitable ratio for use in the Council's new approach, when the Council is clearly making different assumptions to those which underpinned the RS work. The multiplier draws on ONS Household projections from 2004, but the Council has not sought to draw on more recent household projections in determining the appropriate scale of housing.

19. I am unclear how the substantial need for affordable housing identified in the SHMA (CD4/H11) has been weighed by the Council in determining the appropriate overall provision for housing. Affordable housing is discussed in the Stage 2 Report (8.5 – 8.9). That discussion seems to ignore the simple point that increasing the overall level of housing would allow for more affordable housing to be provided. That discussion also suggests a different approach to meeting the backlog of need than that set out in the SHMA. Does the Council endorse the approach suggested? (Some detailed questions on affordable housing delivery are in the Annex 1.)

20. Following on from all the above, it would be helpful if the Council could summarise its approach to the factors set out in paragraph 33 of PPS3 and the conclusions reached and evidence relied on for the different factors listed.

21. Finally on this broad matter, I am concerned as to whether there is adequate flexibility/contingency to achieve the plan's overall aims and to respond to changing circumstances. For example:

- Would the plan be able to accommodate a greater scale of economic growth if the national/regional/sub regional economy was stronger than predicted or would it restrain higher growth?
- If household formation, migration and other demands on housing were greater than allowed for in the multiplier, how/when would any such pressures/consequences be identified and would there be an opportunity to accommodate greater provision than currently planned for?
- Is there sufficient flexibility to accommodate the planned scale of growth if there is any slippage in the delivery of the major sites or lower than expected capacity for housing on such sites?
- Does the overall strategy plan for (or otherwise facilitate) housing development over a 15 year period from adoption?

22. Paragraph 1.36 of the plan refers to *contingency*. It suggests that there is flexibility in the mix and density of some for the large sites for redevelopment. I do not understand how that flexibility would arise in practice or address my concerns above. Firstly, by the time a need for alternative provision is identified, the future mix of the large sites may already be fixed and, secondly, the greater use of one of the larger sites for one type of use would seemingly be at the expense of another use for which the site is also required to deliver the strategy. The Council will need to clarify how flexibility would arise in practice. Paragraph 7.05 suggests that the Core Strategy will be reviewed every 5 years, although the

review process is not set out very clearly. Whilst a review might be necessary or appropriate, core strategies should not generally be reliant on a review to accommodate flexibility.

Schedule of Proposed Changes March 2011 CD5/6

23. Has this schedule been the subject of any public consultation? If so please explain its nature and copy the responses received. If not, the following comments apply. I have the option of embedding minor changes proposed by the Council at submission as part of the Core Strategy under examination and need not then refer to them further. I would confirm the position as part of my Procedural Note in due course. Minor changes typically cover matters of updating, clarification and correction.

24. If changes would alter the scope (uses covered/location etc) of a policy or how a policy might be interpreted and applied in development management decisions then such changes are unlikely to be minor. Significant changes (at whatever stage they might be put forward) normally need to be the subject of appropriate consultation. Although the position may not always be clear cut, my initial impression is that a number of the proposed changes in CD5/6 are more than minor and would therefore need to be the subject of consultation before I would be in a position to recommend them in my report.

25. I attach in Annex 2 a list of the changes in CD5/5 which appear to be significant, but I would ask the Council to consider carefully whether there are any others. Although some changes may be intended to clarify what the Council always intended to express in the Core Strategy, they may nevertheless be a significant change in how a particular policy could be interpreted by others. Some of the changes in the Council's schedule cover a number of changes under one PC reference. Some of these may be minor, others significant. It is probably simplest to treat all such PCs as significant, rather than subdividing them.

26. Accordingly, the Council should prepare a revised schedule of truly minor changes (please keep the original PC reference so as to assist in identifying what has been removed). If I subsequently embed these truly minor changes as part of the Core Strategy under examination, that schedule would then be fixed and the Council would need to start a fresh rolling schedule for any further minor changes that arise (which, in due course, I would expect to endorse and attach to my report).

27. The Council will need to prepare a schedule for consultation of significant changes which have been removed from CD5/6. The wording of any changes in this new schedule can be amended from that in CD5/6 if the Council so wishes and other significant changes can be introduced up until the schedule is the subject of consultation. It would be best to complete any such consultation before the hearings, but the Council should be aware that any further significant changes which arise from the hearings would also need to be consulted on.

28. In sorting out the schedules, particular attention should be paid to whether proposed changes have been made in a consistent and comprehensive way. For example, PC15 and PC18 amend a reference to 2,500 homes to 2,800 homes. The total in policy B13b is now inconsistent with the figure of 6,000 in B1 3a. Paragraph 2.21 still refers to 2,500 homes. The reference to the Outstanding Universal Value of the Bath World Heritage Site is not consistently referred to in the singular (which, according to English Heritage, is the correct expression of the term). PCs 3 and 61 change how South Stoke is shown on Diagrams 3 and 14.

But as the same built-up area shading is also used in Diagram 4 (and perhaps elsewhere) should this also be changed?

29. When the schedule of minor changes and schedule of significant changes is finalised for consultation it would be helpful to have an updated composite version of the text (updating CD5/7) which distinguishes between the minor and the significant changes. There are some small inconsistencies between the changes set out in CD5/6 and the composite version of the plan in CD5/7 (eg PC19 re B1 8b and the heading to B1 10) but there may be others and the Council should check carefully.

Other matters

Flood Risk and the Sequential Test

30. If the Examination proceeds, I will need to look carefully at the application of the sequential test where housing is being proposed in flood zones 2 or 3a and, if it is, whether there is a reasonable expectation of meeting the exception test. In *Flood Risk: Sequential and Exception Test* (CD6/D2, D3 and D4) do the flood zones identified for each policy area take into account the extent of flood risk with climate change? If not, is this consistent with national advice in PPS25?

31. The above Flood Risk Paper refers to the reasons for not pursuing urban extensions and considers that there are no suitable alternative sites at lower risk outside the urban areas. However, the rejected urban extensions would generally be much larger than the amount of development being proposed on higher risk flood zones. Accommodating this more modest scale of development in lower risk land outside the urban area would not necessarily have the disadvantages the Council ascribes to the urban extensions. As far as I understand the approach adopted, the SHLAA has not assessed parcels of land in the Green Belt which might be of comparable scale to the development proposed on higher risk areas. The Council needs to consider on what evidence I would be able to determine that the sequential test in relation to housing has been met.

The Proposals Map

32. Appendix 3 of the Core Strategy is headed *Proposals Map Revision Bath City Centre Boundary*. This shows a red line boundary. This does not make clear how the Proposals Map will be changed if the plan is adopted. I presume that this boundary is to be added, but that is not clear. Is any existing notation on the Proposals Map, such as the City Centre Shopping Area S.1, proposed to be amended or deleted? The position should be clarified in the subsequent consultation on significant changes. (See also the specific question on this matter in Annex 1).

Minerals

33. The Core Strategy refers to minerals in paragraphs 6.65 -6.69. There are policies in the adopted Local Plan. In the absence of any planned bespoke DPD on the topic, the Core Strategy would normally be the place for the overall approach to minerals be set out with any necessary detail and designations to be made via the Placemaking DPD. I note the representation from the Coal Authority in relation to mineral safeguarding and land stability and other matters from the coalfield legacy. I would draw the Council's attention to the conclusions and recommendation I made on this matter in respect of the Bristol Core Strategy. The circumstances appear to be very similar. I consider that the Core Strategy should highlight the need for Mineral Safeguarding Areas in relation to

coal, as well as any other specific minerals, in accordance with MPS1. The plan should also highlight the need to take into account the coalfield legacy and land stability. I would hope that additional text could be agreed with the Coal Authority. Please provide a copy of the plans previously provided to the Council by the Coal Authority which are referred to in its representation.

Gypsies and travellers and Travelling Showpeople

34. The Core Strategy makes only a brief reference to the needs of these groups. It does not indicate: the scale of needs that should be accommodated, how needs between 2011-2026 will be assessed, or the approach to be taken to accommodating identified needs. Policy CP11 is concerned only with criteria to deal with applications, not specifically allocations. The Local Development Scheme (LDS) includes a Gypsies, Travellers and Travelling Showpeople Site Allocations DPD, but the Core Strategy should set out the strategic picture in relation to provision for these groups so as to establish the task for the lower order DPD, just as it does (or should do) on other matters for the Placemaking DPD. I would therefore ask the Council to review its position on this matter. What is the current progress/timetable for the allocations DPD for these groups? Will it be included in any updated LDS? Have any permanent planning permissions for new pitches been granted for any of these groups since 2006?

Further progress

35. Due to other commitments, I anticipate undertaking only a limited amount of additional preparation between now and 8 July. To minimise potentially abortive work, please let me know as soon as possible if the Council wish to request a suspension of the Examination or are to consider making a request to withdraw the plan.

36. If the Council wish me to pursue the Examination, I would need to decide how best to proceed in the light of the Court of Appeal judgement and all other factors. If that is the Council's intention, it would be helpful to receive the requested additional Topic Paper, the responses to the questions in Annex 1, any more general response to my wider concerns and the revised schedule of minor changes by 8 July 2011.

Simon Emerson
INSPECTOR
3 June 2011

Annex 1

A1. In the *Future Housing Growth Requirement to 2026 Stage 2 Report* (CD4/H1) there appear to be some anomalies in the text which add to the difficulty of understanding the report. These need clarifying:

- Paragraph 1.6 refers to para 4.65, but there is no 4.6.5.
- Paragraph 4.2 refers to a)-d) in 4.1 and then to e) but there is no preceding e).
- Paragraph A2.4 refers to Table A8 and Table 10, but these are not in the report.

Economic growth

A2. The Council's assumptions about economic growth in the district and likely increase in number of jobs are not consistent with the aspirations of the West of England Local Enterprise Partnership Bid in September 2010 (notably 95,000 new jobs by 2030 and 3.4% cumulative annual growth in total GVA by 2020 in the WEP area). How does the Council explain the different approaches given that the Council is a member of the LEP which endorsed the Bid (letter 6 September 2010) at:

<http://www.westofengland.org/media/191206/covering%20letter%20woe%20lep%20final.pdf>

Footnote 1 in Topic Paper 2 implies that the Council is distancing or disassociating itself from the LEP's aspirations. Is this the case?

A3. How are the plan's assumptions of economic growth in the district and likely increase in number of jobs consistent with the *remarkable potential* of the area highlighted in the *Story* (Investment Prospectus) Appendix 1 of CD4/E9?

A4. How are the plan's assumptions of economic growth in the district and likely increase in number of jobs consistent with Core Strategy objective 3 and the aspiration of the vision to realise the economic cultural and social *potential* of the area?

Housing

A5. The Stage 2 Report estimates housing requirement at 11,600. Why does the Core Strategy make provision for only 11,000?

A6. Does the housing provision take into account the under provision of the housing requirement in the local plan for the period 1996-2011. If not, why not?

A7. Paragraph 3.7 of Topic Paper 2 (CD6/S3) refers to CD4/H1 taking account of various demographic factors and paragraph 3.9 refers to this work as *absorbing demographic change*. Please explain carefully how this has been done.

A8. Similarly, notwithstanding the explanation in Appendix 2 of CD4/H1, the Council should explain carefully how (and to what extent) the multiplier of 1.33 is intended to accommodate factors such as:

- Internally generated household growth from within the existing population which will include growth from households not economically active.
- Likely in migration from non-economic migrants
- Likely in migration of economic migrants
- Any backlog of housing needs.

A9. In CD4/H1 8.2 how has the figure of locally generated demand been calculated (the reference to 5.1.6 does not assist in understanding how this figure has actually been derived).

A10. Paragraph 3.10 of Topic Paper 2 (CD6/S3) indicates that the Council is seeking to ensure that the growth in local work place jobs matches the growth in the local labour market. Given that the Council cannot control who occupies market housing or where they come how is this match to be achieved? If in-migration of non-economically active households is significant could labour supply act as a constraint on additional job growth?

A11. Similarly, if in-migration of both economically active and non-active households continues at high levels (and higher than allowed for in the model) how would the proposed housing absorb local demographic change?

A12. What is the Council's objective in relation to commuting at the end of the plan period compared with present? The Stage 2 Report (5.1.5) appears to plan to keep commuting proportionally similar to the past. But that is not what the Core Strategy appears to be seeking to achieve in Objective 1. Please explain.

A13. Topic Paper 2 (3.17) refers to the potential delivery of 700 dwellings in the last 5 years of the plan period on sites of less than 10 dwellings (below the SHLAA threshold). How has this figure been derived?

Affordable housing

A14. How as the overall affordable housing target in DW1 of 3,400 affordable dwellings through the planning system been derived?

A15. To test the credibility of this target would the Council illustrate what is the projected outcome for the provision of affordable housing between 2006-2026, taking into account:

a) the number (net gain) of affordable dwellings on sites already built since 2006 (identifying any 100% schemes);

b) expected provision on sites with planning permission/agreed in principle (as the proportion will already be known from S106 agreements); identifying in particular what proportion has been agreed in the outline permission for Western Riverside;

c) an estimate of what might be delivered from development of sufficient SHLAA sites to achieve 11,000 dwellings by 2026. Please show explicitly the assumptions made, including the proportion of future developments where it has been assumed that the percentages in CP9 have been fully met and the proportion where provision may have to be discounted for viability reasons.

d) any planned schemes for 100% affordable provision, including Rural Exception schemes.

In the light of the above does the target have reasonable prospects of being met?

Bath

A16. I am confused by what is intended by the distinction between the City Centre and the Central Area. Is there any practical policy difference intended between the 2 areas given the range of uses listed for the Central Area in B2 4? Diagram 8 indicates that *by 2026 the extent of the city centre uses now stretch across the River Avon*. What then is the purpose of defining the smaller city centre boundary on the Proposals Map as shown in Appendix 3 of the plan?

A17. The 3rd part of diagram 8 refers to a series of new and enhanced pedestrian bridges (which are shown on the diagram). Are these specific projects? Are they necessary infrastructure or merely aspirations?

Infrastructure and delivery

A18 What is the most up to date information on the availability of public funding to assist with site preparation/infrastructure for key sites, especially in Bath? Is the funding from the HCA set out in CD4/I4 still anticipated? What are the implications if this funding is much reduced? (Please weave the response in to the requested Topic Paper relating to Bath capacity/delivery.)

Transportation

A19. Are the CPO Inquiries for the BRT yet fixed? Please keep me up to date with the programming and any outcome of the Village Green Inquiries.

A20. Does the Core Strategy accurately summarise the locations and principles of the BRT as set out in the LTP3, the funding bid (which I understand may be refined by September 2011) and the planning permissions? Does it introduce anything new or different?

A21. If the CPOs are not confirmed or the funding not approved by the Government what are the implications for the strategy for Bath? Is there a contingency plan (bearing in mind that the implementation of the BRT package is clearly seen as critical to the strategy)?

A22. Policy B1 10b includes implementing a new *parking strategy* among the necessary actions to achieve the strategy. What is the current status of this? Please make a Core Document any published draft (eg as reported to Committee/Cabinet). What are its aims and objectives? To be effective, should the CS summarise its purpose?

Flood risk

A23. Is the delivery of the upstream flood compensation storage requirement (2.48) achievable?

- What are the key milestones to implement this work?
- Given that it must be in place before development sites progress (*Management Strategy Report* - CD4/FR2-5 para 7.10) how will it be funded and will it delay the delivery of the riverside redevelopments?
- What is the contingency if it cannot be delivered or is delayed?

A24. Core Strategy 2.48 refers to off-site defences and upstream compensation. But the *Management Strategy Report* (CD4/FR2-5 para 4.102) also refers to *continuous operation of the Lower Bristol Road during times of flood*. Should this be identified in the Core Strategy? Is what is suggested in the *Management Strategy Report* feasible and deliverable? How will it be achieved?

Annex 2

Council proposed changes in CD5/6 which appear not to be minor:

PC12

PC15 change to 2,800

PC18

PC19 deletion of specific reference to Bath RFC

PC20

PC21

PC26 deletion of Roswell Court is minor. As an exception to the point made in paragraph 25 above, it may be helpful to retain this as a separate minor change so that there is certainty that the Core Strategy would no longer mention it. Addition of references to 3 additional buildings appears significant.

PC28

PC29

PC31

PC32 policy B32a – as specific locations are referred to

PC33 there is unnecessary duplication in B3 4(ai).

PC34 paragraph refers to 2,500 which presumably would need changing for consistency.

PC35

PC37

PC42

PC43

PC44

PC47

PC49

PC50

PC52

PC53

PC83

PC84
