ID47

Shropshire Council. Examination of Shropshire Local Plan 2016-2038

Inspectors: Louise Crosby MA MRTPI, Elaine Worthington MTP MUED MRTPI IHBC and Nick Palmer BA (Hons) BPI MRTPI

Programme Officer: Kerry Trueman

Tel: 07582 310364, email: programme.officer@shropshire.gov.uk

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Mr West
Planning Policy
Shropshire Council
PO BOX 4826
Shrewsbury
SY1 9LJ

10 December 2024

Dear Mr West

Shropshire Local Plan Examination: Inspectors' findings following stage 2 hearing sessions

1. Further to our letter dated 28 October 2024 we are now able to set out in detail our soundness concerns.

Background

2. The Council has agreed to contribute around 1,500 dwellings and 30 hectares (ha) of employment land to help meet unmet need in the Black Country (BC). This commitment is in addition to meeting Shropshire's own housing and employment needs. It is made clear in the submitted Local Plan and was a key element in the duty to cooperate discussion and the associated statements of common ground with the relevant local planning authorities.

3. Our letter setting out our interim findings following stage 1 of the hearings dated 15 February 2023 (ID28) asked the Council to provide a topic paper that unambiguously set out the need for housing over the plan period along with the local plan's housing requirement and the same for employment land (paragraph 12). The letter indicates that, on the face of it, the latter is likely to be the sum of Shropshire's housing/employment need, plus the 1,500/30ha homes/employment land relating to the unmet need in the BC.

4. Paragraph 22 of ID28 further states that, *'If, following the additional SA work, the Council chooses to pursue the same growth option as before then it follows that the housing and employment land requirements will increase, and more sites will be required.'*

5. In response to ID28 the Council's updated Housing and Employment Topic Paper (TP) (GC45) sought to clarify and distinguish between the needs of Shropshire and the BC. It accepts that an increase to the housing requirement will be needed if the Plan is to provide for Shropshire's own local housing needs, continue to pursue the high growth option and contribute 1,500 dwellings to meeting unmet needs from the BC. It also sees the addition of 20ha of employment land to the employment requirement.

6. The Council also now proposes to meet the BC needs by apportioning 1,500 homes from existing allocations at Tasley Garden Village, Shrewsbury and the Former Ironbridge Power Station, in addition to 30ha of employment land at Shifnal. As such, these allocations have effectively been re-purposed from meeting Shropshire's housing and employment needs, to specifically meeting wider BC housing and employment needs. Whilst this would allow delivery of sites to meet BC needs to be monitored, no additional sites have been identified to accommodate either the BC needs, or the needs arising from Shropshire, which these sites were initially allocated to meet.

7. It has become increasingly apparent through the course of the examination that when agreeing to take some of the unmet needs of the BC between the Regulation 18 and Regulation 19 stages of the preparation of the Plan, the Council did so on the basis that no additional sites would be necessary. This approach has led to a series of consequential and fundamental inter-related problems with the Plan which are considered below.

Housing and Employment Land Requirement and Supply

Housing Requirement and the Updated Sustainability Appraisal

8. The Council confirmed in the TP that it is still pursuing a 'high growth option' in line with the submitted Plan. As such, put simply, the Plan should set out two separate housing requirements, 30,800 to meet Shropshire's need and an additional requirement of 1,500 to help address unmet housing need in the BC. This would give an overall total requirement of 32,300 rather than the 31,300 in the submitted Plan. In our letter (ID36) dated 4 October 2023, we specifically said that there seemed to be very limited evidence to justify the reduction in the housing requirement for Shropshire itself. We also pointed out that we did not ask the Council to review this in our earlier letter (ID28).

9. At the recent hearings the Council argued that it had followed the advice set out in paragraph 5.7 of our letter dated 16 January 2024 (ID37). This advised the Council to test options in the updated Sustainability Appraisal (SA) (GC44) based on the 2020 baseline with two extra years, but only look at the growth options tested in the original SA (a 5, 10 and 15% uplift) and look at this with the BC unmet needs of 1,500 homes, and without it.

10. ID37 was in response to the Council's letter (GC41) which explained in paragraph 3.4 that the high growth option it was pursuing was based on 15% above the defined housing need. However, it seems that this was not the case. The Council states in the updated SA that the high growth option based on a

15% uplift is 29,800 dwellings over the plan period. This equates to around 1,355 dpa to meet Shropshire's housing needs. This is a reduction when compared to the 30,800 dwellings over the plan period in the submitted Plan, which equates to 1,400 dpa. As such, the high growth option now being pursued in practice represents less growth than previously.

11. The evidence underpinning the Plan, in particular the housing requirement and supply, seems to have constantly shifted over time which has caused great confusion and makes it difficult to follow. Whichever lens it is viewed through, the Council is still opting for a high growth option, but the Shropshire requirement has been reduced by 1000 homes and the sites re-purposed to meet the BC needs. Even based on the Council's latest work, the overall housing requirement is only 500 homes higher than in the submitted Plan, despite the addition of 1,500 homes to meet the BC need.

12. In terms of employment land, the TP proposes a 20ha uplift to the employment land requirement (from 300 to 320 hectares) which is to be met by utilising settlement guidelines and windfall allowances. However, in parallel to the approach to housing, in accommodating the 30ha contribution to the BC within an existing proposed employment allocation, the Council has in practical terms reduced the employment land requirement to meet Shropshire's needs by 10ha.

13. We asked the Council to assess through further SA work the implications of meeting the needs of Shropshire as well as some of the unmet needs of the BC. Whilst deficiencies in the SA process can be corrected during the examination, any updates to the SA must not be used as an exercise to justify a pre-determined strategy. Paragraph 12 of ID36 is clear that it would be inappropriate to retrofit the SA to suit predetermined housing and employment land requirements.

14. The SA process is integral to the production of the Plan and should enable the Council to assess the degree to which its proposals contribute towards the achievement of sustainability. It should help to make sure that the Plan proposals are an appropriate strategy given the reasonable alternatives. Planning Practice Guidance stipulates that the SA needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic, and social characteristics of the area. It should, amongst other things, provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach considering the alternatives. We turn now to consider the SA options and how these are assessed.

15. In terms of the housing uplift, section 10 of the updated SA summarises the reasonable options for accommodating the uplift to the proposed housing requirement. Ultimately Option 1 is considered by the Council, to represent the most sustainable reasonable option and involves increasing settlement guidelines and windfall allowances.

16. The other three options tested are the densification of proposed site allocations (Option 2); increasing site allocations (Option 3); and a combination of these (Option 4). Whilst the updated SA states at paragraph 10.61 g. that Option 1 would ensure that the uplift is accommodated within the most sustainable settlements with the widest array of infrastructure, services, and facilities necessary to support new development, this cannot be assured. Similarly, it is hard to see how Option 1 would necessarily provide increased certainty regarding the urban focus of development, when compared to Option 3.

17. Overall, it seems illogical that the option that relies on windfalls is a more sustainable option than allocating sites in sustainable locations, since the Council cannot guarantee that suitable sites will come forward in the right places at the right times. Therefore, despite the development management policies to manage development in certain locations, they might not always be in the most sustainable location.

18. Relying on planning judgement, the Council appears to have scored Option 3 (proposed site allocations), lower than Option 1 (increase settlement guidelines and windfalls), principally because the locations of the sites are unknown. However, it is difficult to see how this makes sense, since allocating specific sites gives the Council greater control over where development takes place, ensuring that it is in the most sustainable locations and of a scale that attracts other benefits such as affordable housing and infrastructure.

Black Country Unmet Needs and the Updated Sustainability Appraisal

19. Turning to BC needs, Section 6 of the updated SA considers the reasonable options for contributing to the unmet housing needs of the BC. Option 1 is for no contribution, and Option 2 is for a 1,500 dwelling contribution. However, it is not clear whether an option whereby BC needs would be provided 'in addition' or 'over and above' the Shropshire needs has been considered. Paragraph 11 of ID28 is clear that we cannot see how the BC housing and employment land is accounted for in the housing and employment requirement in draft Policy SP2. This remains the case.

20. The commentary boxes of Table 6.2 of the updated SA state that impacts are ‘dependent on the impact of the contribution on the total level of development proposed in Shropshire which is considered separately in the SA process'. Paragraph 6.29 of the updated SA indicates that Option 2 represents a housing contribution towards the unmet housing needs in the BC that is consistent with that currently proposed within the Plan. Similarly, in terms of employment, paragraph 7.28 indicates that Option 2 represents an employment contribution towards the unmet employment land needs forecast to arise in the BC that is consistent with that currently proposed within the Plan. An option that goes over and above that currently proposed within the Plan, does not appear to have been considered.

21. Section 12 of the updated SA identifies the specific sites to contribute towards unmet housing and employment land needs in the BC. It does so via the

identification of a reasonable assessment geography to reflect the functional relationships between Shropshire and the BC based on a number of factors. This found that the potential sites should be located within the eastern and central parts of Shropshire at the larger settlements where growth is proposed, and at all potential strategic settlements/sites.

22. Although a call for sites was not made, within this geography, the Council re-assessed all sites that were previously included in the assessment process. This was not limited to the sites proposed for allocation in the Plan. At the hearings the Council indicated that as part of the process it reviewed 450 reasonable alternative housing sites, and 350 employment sites. Despite the change in spatial and geographical focus from meeting only Shropshire's needs to meeting some of those of the BC, it was found that the most sustainable options were four sites that were already proposed for allocation.

23. As such, the sites selected to meet the BC needs, are sites that were originally allocated to meet Shropshire's needs. Whilst their identification as such will allow the monitoring of how BC needs are being met in Shropshire, in common sense terms, it follows that this approach has reduced the ability of those sites to meet Shropshire's own needs for both housing and employment land.

24. The Council reiterated at the hearings that the housing and employment sites identified to meet the BC needs, were not previously allocated for just Shropshire as the BC needs were subsumed, and that there has been no 'de-allocation' of Shropshire sites. We continue to disagree with this position as those sites were proposed to be allocated through the original SA which assessed only the needs of Shropshire. ID28 requested further work to identify additional sites to meet the higher requirement and the geographical needs of the BC in February 2023.

25. The Council suggests that the identification of these existing proposed housing and employment sites to meet BC needs, and their selection as being the most appropriate, is perhaps unsurprising (because they were themselves informed by a proportionate and robust site assessment process which was reviewed and updated as part of the process). However, we are mindful of the change in geographical emphasis since they were selected to meet Shropshire's needs. Notwithstanding the identification of the reasonable geography, we are concerned as to how this has been factored into the process of selecting them.

26. Paragraph 12.57 of the updated SA confirms that stage 3 of the SA and site assessment process was the point at which detailed consideration of sites that progressed through initial screening was undertaken. It was also at this stage that conclusions regarding proposed allocations were reached by officers as a professional planning judgement. That judgement however lacks transparency or a clear balancing exercise. In some cases the judgements made do not take account of earlier scoring leading to what appear as illogical conclusions.

27. We are also mindful that the land in Shropshire closest to the BC is in the Green Belt (GB). The Council has already committed to taking land out of the

GB to meet its own needs, but due to the planning judgements applied, it has not revisited the GB evidence base with a view to meeting the BC needs. Again, on the face of it, this approach does not seem logical.

Plan Period

28. The submitted Plan at paragraph 2.18 anticipated that the Plan would be adopted in 2022 and therefore have a minimum of 15 years from adoption, as expected by paragraph 22 of the National Planning Policy Framework July 2021 (the Framework). The current Plan period is 2016-2038. Given the further work that would be necessary for soundness it is unlikely the Plan would be adopted until 2026, at the earliest. This means there would be a maximum of 12 years left of the Plan period from adoption.

29. Consequently, as well as the increases in the requirements associated with contributing to meeting BC needs, at least three additional years would need to be added to the housing and employment requirements, and the Council would need to find at least an additional three years' worth of supply. Any extensions to the plan period would also need to be supported by up-to-date evidence and may have implications for the soundness of the proposed spatial strategy.

Windfalls as a component of supply

30. Turning to supply, we have concerns about the amount of windfall development relied upon in the housing supply. Table 10.1 of the TP shows that around 10% of the total housing land supply will be on windfall sites, and if the dwellings on Strategic Land Availability Assessment (SLAA) sites are added, this rises to around 12%. This is the equivalent of around 13.5% of the requirement.

31. Prior to the commitment to meet some of the BC unmet needs, the reliance on windfalls was potentially challenging, but the increased requirement has raised this further. Paragraph 71 of the Framework, says that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply and that it should have regard to historic delivery rates, amongst other things.

32. Figure 8.1 of the TP shows that the number of windfall site completions has fallen year on year since 2018/19 and this is particularly so for medium and large windfall site completions. There is a clear trend here which is concerning given the Council's reliance on this as an important component of its supply.

33. The reliance on windfalls is greater in years 6-10. Whilst this may seem some time away, it is not so far in the future that there will be time to allocate additional sites in a Plan review should some of the allocated or 'saved' sites not come forward as expected and/or windfalls continue to fall. This is particularly so given the Plan review would need to be consulted upon and examined.

34. Whilst smaller windfall site completions have fluctuated but not consistently fallen, like the medium and larger sites, they do not provide affordable housing

or other community benefits and infrastructure, or the same overall quantum of homes.

35. Increasing the development guidelines in the Plan in some settlements to make up the shortfall in supply to meet Shropshire's housing needs is no substitute for allocating sites in sustainable locations. Nor is there any guarantee that sites will come forward in line with the Council's spatial strategy.

36. Furthermore, policy SP2 identifies the delivery of affordable housing as a key priority, but smaller windfall sites are unlikely to deliver affordable housing because of the thresholds set out at paragraph 64 the Framework. As such, the greater reliance on windfalls to meet Shropshire's housing need runs counter to the Council's strategic approach to development. Paragraph 23 of the Framework advocates allocating sufficient sites to deliver the strategic priorities of the area.

37. Leaving more development to chance, through over reliance on windfall sites means that the Council would have less control over delivering its strategic priorities. In addition, affordable housing is a significant component of BC needs. One of the sites (Ironbridge Power Station) now allocated to meet some of the BC housing needs is only required to provide 5% AH due to its viability.

38. A list of 'known significant potential windfall development opportunities' are set out in Table 8.5 of the TP. Whilst we appreciate that the Council has actively chosen not to allocate these sites, we are of the view that allocating them would provide far greater certainty for developers and mean they would be more likely to come forward.

39. There is also a risk that windfall sites for housing could be on existing employment sites and result in a reduction in employment land. In addition, the SLAA was carried out in 2018. Given that it is six years old, it is likely to now be out of date in respect of some sites. Additionally, relying on this process means that the deliverability of sites is not tested through the Plan process in the same way as allocated sites.

40. In terms of the employment uplift, section 11 of the updated SA sets out the reasonable options for accommodating the uplift to the proposed employment land requirement. It also finds that Option 1, utilising settlement guidelines and windfall allowances represents the most sustainable of the options. As is the case for housing, this is as opposed to other options, including Option 3 which concerns increasing site allocations. Again, it is hard to see how Option 1 would ensure that the uplift is accommodated within the most sustainable settlements with the widest array of infrastructure, services, and facilities necessary to support new development (paragraph 11.60 f.).

41. In the light of the above, the Council is seeking to pursue an approach that relies heavily on windfall sites to deliver the Plan's housing and employment land requirements. There is no clear evidence to demonstrate that this

approach is likely to ensure that the Plan's housing and employment requirements will be delivered. In this context, and given the other reasonable alternatives, this approach is not supported by the evidence.

42. Relying so heavily on windfall delivery is contrary to paragraph 15 of the Framework, which says that the planning system should be genuinely plan-led. A key purpose of local plans is to identify development requirements and to 'meet them head-on' where it is possible to do so. The Council's analysis of the reasonable alternatives gives no indication that delivering the identified development requirements is not possible here.

Sites in the Site Allocations and Management of Development (SAMDev) Plan as a component of supply

43. The Plan relies on sites allocated in the current SAMDev plan (2006-2026) to meet Shropshire's housing need. These are listed in appendix 2 of the Plan. We raised concerns about this approach at the stage 1 hearings and in ID28. As a pragmatic solution, to prevent delays to the examination, in ID33 we advised that these sites are not before this examination, but that text could be added to the Plan to explain that the housing and employment land requirement is made up of sites in the emerging plan and the sites in appendix 2 (from the SAMDev plan). The Council has sought to do this through main modifications.

44. Tables 10.1 and 10.2 of the TP show that there are a significant number of homes (3,262) without planning permission. This is an important component of the housing supply for the Plan that is yet to come forward. Similarly, Table 17.1 of the TP shows that there is 128ha of employment land in the SAMDev plan that does not have planning permission. Again, this is a significant amount of land which is being relied upon to meet the requirement.

45. It is a concern that with only two years of the SAMDev plan left there is so much housing and employment land that does not have planning permission. It raises the question as to why it has not yet come forward and therefore whether it would be likely to do so during the period of the submitted Plan.

Site SHR166 Land to the west of the A49 Shrewsbury as a component of supply

46. It came to light in the run up to the recent hearings that the Council no longer supports the proposed 45ha employment site SHR166 in Shrewsbury due to Historic England (HE) objections following the designation of the Uffington Roman Marching Camp as a Scheduled Ancient Monument (SAM). Policy S16 of the Plan says that around 100ha of employment land will be made available for development and accordingly the supply as set out on Table 17.1 of the TP shows a supply of 105ha for Shrewsbury.

47. We agree that SHR166 should be removed from the Plan as it is not deliverable. However, the Plan places considerable importance on this proposed allocation, indicating that it will be developed as a key gateway employment site for Shrewsbury of strategic importance, contributing to the

growth aspirations of the region. Policy S16 deals with the Shrewsbury Development Strategy and highlights the importance of fostering economic development to reflect Shrewsbury's strategic role.

48. This being so, we consider that an alternative new strategic employment allocation in Shrewsbury would need to be found to replace SHR166. This is the case notwithstanding the outcomes of GC9 (Overview of Shrewsbury 'Strategic' Employment Development Options Assessment). Even given the potentially improving position of the authority's overall employment land supply referred to by the Council, we are not persuaded that a reliance on windfall employment sites to plug this large and important gap is appropriate. The identification of a replacement site would require further SA work and consultation, as a minimum.

49. We are also conscious that HE raised objections to SHR166 and made the Council aware it was seeking to have the camp designated during the stage 1 hearing sessions over two years ago. The SAM was designated in late 2022. As such, the Council could have sought to address this issue as part of the further work it has carried out.

50. The loss of SHR166 results in a reduction of 45ha of employment land which is around 14% of the 320ha employment land requirement. Moreover, it undermines the Plan's strategy to provide an employment site of this size in its defined Strategic Centre.

Balancing the requirement and the supply

51. Setting aside our other concerns, and considering the numbers in isolation, the requirement for housing and employment land has been incrementally rising through the lifetime of the Plan and the examination. Prior to submission the Council added two years to the Plan period in order to achieve a minimum of 15 years, at that time. A further uplift was applied more recently and the needs of the BC accommodated. On top of this, there is a need to uplift the requirement further to ensure there is a minimum 15 year plan period on adoption, as set out above. Against this backdrop, sources of the supply of housing and employment land have not increased, indeed a significant strategic employment site has been lost in SHR166.

52. Any headroom that previously existed between the overall land requirement and the supply has been significantly reduced and the buffer removed. This places an undue reliance on the windfall and SAMDev sites as key components of supply. We consider that the balance of these important elements has now reached a tipping point, whereby we cannot be satisfied that the Council's land requirements can be met in numerical terms.

<u>The location of the sites identified to meet BC needs</u>

53. We have serious concerns about the geography and distribution of the proposed allocations that have been identified to meet the BC needs. Whilst the proposed housing allocation at the former Ironbridge Power Station site and the

Bridgnorth site are both well related to the BC, and in particular Telford and Wolverhampton, the site on the west side of Shrewsbury is far less so.

54. This is especially so in comparison to areas such as Shifnal and Albrighton which are located close to the M54 motorway and the BC. Whilst we appreciate this land is in the GB, the Council has already provided evidence to demonstrate that the exceptional circumstances required to justify altering GB boundaries to allocate land for development exist, in principle at least.

55. In terms of employment land, the Council has re-purposed 30ha of the 39ha employment site at Shifnal (SHF018b & SHF018d) for BC needs. Whilst locationally this relates relatively well to the BC, the whole site was previously allocated to meet Shropshire's needs, and exceptional circumstances were argued to justify releasing this site from the GB. Only 9ha is now being allocated to meet Shropshire's needs and no new employment sites are proposed to replace the 30ha that is effectively lost to the BC.

56. Given that the Council felt that exceptional circumstances existed to justify the removal of the site from the GB to meet its own needs originally, it is unclear why the 30ha reduction to its own land supply is now acceptable. Logically the Council would have sought to find an alternative 30ha of employment land as a replacement, even if this meant further GB work.

57. Although the Council indicates that it has sufficient supply to meet the increased employment land requirement, it is a matter of fact that the supply has reduced against the requirement. This diminishes the choice and competition within the market, something the Council sees as an important factor.

58. Furthermore, meeting BC unmet employment need on a single existing allocated site in Shifnal, misses the opportunity to realise the well-recognised benefits of locating housing and employment land close together. The Council commissioned 'M54 Growth Corridor – Strategic Options Study' in 2019 as part of its emerging local plan evidence base. That concluded at paragraph 5.10 that '*It makes economic sense due to opportunities for cross-subsidy and accessibility that the delivery of new employment accommodation would be more sustainable if co-located alongside new residential development'.*

59. From the evidence before us, it seems that there are sites around Shifnal and Albrighton, for example, that may well have the potential to meet the BC unmet housing needs in a location close to where the employment needs are being met, or on a new site that could accommodate both. These would be close to the BC where people migrating and commuting to Shropshire are likely to still have links they would wish to maintain.

60. On the face of it, this would seem to be the most sustainable approach to meeting the BC needs whilst at the same time retaining existing housing and employment allocations to meet the needs of Shropshire and without relying on windfalls. It would also be likely to bring with it other benefits such as affordable housing and infrastructure.

Conclusions

61. Our concerns can be summarised as follows:

- The pre-determined nature of the strategy;
- The complicated shifts in land requirements that have taken place;
- The need to extend the plan period;
- The approach is at odds with the stated high growth strategy;
- The implications of BC needs being met at the expense of Shropshire needs;
- Issues with regard to the SA and the approach to reasonable alternatives;
- The strategy does not meet the needs and commitments or strategic priorities of the area;
- The approach is not plan led;
- The reliance on windfalls in the supply of housing land;
- The reliance on SAMDev sites in the supply of housing and employment land;
- The impact of the loss of site SHR166 on the employment land strategy and supply;
- A tipping of the balance between the requirements for and the supply of land; and
- The location of the sites identified to meet BC needs.

62. The combination of all these interrelated matters have a cumulative effect that go to the heart of the Plan, and because of the serious shortcomings identified we find that it is unsound. It is not positively prepared, as it would fail to meet the housing and economic development needs of Shropshire, or to deliver on the clear commitment to addressing some of the unmet needs in the BC.

63. It is not justified, since it does not provide an appropriate strategy, considering the reasonable alternatives. It is not effective as it would not be deliverable over the plan period, nor would it enable the delivery of sustainable development in accordance with the policies in the Framework. We cannot see that we can recommend main modifications to remedy these deficiencies as they are so fundamental.

64. The Plan has been at examination for over two years and in that time, there has been a good deal of correspondence between us. We have held various hearing sessions, asked the Council to do additional work, and provided considerable and often detailed direction as to what that should look like. This approach was taken in the spirit of pragmatism to help the Council to achieve a sound Plan.

65. On 30 July 2024 the government published a written ministerial statement along with a letter to the chief executive of the Planning Inspectorate from Matthew Pennycook, the Minister of State. This outlines the government's desire to avoid lengthy delays to examinations. It sets out that pragmatism should only be used where it is likely a plan is capable of being found sound with limited additional work to address soundness issues.

66. Given the scale of these concerns and the amount of work that would be required to remedy them (including additional SA work, a revised GB review, finding news sites and consultation) it is likely to take a significant amount of time.

67. Nevertheless, we now ask the Council to provide a project plan to address the shortcomings we have identified. This should include a detailed work programme and realistic timings for all the work necessary to rectify the soundness issues we have identified above. It should outline all of the steps that the Council will need to take and illustrate how these matters can be rectified within a 6 month timeframe. Should this not be possible, we would need to consider our position with the likely outcome being the recommendation of the withdrawal of the Plan.

68. We would be grateful for a reply by 31 January 2025. If this is not possible, please provide an indication of when you will be able to reply in full, with the requested project plan.

69. We will not be accepting any further correspondence from other parties on this matter. A copy of this letter should be placed on the examination website as soon as possible.

Louise Crosby and Elaine Worthington

Examining Inspectors