

East Northamptonshire Local Plan Part 2 (2011-2031) Examination

Matter 10 – Town Strategies

Matter Statement by North Northamptonshire
Council

March 2022

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1. Introduction

- 1.1. This statement sets out the Council's response to Matter 10: Town Strategies, questions 1 - 24, in respect of the following issue(s):
 - Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and the JCS in relation to the matter of the town strategies and redevelopment sites.
- 1.2. The statement also addresses any representations which the Council considers are of particular significance or concern, where this is the case the relevant respondent number and comment id are provided.
- 1.3. All documents referred to in this statement are either hyperlinked, or refer to specific references contained in the Index of Submission Documents which can be accessed as follows:
- 1.4. https://www.east-northamptonshire.gov.uk/downloads/file/12227/index_of_evidence_base_and_supporting_documents

2. Matter 10 – Question 1: Is it clear to which 6 town centres Policy EN34 applies? Where they are in place is Policy EN34 consistent with the relevant NPs?

- 2.1. Policy EN34 refers directly to the Growth and Market Towns where this policy applies. These towns are defined in Table 5 for East Northants as Rushden, Higham Ferrers, Irthlingborough, Raunds, Thrapston and Oundle. In addition to this, the explanatory text to this section of the Plan makes clear the context to the policy and the towns where it applies. The remainder of this section of the Plan then goes on to set out the context and policy proposals for each of the six towns. It is therefore considered that the Policy EN34 provides clarity in respect of where it is to be applied.
- 2.2. There are made neighbourhood plans providing policies for the town centres of Rushden, Higham Ferrers and Raunds, each of these plans include objectives and policies for their respective town centre.
- 2.3. The Higham Ferrers Neighbourhood Plan promotes a mix of uses including employment and commercial and residential uses within the town, along with a recognition of the historic character and support for public realm improvements.
- 2.4. The Rushden Neighbourhood Plan aspires to deliver development that promotes the regeneration of the High Street, through ensuring an appropriate mix of uses to support the night-time economy.

2.5. The Raunds Neighbourhood Plan seeks to ensure a range of vibrant services to serve local needs and includes a policy to encourage mixed use development in the town centre.

2.6. The guiding principles of Policy EN34 are in accordance with the detailed neighbourhood plan town centre policies, as summarised above, for these towns.

3. Matter 10 – Question 2: What are the town centre sites referred to? Are these specific sites or would the policy apply to all sites in the relevant town centres?

3.1. Policy EN34 provides guiding principles for the six town centres as a whole, for all of the defined Growth and Market Towns, as explained in the Council's response to Matter 10 Q1 above. Para10.7 of the explanatory text provides further clarity in relation to the context of how the principles apply to the wider town, rather than specific sites.

3.2. Having set the wider context through Policy EN34 this section of the Plan then addresses site specific opportunities that have been identified for delivery within the plan period, to enhance town centre regeneration. As these sites are all town centre related, Policy EN34 would also provide overarching principles to address these, alongside the specific delivery criteria which are set out in each policy.

4. Matter 10 – Question 3: What is the purpose of the Policy? Does it provide a clear indication of how a decision maker should react to a development proposal or is it a statement of intent?

4.1. As set out in the Council's response to Matter 10 Q2 Policy EN34 provides overarching guiding principles for the defined town centres, which planning applications should satisfy in bringing forward development proposals.

4.2. Policy EN34 sets out clear expectations of how new development proposals should seek to enhance local vitality within the town centres. This is in line with guidance set out in the NPPF, which states that decisions should support the role that town centres play at the heart of local communities (para 86). Policy EN34 seeks to make a positive approach to town centre growth within the defined Growth and Market Towns of East Northants.

5. Matter 10 – Question 4: Is the redevelopment site justified by appropriate available evidence, having regard to national policy and local context, including meeting the requirements of the JCS and is it effective?

5.1. The Council considers that the allocated site Policy EN35 (Splash Pool and Wilko site redevelopment, Rushden) is appropriate, justified and deliverable. The Council has carefully considered opportunities for redevelopment within Rushden town centre, as part of its workshops (Ref I-07 and I08) and public consultation with stakeholders, this led to identifying a series of issues

impacting on Rushden town centre (paras 10.14 -10.15 of the explanatory text).

- 5.2. As indicated in the Council's response to Matter 10 Q3 the proposal seeks to regenerate Rushden, in line with guidance set out in the NPPF. This is also consistent with the Council's economic strategy, which seeks to revitalise and bring investment into the District's town centres.
- 5.3. All allocations have been subject to a sustainability appraisal, various consultation stages and general assessment to understand the site's deliverability and appropriateness to justify its allocation.
- 5.4. The site is within the ownership of the Council; however, it is dependent on the development of replacement facilities. Whilst the redevelopment proposals have not been costed, the Council's Whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability.
- 5.5. The identification of this redevelopment proposal is in accordance with the JCS, which supports the development of town centres uses within the town centres of Growth and Market Towns, where this is of a scale and nature consistent with the character of the settlement. The scale of development proposed of Policy EN35 is consistent with the scale and nature of the Growth Town of Rushden.

6. Matter 10 – Question 5: Having regard to paragraph 99b of the Framework, is the loss of the leisure provision justified?

- 6.1. Policy EN35 is in accordance with NPPF para 99 b) in that the loss of the leisure provision element of the allocation would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location
- 6.2. Criterion g) of Policy EN35 makes clear that the redevelopment of the Splash Pool leisure site will be required to address the loss of the facility and that the Council will aim to undertake a built sports facilities strategy, to inform future opportunities for its relocation.

7. Matter 10 – Question 6: Have the requirements of the policy been costed or viability tested?

- 7.1. Whilst the redevelopment proposals have not been costed the Council's whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability.

8. Matter 10 – Question 7: Is proposed MM32 required for soundness?

- 8.1. Proposed Modification MM32 (Ref EXAM-17) arose from Regulation 19 representations submitted by Anglian Water and Historic England, the latter of

which led to the preparation of a Statement of Common Ground (Ref EXAM-14).

- 8.2. The NPPF set out in para 35 the tests of soundness in preparing plans for examination. The insertion of the additional criteria through MM32 strengthens the policy by incorporating requirements to be addressed in the site's redevelopment, that provide consistency with national policy. This is set out in criterion c) of the NPPF's test of soundness, which seeks to enable the delivery of sustainable development.
- 8.3. The NPPF requires that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including sustaining and enhancing heritage assets (para 190). Arguably, without recognition of taking the heritage assets of the site into account, raised through the statutory consultee Historic England, the ability to deliver sustainable development may be compromised.
- 8.4. It is accepted that whilst the Proposed Modification made in respect of the representation made by Anglian Water to safeguard suitable access for the maintenance of foul drainage infrastructure may not be a soundness issue, however, the addition of the criterion provides appropriate detailed guidance to inform the site's redevelopment.

9. Matter 10 – Question 8: Is the redevelopment site justified by appropriate available evidence, having regard to national policy and local context, including meeting the requirements of the JCS and is it effective?

- 9.1. The Council considers that the allocated site Policy EN39 (Former Select and Save, High Street, Irthlingborough) is appropriate, justified and deliverable. The Council has carefully considered opportunities for redevelopment within Irthlingborough town centre, as part of its workshops (Ref I-07 and I0-8) and public consultation with stakeholders, this led to identifying a series of issues impacting on Irthlingborough town centre (paras 10.14- 10.15) of the explanatory text).
- 9.2. As indicated in the Council's response to Matter 10 Q3 at para 4.2, the proposal seeks regeneration in line with guidance set out in the NPPF. This is also consistent with the Council's economic strategy which seeks to revitalise and bring investment into the District's town centres.
- 9.3. All allocations have been subject to a sustainability appraisal, various consultation stages and general assessment to understand the site's deliverability and appropriateness to justify its allocation.
- 9.4. The site is not within the ownership of the Council; however, it represents a key development site in the centre of Irthlingborough central to the objective of regeneration the town centre.

9.5. Whilst the redevelopment proposals have not been costed the Council's whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability

9.6. The identification of this redevelopment proposal is in accordance with the JCS, which supports the development of town centres uses within the town centres of Growth and Market Towns where this is of a scale and nature consistent with the character of the settlement. The scale of development proposed of Policy EN39 is consistent with the scale and nature of the Market Town of Irthlingborough.

10. Matter 10 – Question 9: Is criterion g consistent with the Framework in relation to heritage assets? Is proposed MM36 required for soundness and does it address the concerns of Historic England in relation to criterion g?

10.1. Proposed Modification MM36 (Ref EXAM-17) arose from Regulation 19 representation submitted by Historic England and which led to the preparation of a Statement of Common Ground (Ref EXAM-14).

10.2. Criterion c) of the NPPF's test of soundness seeks to enable the delivery of sustainable development, whilst para 90 explains that plans should set out a positive strategy for the conservation and enjoyment of the historic environment (as referred to in Matter 10 question para 8.3 above). This criterion, together with the proposed modification, aims to properly address the need to consider the impact of development on the setting of heritage assets, which includes the Grade 1 listed St Peter's Church, raised through the statutory consultee Historic England.

10.3. The NPPF set out in para 35 the tests of soundness in preparing plans for examination. The insertion of the additional criteria wording through MM36 strengthens the policy by providing greater clarity to be addressed in the site's redevelopment, providing consistency with national policy.

10.4. The proposed criterion, along with its proposed modification, is considered to be required and addresses the concerns of Historic England, as set out in the Statement of Common Ground.

11. Matter 10 – Question 10: Have the requirements of the policy been costed or viability tested?

11.1. Whilst the redevelopment proposals have not been costed the Council's whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability

12. Matter 10 – Question 11: Is the redevelopment site justified by appropriate available evidence, having regard to national policy and local context, including meeting the requirements of the JCS and is it effective?

12.1. The Council considers that the allocated site Policy EN40 (Former Rushden and Diamonds Stadium, Nene Park, Irthlingborough) is appropriate, justified and deliverable. The Council has carefully considered opportunities for redevelopment within Irthlingborough, as part of its workshops (Ref I-07 and I0-8) and public consultation with stakeholders, this led to identifying a series of issues impacting on Irthlingborough (paras 10.14- 10.15) of the explanatory text).

12.2. As indicated in the Council's response to Matter 10 Q3 at para 4.2, the proposal seeks regeneration in line with guidance set out in the NPPF. This is also consistent with the Council's economic strategy which seeks to revitalise and bring investment into the District's town centres.

12.3. All allocations have been subject to a sustainability appraisal, various consultation stages and general assessment to understand the site's deliverability and appropriateness to justify its allocation

12.4. The consideration of the allocation of this site, and its context is set out in Background Paper 12 (Ref I-10).

12.5. The identification of this redevelopment proposal is in accordance with the JCS, which supports the development of town centres uses within the town centres of Growth and Market Towns where this is of a scale and nature consistent with the character of the settlement. The development proposed through Policy EN40 is consistent with the scale and nature of the Market Town of Irthlingborough.

13. Matter 10 – Question 12: Is the site intended as an employment allocation or a redevelopment site? Have alternative uses for the site been considered and why have they been discounted?

13.1. The intention of Policy EN40 is to allocate the former Rushden and Diamonds site for employment use.

13.2. The consideration of alternative uses and their appropriateness is set out in Background Paper 12 (Ref I-10).

14. Matter 10 – Question 13: Having regard to paragraph 99b of the Framework, is the loss of the stadium and the pitches justified?

14.1. The former Rushden and Diamonds FC stadium, constructed during the 1990s, was demolished in 2017. The Local Plan has sought to bring forward a viable redevelopment for this significant brownfield site since the Plan preparation process was formally launched (Regulation 18, January 2017).

- 14.2. NPPF paragraph 99 specifies: “**Existing** open space, sports and recreational buildings and land”. Five years have now passed since the demolition of the former stadium, so given that paragraph 99b refers to existing development it is not considered to be directly relevant.
- 14.3. The revived AFC Rushden and Diamonds play in a league several tiers below its predecessor (Rushden and Diamonds FC, who previously occupied the Nene Park stadium)
- 14.4. Provision for redevelopment of AFC Rushden and Diamond’s current site (Hayden Road, Rushden) is already included within the Rushden Neighbourhood Plan (I-01). The Neighbourhood Plan states that: “*The allocation of both the Hayden Road and Manor Park sites for development are contingent upon the relocation of the existing playing pitches and facilities to a suitable alternative site in accordance with Policies CL5 and CL6*” (Policy H2, footnote 4). In other words, the Rushden Neighbourhood Plan makes specific provision for the relocation of AFC Rushden and Diamonds as part of its spatial strategy.
- 14.5. Overall, the stadium site cannot be argued to be a “loss resulting from the proposed development”, as the stadium was already lost before redevelopment proposals were put forward in the Local Plan. Furthermore, provision for the relocation of AFC Rushden and Diamonds has been made within the made Rushden Neighbourhood Plan

15. Matter 10 – Question 14: Is there a need for site specific HRA and is this reflected in the policy? (see MM37)

- 15.1. Modification MM37 has been proposed following discussions with Natural England that led to the publication of a Statement of Common Ground (Ref EXAM-13). The Statement, and the Proposed Modification make clear the need for a site specific HRA, which is set out in the Statement and addressed through modifications to the explanatory text and policy.
- 15.2. Policy EN40 reflects the need for delivering measures to address the Special Protection Area in criterion (c), it is considered appropriate that with an additional para of explanatory text, providing the context to the Policy, and amendments to criterion (c) that the need for a site specific HRA is clearly reflected in accordance with the Statement of Common Ground.

16. Matter 10 – Question 15: Have the requirements of the policy been costed or viability tested?

- 16.1. Whilst the redevelopment proposals have not been costed the Council’s whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability.

17. Matter 10 – Question 16: Does proposed MM38 address Historic England’s concerns and is it necessary for soundness?

- 17.1. MM38 addresses the concerns of Historic England, raised through Regulation 19 representation, and agreed through the Statement of Common Ground (Ref EXAM-14)
- 17.2. The NPPF set out in para 35 the tests of soundness in preparing plans for examination. The insertion of the additional criteria through MM38 strengthens the policy by incorporating requirements to be addressed in the site’s redevelopment, that provide consistency with national policy.
- 17.3. Criterion c) of the NPPF’s test of soundness seeks to enable the delivery of sustainable development, whilst para 90 explains that plans should set out a positive strategy for the conservation and enjoyment of the historic environment (as referred to in Matter 10 question para 8.3 above). This proposed modification aims to properly address the need to consider the impact of development on the setting of nearby heritage assets.

18. Matter 10 – Question 17: Is the redevelopment site justified by appropriate available evidence, having regard to national policy and local context, including meeting the requirements of the JCS and is it effective?

- 18.1. The Council considers that the allocated site Policy EN41 (Riverside Hotel, Station Road, Oundle) is appropriate, justified and deliverable. The Council has carefully considered opportunities for redevelopment within Oundle town centre, as part of its workshops (Ref I-07 and I08) and public consultation with stakeholders, this led to identifying a series of issues impacting on Oundle town centre (paras 10.14- 10.15) of the explanatory text).
- 18.2. As indicated in the Council’s response to Matter 10 Q3 at para 4.2, the proposal seeks regeneration in line with guidance set out in the NPPF. This is also consistent with the Council’s economic strategy which seeks to revitalise and bring investment into the District’s town centres.
- 18.3. All allocations have been subject to a sustainability appraisal, various consultation stages and general assessment to understand the site’s deliverability and appropriateness to justify its allocation.
- 18.4. As a key gateway site leading into Oundle it is appropriate that policy guidance is provided on this site, to ensure future development proposals support the Council’s approach to the regeneration of its Growth and Market Towns.
- 18.5. Whilst the redevelopment proposals have not been costed the Council’s whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability

18.6. The identification of this redevelopment proposal is in accordance with the JCS, which supports the development of town centres uses within the town centres of Growth and Market Towns where this is of a scale and nature consistent with the character of the settlement. The scale of development proposed of Policy EN41 is consistent with the scale and nature of the Market Town of Oundle.

19. Matter 10 – Question 18: Do the heritage asset tests at criterion a reflect those in the Framework?

19.1. The Council engaged with Historic England to publish a Statement of Common Ground, which address issues of concern raised by Historic England following the Regulation 19 representation (Ref EXAM-14). No issues were raised in respect of Policy EN41 or its wording.

19.2. It is further considered that the policy sets out a positive strategy for the conservation of the environment as advocated through para 190 of the NPPF. However, for consistency with similar policies in this section, a Proposed Modification could be offered to the policy wording in line with those proposed for Policy 37, which are set out in the schedule of proposed Main Modifications at MM34 (Ref EXAM-17).

20. Matter 10 – Question 19: Have the requirements of the policy been costed or viability tested?

20.1. Whilst the redevelopment proposals have not been costed the Council's whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability.

21. Matter 10 – Question 20: Are proposed MM39, MM40, MM41 and MM42 to the supporting text required for soundness?

21.1. MM39, MM40 and MM41 are not considered to be required to address issues of soundness. Therefore, the Council proposes that these changes be removed from the Schedule of Proposed Main Modifications (Ref EXAM-17). The Council would, however, wish to include these changes as additional modifications, which it will do outside the consideration of the Inspector.

21.2. MM42 is considered to be required, in part, as the introduction of a development brief to help bring forward site development is seen as introducing an appropriate strategy for site delivery, which is therefore invokes the justified element of the test of soundness.

22. Matter 10 – Question 21: Is the redevelopment site justified by appropriate available evidence, having regard to national policy and local context, including meeting the requirements of the JCS and is it effective?

- 22.1. The Council considers that the allocated site Policy EN42 (Cattle Market, Market Road, Thrapston) is appropriate, justified and deliverable. Permission has been granted for the relocation of the site, as set out in para 10.83 of the explanatory text, and the policy provides guiding principles for the redevelopment of this important town site. The site was highlighted when considering opportunities for redevelopment within Thrapston, as part of the Local Plan workshops (Ref I-07 and I08) and public consultation with stakeholders.
- 22.2. As indicated in the Council's response to Matter 10 Q3 at para 4.2, the proposal seeks regeneration in line with guidance set out in the NPPF. This is also consistent with the Council's economic strategy which seeks to revitalise and bring investment into the District's town centres.
- 22.3. The identification of this redevelopment proposal is in accordance with the JCS, which supports the development of town centres uses within the town centres of Growth and Market Towns where this is of a scale and nature consistent with the character of the settlement. The scale of development proposed of Policy EN42 is consistent with the scale and nature of the Thrapston

23. Matter 10 – Question 22: Is criterion f consistent with the Framework in relation to heritage assets?

- 23.1. Proposed Modification MM44 (Ref EXAM-17) arose from Regulation 19 representation submitted by Historic England and which led to the preparation of a Statement of Common Ground (Ref EXAM-14).
- 23.2. Criterion c) of the NPPF's test of soundness seeks to enable the delivery of sustainable development, whilst para 90 explains that plans should set out a positive strategy for the conservation and enjoyment of the historic environment (as referred to in Matter 10 question para 8.3 above). This criterion, together with the proposed modification, aims to properly address the need to consider the impact of development on the setting of heritage assets, and the conservation area.
- 23.3. The NPPF set out in para 35 the tests of soundness in preparing plans for examination. The insertion of the additional criteria wording through MM36 strengthens the policy by providing greater clarity to be addressed in the site's redevelopment, providing consistency with national policy
- 23.4. The proposed criterion, along with its proposed modification, is considered to be required and addresses the concerns of Historic England, as set out in the Statement of Common Ground.

24. Matter 10 – Question 23: Have the requirements of the policy been costed or viability tested?

- 24.1. Whilst the redevelopment proposals have not been costed the Council's whole Plan Viability Assessment (Ref B-13) concluded that the cumulative impact of plan policies with cost implications, that the proposed Part 2 Plan policy obligations are anticipated to have a marginal cumulative impact on viability.

25. Matter 10 – Question 24: Are proposed MM43 and MM44 required for soundness?

- 25.1. Criterion c) of the NPPF's test of soundness seeks to enable the delivery of sustainable development, whilst para 90 explains that plans should set out a positive strategy for the conservation and enjoyment of the historic environment (as referred to in Matter 10 question para 8.3 above). This proposed modification aims to properly address the need to consider the impact of development on the setting of heritage assets, along with the conservation area, as raised through discussions with the statutory consultee Historic England
- 25.2. The NPPF set out in para 35 the tests of soundness in preparing plans for examination. The insertion of the additional criteria wording through MM44 strengthens the policy by providing greater clarity to be addressed in the site's redevelopment, providing consistency with national policy.
- 25.3. MM43 is not considered to be required to address issues of soundness. Therefore, the Council proposes that these changes be removed from the Schedule of Proposed Main Modifications (Ref EXAM-17). The Council would, however, wish to include these changes as additional modifications, which it will do outside the consideration of the Inspector.