

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

Introduction

1. The Council welcomes this opportunity to forward its representations on the Inspector's Preliminary Findings and is also pleased to note his view that the Council has abided by all statutory requirements in the development of its Development Management Plan (DMP) including the Duty to Co-Operate and those relating to consultations. The Council is also encouraged that the Inspector considers that the Council has done an excellent job in seeking to reconcile the often competing economic, social and environmental roles of planning in so far as they relate to the Borough.
2. For ease of reference this representation sets out the Council's comments in respect of each of the 9 Main Modifications proposed by the Inspector by drawing upon and further detailing the summary of impacts as set down in the published Sustainability Appraisal (SA) of the Inspector's Preliminary Findings. The Council is particularly concerned at the proposed deletion of Harrow Lane (MM4) and what it believes are the overall significant negative sustainability impacts of its potential deletion upon the Plan. For this reason great emphasis is given to our comments in respect of MM4 which are set out at the beginning of this Representation. In view of the significance of these concerns the Council has commissioned further detailed assessment of these impacts including supplementary analysis of options to support this representation and these are attached as Appendix A.

The Council's two principal areas of concern with proposed modification MM4

3. From the Council's perspective our major concerns at the possible deletion of the Harrow Lane site (Policy LRA2) centre upon two significant areas of impact. Firstly the Inspector's assessment of possible future need for recreational space within the Borough on the basis of future residential schemes and the Council's view that any possible future need can, if proven, be better provided for by the enhancement of facilities elsewhere on better located and more suitable sites. Any need arising for green space provision linked to the development of the Harrow Lane site is already catered for in the Policy attached to the allocation and also, in terms of improvement of existing play facilities generally, from required developer contributions including from adjoining allocations through Policies LRA1 and LRA3. It is acknowledged that currently the land is popularly used for informal dog walking however this use will in no way be prejudiced by the future development of the site which requires appropriate open space and green infrastructure to be provided by the developer.
4. The Council's second principal area of concern lies in the impact that this proposed deletion will have on the Plan in respect of the Council's 5 year housing land supply, cumulative impact on the delivery of homes when considered alongside other proposed modifications, including affordable homes, loss of growth and regeneration benefits, impact of an early Plan review upon other work outlined in the Local Development Scheme (LDS), and the potentially adverse impact for the Borough in respect of having to deal with appeals owing to the Plan providing for a reduced number of units when assessed against objectively assessed housing needs (OAHN).
5. Dealing with each of these two areas of concern this Representation firstly addresses the issue of provision of recreational facilities and then sets out the Council's concerns at the impact of the proposed modification on housing delivery matters.

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

5.1 The need for possible future provision of recreational facilities at Harrow Lane

- The concerns regarding the proposed allocation of Harrow Lane as expressed by the Inspector in his Preliminary Findings are set down in the following terms at paragraph 8 of those findings: *“that future residential schemes in the neighbourhood and elsewhere could result (Council underlining) in a need for recreational facilities on this land. It would be prudent to retain this land in its open state at least until the review of the Plan”*
- In response to these concerns we would wish to highlight that within the Council's submitted Examination Document HBC/25, the Council's Facilities Development Officer, has already confirmed the following in respect of Harrow Lane: *“The facilities were not ideal and with a declining client base the opportunity was taken to focus spending on refurbishment of more popular facilities elsewhere in the Borough. In addition a junior pitch was brought back into use at The Firs, the disused football ground on Elphinstone Road. Following appraisal of all facilities the Harrow Lane site was declared as being surplus to requirements and identified for disposal. This has not led to any deficit in facilities within the Borough from a leisure perspective.”*
- Reference is made in this submitted document (HBC/25) to the fact that this decision was only taken after an appraisal of all facilities within the Borough and this, in the Council's submission, would appear to be at odds with the Inspector's expressed concern that the land *could* be required to meet a need for recreational space *in the future* (Council's emphasis in italics) with no information to support the view that Harrow Lane is where any such need, if it does arise, should be met. As part of this representation it is, therefore, considered appropriate to set out the Council's assessment of spare capacity through its land ownership at Bexhill Road and The Firs to provide for any future recreational needs that might arise with further provision possible, again if required, at Combe Valley Countryside Park. In particular Bexhill Road and The Firs are considered to be eminently better and more suitable sites for such purposes. This is in addition to major formal playing field provision (6 pitches) now coming forward at North East Bexhill and which will serve future needs arising from growth within Hastings as well as neighbouring Rother District.
- The Council has assessed its available playing pitch provision and the local demand to confirm that we can accommodate current demand for football and other sports within current provision, without Harrow Lane. We have a reasonable cushion of available and suitable land to deal with foreseeable demand that may arise from growth over the Plan period, subject to the funding required for pitch and facility creation.
- Hastings Borough Council provides grass pitches at Bexhill Road at the Combe Valley Countryside Park (12 football, 1 rugby), Tilekiln (3 football, 1 cricket), Sandhurst (5 football, 2 cricket), and The Firs (1 football). There is unused land within the playing pitch area in the Combe Valley Countryside Park, the equivalent of another 6 senior pitches. The Firs could accommodate further pitches if cleared and brought back into use. In addition, the Archery Field was formerly used for pitches and could be used again should the need arise. These sites all have advantages over Harrow Lane, in that they are flat rather than sloping and less prone to flooding.

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

- The first of the significant developments at North East Bexhill arising from growth in Rother District's Core Strategy/Plan is also now subject of a planning application and will trigger the provision of another 6 new pitches through a Section 106 agreement currently being drafted. Although these are in Rother District, a significant minority of the users of Hastings playing fields are from Bexhill or elsewhere in Rother District.
- In 2011, the Council ceased the use of Harrow Lane for formal football. The trigger was the assessment that the changing facilities, necessary for adult football, were beyond repair. We had sufficient capacity and acceptable facilities at our other sites. We relocated the teams as explained in the Council's submission document HBC/25. There is currently no realistic prospect of funding to reinstate these changing facilities at Harrow Lane and, in the event of any future recreational need being proven, we consider that any funding would best be spent upon expansion or enhancement of facilities on other available and more suitable land within the ownership and control of the Council.

5.2 Reduction in Housing Numbers and overall delivery within the Development Management Plan (DMP)

- The proposed deletion of what is a significant housing site allocation within the Plan, with a potential yield of some 140 units, needs to be seen in the context of the cumulative impact of other deletions proposed via the Inspector's Preliminary Findings which in total will mean a reduction of some 220 homes or some 6.5-7% of the Plan's ability to deliver the figure of "at least 3,400 homes", as set down in the Council's adopted Planning Strategy. As required by the Framework the Council has developed its DMP to provide for an appropriate land supply which will deliver the Planning Strategy requirements. Should all of the proposed modifications resulting in deletions be confirmed as Inspector's recommendations this would reduce, by more than half, the current housing land supply buffer which affords the Council the flexibility to meet the Strategy's "at least" target of at least 3,400 net new homes.
- Whilst the Council is appreciative of the fact that the Inspector's report on our Planning Strategy recognises that there are legitimate environmental constraints that prevent us from meeting our full objectively assessed housing needs we do have genuine concerns with the cumulative impact that the proposed deletion of a number of our housing sites from the DMP will have upon the ability to deliver and meet a number of the economic and social strategic objectives set down within the Strategy itself. Whilst other proposed deletions (namely MM5, MM8 and MM9) are relatively modest in their impact upon housing delivery and overall housing numbers the impact of MM4 at Harrow Lane is considered significant. The loss of other development sites at Robsack A, Victoria Avenue and the rear of Old London Road would remove some 78 homes from current supply figures. With the potential to deliver 140 units, with a policy requirement that c.56 of these should be affordable units, the loss of Harrow Lane viewed either in isolation or cumulatively with the other sites proposed for deletion represents a significant reduction in supply.
- Our submission under Matter 5, paragraph 5.1.4 confirmed that as this was Council owned land the early delivery of this site could be instrumental in providing sufficient flexibility in meeting and maintaining a 5 year housing land supply as required by the Framework. Alternatively and in order to prioritise and encourage the redevelopment of brownfield land in advance of greenfield sites

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

and in accordance with our adopted Planning Strategy, this site could come forward later in the Plan period. This approach is also in alignment with the overall objectives of the Framework (paragraph 17, bullet point 8). As a significant allocation and with control over ownership, Harrow Lane is the only large site in the Plan that affords the Council this flexibility and its allocation is entirely consistent with Policy DS1 of the Planning Strategy which confirms use of the Council's own land to stimulate development interest.

- Although a greenfield site it has nevertheless been shown through the Sustainability Appraisal (SA) process to fare well having low biodiversity interest, no significant constraints on site, being surrounded by existing residential and office development and having good accessibility, including to public transport. In terms of providing for sustainable development Harrow Lane is assessed as being one of the Borough's most viable sites and thus capable of providing a good percentage (c.40%) of much needed affordable housing – again an objective that is entirely consistent with Planning Strategy Policies H2 (Housing Mix) and H3 (Provision of Affordable Housing) and SC1(a) (Managing change in sustainable ways by endeavouring to meet housing needs for all sectors of the community, including the provision of affordable housing). The ability to deliver affordable homes is even more critical now since the Government's recent announcement, made during the course of the Examination Hearings, that for small sites of less than 10 residential units it would no longer be possible for Local Planning Authorities to request provision of affordable housing or indeed for any developer contributions towards infrastructure needs. These recent changes in relation to planning obligations and the preponderance of smaller development opportunities within Hastings will further reduce the Council's ability to meet affordable housing needs over the Plan period and the impact of the potential loss of some 56 units at Harrow Lane is thus intensified.
- The allocation at Harrow lane (Policy LRA2) is consistent with the adopted Planning Strategy and the Framework and has been developed and assessed in terms of sustainability with the adjoining allocations at LRA1 and LRA3. These also include policy requirements for provision of new green space and developer contributions to the improvement of existing play facilities within surrounding areas. The potential sustainability advantages of these 3 conjoined allocations are thus greatest when considered together, as is their potential both to provide for play space and to contribute to the improvement of play facilities in surrounding areas. The site offers an important opportunity to masterplan this area together with those sites immediately adjoining it. The deletion of Harrow Lane, together with the inherent loss of contributions as currently proposed will also have a negative impact upon the ability to masterplan growth in this part of the Borough and to enhance existing play facilities in areas better suited to meet any future recreational needs.
- The proposed deletion of the site and its resultant impact upon housing delivery will mean that the prospect of an early review of the Plan is increased. The process of producing Development Plan Documents is lengthy and resource intensive. Our approved Local Development Scheme (LDS) has currently identified that we wish to consult upon and produce an Area Action Plan for the town centre in addition to a number of Supplementary Planning Documents (SPDs). The potential loss of some 140 units from our future land supply by deletion of this allocation will impact upon our ability to deliver housing and ultimately upon the Council's 5 year supply in the mid to latter Plan period. It will therefore be likely to have unwanted impacts upon our LDS, should an earlier

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

review of the overall Plan be required, meaning that other key documents are delayed.

- We are aware from some representations made to the Inspector that some appearing at the examination called for significant increases in housing numbers to be provided through the DMP. Whilst we are encouraged that this argument does not appear to have found favour with the Inspector, at this stage in the process, we remain concerned that as a number of the modifications proposed result in an overall lowering of housing numbers, that this will leave the Authority more vulnerable to aggressive (i.e. non Development Plan compliant) applications and appeals based upon arguments of housing need and land supply. Whilst other proposed modifications result in modest or relatively modest losses of housing units the loss of Harrow Lane at 140 units is considered significant. The Council considers that reinstatement of Harrow Lane as an allocated site would considerably reduce these risks.

5.3 Sustainability Appraisal of MM4 - proposed deletion of Harrow Lane

- The Council's published Sustainability Appraisal (SA) of the Inspector's Preliminary Findings has identified a number of negative impacts associated with proposed modification MM4, particularly in respect of many of the adopted social and economic sustainability objectives of the Council (Social Objectives SO1, SO2, SO3 and Economic Objective SO20). Whilst the SA acknowledges that there are some benefits with the proposal in respect of environmental objectives it noted that the land at Harrow Lane had not been used as formal open space for some years and that the biodiversity interest of the site was low. The SA concluded that the potential environmental benefits of deleting the allocation were outweighed by the significant negative impacts of the modification upon social and economic objectives.
- In view of the results of the SA process and the significance of these concerns regarding the impact of these upon the Council's Development Management Plan (DMP) and its ability to deliver growth and regeneration benefits the Council commissioned a more detailed assessment of MM4 against the objectives and Policies contained within the Framework, the adopted Planning Strategy and the DMP, together with a review of the baseline information available for consideration of development. This more detailed assessment carried out by consultants AECOM is attached as Appendix A to this representation.
- This further detailed assessment identifies that the only reasonable options to assess at this stage in the Plan process are deletion of the site (MM4), retention of the site as per Policy LRA2, and some form of hybrid option where only part of the site is allocated. Summary table 4.2 of Appendix A shows that retention of the allocation would have significant but positive impacts in respect of two of the Council's adopted sustainability objectives. Where other impacts, both positive and negative, are identified, table 4.2 identifies that Option 3 - retention of Harrow Lane as a residential allocation ranks as first (i.e. best performing) of the 3 options considered in the case of nine of the Council's twenty one sustainability objectives. Option 2 – the Hybrid option, ranks as first of the three options in the case of six of the adopted Sustainability Objectives. Deletion of the site as proposed by MM4 (Option 1) is assessed as ranking first in respect of six of the adopted sustainability objectives. The conclusion in paragraph 4.5 identifies that Option 3, namely retention of Harrow Lane, stands out as performing best in terms of a range of objectives – mainly socio-economic - and having the potential

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

to lead to 'significant' positive effects in relation to housing and 'accessibility' objectives.

The Council comments on the Proposed Main Modifications (MM1, MM2, MM3, MM4, MM5, MM6, MM7, MM8 and MM9)

6. As referred to earlier in the Introduction to this representation and for completeness the Council has set out below its comments in respect of each of the other proposed Main Modifications put forward by the Inspector in his Preliminary Findings. For ease of reference these are now addressed in the Inspector's numerical order.

MM1- Deletion of the site at Upper Wilting Farm (Policy FB12)

7. During the course of the Examination Hearings the Council's witnesses confirmed that further work had been commissioned from specialist consultants in respect of biodiversity impacts and the financial/economic viability of the wind farm proposal. This work had confirmed that whilst some biodiversity impacts might potentially be mitigated the viability assessments indicated that with reduced subsidies available now for wind power schemes and the adverse impact on viability of, in effect, turning off the turbines for some periods to reduce environmental impacts, this made this particular proposal exceedingly unlikely to prove viable and thus deliverable within the lifespan of the DMP. The Council's witness confirmed his view that in the light of these significant concerns over deliverability of the Policy that it should be removed from the Plan. Accordingly the Council wholly supports this proposed modification.

MM2- Former Convent of Holy Child Jesus, Magdalen Road (Policy HN6)

8. In accordance with most of those present at the Hearings and representations made on this site and its Policy of encouragement, the Council confirmed that its overriding objective was to conserve this valuable historic asset within St Leonards and the Borough as a whole. The Council therefore also welcomes this proposed main modification and is happy to accept the wording in the Inspector's Preliminary Findings as the introduction to a revised Policy HN6. As requested by the Inspector the Council has set out the wording of a revised Policy and this is attached as Appendix B. In response to other concerns raised during the examination the Council confirmed that it would ensure consultation with English Heritage (EH or its successor body (Historic England)) in respect of any development proposals that it may receive for enabling development, including consultation with EH on any financial or viability appraisals submitted to support such proposals. In view of the importance of these Heritage assets and the weight of opinion expressed at the Hearing sessions this wording has been incorporated within the Council's appended revised Policy HN6 as an integral part of the Inspector's recommended MM2 rather than as a minor modification to the text of the Plan.

MM3 - Primacy of design quality over indicative housing numbers

9. During the Hearing sessions the Council's witnesses confirmed that they were fully supportive of this clarification which would add considerable weight to the Policy and be of assistance to development control colleagues in ensuring a high quality of design in all development proposals. The additional proposed wording in MM3 including the more specific references to what will be expected within Conservation Areas or for proposals affecting their setting is welcomed. The Council is happy to

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

accept the full text of the suggested draft wording of this Policy as set down at paragraph 7 of the Inspector's Preliminary Findings.

MM4 – Proposed deletion of allocation at Harrow Lane (Policy LRA2)

Summary of the Council's concerns regarding the proposed deletion of Harrow Lane. Please refer also to detailed paragraphs under 5.1-5.3 above

10. Following appraisal of all leisure/recreation facilities within the Borough it was resolved that Harrow Lane was not needed for recreational use and was to be disposed of. There has been no use of the site for formal play since 2011. There is no current deficit in the provision of recreational space within the Borough and those teams that used Harrow Lane have been successfully re-located together with enhancement and expansion of facilities on more popular, suitable and better located sites.
11. Whilst the Inspector's comments as to possible future recreational need are noted any such need, that may arise from future residential growth can comfortably be accommodated on land that is within the control and ownership of the Council at Bexhill Road and The Firs. Developer contributions from proposed allocated sites such as Harrow Lane can further assist in this provision should it be needed. This provision on Council controlled land is in addition to major new provision now being brought forward at North East Bexhill to support future recreation needs within both Hastings and Rother District.
12. Policy LRA2 (iv) relates to the allocation at Harrow Lane and requires provision of new green space within the site and through LRA2 (viii) contributions to the improvement of existing play facilities in the surrounding areas. Any possible future needs are thus accommodated by this Policy. Future green space needs are thus accommodated within the proposed Policy allocation.
13. Importantly however, it also requires developer contributions for the enhancement of existing play facilities in surrounding areas thus helping to accommodate any future recreational needs that may arise.
14. The deletion of the Harrow Lane site would in fact militate against achievement of this latter objective which is geared to consideration of enhancement of facilities elsewhere in the Borough on better and more suitable sites. This is referred to in the section on recreation need and will support not only needs arising from Hastings growth but also from that in North East Bexhill (Rother Core Strategy). In conclusion Harrow lane is not needed to provide for possible future recreational need arising from future growth – better sites are available should any future need be proven. The cumulative effect of the proposed deletions of sites from the Plan arising from all of the relevant proposed modifications (MM4, MM5, MM7, MM8 and MM9) will result in a reduction of some 220 homes being provided. Harrow Lane should therefore be seen in the context of overall housing loss. Overall housing loss of 220 dwellings from the Planning Strategy figure of "at least 3400" comprises 6.5–7% of the Plans total delivery of homes. The Harrow Lane site is a significant site within the Plan with the potential yield for 140 homes.
15. The Framework requires a 5 year housing supply to be continuously maintained over the Plan period. In the case of Hastings that five year supply must include a 20% buffer. This additional requirement upon the Council reflects a modest but persistent under delivery in recent years. The cumulative impact of deleting the

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

allocation at Harrow Lane, together with the other proposed deletions at MM5, MM8 and MM9 will have the effect of significantly reducing the flexibility that the Council requires in order to meet its 5 year housing land supply obligation.

16. The site is assessed as one of the more viable sites within the Borough having the potential to deliver some 40% of these 140 homes (56 units) as affordable homes with some 2% of the total capacity of the site being provided as fully adapted homes for wheelchair users. Policy LRA2 criteria (i) and (ii) refer. As affordable housing can no longer be required from small developments of 10 units or less and with the preponderance of small scale development in the Borough the negative impact of MM4 has thus been accentuated.
17. The Council's published sustainability appraisal of MM4 has identified that this would have significant negative sustainability impacts upon the DMP. The further detailed work commissioned by the Council from AECOM and appended to this representation confirms this finding and further identifies the discrepancy between, deleting (Option 1) and allocating (Option 3) the Harrow Lane site, in terms of its performance against adopted sustainability objectives.

MM5 - Deletion of land at Robsack A, Church Wood drive (Policy GH1)

18. The Council's published SA identifies that this proposed modification would have a positive sustainability effect on the Plan given the sensitive nature of surrounding designations namely Ancient Woodland and Local Nature Reserve (LNR). Whilst there are considered to be some negative impacts in terms of housing delivery these represent fairly modest numbers in the overall scale of the Plan and it is acknowledged in the SA that this is outweighed by the positive environmental sustainability impacts of this modification. During the Hearing sessions the Council's witness confirmed (in response to earlier requests not to allocate this site) a Cabinet resolution that this matter was best assessed through the Local Plan examination when all such requests could be openly and fairly considered. The Council welcomes the attention given to this matter by the Inspector and accordingly supports this proposed modification. The Council will sympathetically consider the Inspector's suggestion that this land be formally designated as a Local Wildlife Site (subject to any necessary biodiversity criteria being met).

MM6 - Proposed inclusion of additional land adjacent to Sandrock Park (Policy SH1)

19. In accordance with accepted good practice and as encouraged by the Inspector following the Pre-Hearing Meeting the Council agreed a Statement of Common Ground (SOCG) with the agent acting for this particular landowner and this was submitted to the examination (HBC/7). The Council accordingly welcomes this proposed modification to allocate this otherwise land locked site together with the additional policy criteria and safeguards proposed by the Inspector. A site plan has been submitted by the agent acting for the owner identifying the western boundary of the site and which, subject to the Inspector's consideration of this Plan, the Council is happy to agree to. This modification was adjudged to have a positive sustainability effect upon the Plan.

Hastings Development Management Plan (DMP) - Inspector's Preliminary Findings (Proposed Main Modifications MM1-MM9)

Representation from Hastings Borough Council

HBC/31

MM7 - Proposed inclusion of a "pocket park" or similar in the proposed allocation at Cornwallis Street Car Park (Amendment to Policy HTC2)

20. The Council's witness confirmed early on in the Hearings that it was happy for the Inspector to receive and consider a late petition submitted in respect of this site. The site in question is considered to be of sufficient size to meet the Plan's indicative capacity for provision of 10 residential units together with a pocket park or similar. Provision of such facility will not therefore adversely affect delivery of housing numbers and the provision of play space could be realistically delivered as this is Council owned land (noting that no such provisions now seem likely from private developers for schemes of 10 units or less following recent Government announcements). Overall this modification is adjudged to have a positive effect on the Plan in sustainability terms and is supported by the Council.

MM8 – Proposed deletion of allocation of land at Victoria Avenue (Policy CVO1)

21. The Council's published SA acknowledges that this proposed modification would have environmental benefits in retaining an area of woodland and that the idea had a high level of community interest and support. This level of interest and concern was expressed strongly during the Hearing sessions and through representations received by the Council. Deletion of the land at Victoria Avenue site does, however, result in an overall loss of a not insignificant amount of housing that can be delivered through the Plan (c.35 units) and overall the modification was thus felt to have a neutral impact upon the DMP in sustainability terms. At the Hearings the Council confirmed that there was a positive resolution to grant outline permission subject to the signing of a Section 106 legal agreement. The agent acting for the site has confirmed his clients concern at the proposed MM8 and will be submitting detailed representations on it. As with MM5, the Council is appreciative of the attention given to this matter by the Inspector and note his preliminary view that the allocation be deleted on the grounds of environmental and community considerations. The Council is therefore prepared to accept this modification and will, notwithstanding an uncertain landownership situation in parts of the area, endeavour to secure some form of appropriate open space designation on this site and in relation to the next modification MM9 if that modification is also confirmed.

MM9 - Proposed deletion of allocation, land rear of Old London Road (Policy CVO3)

22. The Council considers this proposal to have a slight negative effect in sustainability terms bearing in mind that this is a relatively level area and not wooded to the same degree as CVO1. We note however that the Inspector considers that the same reasons for deletion apply here as for his proposed MM8 and it is acknowledged that the two sites taken together could make a more significant contribution to the suggested designation of some form of open space referred to in his preliminary findings. Accordingly and as with MM8 the Council is happy to accept this proposed modification should it be confirmed.