

Ref	Name and Organisation	Comments
CF2	Mr Steven Hill	There's nothing in the plan for showmans sites.
CF4	National Grid	An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Key resources / contacts National Grid has provided information in relation to electricity and transmission assets via the following internet link: <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a> The electricity distribution operator in Forest of Dean District Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a>
CF6	Mr Ryan Norman Dwr Cymru Welsh Water	I refer to the current consultation on the Coleford Neighbourhood Development Plan and would like to thank you for consulting with Welsh Water. I provided a consultation response at the Regulation 14 stage and as such have no further comments to make at this time. I attach this previous response for your information.
CF1	Highways England	Thank you for providing Highways England with the opportunity to comment on the submission version of the draft Coleford Neighbourhood Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A40 which runs some distance to the north of the plan area. We are therefore satisfied that the proposed plan policies are unlikely to result in development which will impact significantly on the SRN and we have no comments to make. However, this response does not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time.
CF3	The Canal and River Trust	Thank you for your consultation on the Coleford Neighbourhood Development Plan. The Canal & River Trust have considered the content of the document and have no comments to make in this case. Thank you for your consultation on the Coleford Neighbourhood Development Plan. The Canal & River Trust have considered the content of the document and have no comments to make in this case.
CF8	The Coal Authority	Thank you for the notification of the 15 March 2018 consulting The Coal Authority on the above NDP. The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing. As you will be aware the Neighbourhood Plan area lies within the current defined coalfield. According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the form of 335 mine entries, recorded and likely unrecorded coal mine workings at shallow depth and 19 reported hazards. It is noted that the Neighbourhood Plan appears to allocate sites for future development. We would expect any site assessment for these to include criteria in respect of mining legacy issues. The potential constraints and risks that coal mining legacy may pose to a potential development site will need to be fully considered prior to any site allocations being finalised in accordance with the National Planning Policy Framework and Development Plan. In addition any allocations on the surface coal resource will need to consider the impacts of mineral sterilisation in accordance with the National Planning Policy Framework and Development Plan.
CF10	M F Freeman	Pegasus Group are instructed by M F Freeman Ltd to make representations to the Coleford Neighbourhood Development Plan 2017-2026 (Submission) which is currently out for consultation following its formal submission to the Forest of Dean District Council (the Council) in early March 2018. These represents are made on behalf of our client with a focus in relation to Land at Poolway Farm, which has been promoted by our clients for many years and is a proposed allocation within the Forest of Dean's Site allocation Plan. A Site Location Plan is provided at Appendix 1 showing the extent of land within our clients control. APPENDIX 1- SITE LOCATION PLAN Neighbourhood Plans National guidance makes clear <sup>1</sup> that a neighbourhood plan should support the strategic development needs set out in the Local Plan." Whilst paragraph 16 of the National Planning Policy Framework makes clear that neighbourhoods should: "develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; • Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan" (our emphasis). Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 sets out a series of basic conditions which must be met before a plan or order can be put to a referendum and be made. These are: a. Having regard to national policies and advice contained in guidance issued by the Secretary of State; b. Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses; c. Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area; d. The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development; e. The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); f. The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations; and g. Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan). We have prepared these representations considering these requirements. Forest of Dean District Council The adopted Development Plan for the Forest of Dean District comprises of the following documents: • Forest of Dean District Council Core Strategy (February 2012); • Cinderford Northern Quarter Area Action Plan (February 2012); and • Saved Policies of the Forest of Dean Local Plan Review 2005. The Council is also at an advanced stage of the production of an Allocations Plan which will provide guidance on how the requirements/proposals within the Core Strategy will be implemented as well as replacing the remaining Saved Policies of the Local Plan Review. The Allocations Plan The Allocations Plan's function is to set out how the Council will deliver its development requirements during the Core Strategy period. It therefore makes a series of strategic land allocations which are necessary to deliver the Council's Core Strategy objectives. Coleford is one of the main settlements in the Forest of Dean and is identified by the Core Strategy as one of three towns within which a range of new development will be promoted. For the purposes of the Core Strategy the settlement of Coleford is defined as "Coleford NDP area plus the area of Berry Hill (which is within West Dean Parish and is in the NDP area for the Berry Hill, Christchurch and Edge End NDP). The CS identifies that Coleford will provide for around 650 dwellings. The Allocations Plan was submitted to the Secretary of State for examination on 28th August 2015. The Submission Draft allocated about 3.2ha of land at Poolway Farm for "up to about 80 dwellings". Following the initial hearing sessions in early 2016 the examining Inspector identified in a letter dated 24th June 2016 significant concerns regarding the Allocations Plan, the Inspector requested further work in relation to the Council's OAN calculation. The Inspector made clear that the Plan could not be found sound until such matters had been appropriately addressed. The Council consulted upon a revised version of the Allocations Plan in December 2016 which increased the level of provision from 4,800 dwellings to 6,600 dwellings (i.e. 330 dwellings per annum). As part of this additional sites were identified or as is the case of Poolway Farm the site was extended. This version of the Plan increased numbers up to 140 but based on 4.6ha of the overall site of 5.2ha. Further hearing sessions were scheduled and took place in May 2017. Pegasus Group acted on behalf of MF Freeman at these hearings in respect of Poolway Farm. Following these Hearing sessions, a further consultation exercise on a series of further Main Modifications. The Main Modifications Draft (October 2017) increased the site from about 3.2ha to 5.9ha and an allocation "from up to about 80" to "up to about 140". Alongside these adjustments the Policy made an allowance from the incorporation of at least a 40m buffer on the western edge of the site. The draft policy also makes clear that the existing right of way and hedgerow should be incorporated within this buffer zone. Pegasus made further representations at this stage on specific wording of the draft policy, whilst clearly supporting the policy in principle. The Council submitted these to the Inspectorate in January 2018 and are expecting the Inspector's report imminently (April/May 2018). It is likely therefore that the Allocations Plan will be adopted by the Council within the next few months and prior to the adoption of the Coleford Neighbourhood Plan. It is also evident that the Allocations Plan has been the subject of detailed scrutiny, given the length of preparation and examination, and that the allocation of land at Poolway Farm is required by the Council from a strategic perspective to meet its housing requirement. Coleford Neighbourhood Plan 2017-2026: Submission Document As currently drafted the Coleford Neighbourhood Plan (CNP) proposes to only allocate the Poolway Farm site for 80 dwellings and not include the additional land at Poolway Farm which is to be allocated by the Allocations Plan. M F Freeman Ltd objects to such a proposal as it is illogical, would not be in conformity with the Development Plan and is not supported by robust evidence as we explain in further detail within the remainder of this letter. CNP The CNP proposes instead to allocate Coleford House (up to 20 units) and provide a further 40 units from Berry Hill, Christchurch, Edge End NDP (BHCEE). This allocation is by no means clear in respect of the exact land parcel which is being referred to. We assume this corresponds with Policy AP59 Land at Berry Hill of the Allocations Plan. Part of this site is currently occupied by Gloucestershire College and the Allocations Plan recognises that the College is vacating this site to consolidate its activities in Cinderford. Other land could become available should the rugby club also relocate (though not expected in the short term). The Policy as drafted potentially allows for development of up to 80 residential units as part of any mixed-use redevelopment of the site. The CNP within Table 9 highlights that the BHCEE has allowed for 80 within their area but that CNP allows for a further 40 units. We are unsure as to what this land relates as the Five Acres site falls beyond the CNP boundary and land reference on Map 6 as "9 Lower Lane" is not proposed by the CNP for allocation. As currently drafted it is unclear where the other 40 units are to be found as no site assessment appears to have taken place. In addition, the BHCEE allocation for 80 dwellings

		<p>appears to correspond directly with draft Policy AP59 of the Allocations Plan. However, those 80 units are only deliverable if other parties relocate. Strategic Need The Council has found it necessary to allocate the extended site at Poolway Farm due to the strategic needs of the District cognisant of these previous permissions. As such, they cannot be robustly used as a direct substitute as the CNP proposes. Such an approach would only result in undermining the strategic plan for the District and the CNP cannot therefore be in conformity with the rest of the Development Plan. Regarding the proposed allocation at Coleford House, we note that this may not be a pure residential development as there appears to be an expectation for a mixed-use development. As identified above, if indeed that is what is proposed, is unclear as to Section 5.3 and Policy CH3: what land it relates to and there is a distinct lack of evidence regarding its suitability, availability and location within the current draft. Accordingly, there is no certainty that these sites will deliver the 60 residential dwellings which is in direct contrast to the Poolway Farm site which will be exclusively residential development and is being promoted by a Forest of Dean based developer with a proven track record of delivering such sites. We would also note that the Poolway Farm site is one that has been promoted for residential development since 2013 with active engagement by the developer to the Allocations Plan consultations and examinations. This contrasts with the very limited evidence which appears to exist regarding the alternative options put forward by the CNP which are difficult to discern as to what is proposed on the alternative sites. It is illogical therefore to adopt a Plan which seeks to undermine another part of the Development Plan which will soon be adopted following years of preparation and examination. We consider that if made the CNP will create unnecessary confusion as two parts of the same Development Plan will be in direct conflict with each other. Given the CNP will follow the Allocations Plan it cannot therefore be in conformity with the Development Plan in line with National Guidance. We have identified significant deficiencies with the current drafting of the CNP and it is likely it will be adopted post the adoption of the Allocations Plan. We have significant concerns that the alternatives proposed are not credible and are not supported by any evidence. As such they are not reasonable alternatives and are therefore not suitable alternatives to divert from the strategic allocation at Poolway Farm. Summary In conclusion, we object strongly to the CNP in its current form. We consider it fails to meet the Basic Conditions for Neighbourhood Plans as it proposes a strategy which is contrary to the strategic approach taken by the Forest of Dean Council and cannot therefore be considered to be in conformity with the strategic requirements of the Development Plan. The alternative sites identified are not supported by credible evidence and have not been promoted in a comprehensive way as the Poolway Farm site. Poolway Farm is promoted by a developer who is committed to bringing it forward for residential development, but the certainty is being undermined by the approach of the CNP. We respectfully request that we are invited to any oral hearing sessions to provide further evidence on this issue.</p>
CF12	Mr J Hawkins	<p>Objection is raised to the NDP on the basis of soundness and lack of conformity to the Allocation Plan in its current examination stage with outstanding objections and lack of adequate provision for required range of housing (including affordable housing). Objection is also raised to the lack of conformity to National policy, inclusive of the direction of travel of national policy (taking into account recent decisions of the Planning Courts- decisions precedent. Object to the Defined Settlement boundary, as drawn. This reflects the boundaries prepared for FODDC which remain under examination. The boundaries as currently drawn lack flexibility and are counter-productive to e.g. the housing provision aims of the NDP and other DP documents. Object to map 7 (as above) Object to Housing 5.3. Contrary to housing needs and aspirations being too restrictive and too inflexible. Object to policy CH1. DSB needs to be re-assessed according to needs and constraints. Object to Policy CNE2 Green Ring. Whilst the principle of the policy is supported the Green Ring needs to be reviewed in association with a necessary review of the DSB. As drawn the plan is too inflexible Object to Map 10 (as above) Table 8 needs to be revised and corrected taking account of the decision of the Secretary of State on the Lower Lane Berry Hill appeal. The timing of the NDP is unfortunate. It is respectfully suggested that the Coleford NDP be reviewed to address concerns and if necessary that progress be deferred until the FODDC Allocation Plan has been approved and draft national policy published in its final form. It is not in the interests of the NDP to be Made, only to be superseded or outdated shortly thereafter due to changes in other DP documents and national policy which are expected in the near future. The objections relate to matters of importance, but with review the matters of concern can be addressed.</p>
CF5	Forest of Dean District Council	<p>FoDDC welcomes the further progress of the Coleford NDP. The NDP is currently in its submission version and the FoDDC have supported it in considering that it is in general conformity with the strategic policies in the current development plan. It is also in general conformity with the emerging Allocations Plan (AP) which has yet to be adopted, and covers the same period as both. The AP provides for additional housing numbers required as part of the assessments now required and also the five year land supply calculation. It, in its current form meets the needs so far identified through its examination. The NDP as drafted provides broadly in accordance with these requirements although there is some detailed variance between the NDP and AP. As of April 2018 the AP Inspector's comments or his final report are awaited following his consideration of the representations arising from the MM exercise. On April 11 th an appeal decision permitted an additional major housing site at Berry Hill. This is referred to in the NDP and is commented on below. Housing policies One minor point which may benefit from clarification re CH1 : Although the council (FoDDC) may seek developer contributions on sites of less than 10 dwellings, it is not policy to seek contributions for affordable housing on these sites. CH3- housing allocations outside town centre This policy along with CTC 1 and 2 allocates land for housing. The proposed housing allocations are noted. The manner and time over which they are likely to be delivered will vary, and some variation from the allocations may occur. One site that is of some concern is that at Poolway Farm. We recognise the NDP's concerns for the "green ring" and support the principle of the policy which protects the strategic gap between Coleford and the surrounding settlements. We do however consider that in order to help bring forward the land at Poolway Farm for development and provide the best contribution to housing supply the site should be enlarged from its original capacity of about 80 dwellings to one of about 140. This would inevitably eat into part of the open land between Coleford and Berry Hill but would also enable the site to be developed in a manner that retains the present farmhouse and other buildings. The allocation of a larger site also enables the establishment of a green feature around the existing water course which may be required for flood protection. The draft AP policy includes requirements for major landscaping to the west of the site, something and this and other landscaping will help establish a better defined boundary to the town. The history of the Poolway site is that it was first allocated in the 2005 Local Plan and that it has so far failed to reach the planning application stage. It is understood that it is now likely to come forward and pre application discussions have taken place. These highlighted the above issues as well as the AP inspector's view that the amended site was compatible with the landscape "issues" and serve to support the FoDDC view that the allocation should remain as in the draft AP. (Interim Findings June 2016, para 89). Although the NDP can depart from the proposed FoDDC allocation, for the above reasons it is considered that it would be a more robust document if it did not do so in respect of this site. The NDP does refer to alternative allocations which could compensate for a reduced allocation at Poolway Farm. These are useful sites to draw attention to by allocation and although they could be beneficially developed in the manner proposed it is not clear that they could be reasonably expected to come forward within five years. Lawnstone CTC1 This site has been the subject of a planning application and is now subject of negotiation. It may be appropriate for the NDP to update its text at the time it is finalised. Berry Hill Appeal On 11 th April 2018, a decision by the Secretary of State gave outline permission to a development of up to 180 dwellings at Lower Lane Berry Hill. This development is not supported by the NDP draft nor was it supported by the FoDDC. It is of major significance to the locality and to Coleford so it may be appropriate to record as a matter of fact the situation at the time the NDP is finalised. The site is not considered necessary to provide what is regarded as an adequate land supply as proposed in the Allocations Plan and whilst any current permission is recognised as a commitment it is not intended to allocate the site, although it would be taken into account in any plan review. The site's contribution to the five year supply will also need to be assessed. The statement in the NDP about review of the housing allocations (5.3.18) is noted and given the policy which allocates land (CH3) it is assumed that any change to land allocated would take place as part of the plan (NDP) review.</p>
CF7	Environment Agency	<p>Thank you for referring the Regulation 16 consultation for the Coleford Neighbourhood Development Plan (dated 14 March 2018). You will have received our responses to the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) screening consultation request dated 25 May 2017; the Regulation 14 consultation dated 30 June 2017 and the requested clarification of that consultation in email dated 7 September 2017. This included a copy of our pro-forma guidance for neighbourhood planning and our revised climate change allowances, these documents should inform the neighbourhood development plan as to the necessary flood risk considerations to be taken. Please find attached copies of the pro-forma guidance for neighbourhood planning and our revised climate change allowances for completeness. Having reviewed the Coleford Neighbourhood Development Plan Submission Version (dated 1 March 2018), we note the Old Guardian Office is still allocated for housing. The National Planning Policy Guidance (NPPG) states that: ...' Where the Strategic Flood Risk Assessment, or other available flood risk maps or information, indicates that part or parts of a neighbourhood plan area may be at risk of flooding, the qualifying body will need to have regard to the National Planning Policy Framework's policies on flood risk. Where they are considering proposing development, they should show that this would be consistent with the local planning authority's application of the Sequential Test and if necessary, the Exception Test for the Local Plan.' 'Where areas under consideration for development are not consistent, or the relevant Local Plan is inconclusive, it is likely that the qualifying body will need to provide further information to demonstrate that any development proposed by the neighbourhood plan passes the Sequential Test, and if necessary the Exception Test.' As has been pointed out in previous correspondence, the Old Guardian Office is located in Flood Zone 3 (high risk zone). Flood risk is identified in the plan as a key constraint but further assessment has not been undertaken contrary to the recommendations in our email dated 07 September 2017. As the Old Guardian Office is likely to be a 'change of use', pragmatism might be applied in considering the application of the Sequential Test and Exception Test. The Neighbourhood Plan should consider this fundamental policy requirement in greater detail and provide evidence of any decision making to this end. Whilst residential uses at the Old Guardian Office may be appropriate above ground floor level, subject to safe access to and from the building, further built form may not be acceptable and may increase flood risk to third parties. For residential development, pedestrian access should preferably remain flood free in a 1% river flood event plus climate change. However, in cases where this may not be achievable, it may be demonstrate that pedestrian access is acceptable based on an appropriate assessment of 'hazard risk'</p>

		including water depth, velocity and distance to higher ground (above the 1% river flood level plus climate change). Reference should be made to DEFRA Hazard risk (FD2320) – ‘Danger to People for Combinations of Depth & Velocity’ (see Table 13.1 – DEFRA/EA Flood Risk Assessment Guidance for New Development FD2320 at: <a href="http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/FD2320_3364_TRP_pdf.sflb.ashx">http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/FD2320_3364_TRP_pdf.sflb.ashx</a> In the absence of detailed assessment, the Plan should recognise the limitations of bringing forward residential uses at the Old Guardian Office. The form of development that is appropriate at this location should be informed by a site specific Flood Risk Assessment (FRA). The Plan should reflect the limitations in policy wording or further assessment be undertaken. The National Planning Policy Guidelines (NPPG) contains a useful checklist for FRAs at sub-section 26 of the Flood Risk and Coastal Change section. We would have no comments to make on any of the other site allocations or proposed developments that make up the Coleford Neighbourhood Development Plan and refer to our attached pro-forma guidance. I trust that the above is clear and of use but should you wish to discuss in further detail please do not hesitate to get in touch.
CF9	Hannick Homes	This consultation response is submitted by Hannick Homes in support of the proposed allocation of land off Ellwood Road for residential development (Policy CH3). 1.2 At the outset we wish to congratulate the Neighbourhood Plan Steering Group on the preparation of the Coleford Neighbourhood Development Plan and acknowledge the considerable voluntary time and effort provided by those within the Parish who have been involved in its preparation. 1.3 We have outlined below our comments in relation to Section 5.3 of the Neighbourhood Development Plan which deals principally with the future delivery of housing within the parish. 1.4 We support the allocation of our site at Ellwood Road for 48 dwellings and can confirm that the site is deliverable and can be developed as per the policy aspirations set out in Policy CH3. This site has also been identified as a proposed allocation for 48 dwellings within the Forest of Dean District Council’s emerging Allocations Plan which is at a very advanced stage in the Examination process. Hannick Homes has been working positively with the District Council during the Examination process and we are currently undertaking the preparatory work for a planning application for residential development which will be submitted later this year. 1.5 However, we raise concerns regarding the content of paragraph 5.3.18 of the Neighbourhood Development Plan which states that should the appeal for 180 houses on land North of Lower Lane, Berry Hill, Coleford (appeal ref: App/P1615/W/15/3005408) be allowed then 180 dwellings should be taken off the total allocation for Coleford by removing allocated sites which do not have planning consent. Three sites have been identified as suitable candidates for removal, including Hannick Home s’ site at Ellwood Road, Milkwall. There is no explanation provided regarding the mechanism by which such sites should be removed. Although we question the validity of ad hoc revisions to Development Plan Documents as a result of contentious planning appeal decisions, if such an approach was to be followed it would need to be implemented through a subsequent review of the adopted Allocations Plan and the Coleford Neighbourhood Development Plan, and would need to be subject to the appropriate levels of public consultation. Furthermore, it is worth noting that the Allocations Plan has been through a rigorous examination process with additional site allocations identified during the examination as being required to ensure the District has a robust 5 year land supply. If some of these sites are to be removed a reassessment of the deliverability of sites over the coming 5 years will be required. 1.6 We note that our site at Ellwood Road was identified as a proposed allocation for housing in in the two previous consultation versions of the draft Coleford Neighbourhood Development Plan (Public Consultation Draft dated May 2016 and the Regulation 14 Consultation Version dated May 2017). The Regulation 14 consultation version also included the proviso that the site should be retained as a proposed allocation in the emerging Neighbourhood Plan if it was also allocated in the District Council’s Allocations Plan , which is now the case. It is also worth noting that the proposed allocation of our site at Ellwood Road is not contentious locally and indeed benefited from a high level of support (75%) by respondents to the initial Neighbourhood Plan consultation undertaken in May 2016 (see extract below). The potential removal of this site would be a signification alteration from the earlier iterations of the draft Neighbourhood Plan. Extract from Table 1b on page 75 of the Coleford Neighbourhood Development Plan Consultation Version 2017 see attached document 1.7 Furthermore, if amended in isolation of the Allocations Plan, the Neighbourhood Plan would not be in accordance with the likely adopted version of the District Council’s Allocations Plan, and thus would fail one of the Basic Conditions which a Neighbourhood Plan needs to meet – (i.e. a neighbourhood plan must be in general conformity with the strategic policies contained in the development plan).
CF11	Gladman	This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Coleford Neighbourhood Plan (CNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. On the 11th April 2018, during the course of this Regulation 16 consultation, the Secretary of State issued the redetermined appeal decision (APP/P1615/W/15/3005408) approving our scheme for 180 dwellings on Land north of Lower Lane. The Steering Group should ensure that the implications of this decision are considered in full and that appropriate reference is made to this appeal decision within the CNP. Gladman request for the site to be identified as a commitment within the CNP and that references to the quashed Secretary of State decision from December 2016 are removed. The CNP should not retain policies which seek to restrict the approved development on land north of Lower Lane. A notable example of this being the Policy CNE2 Green Ring designation and Gladman request this designation is removed from the site along with the associated references throughout the document.
CF13	Historic England	Thank you for your Regulation 16 consultation on the Coleford Neighbourhood Plan. Our apologies for not responding before now. I can confirm that there are no comments on the Plan that we wish to make. There are no residual issues of concern associated with our advice offered in response to the previous Regulation 14/SEA consultation.