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Eland House
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19 February 2008

Dear Mr. Bridgman,

Streamlining Local Development Frameworks – Consultation

Thank you for providing the opportunity to comment on these proposals. The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). Individual National Park Authorities may submit separate comments, which will draw on the specific issues for their particular area.

While there is much in these proposals to be welcomed, there are elements which are poorly integrated with other aspects of Government policy, or lack sufficient grounding in the reality of development plan production and of engaging public and partners. Your attention is drawn in particular to the following key points.

1. The new PPS12 should be integrated with other, existing national policy and guidance to explicitly recognise the importance of the National Park Management Plan as providing the over-arching strategy for their areas, and the means to integrate the multiple sustainable community strategies covering a national park. PPS12 should require that national park DPDs, and especially core strategies, must demonstrate that they have had proper regard to the national park management plan as part of their 'Justification' Test of Soundness.
2. The new PPS12 should explicitly recognise that some local planning authorities, such as national park authorities, are not councils, do not have responsibilities for sustainable community strategies, and are likely to have multiple community strategies covering their areas.

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Note that at least one question (C6) posed by the Consultation Document is seriously at variance with the change actually proposed in the draft PPS, while others do not adequately cover the changes proposed by the draft regulations or PPS. Furthermore, the Response Form provided excludes some of the questions posed by the Consultation Document.

Because the Response Form provided does not cover all the questions posed and changes proposed, the Association's response is in two parts. The first deals with those matters not included within the Response Form, the second is the completed Response Form.

We are happy for this response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be of help. Should you require any further clarification of these points, please do not hesitate to contact me in the first instance.

Yours sincerely

Paul Hamblin
ENPAA Director

Streamlining Local Development Frameworks - Draft PPS 12

A detailed response by the English National Park Authorities Association

PART ONE: Issues not covered by the Response Form

Section B. Draft revised regulations

1. The Consultation Document makes no mention of the apparently proposed changes to the treatment of non-site allocation representations contained in the draft Regulation 28. While the apparent simplification of the handling of these is welcomed in itself, the justification for continuing to treat site and non-site representations differently is not explained. It is, in any case, difficult for the public to grasp the distinction and may lead to erosion of confidence in the plan-making system.

Section C: Draft revised PPS12

C1: Emphasis on timely completion of DPDs

2. The importance of timely delivery of DPDs is accepted and supported. However, the Government has two contradictory aims for LDSs. The first is to inform the public of a LPA's programme and, in particular, forthcoming consultations. The second is to provide a fixed framework against which progress is to be measured. These two should be addressed separately, and not confused. The LDSs should focus principally on one role only, with separate provision for the other role.

3. If the aim is to inform the public of a LPA's programme and, in particular, forthcoming consultations, LDSs (or an alternative document) must be readily amendable to reflect the up-to-date situation and expectations. In these terms it is simply unrealistic to say that LDSs should be changed only in exceptional circumstances. The uncertainty of the development process and of political life; the complexities and constraints of the legislative basis of plan-making; and the tendency to seek to complete LDDs in the shortest time possible, when unanticipated circumstances will almost always result in a lengthening, rather than a shortening, of the time required, all conspire to render LDD preparation at significant risk of delay as a matter of course. It is noted that submissions of DPDs for examination were recently running at only 20% of that planned in early LDSs, and that both PINS and Government Regional Offices keep 'informal' timetables of currently expected LDD preparation key dates in addition to the 'formal' records of LDS programmes. Even allowing for inexperience with the new system, this should be recognised as indicating that it is the context that planning operates in, and not the system of plan-making, nor the willingness of local planning authorities, that is the reason for much delay in the preparation of plans.

4. If the aim is to provide a benchmark against which performance can be measured (and perhaps rewarded) then, of course, a fixed point needs to be established and change to this limited. But this cannot properly also perform the previous function.

Changes sought:

The PPS should be amended to allow LDSs to be amended and updated as LPAs see fit, while performance would be measured against either a separate document entirely, or the LDS which was in force at a certain specified date (e.g. at the beginning of the year under review in an AMR, or HPDG).

C2: LDFs as part of joined-up local strategy making

5. The ambition of joined-up local strategy making is supported. It is regrettable that a draft policy document that emphasises the coordination of priorities and policies, should itself fail to be 'joined-up' with other areas of national policy and advice to recognise the importance of other strategies such as national park management plans. This is despite these matters having been identified as an issue for ODPM in the 2002 DEFRA Review of National Parks¹ and the 2004 IHPC Report² which followed it.

6. The mistaken assumption that all LPAs are councils with responsibilities for SCSs is evident in numerous places through the draft PPS. National Park Authorities and the Broads Authority are LPAs, but are not councils (nor, strictly, local authorities); have no responsibility for LSPs or SCSs; and their areas usually encompass several, and sometimes many, different local authority areas and community strategies. The Peak District National Park (where the Peak District National Park Authority is the LPA) has eleven community strategies, for example, each covering a part of the National Park but often focused, and extending, beyond it.

Changes sought:

Paragraphs 1.2, 2.2, 4.34 and 4.35 of the PPS should be amended to explicitly recognise that not all LPAs are councils or local authorities with responsibilities for Sustainable Community Strategies. Paragraph 4.2 also assumes each LPA has a SCS, and should be amended to read 'should be related to the SCS(s) for the area'.

7. PPS12 should be integrated with policy and guidance produced by other arms of government. It should explicitly recognise the significance of National Park Management Plans (prepared under the Environment Act 1995) in providing the strategic vision and priorities for LPA areas where these are National Parks, the basis for partnership working, and the context through which the various SCSs can be integrated and carried forward. In this way planning policy from CLG would be coordinated with policy provided by other arms of government.

8. Guidance from the Countryside Agency³ states that:

'The National Park Management Plan is the single most important document for each National Park... It is the over-arching strategic document for the National Park – central to the future of the Park.

¹ DEFRA Review of English National Park Authorities, 2002.

² National Park Authorities: An Evaluation of Planning Policies. In House Policy Consultancy, March 2004

³ Countryside Agency, 2005, *National Park Management Plans – Guidance (CA216)* (now published by Natural England)

It co-ordinates and integrates other plans and strategies and actions in the National Park... It sets the vision and objectives for the National Park, which will guide the future of the Park over the next 20-30 years. It indicates how the National Park purposes will be delivered through sustainable development.' [underline emphasis added].

9. According to DEFRA⁴ 'the National Park Management Plan should be given renewed importance in government policy advice' and 'ODPM and DEFRA should consider the implications for Parks of Government proposals for reforming the planning system'. The current revision of the new system provides the opportunity to implement these recommendations. We note that this is already the case in Wales, where National Park Management Plans are afforded this reference and recognition in the production of Local Development Plans.

10. National Park Authorities have shown themselves adept at making creative and productive links between national park management plans and development and spatial plans. Under the new plan-making system National Park Authorities have sought, variously, to use existing national park management plans to inform the preparation of their LDF core strategy; prepare a core strategy in tandem with a new national park management plan; or to combine the two in a single document. Each of these approaches has merit, and may reflect particular local circumstances. However, it is not always easy to impress upon others, such as those in the planning sphere and unfamiliar with the situation of national park authorities as planning authorities, the importance of national park management plans when this derives from DEFRA guidance but national planning policy is silent on the matter.

Changes Sought:

The following additional text should be inserted in Section 1 of the new PPS

'In National Parks and the Broads, where there are likely to be a number of different SCSs, each covering only part of the LPA's area, the National Park Management Plan (or Broads Management Plan) provides the overarching strategic document. This coordinates and integrates other plans and strategies in the National Park (or the Broads), and sets a vision and objectives which will guide the future sustainable development of the area over the next 20-30 years. It indicates how the National Park (or Broads) purposes will be delivered through sustainable development. Local Development Frameworks for National Parks (and the Broads) should be closely integrated with National Park Management Plans, and provide the basis for the integration and delivery of the relevant components of the various SCSs in the area.'

Paragraph 4.34 should also be amended to include reference to the National Park Management Plan.

11. It is unfortunate that the title of section 2 of the draft PPS, 'The Importance of Spatial Planning in Creating Strong, Safe and Prosperous Communities', does not reflect the environmental dimensions of planning.

⁴ DEFRA Review of English National Park Authorities.

Change sought:

The title of Section 2 of the PPS should be amended to reflect the environmental dimensions of planning.

C3: Greater flexibility for local authorities to determine which DPDs they will produce

12. Such flexibility would be welcomed, but the draft PPS seems to focus on some rather rigid constraints on the discretion of LPAs to determine the range and content of DPDs.

13. The list of bulleted issues at 5.1 in the draft PPS should be extended to include protection of the environment.

14. There are significant difficulties arising from some of the criteria in 5.2, but these are dealt with separately below (repetition of national and regional policy at C5; and consistency with national policy at C6).

Change sought:

Extend the list of bulleted issues at 5.1 to include protection of the environment,

C4: Greater flexibility for local authorities to allocate strategic sites in the Core Strategy

15. This flexibility is welcomed.

C5: Reduction in complexity and number of DPDs

16. This change seems, in contrast to the wording of the question, to be principally about the exclusion of certain matters from DPD content. There are particular concerns about the PPS seeking to prevent repetition of national policy, and its insistence on consistency with national policy.

17. On repetition (or reiteration) there is a discrepancy between the Consultation Document and the draft PPS. Whereas the Consultation Document suggests that it is not always necessary to repeat national policy, the PPS states that it should not be repeated, a very different thing. The PPSs should be changed to reflect the former, and recognise that there are situations where a repetition of national policy is useful and desirable.

18. The Consultation Document itself implicitly recognises one of the potential justifications for including national policy within a DPD, namely that the latter has development plan status and the former has not. The Act makes it clear that the development plan has a special status, and should be the starting point for determination of a planning application, for instance. There is at least the potential for poor decisions because a significant part of the policy basis has a different status. There is also an important procedural point, in that if the Government wishes its policy, rather than the development plan, to be the

starting point for determinations, it should seek approval for that change from Parliament.

19. More practically, the Government rightly lays great emphasis on community involvement in plan-making, and on 'delivery'. The public, and local authority or national park authority members, expect to see a whole strategy, not half a strategy. It is often difficult for them to see why policies on the most pressing issues in an area are absent from a Core Strategy (or other DPD), and are often suspicious as to what is intended. This can itself generate more work, delay and lack of commitment to the planning process.

20. Further, if Core Strategies are to be effective, they must influence a wide range of parties, including investors, developers, and local communities. This is less likely to happen if plans and policies are not readily accessible and complete. Few of these 'delivery agents', especially in rural areas, are likely to have the knowledge or resources to find, search within, or understand the implications of national policy to gain an understanding of the plans for the area. Their actions and decisions are therefore less likely to be influenced by a Core Strategy (or other DPD) which does not repeat national policy where this provides a necessary full explanation of the policies for an area. It is very difficult for applicants to access and interpret higher level policy documents, especially when the subject matter is not referenced in the local DPDs eg the Core Strategy. This approach is not endorsed by key stakeholders with specific remits, eg RSPB, English Heritage because it appears to them to devalue their interest in decision making and they then request that a policy is inserted in the local document.

21. Turning to the issue of consistency with national policy, it is generally considered that this is a good thing, but that it is in the interests of neither local areas nor, in the long run, Government policy, to preclude deviation from national policy where this is justified.

22. Particular local conditions can result in unintended and harmful results from the strict application of 'one size fits all' national policies. National Parks, because of their special circumstances such as the emphasis on conservation and usually small, dispersed populations, provide examples of where the straightforward application of national policy can result in negative effects. This is perhaps an inevitable symptom of trying to devise policies that should apply across the range of geographical areas from city centres to deep rural, and to areas that are to be managed to achieve quite different benefits. For example, the need in some national parks to provide a special approach, varying from national policy, to the provision of housing because of the special circumstances of lack of affordability, environmental sensitivity and dispersed rural communities, has been recognised in a number of instances by inspectors in relation to local and structure plans and a regional spatial strategy.

23. The PPS should therefore explicitly recognise that special local circumstances may justify a departure from the strict application of national policy, and for the avoidance of ambiguity the use of the phrase 'general consistency' (with national policy) should be used instead of merely 'consistent'.

Change sought:

The PPSs should be changed to state 'it is not always necessary to repeat national policy', rather than 'should not be repeated'.

C7. Making it clear that infrastructure delivery planning to support the core strategy needs to be undertaken satisfactorily

24. PPS12 refers only to infrastructure needed to support development. Infrastructure may be required to meet other key objectives of the spatial vision, eg flood defences, country parks, transport networks (waterways, bridleways), conservation and enjoyment of the environment, and to support existing communities.

Streamlining Local Development Frameworks - Draft PPS 12

A detailed response by the English National Park Authorities Association

PART TWO: Consultation response form

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B: Draft Local Development Amendment Regulations

B1: Improved Consultation Arrangements

<i>Do you support the proposal to remove the requirement to have a stage of consultation in the middle of the process (i.e. regulation 26 Preferred Options)?</i>	Yes	✓
	No	

This proposal is welcomed as it simplifies the regulatory basis of DPD preparation, and provides freedoms to local planning authorities to tailor consultation to suit the nature of their locality and the particularities of each DPD in hand. This is particularly useful in national parks as they often feature small, close knit communities, and very particular circumstances, which may best be addressed through imaginative, and more personal and focused, consultation processes than may suit a large urban area.

The terms 'issues and options' and 'preferred options' are not referred to in the current Act and Regulations, nor in the proposed Regulations and PPS12, and their use to date, with varying interpretations, has resulted in confusion.

Changes Sought:

The terms 'issues and options' and 'preferred options' should be avoided (for instance the proposed Manual), or, failing this, more clearly linked to the legislative framework.

B2: Bringing forward the time for making formal representations on the plan before the point of submission to the Secretary of State.

<i>Do you agree that the period for formal representations on the plan should be brought forward before submission?</i>	Yes	✓
	No	

No objection is made to the proposal to bring forward consultation in advance of submission. It should be noted, however, that this is unlikely, in itself, to lead to any reduction in the overall time required for DPD preparation. While the examination period may be reduced, the pre-submission timetable would probably have to be extended to accommodate the consultation period. There are other significant potential

benefits in this proposal, but only if it were to be combined with arrangements to facilitate amendment of the DPD prior to submission if this is thought necessary in the light of representations received.

The proposal to enable LPAs to consult for a period longer than 6 weeks is welcomed. This will enable consultation to better fit local circumstances and preferences, and facilitate joint consultations in appropriate cases.

Do you think that the process for handling Site Allocations Representations is unnecessarily burdensome?

Yes

✓

No

The current process is exceptionally burdensome. It:

- results in all the bodies being reconsulted with all the paperwork whether they want it or not – this annoys consultees, confirms perceptions that authorities are wasteful, is expensive and time consuming to organise;
- gives the impression that it is the LPA which is promoting the sites – this creates local campaigns which adds an additional task for the LPA to manage; and
- gives weight to proposals which should have been put forward at an earlier stage.

B3. Opportunity for change after formal representations in exceptional circumstances

Do you think we should require (by regulation) Local Planning Authorities to be under a separate and specific duty to consider the representations at this stage, or should this be left to their discretion?

Yes

No

The question above asks does the respondent prefer one approach or another, then requires an answer yes or no, which is illogical.

The opportunity to change proposed DPDs before submission is one of the key potential benefits of bringing forward consultation on proposed submission documents to before actual submission. This would enable LPAs to respond to any significant new issues or opportunities raised by representations at this stage, and, importantly, to any substantially changed circumstances (whether locally or in, say, Government policy) which had arisen in the interim. However, if the new pre-submission consultation is to yield any benefit, there needs to be scope for changes to DPDs that go beyond those circumstances that are ‘unforeseen’ or ‘exceptional’. Pre-submission consultation without scope for changes would be tokenistic at best and could undermine public confidence in the system.

Whilst all concerned would share the Government’s hope that ‘front-loading’ would ensure that all issues and views were raised and resolved in advance of preparation of submission proposals, the experience of local planning authorities suggests that this ideal will not always be realised. Some stakeholders and members of the public find it difficult to engage with abstract ideas and ‘issues and options’, or will respond only when they see formal, detailed proposals. While such representations will only rarely raise significant new issues, there should be the capacity (not available under current arrangements) to deal with them if this occurs.

Such change should be facilitated and recognised by regulation(s), and not require 'withdrawal' of a proposed DPD. The term 'withdrawn' will be confusing to the public, and the withdrawal notification procedures under Regulation 37 are burdensome without any benefit. Instead, representors and other interested parties should simply be notified that the LPA is consulting on revised pre-submission proposals.

It is difficult to give credence to the Consultation Document's suggestion, at page 10, that the process of change would be 'a matter of a few weeks' if the arrangements stand as currently proposed, particularly bearing in mind that democratic processes of consideration and approval of all the steps will also be necessary. Statements such as this and 'producing the changed plan ... should be a relatively straightforward exercise' (also p.10), indicate that the complexities and demands of local consultations and community involvement are too little understood or appreciated.

Where change to a proposed DPD is put forward by the LPA, it would simplify matters for all concerned if regulation(s) provided for consultation on the changes, rather than on the whole plan. This would enable all representations on the remainder of the DPD to stand without requiring action on the part of both LPA and those who have already made representations, and also avoid new issues being raised in relation to proposals which have already been consulted on. Failing this, regulation could provide for existing representations to stand, unless explicitly amended, even if the whole DPD were re-consulted on.

The public find it difficult to understand that a LPA will not consider the representations they may make on a plan. In order to strengthen the public's acceptance of the plan-making system, LPAs should be under an obligation to consider representations. Such an obligation, however, does not have to be open-ended. Regulation should provide that LPAs should consider the representations received at this stage and decide whether they raise significant issues not already taken into account.

Changes sought:

1. Recognition that scope is needed for changes to DPDs after formal representations that go beyond those circumstances that are 'unforeseen' or 'exceptional'; and
2. Amend regulations to allow LPAs to:
 - a. amend and reconsult on DPDs prior to submission without having to withdraw it;
 - b. reconsult only on any changes introduced after pre-submission consultation, rather than the whole DPD;
 - c. treat original pre-submission consultation representations as continuing to stand (in the event of further consultation) unless explicitly withdrawn; and
 - d. oblige LPAs to consider consultation pre-submission consultation representations responses, but only insofar as they raise significant issues not already considered.

B4. Allowing Supplementary Planning Documents to be issued in accordance with policy in documents other than Development Plan Documents

<i>Do you agree that Local Planning Authorities should be able to produce Supplementary Planning Documents based directly on national or regional policy rather than on local policy, provided it does not contravene their Development Planning Documents?</i>	Yes	✓
	No	

The proposal to allow SPDs to be prepared on the basis of regional or national policies (rather than just DPDs as at present) is strongly supported. The current restrictions are believed to have led to significant problems in some instances. The presumption against repetition of national and regional policy in LDFs has created an absurd situation where generalised national policies cannot be interpreted (in a minor but significant way) to address specific local situations without the unjustifiable delay and resources involved in producing a new DPD. In the intervening period there may well be adverse consequences on the ground, and the DPD overtaken by a further change in national policy.

<i>Do you agree that we should draw attention to the possibility that certain key bodies could produce non statutory guidance?</i>	Yes	
	No	✓

Strong objection is made to preparation of supplementary planning guidance by 'other bodies'. This will further complicate an already complex system, and undermine the LPAs' role and responsibilities in spatial coordination. It is difficult to reconcile with the statements in the current and draft PPS12s, in particular in relation to the central role of the Core Strategy, the 'community led' aspect of policy, and the emphasis on partnership. On a practical level it will make it yet harder for developers, investors and interested parties to know what are the complete set of policies and plans for an area, and to understand their relative weights.

There already exists provision for the preparation of joint SPDs, and much good practice on the ground in joint working between LPAs, and between LPAs and other bodies, to provide supplementary (or development plan) policy across geographic boundaries and in relation to particular shared policy issues.

Changes sought:

Delete references to preparation of supplementary planning guidance by any other than the LPA.

B5. Changes to Regulations to reduce administrative burdens

<i>Do you agree that only specific consultation bodies must be sent copies of the Development Plan Document?</i>	Yes	✓
	No	

These proposals are welcomed, as far as they go, as the distribution of unwanted documentation has been not just wasteful but embarrassing to LPAs. However, there should be a further rationalisation of the lists of consultation bodies who must be sent all materials, with at least provision for them to opt out of receipt of these.

Change sought:

Amend regulations to allow consultations bodies to opt out of receiving documentation should they wish to do so.

C Changes to PPS12

C3. Greater flexibility for local authorities to determine which Development Plan Documents they will produce

Do you agree that the criteria listed in Planning Policy Statement 12 are useful and cover all aspects needed? What else should be included or changed?

Yes

No

✓

Such flexibility would be welcomed, but the draft PPS seems to focus on some rather rigid constraints on the discretion of LPAs to determine the range and content of DPDs.

The list of bulleted issues at 5.1 in the draft PPS should be extended to include the need for protection of the environment.

There are significant difficulties arising from some of the criteria in 5.2, but these (repetition of national and regional policy; justification and effectiveness; consistency with national policy) are dealt with separately below.

Change sought:

Amend the list in paragraph 5.1 to include the need for protection of the environment.

C6 Re-presenting the tests of soundness in a way which avoids duplication with legal processes and makes it clear why testing for soundness matters

Do you agree that the proposal to focus on justification and effectiveness will make the tests clearer, and the process of examining plans more transparent?

Yes

No

✓

The text of the Consultation Document is seriously misleading and at odds with the changes proposed by the draft PPS. The Consultation Document states that the proposal is to replace the nine current tests of soundness with just two - justification and effectiveness. The draft PPS adds a third - consistency with national policy.

The change to the two principles of justification and effectiveness is strongly supported. The addition of a specific test of 'consistent with national policy' is not.

The objection to any specific test of 'consistent with national policy' is that this may be interpreted as precluding variation from national policy where it is justified and desirable in particular local circumstances, and it gives this one criterion undue weight. Instead, relationship to national policy is more appropriately part of the test of justification (at paragraph 4.36) rather than a separate test in itself. Furthermore, the criterion should be 'general consistency'.

It is in the interests of neither local areas nor, in the long run, Government policy, to preclude deviation from national policy where this is justified.

Particular local conditions can result in unintended and harmful results from the strict application of 'one size fits all' national policies. National Parks, because of their special circumstances such as the emphasis on conservation and usually small, dispersed populations, provide examples of where the straightforward application of national policy can result in negative effects. This is perhaps an inevitable symptom of trying to devise policies that should apply across the range of geographical areas from city centres to deep rural, and to areas that are to be managed to achieve quite different benefits. For example, the need in some national parks to provide a special approach, varying from national policy, to the provision of housing because of the special circumstances of lack of affordability, environmental sensitivity and dispersed rural communities, has been recognised in a number of instances by inspectors in relation to local and structure plans and a regional spatial strategy.

The PPS should therefore explicitly recognise that special local circumstances may justify a departure from the strict application of national policy, and for the avoidance of ambiguity the use of the phrase 'general consistency' (with national policy) should be used instead of merely 'consistent'.

Changes sought:

1. Delete 'consistent with national policy' from the tests of soundness.
2. Insert 'generally consistent with national policy, with any departures demonstrated to be warranted by local circumstances and evidence', or similar, in paragraph 4.36.
3. Amend paragraph 4.32 to clarify that departures from the detail of national policy may exceptionally be justified by local circumstances, where this meets the overall aims of national policy and the objective of sustainable development.

C8 Extending the lifespan of the Core Strategy to 15 years

<i>Do you agree with the proposal to extend the lifespan of the Core Strategy to 15 years?</i>	Yes	
	No	✓

The text of the draft PPS underestimates the challenges of planning effectively for uncertainty. While it may be true in some cases that a longer time horizon will reduce the need for review, it is probably more likely that the reverse will be the case if the longer time frame involves significantly more uncertainty or likely changes in, say, regional policies, and hence robustness. It is also likely to involve more work and take longer to prepare Core Strategies to such a horizon. Therefore it would be preferable to say that the time horizon should be a minimum of 10 years, but preferably 15 or 20 where this is practicable, and normally the same period as the relevant RSS.

Changes sought:

Amend paragraph 4.13 to state that the time horizon should be a minimum of 10 years, but preferably 15 or 20 where this is practicable, and normally the same period as the relevant RSS.