



Report to Canterbury City Council

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MIHT

an Inspector appointed by the Secretary of State
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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO
THE HERNE BAY AREA ACTION PLAN
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 13 August 2009

No examination hearing was held

File Ref : PINS/J2210/429/4

1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
- (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Herne Bay Area Action Plan DPD (AAP) in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 I am satisfied that the AAP meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted AAP against the advice set out in paragraphs 4.51 - 4.52 of Planning Policy Statement 12 (PPS12). In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the legal requirements and/or to make the document sound in accordance with PPS12. None of these changes should materially alter the substance of the AAP and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.4 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the Examination in terms of justification, effectiveness and consistency with national policy.
- 1.5 **My overall conclusion is that the Herne Bay Area Action Plan is sound, provided it is changed in the ways specified in this report. The principal changes which are required are, in summary:**
- (a) the inclusion of a more robust assessment of the existing situation in Herne Bay and a clearer vision for the town's future;**
 - (b) the provision of greater detail with regard to what it is proposed to deliver; and**
 - (c) the strengthening of the mechanisms for delivery and monitoring.**
- 1.6 The Report sets out, in Annex 1, all the detailed changes required to ensure that the AAP meets the legal requirements and is sound.

2 Legal Requirements

- 2.1 The Herne Bay Area Action Plan is contained within the Council's Local Development Scheme (LDS) dated March 2009. There, it is shown as having a submission date of May 2009. However, the submission was delayed until August 2009 in order that the Council could undertake negotiations with a number of statutory bodies, with a view to agreeing minor changes to wording that would overcome their concerns. The submission AAP generally reflects the proposed subject matter as set out in the LDS.
- 2.2 Unusually the AAP has been prepared in advance of the Core Strategy. The policy framework is therefore primarily provided by the Canterbury District Local Plan (First Review) which was adopted in July 2006. Chapter 2, Appendix A and parts of appendices B, C and D of the AAP clearly set out the framework provided by the local plan.
- 2.3 The South East England Partnership Board has indicated that the AAP is in general conformity with the approved Regional Spatial Strategy (the South East Plan - SEP) and I note that policy EKA4 of the SEP specifically encourages the urban renaissance of the east Kent coastal towns. I consider that this adds weight to the Council's decision to prepare the AAP at this stage.
- 2.4 Based on the evidence I have been given and following visits to the town I concur with the Council that it is right to pursue its ambition to regenerate and revive the economy and image of Herne Bay as a matter of priority. I consider it is appropriate to produce the AAP in advance of the Core Strategy and also that the AAP would not unduly prejudice future overall policy for the District as a whole or for adjoining communities. I am satisfied that the preparation of the AAP has been generally in accordance with the LDS.
- 2.5 The Council's Statement of Community Involvement (SCI) has been found sound by the Secretary of State and was formally adopted by the Council in April 2007. It is evident from the documents submitted by the Council, including the Regulation 30(d) and 30(e) Statements and its Self Assessment Paper, that the Council has met the requirements of the SCI.
- 2.6 Alongside the preparation of the AAP it is evident that the Council has carried out a parallel process of sustainability appraisal. Four options were considered and assessed against 19 sustainability objectives. Key issues that were identified following public consultation were addressed under five themes and 21 policies were drawn up by the Council that were also considered against the sustainability appraisal objectives.
- 2.7 The sustainability appraisal concluded that the proposed submission draft of the AAP would have a range of significant and minor positive effects. There would be no significant negative effects and the minor negative effects could be avoided, mitigated or reduced. Following

consultation the Council proposed a small number of changes which resulted in some further minor positive effects. I am satisfied that the AAP has been subject to appropriate sustainability appraisal.

- 2.8 The site is close to wildlife sites of European importance. In accordance with the Habitats Regulations, I am satisfied that a Stage 1 Assessment has been undertaken and that, as a result of the changes proposed by the Council, there would be no significant harm to the conservation of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) or the Thanet Coast and Sandwich Bay Ramsar site as a result of the policies and proposals within this AAP.
- 2.9 I consider that the AAP has regard to the sustainable community strategy for the area (the East Kent SCS – 2009).
- 2.10 I am satisfied that the AAP complies with the specific requirements of the 2004 Regulations (as amended) including the requirements in relation to publication of the prescribed documents; availability of them for Inspection and local advertisement and the notification of appropriate bodies.
- 2.11 Accordingly, I consider that the legal requirements have all been met.

3 Justified, Effective and Consistent with National Policy

- 3.1 The AAP is founded on a robust and credible evidence base and it is the most appropriate strategy when considered against reasonable alternatives. I am therefore satisfied that the AAP is justified in terms of participation, the evidence base and the consideration of alternatives. It is also consistent with national policy. The outstanding issues all relate to matters of effectiveness.
- 3.2 I have identified the main issues as:
 - 1) whether the vision and objectives are appropriate and sufficiently focussed;
 - 2) whether the AAP's policies will result in the successful regeneration of Herne Bay; and
 - 3) whether the AAP is sufficiently focussed on implementation, sets out clear mechanisms for delivery and monitoring and is flexible enough to deal with change.

Issue 1: The Vision and Objectives

The Vision

- 3.3 The AAP has been produced in advance of the Core Strategy. The latter will be expected to contain an overall vision for the District, strategic objectives, a spatial strategy, a delivery strategy and a monitoring framework. However, there is no clear statement in the AAP regarding the relationship of the document to the forthcoming Core Strategy and I consider this to be necessary in order to clarify the process that the Council is following.
- 3.4 I accept the Council's justification for bringing forward this AAP, in order to provide the policy framework for the regeneration of Herne Bay. However, it is important that there is clarity regarding what the AAP seeks to achieve and how those achievements will be measured.
- 3.5 In order that the origins of the policies can be appreciated I consider it is necessary for the AAP to specifically identify the issues that it is seeking to address. Flowing from these issues should be a focussed vision for the town and from the vision will stem the policies and proposals that will seek to ensure that the vision is delivered.
- 3.6 Although there is reference to the regeneration and revival of the economy and image of Herne Bay, there is no specific vision identified. Such a vision, however, is explicitly set out in the Council's Corporate Plan (2008-2012) and for reasons of consistency and clarity the vision should be included in the AAP.
- 3.7 In this way the process becomes clearer; links can be identified between the issues, the vision, the objectives and the policies; and the success of the AAP can be appropriately monitored and measured, thus improving the effectiveness of the document, particularly in terms of deliverability.
- 3.8 In the same way, in order to strengthen the effectiveness of the AAP, there should be a record of the assumptions upon which the document is based. This not only contributes to the foundation for the AAP but will facilitate the monitoring process because, should any element of the AAP fail to materialise, the Council will be able to assess whether or not it is as the result of the initial assumptions that were made.
- 3.9 The Council has provided a list of issues to be addressed and a summary of the assumptions on which the AAP is based. These stem from several sources including the Options Consultation Document (2006) and the public consultation responses and I am satisfied that their content is appropriate. I am also satisfied with and support the Council's vision for the town.
- 3.10 Accordingly, in order to improve deliverability and monitoring, the AAP should state the assumptions upon which the content of the document is based, identify the existing issues in the town and establish a clear

vision for Herne Bay. The AAP should also include an explanation of how the document will relate to the forthcoming Core Strategy. The changes set out in Items 1, 2, 4 and 41 of Annex 1 are necessary to make the document sound and I recommend them accordingly.

R1	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 1, 2, 4 AND 41 OF ANNEX 1
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The Objectives

- 3.11 Among the main objectives of the AAP are to deliver the redevelopment of Key Opportunity Sites as a catalyst for the regeneration of the town; to create a thriving town centre; to provide improved facilities for residents and visitors; to improve the public realm and to improve the attractiveness of Herne Bay as a visitor destination.
- 3.12 The AAP identifies three major town centre redevelopment sites, where a range of land uses are proposed. Further improvements are proposed elsewhere, for example at the Pier and the Memorial Park. Permeability through the area will be increased, in particular between the town centre and the sea front.
- 3.13 I consider that the stated objectives provide an appropriate framework through which the regeneration of the town can be achieved, except for the fact that there is no specific reference to the pier in the objectives or in the policies. The Council's Corporate Plan affords critical priority to the regeneration of the pier and I agree that the delivery of a revitalised pier could be a key element in the regeneration of the town and should therefore be specifically recognised in the objectives and in policy HB11. Consequently I recommend the changes set out in items 3 and 30 of Annex 1 because they are necessary to make the document sound.

R2	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 3 AND 30 OF ANNEX 1
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Issue 2: Whether the Policies will Lead to the Successful Regeneration of Herne Bay

Land Uses

- 3.14 The AAP includes a suite of 21 policies which indicate the direction which the Council wishes to take towards the regeneration of the town. However, a number of them lack sufficient detail and clarity and

consequently reduce the effectiveness of the document and limit the ability for appropriate monitoring to be undertaken.

- 3.15 Whilst I recognise the need for a level of flexibility, I consider it is important that the document sets out clearly the aspirations of the Council and identifies in more detail the proposed uses. Therefore I consider that a reference should be made to the proposed land uses, the number of residential units and the amount of floorspace for retail, leisure, health, Gateway and office uses. This will provide a clearer reflection of the Council's ambitions and a more specific framework against which progress can be monitored. It would also clarify the situation for prospective developers and other interested parties.
- 3.16 I agree with the Council that because of the current economic climate and the need to make progress on the regeneration of the town, such figures should not be set in stone. Therefore I accept that the figures should be referred to as indicative and placed within the supporting text. In this way the Council's aspirations are clear but an appropriate level of flexibility is retained.
- 3.17 No land uses are proposed which were not identified in the submission document and I am satisfied that the figures proposed by the Council are appropriate, bearing in mind the Retail Need Assessment Study, the size, location and ownership of the sites and the work that has already been undertaken, for example with regard to the expansion of the facilities at Herons Leisure Centre.
- 3.18 To that end specific references to the indicative levels of proposed development on the three Development Opportunity Sites, as set out in Items 8, 15 and 20 of Annex 1, are necessary to make the document sound and I recommend them accordingly.

R3	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 8, 15 AND 20 OF ANNEX 1
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Retail Core

- 3.19 With regard to strengthening the retail core I have given careful consideration as to whether or not the "range of unit types and sizes" which is referred to in policy HB5, should be specifically set out. However, in the current economic climate and having regard to the need for flexibility, I conclude that a precise description within the policy of all unit types and sizes would be too prescriptive.
- 3.20 I am recommending that guidance on overall retail floorspace figures is included in the AAP (10,000 – 12,000m² in Central Development Area; 400 – 600m² at Beach Street; and 2,500 – 3,000m² on bus depot site). However, I consider that the inclusion of a further reference to floorspace in the section on 'Strengthening the Retail Core', would be appropriate for reasons of clarity, consistency and delivery. A reference to the approach that the Council will adopt

towards determining applications for additional retail floorspace in the town centre would also improve the effectiveness of the AAP.

- 3.21 Based on the information in the Retail Need Assessment Study (December 2007) and the Supplementary Update (2008) I am satisfied that the level of retail development put forward by the Council would not harm neighbouring centres and that the requirements of Planning Policy Statement 4: Planning for Sustainable Economic Growth would be met (particularly policies EC3, EC4 and EC5 which relate to town centres).
- 3.22 Therefore I recommend the insertion of some explanatory text, at the end of paragraph 3.14 (as set out in Item 25 of Annex 1) summarising the Council's approach to this matter.

R4	CHANGE THE AAP IN ACCORDANCE WITH ITEM 25 OF ANNEX 1
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- 3.23 There are a number of references in the AAP, both in the text and in the policies, to proposed and existing land uses but some of them are incomplete or imprecise. For example no advice is given with regard to where the existing market should relocate – so in theory it could move to anywhere in the town. For reasons of clarity I consider it should be indicated that the market should relocate within the town centre, thus continuing to contribute towards the vitality and viability of central Herne Bay.
- 3.24 In terms of deliverability it would be beneficial to set out the additional facilities that are proposed at Herons Leisure Centre and consequently policy HB10 should be expanded. Reference should be made to leisure uses in policy HB1; to the potential uses that would help to revitalise the pier; and to the uses that the Council will seek to ensure are retained along the seafront. A plan should be included which shows the pedestrian routes to be enhanced.
- 3.25 For reasons of clarity, consistency and completeness I recommend changes to the text of the AAP, as set out in Items 13, 26, 27, 29, 31, 32, 37, 38 and 39 of Annex 1, in order to make the document sound.

R5	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 13, 26, 27, 29, 31, 32, 37, 38 AND 39 OF ANNEX 1
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The Development Opportunity Sites

- 3.26 The submitted AAP includes three lengthy Appendices (B, C and D) relating to the three main Development Opportunity Sites. The Council's intention was to publish these separately as Development Briefs for the three areas.

- 3.27 They include some information which contributes to the soundness of the document but there is also much repetition, including descriptions of the areas; design, layout and landscaping criteria; and the planning policy context. All DPDs should be concise and focussed and convey essential messages in a clear and convincing way. In order to achieve this objective the appendices should be deleted and the relevant text from them incorporated into the main body of the document.
- 3.28 Accordingly the text of the AAP should be condensed with the deletion of Appendices B, C and D and the relevant paragraphs from those appendices relating to site descriptions, principles of design and layout, land uses and flood prevention, should be included in the main body of the text. Further clarification regarding the consequent Supplementary Planning Documents should also be added. This will aid delivery and monitoring of the policies. The changes as set out in Items 6, 7, 9, 10, 11, 12, 14, 17, 18, 19, 21, 22, 23, 28, 58, 59 and 60 of Annex 1 are necessary to make the document sound and I recommend them accordingly.

R6	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 6, 7, 9, 10, 11, 12, 14, 17, 18, 19, 21, 22, 23, 28, 58, 59 AND 60 OF ANNEX 1
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Wildlife Protection

- 3.29 The sea front of Herne Bay is close to the western edge of the Thanet Coast and Sandwich Bay Special Protection Area and Ramsar site (wildlife sites of European importance). In order that the AAP provides an accurate and appropriately detailed reflection of the consequences of these nearby designations, and because of the potential consequences for delivery and monitoring, I consider it is necessary to up-date and add more information to the supporting text and to policies HB16 and HB17, on this matter. The changes as set out in Items 33, 34, 35 and 36 of Annex 1 are necessary to make the document sound and therefore I recommend them.

R7	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 33, 34, 35 AND 36 OF ANNEX 1
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Flooding

- 3.30 Part of Herne Bay Town Centre falls within an area at risk from sea flooding and policy HB2 (Beach Street) refers to residential use on upper floors (as proposed to be amended by the Council). However, the Beach Street Development Opportunity Site lies within the Rapid Inundation Zone, where under present day conditions, according to the Environment Agency, a '200 year' event could result in up to 0.6m depth of flooding on the site.

- 3.31 The Herne Bay AAP Flood Risk Assessment (FRA), however, concludes that "the developments proposed should be permitted in principle subject to approval in detail by the Environment Agency" and that an individual FRA for each site should be produced at planning application stage.
- 3.32 The FRA confirms that first floor residential development would be safely above predicted sea flood levels. It also states that the duration of the worst of the potential sea flooding would not be long, that all new property would have a safe refuge above flood level and that the proposed development would be a maximum of 150m away from higher ground.
- 3.33 In circumstances such as this, development would need to pass the Exception Test as set out in Planning Policy Statement 25: Development and Flood Risk (PPS25). In particular it must be demonstrated that the development would be safe and paragraph 8 of PPS25 refers to safe access and escape routes where required.
- 3.34 The Environment Agency advises that current best available information suggests that the Exception Test can not be passed and therefore the residential element of the development is unlikely to be deliverable.
- 3.35 On the other hand, the Council has confirmed that the delivery of the Beach Street redevelopment is likely to be dependent on an element of residential development. I consider that the benefits of this Development Opportunity Site would be significant, particularly in terms of enabling improved access between the town centre and the sea front, in improving the character of the conservation area and in meeting the requirements of Planning Policy Statement 3: Housing, in terms of making efficient and effective use of previously developed land.
- 3.36 In this situation the advice of the Environment Agency needs to be balanced against:
- the conclusions of the FRA;
 - the reliance of the Beach Street redevelopment, in terms of viability, on the inclusion of an element of residential floorspace;
 - the importance of the Beach Street redevelopment to the regeneration of Herne Bay;
 - the lack of specific detail in the proposals for Beach Street as set out in the submission document;
 - the requirement of PPS3: Housing to make efficient and effective use of previously developed land; and
 - the fact that the site is within a conservation area.
- 3.37 I am mindful that there remains a level of uncertainty regarding the precise impact that a flood event is likely to have. For example the Council refer to the changes in ground levels across the site and have

concluded that "at the back of the proposed buildings virtually the full length would be above the flood level".

- 3.38 PPS25 advises that a risk-based approach to flooding should be adopted at all levels of planning. However, I have been given some contradictory evidence regarding flood risk and at this stage I consider that the wording of policy HB2 (which includes the requirement that the Environment Agency must be satisfied with any scheme), is sufficiently robust to encompass any issues which become apparent when a more detailed proposal is drawn up.
- 3.39 An alternative to making a specific reference in the policy to residential development on upper floors would be to refer only to 'mixed use development'. Whilst this would allow flexibility in the interpretation of the policy, it would not reflect the Council's aspirations for the site in sufficient detail and would therefore be of less value to prospective developers and other interested parties.
- 3.40 In these circumstances I conclude that every opportunity for the formulation of an acceptable and viable scheme should remain available at this comparatively early stage in the evolution of the Beach Street site. If when consideration is given to detailed schemes it transpires that there are matters with regard to flooding that can not be satisfactorily overcome, then the policy, as proposed by the Council, includes the proviso that 'floor levels and access and egress arrangements of any residential development proposed shall be subject to agreement with the Environment Agency'. I therefore support the Council's argument on this matter and consider that the wording of policy HB2 should be as is proposed by the Council.
- 3.41 There are, however, a number of points of clarification with regard to flood risk assessments, floor levels, flood zones and the rapid inundation zone which should be included within the AAP in order to reflect current advice on these matters. These amendments will improve the effectiveness of the document.
- 3.42 Consequently the amendments as set out in Items 10, 16, 18, 24 and 28 of Annex 1 are necessary to make the document sound and I recommend them accordingly.

R8	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 10, 16, 18, 24 AND 28 OF ANNEX 1
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The Sewerage System

- 3.43 The sewerage system in Herne Bay has little spare capacity and the Council provided advice on this issue in the appendices of the submitted AAP. However, I am recommending that the appendices on the three Development Opportunity Sites be deleted/subsumed into the main body of the document and therefore the references to the sewerage system would be lost.

- 3.44 I consider that for reasons of clarity and delivery the AAP should indicate that foul sewerage capacity is a matter that will have to be addressed in any redevelopment schemes and that further advice is included in the 'Development Principles' for each of the Opportunity Sites.
- 3.45 Southern Water, with the support of the Council, suggested wording for cases where the sewerage capacity would be insufficient, which included a reference to the requirement for the developer to requisition a connection to the sewerage system.
- 3.46 However, a recent Supreme Court judgement (*Barratt Homes Ltd v Dwr Cymru: point of connection to a public sewer*, 9 December 2009) states that (a) a developer has the right to specify the point of connection to the sewerage system regardless of whether or not existing capacity is adequate, and (b) the cost of the works to accommodate the increased load on the public sewer should be borne by the sewerage undertaker. This means that requisitioning by the developer is no longer an appropriate mechanism by which the demand from new development can be met.
- 3.47 I have therefore decided not to include a reference to requisitioning but have made it clear that sewerage capacity is an issue that has to be addressed and that early contact with Southern Water is advisable. Consequently the amendment as set out in Item 5 of Annex 1 is necessary to make the document sound and I recommend it accordingly.

R9	CHANGE THE AAP IN ACCORDANCE WITH ITEM 5 OF ANNEX 1
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Issue 3: Whether the AAP Satisfactorily Encompasses Delivery, Monitoring and Flexibility

- 3.48 One of the elements which will aid the effectiveness of the AAP is the ease with which it can be monitored. Chapter 8 of the AAP explains the monitoring and delivery processes; the mechanisms that will be used to ensure the effective implementation and monitoring of the document; and sets out (as far as practicable) the timetable for the implementation of the proposals.
- 3.49 However, there are a number of changes which would add clarity and further emphasise the importance of these elements of the process. Changes are also required in order that the contents of Chapter 8 reflect the other changes that I am recommending be made to the AAP.
- 3.50 Updates are required to all the columns in Tables 1 and 2 and specific reference needs to be given to the Annual Monitoring Report both in

the Tables and in the supporting text. Consequently I recommend the amendments to the document as set out in Items 40 and 43-57 of Annex 1 (which are the up-dates) because, in terms of effectiveness, they are necessary to make the document sound.

- 3.51 With regard to flexibility, PPS12 advises that Plans should be able to show how they will handle contingencies and that Authorities should not necessarily rely on a review of the document as a means of handling uncertainty.
- 3.52 The three development opportunity sites form the backbone of the AAP. The Council is the major land owner of the Central Development Area (CDA) and is a part landowner at Beach Street. The bus company already have planning permission for a new bus depot elsewhere in the town and all the indications are that this relocation will proceed. I am satisfied that good progress is being made on all three of these significant sites.
- 3.53 The Council has been committed to the regeneration of Herne Bay for many years and the regeneration initiative is identified as a critical priority in the Council's Corporate Plan (i.e. the highest priority). The Council has established a Corporate Project Team to support the delivery of major projects and a Senior Project Manager is employed within this team, with responsibility for delivering the regeneration of Herne Bay.
- 3.54 On the evidence I have been given I am confident that there is little likelihood of that commitment being reduced, especially as the Council is such a major stakeholder. Steady progress is already being made towards the delivery of the various schemes, for example through negotiations with land owners, the appointment of a development partner for the CDA and the commissioning of a report into the future of the pier.
- 3.55 In a tightly constrained town centre the scope for flexibility and the formulation of realistic alternatives which would meet the Council's objectives, is very limited. In these circumstances and bearing in mind the progress that has already been made, I consider that the Council's reliance on the annual review of the Corporate Plan, the Annual Monitoring Report (AMR) and the existence of the dedicated Project Manager to handle any contingencies that arise, is an appropriate approach.
- 3.56 However, in order to emphasise the significance of the AMR and the Corporate Plan, I recommend that supporting text which clarifies the Council's position is added to paragraph 8.5 under the sub-heading 'Flexibility', as set out in Item 42 of Annex 1.

R10	CHANGE THE AAP IN ACCORDANCE WITH ITEMS 40, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56 AND 57
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4 Minor Changes

- 4.1 The Council wishes to make some minor changes to the submitted AAP in order to clarify, correct and update various parts of the text. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy. These changes are shown in Annex 2.

5 Other Policies and Text

- 5.1 For the avoidance of doubt I have examined all the remaining policies and text of the AAP which are not specifically referred to above and find them sound.

6 Overall Conclusions

- 6.1 I conclude that, with the amendments I recommend, the Herne Bay Area Action Plan satisfies the requirements of s20(5) of the 2004 Act and is sound, in accordance with PPS12.

David Hogger

Inspector

Annex 1: Schedule of Recommended Changes

Annex 2: Schedule of Minor Changes