

Issue 3	Placemaking	
Development Plan reference:	Page 12, paragraphs 3.5-3.6, pages 16-17, table 3.1	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr George Adam (037603) BP North Sea Infrastructure (040619) Cockburn Association (037249) Edinburgh Association of Community Councils (040476) Eskbank and Newbattle Community Council (891202) Mr Jon Grounell (786916) Gullane Area Community Council (037068) Haddington and District Amenity Society (HADAS) (803807) Juniper Green Community Council (028859) Mr Ray Kirk (928384) Mrs Jennifer Marlborough (024817) Mr Mike Martin (798523) Mrs Mirabelle Maslin (928549) D and L McAuslan (040611) Midlothian Green Party (778339) Moorfoot Community Council (906008)</p>	<p>NHS Lothian Public Health and Health Policy (840024) National Trust for Scotland (040626) North Berwick Community Council (035522) Paths for All (034382) Peebles Community Trust (810911) Police Scotland (040584) Rosewell and District Community Council (790523) Roslin and Bilston Community Council (790524) RSPB Scotland (031480) Rural Renaissance (039402) Scottish Enterprise (790575) Scottish Environmental Protection Agency (790577) Scottish Government (034404) Scottish Natural Heritage (790587) Mr Charles Strang (907037) Trinity Community Council (039995)</p>	
Provision of the Development Plan to which the issue relates:	Placemaking Principles to guide development in the city region.	
Planning Authority's summary of the representation(s):		
<p><u>Mr George Adam (037603)</u> Placemaking principles includes two headings that require further comment, namely Resource Efficient and Easy to Move Around including the impact of housing in Linlithgow and Winchburgh on school places in the next five years.</p> <p>Plan should be more positive in regard to sustainable housing and renewable energy at the building stage.</p> <p><u>BP North Sea Infrastructure (040619)</u> SDPA should remind planning authorities of requirements for allocations and applications in pipeline areas.</p>		

Cockburn Association (037249)

Coalescence of existing settlements should be avoided.

Questions how to successfully apply placemaking principles along linear growth corridors.

General support for placemaking principles, but recommends that residents should be consulted on effects of growth and the optimum size of where they live.

Stronger protection should be given to protect prime agricultural land and to ensure that green land should only be used for development which cannot be accommodated on brownfield land.

Edinburgh Association of Community Councils (040476)

Support. Brownfield sites may be suitable for mixed use development and housing at greater densities than greenfield, leading to less land use and closer proximity to jobs and public transport.

Eskbank and Newbattle Community Council (891202)

It is to be hoped that objections to proposed developments will be considered valid if these principles are not applied.

The principle that LDPs must be aligned with relevant community plans in paragraph 3.6 is very positive. The Placemaking Principles (Table 3.1) are sound and strongly supported.

Mr Jon Grounsell (786916)

Landscape should not be relegated to an aspect of place-making. It has greater significance and should be a key driver informing the Plan.

Gullane Area Community Council (037068)

Garleton Hills south of Haddington should be included under 'Distinctive'.

Haddington and District Amenity Society (803807)

The amount of new housing proposed is too high and high housing demand needs to be balanced against potential negative impacts of over development.

Questions whether a growth corridor in East Lothian is appropriate.

Table 3.1 should be amended to make specific reference to the cultural heritage of the landscape, including the Firth of Forth and the coast.

Juniper Green Community Council (028859)

Placemaking along linear transport corridors will be difficult, if not impossible, to achieve successfully.

Mr Ray Kirk (928384)

Representation supports the plan's approach to delivering high quality places.

Call for a more holistic approach to developer funding involving local authorities

and central government.

Notes Calderwood development receiving 6 stars in Designing Streets assessment. Representation looks to promote the role of 'exemplar' developments for new housing.

Mrs Jennifer Marlborough (024817)

Current and recent development plans for high density housing in Leith, Newhaven and Waterfront area do not comply with Placemaking Principles. High density, multi-storey, unattractive developments in Leith and Waterfront area are lacking in sympathy or consideration for nearby residents and conservation areas. Lack of Greenspace and communal areas. Pressure on schools and health services, and traffic management.

D and L McAuslan (040611)

Support principles. Important to prevent coalescence, maximise contribution of natural and historic environment, protect views and setting, protect public spaces from traffic noise and pollution, consider people before movement of vehicles and provide access to green/open space. Important to apply principles to smaller communities.

Mr Mike Martin (798523)

Implementation of principles in developer led system will be difficult. Community needs ability to veto plans.

Mrs Mirabelle Maslin (928549)

How can it be assured Principles are upheld.

Contribution of natural and historic environment should be maximised.

Areas of archaeological significance should be protected in the Plan.

A more robust approach required to ensuring developers provide green space.

Midlothian Green Party (778339)

Support the Placemaking Principles but there needs to be a stronger incentive for developers to comply with them.

Moorfoot Community Council (906008)

Unclear how planning authorities will be able to commit to community engagement.

Unclear how principles will be delivered.

Some principles in MIR not included.

NHS Lothian Public Health and Health Policy (840024)

Section would be improved by a specific reference to the Place Standard as a tool to achieve placemaking.

Placemaking principles indicate that development should be located away from functional flood plains and areas of medium to high flood risk. The health impacts of flooding are universally negative in the short and long term. Flood prevention should mitigate against unavoidable risk rather than be adopted as an approach to allow development in otherwise unsuitable locations.

National Trust for Scotland (040626)

This is limited to micro level - plan should recognise a regional perspective including the need for large scale residential and industrial to deliver high quality environments. Plan should address need to enhance and link sites to natural heritage.

North Berwick Community Council (035522)

Support Placemaking Principles but not the growth corridor to North Berwick.

Essential planners and Reporters have a clear understanding of Placemaking Principles and are willing to apply them to reduce inappropriate development.

Should include Garleton hills under 'Distinctive'.

Urge the Plan to identify and designate a CAT that extends around the entirety of North Berwick (west, south and east).

Many of the elements of the Placemaking Principles including resource efficient and easy to move around cannot be achieved by development in North Berwick.

Paths for All (034382)

Welcome the adoption of placemaking principles in developing the spatial strategy. Trust that the commitments and principles outlined will be implemented in such a way that they directly influence the location, form and purposes of development throughout the duration of the Plan.

Peebles Community Trust (810911)

Support principles and specific reference to flood plains.

Welcome the references under paragraph 3.6 to development frameworks, masterplans and design briefs that are aligned with relevant community plans and have been developed jointly with local people.

Police Scotland (040584)

Consideration should be made to contacting Police Architectural Liaison Officers on development. Encourage adoption of Secured by Design and Crime Prevention Through Environmental Design (RSD01) and Planning Advice Note 77 Designing Safer Places (RSD02). Sensible and practical levels of security are essential for the success and sustainability of any development / project. To this end, Police Scotland need to work closely with industry.

Rosewell and District Community Council (790523)

Do not agree with welcoming principle as in practice developer contributions are going elsewhere.

Roslin and Bilston Community Council (790524)

Neighbourhood Plans could be used for greater involvement of local people.
Essential to also involve younger people.

Need structure in place to ensure principles are upheld.

Character of Roslin should be protected.

Use of Brownfield sites before Prime Agricultural Land has not happened in practice. Local authorities overpowered by developers. Development on greenbelt land should not be considered until there are no remaining brownfield sites.

Stricter standards and enforcement required to increase energy efficiency of new developments.

RSPB Scotland (031480)

Opportunity should be taken to introduce biodiversity enhancements.

Should be noted that brownfield sites are often much richer for nature, particularly richer than prime agricultural land and greenfield land. Any development of brownfield sites and concomitant loss of habitat should, therefore, be accompanied by an Environmental Impact Assessment and any loss of biodiversity should be mitigated for by the provision of suitable habitat in new brownfield developments and on suitable sites elsewhere.

All new housing should have high low carbon and green credentials. This should be made clear within the SESplan.

Rural Renaissance (039402)

Development principles should be amended to make reference to the presumption in favour of sustainable development set out in SPP. Should direct LDPs to refer to the 13 measures of sustainability and show how these will be used to assess individual applications. This is particularly important in assessing sites that come forward when there is judged to be a lack of effective housing land. SPP is explicit that in these circumstances the presumption in favour of sustainable development is paramount. This needs to be reflected in SESPlan policy dealing with this issue and it needs to be given greater importance.

Scottish Enterprise (790575)

Add introduction to table itself.

Scottish Environmental Protection Agency (790577)

Considers Plan does not conform to principle in SPP of avoidance of increased flood risk.

Development should be located away from functional flood plains and areas of medium to high flood risk.

Agree areas of flood plain should be safeguarded for water quality / attenuation

and habitat but these are not compatible uses these are functions. Consider recreation a benefit but need clarification that only certain types of recreation may be compatible provided these do not affect storage / conveyance.

Welcome inclusion of Heat Mapping in principle but should include other types of high heat demand including industrial, retail, business and leisure uses. Should also include other types of heat supply including waste or excess heat sources.

Placemaking principles in the proposed plan (table 3.1, page 16) should include the aims and objectives of the Cleaner Air For Scotland strategy (Scottish Government 2015) (RSD21).

Scottish Government (034404)

Whilst it is appropriate for LDPs to provide the detailed policy for protecting and promoting the natural and historic environment, it would also be relevant to strengthen the references to the significance of these policy issues for the whole SESplan area.

Scottish Natural Heritage (790587)

Concerned Principles too vague and open to interpretation. A more succinct and robust test of requirements is needed to focus relevant Local Development Plans on the key issues related to long term and strategic growth.

Seek greater clarity on public transport, impact on landscape, access to open space and new open space, strategic green network connections, strategic active travel routes, flooding, local services and community facilities and creation of place.

The use of 'should' leaves actions open for debate.

Placemaking Principles should reference the "Tools for Making Better Places" as set out in paragraph 57 of Scottish Planning Policy.

Highlight the importance of the Proposed Plan in guiding Local Authorities towards utilising Design Frameworks and Development Briefs.

Consider it would also be appropriate to highlight in the plan cross boundary areas where such co-ordination may help guide significant change

Mr Charles Strang (907037)

Placemaking principles should include the requirement that all places made should include 'beauty' amongst their characteristics, as was promoted in an earlier Scottish Architecture Policy.

Trinity Community Council (039995)

These principles are highly laudable and we commend them but to be meaningful, they must be enforced on the ground.

Modifications sought by those submitting representations:

BP North Sea Infrastructure (040619)

The Proposed Strategic Development Plan should be amended to refer to the consideration of statutory safety exclusions zones. It is recommended that paragraph 3.6 of the Proposed SESplan is amended to include the following statement: 'The SESplan Assets on page 4 illustrate many of the key natural and historic assets of international, national and regional importance. The specific land take requirements of development will take into consideration statutory safety exclusion zones or health and safety consultation zones.' □

Cockburn Association (037249)

Paragraph 3.5, Line 4 after 'community' Insert 'As a first step, SESplan member authorities should consult communities on the proposed growth for the Region, Line 5 after 'will' Insert 'then'.

Paragraph 3.6, line 5 after 'afforded' Insert 'protection giving greater weight to Placemaking criteria in making decisions'.

Table 3.1

Safe and Pleasant, add new bullet point:

'New greenspaces need sensitive landscape design which reflects their countryside heritage and retain views, large open spaces and important features such as trees which mitigate climate change'.

Welcoming, add at the end of the 2nd bullet:

'.....especially provision of play areas, both formal and natural.'

Adaptable, 1st bullet add:

'The enhancement of green networks and green belt for the benefit of people and wildlife is important and adequate resources should be allocated for this work'.

Resource Efficient, add new bullet:

Brown field sites will be given the highest priority as green land should only be used for essential development that cannot be accommodated on brown land.

Add new bullet:

'The climate for Scotland is predicted to become significantly wetter and stormier and guidance should be given on afforestation; flood defences; avoiding building on flood plains; building techniques to minimize flood damage and on places with high winds to help the area adapt to climate change.'

Easy to Move Around, insert new bullet after the first bullet:

'On recreational networks, which are used by a variety of activities (walking, jogging, cycling, horse riding etc.), a code of behaviour for users should be devised and promulgated to contribute to the safety and enjoyment of people e.g. cyclists in particular need to be encouraged to ride responsibly and use their warning bells'.

Edinburgh Association of Community Councils (040476)

Insert sentence stating that brownfield sites may be more suitable at higher densities, requiring less land take, are closer to employment and support public transport.

Haddington and District Amenity Society (803807)

Table 3.1 should be amended to make specific reference to the cultural heritage of the landscape, including the Firth of Forth and the coast.

In relation to Haddington particularly, the Garleton Hills and Traprain Law are essential additions.

Mrs Jennifer Marlborough (024817)

Build attractive, less dense properties incorporating village type communities that will accommodate a wide range of occupants. Ensure all development plans are tenure blind rather than affordable housing being segregated.

Mrs Mirabelle Maslin (928549)

Plan must direct authorities to reject any more such developments and to require the higher standard of design. Contribution of natural and historic environment should be maximised. Areas of archaeological significance should be protected in the Plan.

NHS Lothian Public Health and Health Policy (840024)

Include reference to the Place Standard as a tool.

National Trust for Scotland (040626)

This is limited to micro level. Plan should recognise a regional perspective including the need for large scale residential and industrial to deliver high quality environments. Plan should address need to enhance and link sites to natural heritage.

North Berwick Community Council (035522)

Wish the Plan to acknowledge and reinforce the need for planners, developers, and the Scottish Government's Reporter Unit, to apply and abide by the place-making principles. Plan should include views around East Lothian. Plan should recognise the significance of gateways to the town and identify, designate and adopt a CAT that extends around the entirety of North Berwick. The Plan needs to acknowledge the limitations of existing public transport hubs and infrastructure to extend public transport to and from North Berwick.

Peebles Community Trust (810911)

Easy to move around - strengthen first statement - stronger reference to walking and cycling networks within settlements - involves retro-fitting / upgrading in-settlement systems, particularly in settlements outside the central area.

Rosewell and District Community Council (790523)

Facilitate more involvement from the communities and base development on Neighbourhood Plans and not developer demands.

Roslin and Bilston Community Council (790524)

Include details on how principles can be achieved in practice.

RSPB Scotland (031480)

Biodiversity enhancements incorporated into buildings and other infrastructure

should be referred to in the plan under the place making principle 'adaptable'. Under the 'Resource Efficient' heading, reference to requirement for EIA when building on brownfield land should be added.

Include development of design guidance to ensure that new homes are low carbon and meet high environmental standards. SESplan could set an aspiration for all new homes to meet Code for Sustainable Homes standards.

A biodiversity assessment should be required for brownfield land to ensure that valuable habitats and species are not adversely affected.

Rural Renaissance (039402)

Amend development principles to make reference to the presumption in favour of sustainable development set out in SPP.

Scottish Enterprise (790575)

Add introduction to table itself stating: 'Underpinning the overall spatial strategy is the need to achieve good place-making, and this is critical for local and regional economies to perform. High quality mixed-use, compact, walkable neighbourhoods are the fundamental building blocks of communities that engender a strong sense of place. Good place-making can help provide strong added value, in helping to maximise the economic value of land, assist with economic development in attracting and retaining talent, and in delivering positive health and environment outcomes too.'

Scottish Environmental Protection Agency (790577)

The statement should be rephrased to: "Development should be located away from functional flood plains. Functional flood plain is generally defined as areas of medium to high flood risk. Development should also be located away from areas liable to surface water, groundwater or coastal flooding. Vulnerable land uses, such as hospitals and schools need to be located out with the 1:1000 year flood extent." Alternative acceptable rewording is: "Development should be located away from functional flood plains (see glossary) and areas of medium to high risk of flooding from all other sources. More vulnerable land uses such as hospitals, schools, care homes, and critical infrastructure should be located out with the 1:1000 year flood extent".

Resource Efficient bullet 6 should be rewritten as: 'Areas important for flood storage and conveying capacity should be safeguarded for water quality management, flood attenuation, and habitat creation as well as compatible recreational uses.'

Principles should include other types of high heat demand including industrial, retail, business and leisure uses. Should also include other types of heat supply including waste or excess heat sources.

Placemaking principles in the Proposed Plan (table 3.1, page 16) should include the aims and objectives of the Cleaner Air For Scotland strategy (Scottish Government 2015) (RSD21).

Scottish Government (034404)

Add to the end of paragraph 3.6 “Natural and historic assets contribute significantly to the quality of the environment for the plan area and it is important this heritage is protected and promoted across SESplan.”

Scottish Natural Heritage (790587)

Strengthen principles generally. Suggest that the principles are reviewed to focus on key issues and what 'must' happen rather than what 'should'.

Mr Charles Strang (907037)

Table 3.1 Placemaking Principles: a requirement should be added to this table that development should also be 'beautiful'.

Summary of responses (including reasons) by Planning Authority:

Long Term Growth Corridors

Cockburn Association (037249), Haddington and District Amenity Society (803807), Juniper Green Community Council (028859), North Berwick Community Council (035522)

The long term growth corridors, as established through the Proposed Plan Spatial Strategy, are used to direct growth, beyond 2030, to established settlements and locations which have good, or potential for good, public transport access and within acceptable travel times to the city. This ensures new development is sustainable in terms of movement both locally and to the city, that there are established local services and access to wider services and that the impacts on the quality of the natural environment are minimised. They do not allocate development in a linear fashion. SESplan does not therefore consider that the Placemaking Principles are contrary to the Spatial Strategy or long term growth corridors. **No modification proposed.**

Development and Placemaking Principles and Functional Floodplain

NHS Lothian Public Health and Health Policy (840024), Scottish Environmental Protection Agency (790577)

It is noted that it could potentially be interpreted that the principle of development within the strategic growth areas is established through the Spatial Strategy and Key Diagram Figure 3.1. Whilst paragraph 3.6, Placemaking in the City Region, instructs that development should take account of the Placemaking Principles in table 3.1, it is considered however, that further clarification could be provided at strategic level. This would be in order to confirm that areas of growth do not mean that development here will be universally acceptable and that constraints, including flooding, may mean that some sites within growth areas are not suitable for development. This is consistent with the Proposed Plan Strategic Flood Risk Assessment and Strategic Flood Risk Addendum (ASD01 and ASD53).

If the Reporter is so minded, the wording in paragraph 3.6 could be made clearer to reference that any sites within areas of strategic growth will be subject to assessment of a range of considerations such as flood risk in LDPs and at detailed planning stages and that the Resource Efficient Placemaking Principle could reference that development should be located away from functional flood plains and areas of medium to high risk.

It is not, however considered necessary to include additional wording on specific vulnerable land uses (e.g. hospitals, schools etc.) as these are more appropriate detailed considerations for Local Development Plans.

It is also noted that not all types of recreation will be appropriate in areas important for flood storage, as per Resource Efficient principle bullet 6. It is considered that the use of the word 'compatible' in this bullet implies that not all recreational uses will be appropriate.

No modifications proposed.

Scottish Planning Policy

BP North Sea Infrastructure (040619), NHS Lothian Public Health and Health Policy (840024), RSPB Scotland (031480), Rural Renaissance (039402), Scottish Environmental Protection Agency (790577), Scottish Natural Heritage (790587), Mr Charles Strang (907037), The National Trust for Scotland (040626)

Strategic Development Plans are to be concise documents with no requirement to repeat the contents of Scottish Planning Policy or other elements of national policy. It is not therefore considered necessary to repeat this in relation to the Placemaking Principles.

Reference to the use of the Place Standard tool is made in paragraph 3.5. **No modification proposed.**

Application and Delivery of Principles

Eskbank and Newbattle Community Council (891202), Mr Mike Martin (798523), Mrs Mirabelle Maslin (928549), Midlothian Green Party (778339), Moorfoot Community Council (906008), North Berwick Community Council (035522), Paths for All (034382), Roslin and Bilston Community Council (790524), Scottish Natural Heritage (790587), Trinity Community Council (039995)

The Placemaking Principles, by inclusion in the Strategic Development Plan, forms part of the overarching Development Plan for all local authorities. The principles are required under the planning system to be reflected though Local Development Plans and any supporting masterplans, design briefs or guidance and delivered through relevant Development Management decisions. The Principles use of the word 'should' is to ensure there is sufficient flexibility where this is necessary. **No modification proposed.**

Land Designations

Cockburn Association (037249), Mrs Mirabelle Maslin (928549), Roslin and Bilston Community Council (790524), RSPB Scotland (031480), The National Trust for Scotland (040626)

The Placemaking Principles support the contribution which historic and natural environments make to the region. Re-use and re-development of brownfield sites is promoted ahead of greenfield land including agricultural land. It is noted that brownfield sites can have greater biodiversity value than some greenfield sites. It is considered that a balanced approach to sustainable development is required across the region and that this approach is promoted through the Placemaking Principles and Green Networks. **No modification proposed.**

Place Specific References

Mr George Adam (037603), Mr Jon Grounsell (786916), Gullane Area Community Council (037068), Haddington and District Amenity Society (803807), Mrs Jennifer Marlborough (024817), North Berwick Community Council (035522), Peebles Community Trust (810911), Mr Ray Kirk (928384), Roslin and Bilston Community Council (790524)

The Placemaking Principles make limited reference to specific places in the region. This does not mean that any particular areas are not intended for protection or enhancement. It is considered that Local Development Plans will have the opportunity to be more place specific when applying these principles through masterplans, design briefs and so on. **No modification proposed.**

Landscape and Coalescence

Cockburn Association (037249), Mr Jon Grounsell (786916), D and L McAuslan (040611), Roslin and Bilston Community Council (790524)

The Placemaking Principles support the Spatial Strategy in terms of avoidance of coalescence and are considered to form a strong basis by which the character of existing places can be reinforced or enhanced and a strong basis for the creation of new places with unique characters. It is considered that the region's landscape is central to the Placemaking Principles and its importance reinforced by the spatial Strategy. **No modification proposed.**

Community Involvement

Cockburn Association (037249), Eskbank and Newbattle Community Council (891202), Mr Mike Martin (798523), Moorfoot Community Council (906008), Roslin and Bilston Community Council (790524)

Consultation and community involvement in shaping the development of places is cited as a requirement in paragraph 3.5 of the Proposed Plan and paragraph 3.6 states that development frameworks, masterplans and design briefs will align with community plans. This provides a basis for community involvement in development which can be implemented by SESplan's member authorities. Further detail would not be considered relevant with the Strategic Development Plan itself.

Consultation on the location and scale of development takes place at a number of different stages in the planning system, including but not limited to SDPs, LDPs, Supplementary Guidance and consultation on major applications. **No modification proposed.**

Developer Contributions

Mr Ray Kirk (928384), Rosewell and District Community Council (790523)

The Placemaking Principles are not intended as specific guidance to developer contributions or funding. **No modification proposed.**

Detailed Principles

Mr George Adam (037603), Edinburgh Association of Community Councils (040476), D and L McAuslan (040611), Mrs Jennifer Marlborough (024817), Mrs Mirabelle Maslin (928549), Moorfoot Community Council (906008), Police Scotland (040584), Rosewell and District Community Council (790523), RSPB Scotland (031480), Mr Charles Strang (907037), The National Trust for Scotland (040626)

The Placemaking Principles intentionally do not give detail on smaller scale issues,

such as specific house design, nor do they contain every aspect which could be considered as an aspect of place.

The need for sustainable buildings with renewable and low carbon technology is noted and location and orientation of development is included in the Placemaking Principles under resource efficient and is also referenced in the Low Carbon Economy section paragraphs 4.24 - 4.29.

Density is an important consideration for sustainable development and this is reflected in the Supporting Non-Car Travel section of the Proposed Plan (paragraphs 6.1 - 6.4), however, as different densities are appropriate for different sites, or even different densities over one site, specific detail on density should be considered on a site by site basis.

The nature of the plan means that the principles, whilst reflecting key aspects and important considerations for the region, are strategic in their remit. It is considered that Local Development Plans, design briefs and masterplans will provide the opportunity for more detailed and specific design considerations. **No modification proposed.**

Introduction

Scottish Enterprise (790575)

The suggested introductory paragraph is noted, however, the suggested addition wording focuses on residential development and economic benefits. The Placemaking Principles and their application are referenced in the Spatial Strategy paragraphs 3.5 and 3.6 (page 12). It is accepted, however, that as these do not directly precede the Placemaking Principles table 3.1 (pages 16 and 17). If the Reporter is so minded, inclusion of a general introduction directly proceeding table 3.1 may be beneficial. **No modification proposed.**

Natural and Historic Assets

Scottish Government (034404)

It is noted that the references to promoting and protecting the natural and historic environment could be strengthened. If the Reporter is so minded, additional wording on natural and historic assets may add clarity to paragraph 3.6, however these are also referenced within the SESplan Assets pages 4 - 5 and the Placemaking Principles table 3.1. **No modification proposed.**

30 representations in support of the placemaking principles are noted.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]