Suffolk Coastal Local Plan Examination

Hearing Day 9

Matter 3 Area Specific Strategies

Note on Sequential Test related to Flood Risk

1. This note responds to a request from the Inspector during the hearing session on Matter 3 Area Specific Strategies 12.34-12.72 (Tuesday 17th September, AM) to demonstrate how the Sequential Test has been undertaken as part of the process of preparing the plan and allocating sites. This relates to the Inspector’s Matters, Issues and Questions 3.80, 3.106 and 4.29.

2. Inspector’s question 3.80 asked whether the allocation under Policy SCLP12.60 Land Adjacent to Farthings, Sibton Road, Peasenhall within an area of Flood Zone 2 is justified in terms of the Sequential Test. Question 3.106 asked whether the allocation of Land at Street Farm, Witnesham including an area of Flood Zone 3 is justified in terms of the Sequential Test. The Council’s responses to these questions are set out on pages 31-33 and pages 53-55 of the Council’s Matter 3 SCLP12.34 – SCLP12.72 Statement, respectively. These responses explain that whilst there are areas outside of Flood Zone 1 within these allocations, the policies direct development to the parts of the site within Flood Zone 1.

3. Inspector’s question 4.29 asked whether the Plan has taken a sequential, risk-based approach to the location of development as per national policy set out in the Framework. The Council’s response is set out on pages 35-36 of the Council’s Matter 4 Statement and explains that the allocation of sites has been informed by the evidence contained in the Strategic Flood Risk Assessment (SFRA) (Document D23).

4. Paragraph 157 of the National Planning Policy Framework (NPPF) (Document C1) requires plans to apply the Sequential Test, to the location of development, taking into account the current and future impacts of climate change. Paragraph 158 of the NPPF states that the aim of applying the Sequential Test is to steer new development to areas with the lowest risk of flooding, and that the SFRA (Document D23) should provide the basis for applying this test. Added to this, paragraph 163 of the NPPF requires development located in areas of flood risk to demonstrate that within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location.

5. The Planning Practice Guidance (PPG) (Document C2) on Flood Risk and Coastal Change sets out further guidance in relation to applying the Sequential Test. Paragraph 021 sets out a flow diagram (Diagram 2) which shows the process that should be followed in identifying land for development. This diagram is shown in Appendix 1 of this note. Reference is also made in the PPG to Table 1.
(which describes the Flood Zones), Table 2 (which sets out the flood risk vulnerability classification for different uses) and Table 3 (which sets out the compatibility of the vulnerability classifications in each flood zone). Tables 2 and 3 are included in Appendix 2 and Appendix 3 of this note.

6. Under Table 3, residential uses (categorised as ‘more vulnerable’) are identified as being ‘compatible’ with Flood Zones 1 and 2, and employment uses (categorised as ‘less vulnerable’) are identified as being compatible within Flood Zones 1, 2 and 3a. If residential development were to be allocated in Flood Zone 3a the Exception Test would need to be applied. Paragraph 021 of the PPG also states that other sources of flooding will need to be considered through the Sequential Test.

7. The Council has applied the Sequential Test in accordance with Diagram 2 from Paragraph 021 of the PPG (see Appendix 1 of this note), by seeking to steer development to areas with the lowest risk of flooding. Paragraph 022 of the PPG states that the Sequential Test can be undertaken as part of the Sustainability Appraisal or as part of strategic housing land or employment land availability assessments or as part of a free-standing document.

8. The SFRA (Document D23) identifies the spatial variation in flood risk across the District to allow for a comparison of future development sites with respect to flood risk considerations. In this respect, it considers several sources of flooding including tidal, fluvial, pluvial, groundwater, sewer and artificial flooding in order that flooding from a range of sources can be considered in line with the guidance in the NPPF and PPG. As stated in our Matter 4 Statement, the Council has used the evidence provided in the SFRA to inform the application of the Sequential Test. The policy and guidance set out in the NPPF and the PPG for the application of the Sequential Test is set out in sections 4.1.1 and 4.1.2 of the SFRA (Document D23, pages 39-42). In particular, page 41 of the SFRA states that the SFRA provides the tools to undertake the Sequential Test.

9. The principles of the Sequential Test were applied against all sites considered for development through the Strategic Housing and Economic Land Availability Assessment (SHELAA) (Document D10). The SHELAA is an assessment of potential sites which identifies whether there is sufficient land for development to meet the needs for housing and employment land over the Local Plan period. In this respect, the SHELAA assessed the suitability of sites for development based on a number of criteria which included flood risk. Paragraph 2.22 of the SHELAA shows that Flood Zone 3b was considered as an absolute constraint that would make a site unsuitable for development, in line with the national guidance on compatibility set out in Tables 2 and 3 of the PPG (replicated in Appendices 2 and 3 of this note). The criteria against which sites were assessed is contained in Appendix H of the SHELAA (Document D10), with flood risk being criterion 5 (pages 54-55). Where a site was considered to have insufficient developable area outside of Flood Zone 3b a red was attributed to the site, based on the red, amber, green suitability criteria. Amber was attributed to sites within Flood Zone 2 or 3a but the SHELAA did not apply an absolute constraint on development for such sites, in line with Table 3 of the PPG (Appendix 3). Green was attributed to sites not at risk from any flooding. Appendix G of the SHELAA shows sites that were initially excluded on this basis. The mapped information provided with the SFRA have been used to inform this consideration.
10. Surface water flooding has also been considered through the SHELAA, as set out on page 55 of the SHELAA (Document D10), using mapped information set out in the SFRA (Document D23). Where surface water flooding has been identified this has been explained in the SHELAA in relation to individual sites, and has been a consideration in allocating sites for development. Where surface water flooding exists, consideration has been given to the extent in relation to the site area. The Cross Boundary Water Cycle Study (Document D24, paragraph 4.4.14, page 78) explains that areas identified as at risk from surface water flooding should not be excluded solely on that basis and that surface water flooding can often be carefully managed and good site design may reduce risk or even help to alleviate flooding problems downstream. This is reflected in policies for site allocations where surface water flooding has been identified, through a specific requirement for surface water disposal to be in accordance with the water management hierarchy. Policies SCLP9.5 Flood Risk, SCLP9.6 Sustainable Drainage Systems and SCLP9.7 Holistic Water Management would act to reinforce this approach.

11. Flood risk has been further considered through the Cross-Boundary Water Cycle Study (Document D24), with reference back to the SFRA. This presented flood risk on a site by site basis, in relation to sites proposed for allocation, and this evidence has been directly reflected in the Final Draft Local Plan in relation to individual site allocations.

12. As stated above, the SHELAA was used to inform the selection of sites for development. Preferred sites were initially identified in the First Draft Local Plan (Document B4), informed by the Draft SHELAA (Document D12), the Interim Sustainability Appraisal (Document B6) and other evidence as explained in the Topic Paper - Site Selection: First Draft Local Plan (Document D37). Sites currently allocated in the Site Allocations and Area Specific Policies Development Plan Document (Document F2) and in the Felixstowe Peninsula Area Action Plan Development Plan Document (Document F3), which did not have planning permission as at 31st March 2018, were reviewed and carried forward into the new Local Plan (as explained in paragraph 12.19 of the Final Draft Local Plan, Document A1). Following consultation on the First Draft Local Plan, informed by consultation responses and evidence, the Council reviewed the proposed site allocations. As part of this, some additional sites were introduced (and some proposed sites were removed from the Plan). The schedule at the end of this note explains the inclusion of all site allocations which contain any area of land outside of Flood Zone 1, in relation to paragraph 158 of the NPPF. This also includes Existing Employment Areas, identified under Policy SCLP4.1 which are identified as allocations within Chapter 12 of the Final Draft Local Plan.

13. The Sustainability Appraisal (Document A3) also assessed flood risk for each allocation (Appendix B) and alternative site (Appendix D) against Sustainability Appraisal Objective 11 – ‘To reduce vulnerability to climatic events and flooding’. This has formed part of an assessment of sites against a number of other objectives including health, wellbeing, poverty reduction and housing requirements. This has acted as a further assessment to identify how policies will act in relation to this objective, and to further inform the development of the Plan.
14. The majority of sites allocated for development are not identified as including any areas at risk of flooding. Where a potentially suitable site has been identified but includes an area of flood risk, consideration has been given to whether development can occur outside of areas at risk of flooding, consistent with paragraph 158 of the NPPF and Diagram 2 of the PPG on Flood Risk and Coastal Change (see Appendix 1 of this note). This approach has enabled the wider objectives of the Plan to be considered alongside flood risk, consistent with paragraph 159 of the NPPF. This consideration is reflected in the policies and/or supporting text where necessary to ensure that development takes place in a way which is in accordance with the Sequential Test. The policies set out below are those which include areas at risk from flooding. Please note, the flood risk maps in the SFRA referenced for each site do not delineate the boundaries of any sites:

- **Policy SCLP12.3 North Felixstowe Garden Neighbourhood** - The site is allocated for the development of a Garden Neighbourhood including up to 2,000 new dwellings alongside other uses. The development of the North Felixstowe Garden Neighbourhood forms a key part of the strategy of the Local Plan, as set out in Policy SCLP3.2 of the Final Draft Local Plan. Part of the site benefits from outline permission for 560 dwellings, as set out in paragraph 12.31 of the Final Draft Local Plan. The allocated site comprises a number of individual sites put forward for consideration for allocation through the Local Plan process. An area in the northern part of the site allocation is within Flood Zone 2 (SFRA Figure 05.36, page 136) and areas of surface water flooding (SFRA Figure 06.36, page 172) have also been identified. Development is, therefore, expected to be focused away from the northernmost parts of the site and criterion (j) of Policy SCLP12.3 requires a site-specific Flood Risk Assessment. The approach reflects paragraph 158 of the NPPF by steering new development on the site away from areas of flood risk.

References:
- **Sustainability Appraisal Report** – Final Draft Local Plan (Document A3) - page 466
- **Final Draft Local Plan** (Document A1) –
  - Paragraph 12.54, page 203;
  - Policy SCLP12.3 criterion j, page 206.
- **Policy SCLP12.6 Land at Sea Road, Felixstowe** – This site is carried forward from the Felixstowe Peninsula Area Action Plan (Document F3, Policy FPP3, page 30-31). Part of the site is within Flood Zone 3a (SFRA Figure 05.36, page 136). The site is allocated for mixed

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22 Page references herewith for the SFRA refer to the PDF page numbering of the document
use commercial/tourism and 40 dwellings. Criterion (d) requires no residential accommodation on the ground floor along with flood mitigation measures, and the policy is therefore consistent with the approach to locating ‘more vulnerable’ uses outside of Flood Zone 3a, as per Table 3 in the Flood Risk and Coastal Change PPG (see Appendix 3 of this note). Planning permission has been granted (Ref DC/17/3967/FUL) for 48 flats over ground floor commercial units and erection of 11 houses. The Council’s Housing Land Supply Statement Appendices (Document H20, page16) shows that this site is a deliverable site and is expected to be delivered within the 5 year period. As an existing site allocation, the potential suitability of the site has not been considered through the SHELAA relating to the production of the new Local Plan.

References:

- Sustainability Appraisal Report – Final Draft Local Plan (Document A3) - page 478
- Final Draft Local Plan (Document A1) –
  - Paragraph 12.93, page 215;
  - Paragraph 12.101, page 216
  - Policy SCLP12.6 criterion d), page 217.

**Policy SCLP12.9 Land at Carr Road/Langer Road, Felixstowe** – This site is carried forward from the Felixstowe Peninsula Area Action Plan (Document F3, Policy FPP11, page 53-54). Part of the site is within Flood Zone 3a (SFRA Figure 05.36, page 136). Criterion (a) of Policy SCLP12.9 requires a site-specific Flood Risk Assessment. The site is an Existing Employment Area (under Policy SCLP4.1 of the Final Draft Local Plan, page 60-62), and its identification as an allocation reflects the existing role that this site plays in the local economy as set out in paragraph 12.124 of the Final Draft Local Plan (page 223). The site is already in employment use and is home to a number of manufacturing and logistics companies. The approach is therefore consistent with paragraph 159 of the NPPF in that wider sustainable development objectives are relevant. As an Existing Employment Area, the potential suitability of the site has not been considered through the SHELAA relating to the production of the new Local Plan.

References:

- Sustainability Appraisal Report – Final Draft Local Plan (Document A3) - page 485 - 486
- Final Draft Local Plan (Document A1) –
  - Paragraph 12.127, page 223-224;
• Policy SCLP12.9 criterion a), page 224.

• **Policy SCLP12.16 Felixstowe Leisure Centre** – The site lies wholly within Flood Zone 3a (SFRA Figure 05.36, page 136) and the site is recognised as being at risk from fluvial and tidal flooding. The allocation of the site is solely related to the future of the site, in that, the leisure centre currently occupying this site is to be re-provided as part of the development of the North Felixstowe Garden Neighbourhood. Indeed, the policy itself encourages leisure and resort-type uses which are considered to be less vulnerable uses based on the Flood Risk vulnerability classification in the PPG (Appendix 2 of this note). The Council has separately proposed a modification to remove criterion i) which specifically supported the provision of ‘limited residential on upper floors.’ This would enable greater flexibility over the mix of uses that could be provided, where they comply with Policy SCLP9.5.

Paragraphs 12.160 and 12.161 of the Final Draft Local Plan explain that the site is in a high-profile location on the seafront and that significant improvements have taken place in the surrounding area in recent years. The policy sets out a framework for redevelopment of the site to complement the enhancements that have taken place in the vicinity. It would therefore not be appropriate to consider whether the uses could be provided in another location. Further, the Sustainability Appraisal (Document A3, Page 500 – 502) presents positive scorings for this site against objectives relating to reduced poverty and social exclusion, improved health and wellbeing, material assets, cultural heritage, landscape, transport and enhanced economic opportunity. A number of these positive scorings relate to the redevelopment of the site at the seafront location as highlighted in paragraphs 12.160 and 12.161 of the Final Draft Local Plan. This approach is consistent with paragraph 159 of the NPPF.

In respect of the site lying with Flood Zone 3a, criterion (e) of Policy SCLP12.16 requires a site-specific Flood Risk Assessment.

The site was not assessed through the Strategic Housing and Economic Land Availability Assessment as it was identified as being made available for uses other than employment or housing (site 1094).

References:

- Sustainability Appraisal Report – Final Draft Local Plan (Document A3) - page 500 - 502

- Final Draft Local Plan (Document A1) –
  - Policy SCLP12.16 criterion e), page 236.

• **Policy SCLP12.32 Former Council Offices, Melton Hill** – The site was initially identified as potentially suitable for development in the Draft Strategic Housing and Economic Land...
Availability Assessment (Document D12) and, following consultation on the First Draft Local Plan, was subsequently identified for allocation in the Final Draft Local Plan. As identified in paragraph 12.335 of the Final Draft Local Plan the development of this site presents an opportunity to re-use a previously developed site. The site is allocated for the development of 100 dwellings. The eastern part of the site is within Flood Zone 3a (SFRA Figure 05.30, page 130). Criterion (e) of Policy SCLP12.32 requires a site-specific Flood Risk Assessment and paragraph 12.337 of the Final Draft Local Plan (page 288) states that the eastern part of the site should be retained as open space. The approach is therefore consistent with paragraph 158 of the NPPF, in that the policy steers development away from areas at risk from flooding.

References:
- Sustainability Appraisal Report – Final Draft Local Plan (Document A3) - page 541
- Strategic Housing and Economic Land Availability Assessment (Document D10) – Site 993, page 405
- Final Draft Local Plan (Document A1) –
  - Paragraph 12.337, page 288;
  - Policy SCLP12.32 criterion e), page 289.

Policy SCLP12.37 Carlton Park, Main Road, Kelsale cum Carlton – This site is carried forward from the Site Allocations and Area Specific Policies Development Plan Document (Document F2, Policy SSP25, page 71-72). The site is within Flood Zone 3a (SFRA Figure 05.36, page 136). The site is an Existing Employment Area (under Policy SCLP4.1 of the Final Draft Local Plan, page 60-62), and its identification as an allocation reflects the existing role that this site plays in the local economy as set out in paragraph 12.406 of the Final Draft Local Plan (page 304). The site is already in employment use and is home to a diverse mix of employment uses. The approach is therefore consistent with paragraph 159 of the NPPF in that wider sustainable development objectives are relevant. As an Existing Employment Area, the potential suitability of the site has not been considered through the SHELAA relating to the production of the new Local Plan.

References:
- Sustainability Appraisal Report – Final Draft Local Plan (Document A3) - page 555
- Final Draft Local Plan (Document A1) –
  - Paragraph 12.409, page 305;
  - Policy SCLP12.37 criterion a), page 305.
• **Policy SCLP12.60 Land adjacent to Farthings, Sibton Road, Peasenhall** - The site was initially identified as potentially suitable for development in the Draft Strategic Housing and Economic Land Availability Assessment (Document D12) and, following consultation on the First Draft Local Plan, part of the site was subsequently identified for allocation in the Final Draft Local Plan. The allocation of part of the site only, excluded much of the land within Flood Zone 2. The north-eastern corner of the allocated site lies within Flood Zone 2 (SFRA Figure 05.15, page 115), however this is reflected in the Policy. The site is allocated for the development of approximately 14 dwellings. Criterion (f) requires a site-specific Flood Risk Assessment. Paragraph 12.675 identifies that the provision of landscaping would be appropriate in this part of the site and this is reflected in criterion (b) of Policy SCLP12.60 which requires landscaping of the north eastern borders of the site. The approach is therefore consistent with paragraph 158 of the NPPF in that the policy steers development away from areas at risk from flooding.

References:

- Sustainability Appraisal Report – Final Draft Local Plan (Document A3) - page 611
- Strategic Housing and Economic Land Availability Assessment (Document D10) – Site 1042, page 443 (note, the SHELAA relates to the full area of the submitted site)
- Final Draft Local Plan (Document A1) –
  - Paragraph 12.675, page 371;
  - Policy SCLP12.60 criterion f), page 372.

• **Policy SCLP12.72 Land at Street Farm, Witnesham (Bridge)** - This site is carried forward from the Site Allocations and Area Specific Policies Development Plan Document (Document F2, Policy SSP19, page 60-62). The site is allocated for the development of approximately 20 dwellings. A small part of the northern part of the site is within Flood Zone 3a (SFRA Figure 05.25, page 125). Criterion (a) requires a site-specific Flood Risk Assessment (note, criterion d) of the Final Draft Local Plan also requires this however this is duplication and a modification to remove criterion d) is proposed through the Council’s response to Inspector’s question 3.106). Criterion (i) does not allow for development in Flood Zone 3 to ensure no impediments to flows are introduced that could increase the risk of flooding downstream. The approach is therefore consistent with paragraph 158 of the NPPF in that the policy steers development away from areas at risk from flooding. As an existing site allocation, the potential suitability of the site has not been considered through the SHELAA relating to the production of the new Local Plan.

References:

- Sustainability Appraisal Report – Final Draft Local Plan (Document A3) - page 641
• Final Draft Local Plan (Document A1) –
  ▪ Paragraph 12.831, page 409;
  ▪ Policy SCLP12.72 criterion a), page 411
  ▪ Policy SCLP12.72 criterion i), page 411

15. Policy SCLP9.5 Flood Risk (Final Draft Local Plan, Document A1, page 147) sets out an approach in line with the Sequential Test, and also sets a framework for the application of the Exceptions Test, where necessary. The Exceptions Test is a method of ensuring that flood risk to people and property will be managed satisfactorily, and would need to be applied in accordance with paragraph 160 of the NPPF, where relevant under Table 3 of the Planning Practice Guidance on Flood Risk and Coastal Change (see Appendix 3 of this note). Policy SCLP9.5 does not allow for single storey residential developments in areas of high risk of flooding, where the Sequential Test has been passed, and requires development to address flood risk safety. This is aligned with the requirement of the Exception Test – to provide a safe means of access and egress during a flood event and to locate the most vulnerable development in areas of lowest flood risk. As this policy is a development management policy, it will be applied against all site allocations and planning applications, wherever relevant.

16. To conclude, the approach outlined above is consistent with the NPPF and the PPG. The approach has sought to steer development to areas of lowest flood risk, as required by paragraph 158 of the NPPF and as set out in Diagram 2 of the PPG (see Appendix 1 of this note). Flood risk has been assessed through the SFRA (Document D23) and has been considered in the allocation of sites and in drafting appropriate policies, informed by the Strategic Housing and Economic Land Availability Assessment (Document D12) and the Sustainability Appraisal (Document A3).

17. In order to meet the wider objectives of the Plan, appropriate criteria have been included within policies, where relevant, to direct built development away from areas of flood risk.
Appendix 1 – PPG Diagram 2 – Application of the Sequential Test for Local Plan preparation

Can development be allocated in flood zone 1*? (Level 1 Strategic Flood Risk Assessment)

- Yes → Sequential test passed
- No → Tables 1 & 2

Can development be allocated in flood zone 2? (Level 2 Strategic Flood Risk Assessment) – lowest risk sites first

- Yes → Allocate, subject to exception test if necessary
- No → Tables 1 & 2

Can development be allocated within the lowest risk sites available in flood zone 3?

- Yes → Allocate, subject to exception test if necessary
- No → Tables 1, 2 & 3

Is development appropriate in remaining areas?

- Yes → Allocate, subject to Exception Test
- No → Strategically review need for development using Sustainability Appraisal
### Appendix 2 – PPG Table 2 – Flood Risk vulnerability classification

#### Table 4.2 Flood Risk Vulnerability Classifications (Source: NPPF Planning Practice Guidance)

<table>
<thead>
<tr>
<th>Appropriate Use Classification</th>
<th>Examples of Classification</th>
</tr>
</thead>
</table>
| **Essential Infrastructure**  | - Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.  
                                - Essential utility infrastructure which has to be located in a flood risk area for operational reasons need to remain operational in times of flood.  
                                - Wind turbines. |
| **Highly Vulnerable**         | - Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.  
                                - Emergency dispersal points.  
                                - Basement dwellings.  
                                - Caravans, mobile homes and park homes intended for permanent residential use.  
                                - Installations requiring hazardous substances consent. |
| **More Vulnerable**           | - Hospitals.  
                                - Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.  
                                - Buildings used for dwelling houses, student halls of residence, drinking establishments, nightlife and hotels.  
                                - Non-residential uses for health services, nurseries and educational establishments.  
                                - Landfill and sites used for waste management facilities for hazardous waste.  
                                - Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan. |
| **Less Vulnerable**           | - Police, ambulance and fire stations which are not required to be operational during flooding.  
                                - Buildings used for shops, financial, professional and other services, restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in “more vulnerable”, and assembly and leisure.  
                                - Land and buildings used for agriculture and forestry.  
                                - Waste treatment (except landfill and hazardous waste facilities).  
                                - Minerals working and processing (except for sand and gravel working).  
                                - Water treatment works which do not need to remain operational during times of flood.  
                                - Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place). |
| **Water Compatible Development** | - Flood control infrastructure.  
                                - Water and Sewage transmission infrastructure and pumping stations.  
                                - Sand and gravel working.  
                                - Docks, marinas and wharves.  
                                - Navigation facilities.  
                                - Ministry of Defence, defence installations.  
                                - Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.  
                                - Water-based recreation (excluding sleeping accommodation).  
                                - Lifeguard and coastguard stations.  
                                - Amenity open space, nature conservation and biodiversity, outdoor sports and recreation.  
                                - Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan. |
Appendix 3 – PPG Table 3 – Flood Risk vulnerability and Flood Zone ‘compatibility’

<table>
<thead>
<tr>
<th>Flood Zones</th>
<th>Flood Risk Vulnerability Classification</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Essential infrastructure</td>
</tr>
<tr>
<td>Zone 1</td>
<td>✓</td>
</tr>
<tr>
<td>Zone 2</td>
<td>✓</td>
</tr>
<tr>
<td>Zone 3a †</td>
<td>Exception Test required †</td>
</tr>
<tr>
<td>Zone 3b *</td>
<td>Exception Test required *</td>
</tr>
</tbody>
</table>

Key:

✓ Development is appropriate

x Development should not be permitted.