

# Nitrate Mitigation

Report of the Planning Portfolio Holder

## Recommended:

1. That the purchase of 250 nitrate credits from land shown in Annexes 1 & 2 to the report be approved.
2. That the Council releases funding from the unallocated New Homes Bonus Reserve, up to the amount described in section 8 for the purpose of purchasing nitrate credits from the land shown in Annexes 1 & 2 to the report.
3. That authority is delegated to the Head of Planning Policy and Economic Development in consultation with the Head of Finance and Revenues, the Head of Legal and Democratic Services, the Finance Portfolio Holder and the Planning Portfolio Holder to enter into the appropriate Agreement/s securing the purchase and delivery of the nitrate credits from the land shown in Annexes 1 & 2 to the report.

## SUMMARY:

- In order to satisfy the Habitat Regulations certain types of development are required to be nutrient neutral in order to have no adverse impact on The Solent. The absence of mitigation is an impediment to housing delivery.
- In line with the adopted Nitrate Mitigation Framework it is proposed that the Council purchase nitrate credits from Roke Manor Farm. Applicants would be able to purchase these credits.
- In April 2021 Council agreed to the purchase of 250 credits. The Council has reached the stage where it needs to consider whether to purchase an additional 250 credits.

## 1 Introduction

- 1.1 As Local Planning Authority, the Council has been severely affected by the lack of options available to applicants whose schemes are required to achieve nutrient neutrality in order to address the adverse effects on the international designated nature conservation sites (SPAs, SACs and Ramsar sites) in and around the Solent.
- 1.2 The purpose of this report is to seek approval for the purchase of a second tranche of nitrate credits from land at Roke Manor Farm, Romsey and that the second purchase of 250 credits for £750,000 be funded from the New Homes Bonus reserve. This would provide the Council with a mechanism to help unlock current and future planning applications by satisfying the Habitat Regulations.
- 1.3 The attached plan at Annex 1 (with the same site shown at a larger scale in Annex 2) indicates the location of the land where the credits will be generated.

## **2 Background**

- 2.1 The Solent provides one of the most important water environments for wildlife in the United Kingdom, with many parts of its estuary, shoreline and the sea being protected through legislation. The area is home to a wide variety of habitats and species that help to make it special, some of which result in international designations. A number of the habitats, such as the mudflats and saltmarshes, provide essential winter feeding and roosting grounds for tens of thousands of coastal birds that fly from as far as Artic Siberia to spend the winter on the Solent. This includes about 10 per cent of the global population of Brent geese. The area also supports important breeding gull and tern populations. It is unique in Britain for the complexity of the marine and estuarine habitats that are found.
- 2.2 Excessive levels of nutrients (nitrogen and phosphorus) in the water environment are having an adverse effect on international designated nature conservation sites in and around the Solent. These are causing eutrophication, resulting in dense mats of green algae that impact on the internationally protected species and habitats. This must be addressed as required by the Conservation of Habitats and Species Regulations 2017 (as amended) (referred to as the Habitats Regulations). The impact of the condition of these sites is relevant in the context of their conservation objectives and achieving favourable conservation status.
- 2.3 Following the Court of Justice of the European Union judgments, Natural England advised in June 2019 that in order to comply with the Habitats Regulations, all new residential and overnight accommodation development should be nutrient neutral. In taking a precautionary approach, their advice is that it is uncertain as to whether the increase in such wastewater will have an adverse effect on the Solent's international designated sites. As such mitigation is required to be put in place.
- 2.4 This constraint applies to the area of the Borough which falls within the catchments of the River Test and River Itchen and their tributaries, which then flow into the Solent. Essentially this covers the whole Borough, with the exception of a small area around Shipton Bellinger and Cholderton, which falls within the catchment of the River (Hampshire) Avon.
- 2.5 In light of the Natural England advice since summer 2019 the Council has not permitted any affected planning applications which do not achieve nutrient neutral development. In order to satisfy the Habitats Regulations, it needs to be established that planning decisions will not make the situation worse. Any increase in nutrients is deemed significant, however small, due to the in-combination impact and therefore small sites cannot be screened out from the requirements to achieve nutrient neutrality. A mitigation solution is therefore needed in order to enable such developments to proceed where they are otherwise unable to achieve nutrient neutrality, but are deemed to be acceptable in all other planning respects. The absence of a solution is an impediment to housing delivery and a consequential impact on the local economy.

- 2.6 The issue of nitrate mitigation is a controversial one from the perspective of both the development industry and interested parties objecting to development. In April, Council were made aware of a Judicial Review challenge from local objectors to the operation of Fareham Borough Council's nitrate mitigation schemes and the use of the Natural England's nitrate methodology to conduct appropriate assessments as part of the Habitats Regulations. These judgments have now been handed down and whilst amendments are required to Natural England's approach they do not affect the principle of off-site mitigation or nitrate purchase.
- 2.7 Whilst the issue affects a wide geographic area, for Test Valley achieving nutrient neutral development without the provision of off-site mitigation solutions is particularly challenging as the amount of nutrient in wastewater is assumed to be higher in the absence of wastewater treatment works (WwTW) having a permit limit for nitrogen discharge. This means that there is no nitrate stripping at the WwTW taking place. Of the WwTW which serve Test Valley only Millbrook WwTW which serves Chilworth, North Baddesley and Nursling and Rownhams has such a permit limit. There are also rural areas within the Borough which are not served by mains drainage and are therefore reliant on package treatment plants or septic tanks. Achieving on site nutrient neutrality is unlikely to be achieved for all but the large scale greenfield allocations.
- 2.8 The Council continues to explore other options to reduce the scale of the challenge. One approach is for the Environment Agency to undertake a Solent specific nitrogen permit review or formal 'Review of Consents'. Following a meeting of Environment Agency directors on 25 January 2021 to instigate a target review of permits a dedicated officer has now been appointed to lead the review. This is particularly relevant as the Fullerton WwTW and Romsey WwTW do not have permits in place. By reviewing the permits which set the level of nitrates discharged in the water it would reduce the levels of nitrates currently seen. Further details and timescales for the permit review are yet to be confirmed but it is hoped that these will be considered by Southern Water, Environment Agency and OFWAT as part of the five year investment programme for the period 2025-30. However, this option is currently not available to the Council and as such an alternative short term solution needs to be secured. It should also be noted that the providing permits would not eliminate the issue but would mean the size of the constraint may become more manageable.

- 2.9 In the absence of practical mitigation solutions being available at present, the focus is on potential land based off-site mitigation in the form of 'nitrate offsetting' solutions. This concerns taking land out of agricultural production, or significantly reducing the current level of artificial additional nitrogen added to agricultural land from fertiliser and animal waste. This source accounts for between 70-80% of excess nitrates as opposed to that arising from development or other background sources. It can take decades for nutrients in the upper reaches of river catchments to reach the sea. However, as the Habitats Regulations apply to planning decisions, there is a legal obligation on considering the impact of new development in order to avoid exacerbating an existing issue, notwithstanding that the impact of this is relatively minor overall. By taking land out of agricultural production this reduction in nitrates can then be used as a 'credit' to offset the increased nitrogen from new development so that neutrality is achieved. Credits can be achieved either through land acquisition or purchasing credits from third parties.
- 2.10 At its meeting on 27 January 2021 the Council approved the 'Nutrient Neutrality Off-Site Mitigation Framework'. This framework set out the options that could apply once the applicant has completed the NE nitrate methodology. Applicants could a) demonstrate that the development would not lead to an increase in nutrients and would therefore achieve nutrient neutrality on-site; b) provide and secure in perpetuity a bespoke off-site package; or c) provide a financial contribution of £3,000 per kg of nitrogen, plus a £100 fee to cover much of the additional administrative and legal work, to provide off-site mitigation (the nitrate credit tariff).
- 2.11 As part of the Council's agreed approach it was confirmed that the tariff would be used to secure credits either through the purchase of land and/or credits, to provide off site mitigation solutions in order to achieve nutrient neutral development. It was on that basis which officers explored opportunities for mitigation and engaging with landowners on a without prejudice basis. Out of this exercise land at Roke Manor Farm, Romsey was promoted by the landowner for nitrate credit purchase.
- 2.12 The site at Roke Manor Farm extends to 101.5 Ha (250 acres) of which: 40.4 Ha (100 acres) of land used for rearing pigs on for 15+ plus years. The remainder comprises 26.3Ha (65 acres) of mixed woodland and 34.8 ha (85 acres) of traditional (unimproved) Test Valley water meadows designated as a Site of Special Scientific Interest.
- 2.13 The landowner is phasing the removal of the pig farming operation on site and is selling the nitrate credits arising. It has been calculated that the site would provide a total of 2,522 credits. A long term management plan has been agreed with Natural England and the Council. The management plan secures habitat creation through additional tree planting of mixed native species, soil restoration and soil stabilisation through the creation of meadows for an 'in perpetuity' period (i.e. 80+ years). Work has commenced on site in compliance with the management plan.

- 2.14 In April 2021 the Council agreed to the release of £750,000 from unallocated New Homes Bonus reserve to purchase 250 credits from Roke Manor Farm. The purchase was completed in June 2021. Since that time officers have been liaising with applicants and developers and allocating credits to those planning applications where a positive response has been received.
- 2.15 Agreeing an equitable way of distributing the purchased credits is a complex one. Following discussions with the portfolio holder it was agreed to focus the available credits on southern Test Valley housing market area for the purposes of unlocking applications to help supplement the housing land supply. Whilst there is a benefit to housing land supply it should be noted that the impact is relatively small due to some sites who have purchased credits already being accounted for in supply forecasts. There was also an allocation of credits to the northern Test Valley market area. In both instances it was to first offer those applicants who had been waiting the longest for a mitigation solution. At the time of writing of the 250 credits purchased, 218 have been reserved (131 in southern Test Valley and 87 in northern Test Valley) to specific planning applications. This approach would equates to an extra 0.2 years Housing Land Supply (based on the position as at 1 April 2020). In addition a further 21 dwellings which are already included in the supply as they have outline permission, but need mitigation in order for their reserved matters to be permitted, would also benefit.
- 2.16 It is acknowledged that there remains a small surplus of credits which have not been allocated by applicants. However, the Council has to be mindful that there is no ability to control how the landowner disposes of the nitrate credits that they have available. It is completely within the landowner's gift to sell the credits to developers and applicants anywhere within the catchment of the River Test, River Itchen or Bartley Water. Given the lack of mitigation options available across the three catchments there was a risk that credits could be purchased relatively quickly. To safeguard the Council's ability to purchase more credits from Roke Manor Farm a 'first refusal' clause was included in the legal agreement with the ability to purchase a further 250 credits. The clause does require the notification of intention to purchase to be made by 14 September 2021. This clause allowed the Council to make a decision guided by a more informed estimated demand whilst being able to re-evaluate the risks. It should also be noted that the previous Council report highlighted that the purchase of future credits may be required, if justified.

### **3 Corporate Objectives and Priorities**

- 3.1 The Test Valley Corporate Plan (2019-23) sets out that the Council will work with communities and partners to deliver the supply of homes which reflect current and future housing needs. The lack of nitrate mitigation is preventing the majority of relevant planning applications from being permitted. The Corporate Plan also identifies the aim of providing high quality green infrastructure for our communities to enjoy. Subject to the detailed discussion and agreement of the management plan this proposal would help deliver that objective.

- 3.2 The Council's Climate Emergency Action Plan (CEAP) was adopted by the Council in June 2020. The aim of the plan is for the Council to achieve carbon neutrality as quickly as possible. The plan includes the action of continuing to explore opportunities for small scale woodland creation. This action was included because such opportunities would not only reduce carbon emissions via offsetting but also providing ecological mitigation and public recreation to help improve our residents' health and wellbeing. Whilst the site would remain in private ownership the principles of what the landowner is seeking to achieve on site and secured through the management plan are mutually beneficial to the aspirations of the CEAP.
- 3.3 The Council's draft Green Space Strategy (2020) also promotes tree planting and options for future woodland creation. Again, the landowner's aspiration for the site complement the Council's own approach.

#### **4 Consultations/Communications**

- 4.1 The principle of using credits arising from Roke Manor Farm have previously been agreed by both the Council and Natural England. The availability of credits has been the subject of communications with the local development industry and applicants.

#### **5 Options**

- 5.1 There are two options considered in the report, whether the Council notifies the landowner of the intention to purchase a further 250 credits from Roke Manor Farm (option one), or not (option two).

#### **6 Option Appraisal**

##### **6.1 Option One (Recommended)**

- 6.1.1 The principle of purchasing credits has previously been agreed by Council through its nitrate mitigation framework (January 2021) and the initial purchase of credits (April 2021).
- 6.1.2 It is proposed that a second tranche of 250 credits is purchased from Roke Manor Farm. The adopted tariff sets a rate of £3,000/credit with a further £100 to cover additional administration and legal fees. No profit is sought from this approach. The cost would be £750,000 and would be funded from the New Homes Bonus unallocated reserve with the intention that future nitrate tariffs secured through S106 would be used to replenish that budget.

- 6.1.3 The challenge of achieving nitrate neutrality is affecting a significant number of planning applications for residential and overnight accommodation. At the time of writing the total number of credits required to meet the backlog is 275 (189 credits for southern Test Valley planning team and 86 credits for northern Test Valley planning team). These cover those applications which are expected to receive a favourable officer recommendation of permission, but are not currently expected to achieve nutrient neutrality without additional off site mitigation. The opportunity to provide mitigation benefits the delivery of those sites with outline planning permission, and are therefore already included in land supply calculations, and bringing forward those sites which constitute a windfall allowance. It should be noted that the backlog does not equate to a confirmed appetite from the applicant to make use of the Council's approach.
- 6.1.4 In considering this proposal officers have looked to balance a number of factors relating to the site and the landowner's intention and disposal of those credits purchased.
- 6.1.5 The site is 101.5Ha of which approx. 40.4Ha has been used for outdoor pig production. There is an understandable reluctance to mitigate nitrates through taking land out of agricultural production. The loss of the agricultural land should not be seen solely as a mechanism to generate nitrate credits. It is necessary to achieve additional benefits from that land. The Council has worked with Natural England and the landowner to agree a management plan which includes securing the principles of tree planting and habitat creation with the future intention of opening parts of the site to public access. These multiple benefits when combined outweigh the loss of agricultural land.
- 6.1.6 In any event there is no ability for the Council to prevent the landowner from ceasing operation or controlling their intention of selling the nitrate credits arising from the site. It is completely within the landowner's gift to sell the credits to developers and applicants anywhere within the catchment of the River Test, River Itchen or Bartley Water.
- 6.1.7 The implications of this are that the nitrate credits could provide mitigation for sites outside of the Borough and thus help other authorities' housing delivery and land supply calculations at the expense of our own. The landowner could also dispose of the credits to developers within Test Valley who are seeking to promote sites which are contrary to policy. Whilst this may not happen as any credit payment would be dependent on achieving a successful planning permission there is a risk that if the Council's housing land supply fall below five years, being able to demonstrate nitrate mitigation would be a significant material matter in favour of the speculative application. The only ability the Council has to influence how some of the credits are used is through their direct purchase.
- 6.1.8 Purchasing credits would allow the Council to provide the mitigation for the applications currently locked in the planning system. Whilst not exclusive, the tariff approach is aimed at supporting smaller windfall sites from undertaking unnecessary work to locate, negotiate and secure nitrate mitigation. Should credits remain there is scope to help mitigate larger residential developments.

- 6.1.9 At the time of the initial purchase it was identified that it would be difficult to try and gauge future demand for the credits. There was a risk that in purchasing the credits the Council may not be able to dispose of all of them. That risk remains. To reduce the risk any credit purchase must be measured against likely appetite and secured in amounts that would minimise the likelihood of the Council being unable to dispose of them. In December 2020/January 2021 an expression of interest exercise was undertaken. Whilst the level of interest equated to approximately 500 credits the exercise did not give the certainty to justify the risk of a greater purchase.
- 6.1.10 The April 2021 report did identify the possibility that once the mitigation was confirmed it would generate a higher level of interest from applicants and this has been demonstrated. Given the response the Council has had to both the expression of interest exercise held at the beginning of the year and more recent contact with applicants it is considered that the risk of not being able to dispose of the credits purchased is low. Should the Council find itself in the position of not having disposed of all of the purchased credits these could be 'banked' to provide mitigation for the development in the two town centres. This would further reduce the risk.
- 6.1.11 A linked risk relates to the availability of alternative mitigation sites/ credits arising from other landowners, especially if those credits were made available at a lower price. Officers are aware of other schemes within the Borough which are considering being brought forward although at the time of writing there are no other sites within the Borough which are in the same position as Roke Manor Farm. What should be noted is that whilst alternatives could be brought forward the important factor is the speed in which the site and the credits are made available. Roke Manor Farm has that benefit of being able to release credits in a relatively short period with an agreed management plan and legal framework. Officers are also mindful of the availability of other mitigation schemes within neighbouring districts which would be available to applicants. As such there is a risk that applicants may make use of alternative sites and that further mitigation sites will become available during the period where any credits purchased remain unsold. Should that happen those credits can be either used on other applications who choose to remain with the Council's scheme or the credits could be 'banked' for the Council's own development in Andover and Romsey.
- 6.1.12 There is an additional factor of the length of time in recovering the cost of purchase. The agreed approach is that the credits are secured by applicants through individual S106 with the trigger for payment being prior to occupation. This results in a lag between the allocation of credits and the receipt of funds for those credits. It is difficult to know how long that lag would be, 12 months between permission being granted and occupation is a reasonable estimate. It would be unreasonable to apply an earlier trigger (e.g. prior to commencement) as the mitigation is only required once the house is occupied.

- 6.1.13 A further issue is that there is a risk of non-implementation of a planning permission and therefore no nitrate tariff payment made. Whilst this could occur it is considered to be rare given the current housing market and delivery rates within Test Valley.
- 6.1.14 There is also a risk that an applicant could reserve TVBC credits but then decide to use alternative measures e.g. cheaper credits being sold from an alternative source/landowner. This risk could occur both prior to signing the S106 or after issuing planning permission through applying to vary the S106. Whilst possible, this situation would only occur if those alternative credits are being sold at a price significantly lower than the current value of £3,000. The likelihood of this occurring is difficult to forecast but given the procedural delays and additional costs involved with varying the S106 it is unlikely that applicants would chose to swap mitigation so late in the process. Should it happen, those credits can be either used on other sites or ‘banked’ for the Council’s own schemes.
- 6.1.15 It will be necessary for both the financial contribution framework and specific credit purchase to be monitored and kept under review, especially in light of how any market may develop and the principle and scale of other available off site mitigations. Should sufficient alternative mitigation solutions become available then the Council may step back from direct participation and only have a signposting role to mitigation schemes administered by other parties.
- 6.1.16 The Council continues to explore other mitigation opportunities however there is limited land available which would be of a size to secure the scale of credits or provide the multiple benefits proposed. Other non-land based mitigation options are not available in the short term and in any event would not eliminate the need for mitigation.
- 6.1.17 Given the issues identified and the potential for other mitigation schemes to become available it is recommend to limit the second purchase to 250 credits. A higher number of credits would increase the scale of the risk at this stage. Should it prove necessary the Council could consider a further purchase from Roke Manor Farm or an alternative site at the appropriate time.
- 6.1.18 In April 2021, when considering the purchase of nitrate credits, the Council also approved a strategic land purchase. Work on this continues although the purchase has yet to be completed. The site’s current agricultural use may potentially generate a nitrate benefit from its change of use. Work has been commissioned to calculate the principle, scale and delivery of any nitrate credits. Based on an initial calculation any credits that may arise from the potential purchase would not be sufficient to provide mitigation for the anticipated demand.

## **6.2 Option Two**

- 6.2.1 The alternative option is that the Council does not trigger a further purchase of credits. This is not preferred for the following reasons.

- 6.2.2 To not to proceed with the recommendation would mean that achieving nutrient neutrality continues to be very difficult especially in the short term. This is particularly the case for brownfield sites and for those developments which discharge their wastewater to WwTW without a permit limit, or which are reliant upon non-mains drainage.
- 6.2.3 One of the main consequences of not purchasing the credits is the implications this has for housing delivery. If delivery of homes is not achieved in the short term, it puts pressure on the Council's housing land supply and puts the Borough at risk of speculative planning applications which have managed to secure nitrate mitigation through some means. In the medium and longer term the Council will need to be able to demonstrate a suite of mitigation measures as part of delivering the next local plan and the future housing requirement. At this stage it is too early to know what mitigation approach will need to be put in place or at what scale.
- 6.2.4 As outlined above the Council has no control over the principle of the landowner's intention to sell credits and also who these are sold to. The implications of this are that the nitrate credits could provide mitigation for sites outside of the Borough and thus help other authorities' housing delivery and land supply at the expense of our own. Their sale may be to applicants of sites within the Borough. This would negate the need to purchase all or part of the credits and the risks attached to not recovering the cost. However, by putting in place the nitrate framework it is intended to make for a simpler, quicker process which will be attractive to applicants, especially smaller developers, to participate in.
- 6.2.5 If the decision were to not purchase further credits, the Council could take on a role of 'sign posting' applicants to available mitigation schemes. Whilst this removes the financial risk there would be no mechanism for the Council to control which sites would benefit from the mitigation. It is completely within the landowner's gift to sell the credits to developers and applicants anywhere within the catchment of the River Test, River Itchen or Bartley Water.
- 6.2.6 It is for these reasons that this option is not recommended.

## **7 Risk Management**

- 7.1 Risks of the proposed options are set out in the narrative above. These relate to the financial outlay, the timing of repayment and whether all credits will be purchased. The report outlines the approach which officers have taken or identified in reducing the risk. This includes limiting the number of credits purchased and identifying the ability to bank surplus credits to benefit development on Council land.

## **8 Resource Implications**

- 8.1 The cost of purchase of the second tranche of credits would be £750,000. Please note that Stamp Duty Land Tax will not be payable on this transaction. This purchase would be funded from the New Homes Bonus unallocated balance with the intention that future nitrate tariffs secured through S106 would be used to replenish that reserve.
- 8.2 The existing tariff approach includes an additional £100 administration and legal fee to cover the extra cost of putting the requirement in place within the agreements attached to each application along with any charges for drawing up the required legal agreements as per existing practice.

## **9 Legal Implications**

- 9.1 The implications relating to the Habitats Regulations and the nitrate mitigation benefits arising from the site have been outlined within the report.
- 9.2 The nitrate scheme would be secured through two separate legal structures.
  - 1) A S106 agreement obligating the landowner to:-
    - Establish and maintain the site as a nitrate credit scheme;
    - Comply with the Management Plan, which must be approved by the Council and Natural England.
    - Maintain a schedule of allocations of credits sold and provide a copy to the Council each and every time an Allocation Agreement is entered into.
  - 2) An Allocations Agreement which would set out the commercial and contractual terms in relation to the sale of the credits. This will include the obligation to ensure that the credits are implemented for first occupation of the reliant development and that the mitigation will be provided in perpetuity. The Allocations Agreement would be agreed with any potential purchaser, including the Council, who need to secure nitrate credits.
- 9.3 The S106 Agreement has already been agreed and it is not proposed to be amended. This would continue to be the legal framework the Council would use for monitoring and enforcement of the future legal agreements connected with the sale of the credits whether the purchase is direct with the landowner or through the credits the Council has obtained.
- 9.4 A new Allocation Agreement would need to be agreed to confirm the purchase of the second tranche. At this stage the agreement has not been drafted. It is proposed that delegated authority be given to the Head of Planning Policy & Economic Development, in consultation with the Head of Legal & Democratic, Head of Finance & Revenues, the Planning Portfolio Holder and Finance Portfolio Holder to enter into any agreements necessary to secure the purchase.

## **10 Equality Issues**

- 10.1 The EQIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have and will be taken.

## **11 Other Issues**

- 11.1 Ward/communities affected.

11.1.1 The site is located in Blackwater ward but the purchase of credits has the potential to benefit the delivery of homes throughout the borough.

- 11.2 Sustainability and addressing climate change.

11.2.1 As outlined in the report there is the opportunity to deliver a number of measures which can help address climate change through the management plan.

## **12 Conclusion and reasons for recommendation**

- 12.1 The challenge of finding nitrate mitigation is one that many Hampshire authorities are facing. In the absence of alternative mitigation measures to unblock current and future housing delivery the Council has needed to explore land based solutions. This is in line with the Council's adopted Nitrate Mitigation Framework. The option of buying further credits from Roke Manor Farm represents an opportunity to unlock existing planning permissions and achieve wider environmental benefits.

### Background Papers (Local Government Act 1972 Section 100D)

Borough Local Plan 2016

Nitrates Mitigation Framework (2021)

Climate Emergency Action Plan 2020

Corporate Plan 2019-23

Green Spaces Strategy (draft) 2020

Natural England Advice on Achieving Nutrient Neutrality for New Development in the Solent Region (Version 5) (June 2020)

### Confidentiality

It is considered that this report does not contain exempt information within the meaning of Schedule 12A of the Local Government Act 1972 (as amended) and can be made public.

No of Annexes:	2	File Ref:	Pp5.1.1
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(Portfolio: Planning) Councillor N Adams-King

Officer:	Graham Smith	Ext:	8141
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Report to:	Council	Date:	1 September 2021
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